

		<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: 3/3/15 <i>[Signature]</i></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	[REDACTED]	
Address	WELSH WATER [REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	
Email address	[REDACTED]	

Guidance Note.

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

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

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

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

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

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

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

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

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

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

Enwam Hebydd (Aberbad 16)

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

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

2c. Please provide details of your representation on the Deposit Plan.
<p style="text-align: right;">Please use additional sheet if necessary. Please state how many additional sheets have been used.....</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.	<input checked="" type="checkbox"/>
I want to speak at a hearing session.	<input type="checkbox"/>

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

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

Submission of documents and evidence to the examination	<input 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:

Signed: 	Dated: 31/3/15
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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.

Rhosgadfan

- There are isolated incidents of flooding in the public sewerage system that, depending on the location of the development, may need to be resolved to allow development to proceed. Potential developers can either wait for DCWW to resolve the flooding, subject to funding being approved by our regulator Ofwat, or progress the improvements through the sewerage requisition provisions of the Water Industry Act 1991 or S106 of the Town & Country Planning Act 1990. 1306
- Rhosgadfan is served by Llanfaglan Wastewater Treatment Works (WwTW). The proposed growth being promoted for this catchment area would require improvements which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions. 1307

Rhostryfan

- No additional growth is anticipated in Rhostryfan as the indicative housing growth is provided for by completed units and the existing landbank. 1308

Sarn Mellteyrn

- Sarn Mellteyrn Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area. 1309

Talysarn

- Talysarn is served by Llanllyfni Wastewater Treatment Works (WwTW) which can accommodate the foul flows from the proposed growth figure allocated for this catchment area. 1310

Tregarth

- There are isolated incidents of flooding in the public sewerage system that, depending on the location of the development, may need to be resolved to allow development to proceed. Potential developers can either wait for DCWW to resolve the flooding, subject to funding being approved by our regulator Ofwat, or progress the improvements through the sewerage requisition provisions of the Water Industry Act 1991 or S106 of the Town & Country Planning Act 1990. 1311
- Tregarth Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area. 1312

Trefor

- Trefor Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area. 1313

Tudweiliog

- Tudweiliog Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area. 1314

Waunfawr

- No additional growth is anticipated in Waunfawr as the indicative housing growth is provided for by completed units and the existing landbank. 1315

Y Fron

- Y Fron is served by Llanllyfni Wastewater Treatment Works (WwTW) which can accommodate the foul flows from the proposed growth figure allocated for this catchment area. 1316



CYNGOR SIR
YNYS MÔN
ISLE OF ANGLESEY
COUNTY COUNCIL

Defnydd swyddfa yn unig:

Rhif Cynrychiolydd:

Dyddiad derbyn:

Dyddiad cydnabod:

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

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

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

RHAN 1: Manylion cyswllt

	Eich manylion/ Manylion eich cleient	Manylion yr Asiant (os yw hynny'n berthnasol)
Enw	Cyngor Cymuned Llanllifni	
Cyfeiriad		
Cod Post		
Rhif Ffôn		
Cyfeiriad e-bost		

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

2a. Ar ba ran o'r Cynllun Adnau yr ydych chi'n gwneud sylwadau?	
Polisi rhif (nodwch)	JLDP - SP860
Paragraff rhif (nodwch)	
Cynigion/ Map Mewniod (nodwch y rhif cyfeirnod)	JLDP - SP 860
Map Cyfyngiadau	
Atodiadau (nodwch)	

2b. A ydych yn gwrthwynebu neu gefnogi?			
Gwrthwynebu	<input checked="" type="checkbox"/>	Cefnogi	<input type="checkbox"/>

2c. Rhowch fanylion eich sylwadau ar y Cynllun Adnau.

Gwrthwynebu maint y tirdan ystyried at ddefnydd pentref bach fel Talysarn.

With gws mae angen tir adeiladu yn y pentref, ond os bydd y cynllun yn cael ei fabwysiadu fel ag y mae bydd yn newid cymeriad y pentref drwy gael effaith andwygol ar iaith, lefel sŵn, a hefyd yn ychwanegu at draffig ar y strydoedd sydd eisoes yn rhy gwl a pheryg ar gyfer traffig presennol

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

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

Blank space for providing a list of words.

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

Blank space for providing details of proposed changes to the plan.

2dd. Ydi'r Cynllun yn gadarn?

Ydi	<input type="checkbox"/>	Nac ydi	<input type="checkbox"/>
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2e. Os ydych chi'n meddwl nad yw'r Cynllun Adnau yn gadarn, pa brawf cadernid ydych chi'n meddwl y mae'n ei fethu? (Ticiwch isod os gwelwch yn dda) Rhoddir mwy o fanylion am y profion cadernid ar gefn y ffurflen hon

Gweithdrefnol				Cysondeb								Cydluniad ac Effeithiolrwydd							
P1	<input type="checkbox"/>	P2	<input type="checkbox"/>	C1	<input type="checkbox"/>	C2	<input type="checkbox"/>	C3	<input type="checkbox"/>	C4	<input type="checkbox"/>	CE 1	<input type="checkbox"/>	CE 2	<input type="checkbox"/>	CE 3	<input type="checkbox"/>	CE 4	<input type="checkbox"/>

Rhan 3: Beth sy'n digwydd nesaf?

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

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

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



Hoffwn siarad mewn sesiwn gwrandawriad.

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

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



Cyhoeddi adroddiad yr Arolygydd



Mabwysiadu'r Cynllun



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

Llofnod:



Dyddiedig:

29-3-15

DIOLCH AM EICH SYLWADAU AR Y CYNLLUN ADNAU

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

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

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

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

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

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

		CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL	For office use only: Represantor No. Date received: 24/3/15 (Cherry) Date acknowledged:
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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.

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PART 1: Contact details

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

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

2a. Which part of the Deposit Plan are you commenting on?	
Policy number (please specify)	
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	SP860
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 THE ADDITIONAL SHEETS FOR THE OBJECTION DETAILS.

Please use additional sheet if necessary.
Please state how many additional sheets have been used...9.....

Part 2c

I am objecting to the proposal to designate the abovementioned area (SP860) as a suggested housing site.

From reading your development plan as well as the peripheral documentation it seems to me that the current buzz word is "infill". This of course being the term used to describe the process of building on any unused land within a development boundary. The issue with this policy is that it further urbanises an already built up area.

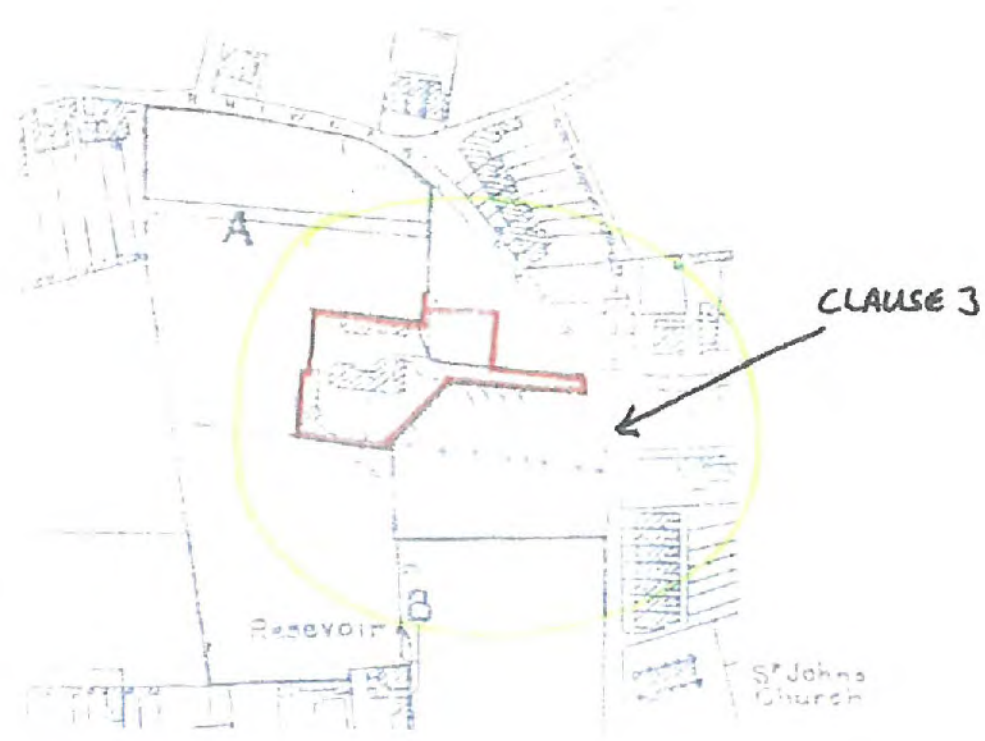
Communities need green areas just as much as they need affordable housing and good Council services. The current development plan for Talysarn shows that there are only two such excluded green areas within the main development boundary. This proposition, should it be approved, would remove the largest green space from within the existing development boundary. Granted it is agricultural land rather than a community use asset, but it nevertheless helps connect the surrounding residents to the greater countryside and provides an island of calm within the village. As such I would go so far as to say that it is an important amenity for the village and its possible loss to yet another housing estate would be a great loss.

Of course in order for my objection to have validity in your eyes, I need to provide factual evidence as feelings of the existing residents will not be enough. I have therefore prepared the following statement using extracts from the Council's own planning guidance as well as from other sources.

Upon first discovering your proposition to include the area known as SP860 within the new development area, I revisited some documentation I had obtained last year. This document was a copy of the Conveyance between the previous owner of the land (SP860) and the current owners of Plas Coed Madog, and this agreement is dated 1st November 1976. The restrictive covenants in question of course were being referred to on land register title number CYM155940.

Upon re-reading this document it came to my attention that adequate due diligence might not have been carried out by the proposers of this new Unitary Development Plan. This opinion is reached because the covenant clearly states in section 3, made as mentioned above, between the then owner of the land and the purchasers of Plas Coed Madog, that a section of the land currently being proposed as a suitable site for housing cannot be used for anything other than agricultural / horticultural purposes and that nothing over seven feet tall could be grown or built within this area. If adequate due diligence had been carried out the Council would be aware of this covenant and should have at the very least excluded this area from the proposed site plan.

3. FOR the benefit and protection of the property hereby conveyed or any part or parts thereof the Vendor on behalf of herself and her successors in title the owner or occupier for the time being of that portion of the retained property is hatched Green on the said plan or any part or parts thereof hereby covenants that she will not grow build or place or permit to be grown built or placed any tree shrub or structure of any nature whatsoever on the said land as aforesaid which would exceed seven feet in height and that such piece of land shall be kept and maintained at all times as agricultural or horticultural land.



Secondly, the whole area proposed in this development plan is as mentioned above, outside of the current development boundary, as is the slice of land near Hyfrydle Terrace. I stipulate that they were left out for good reason as their inclusion within the new Unitary Development Plan (UDP) would contravene a number of the Council's own planning policies.

- The Landscape Character – Supplementary Planning Guide states in point 9 that “landscape character relates to the distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another. Character makes each part of the landscape distinct and gives each its particular sense of place.”

This patch (1.7Ha) of agricultural land within the village boundary is a unique characteristic of the village and such it is a “distinct, recognisable and consistent... element in the landscape”.

Section 21 of this guide asks a number of questions that the Council's planners should consider. These questions being:

1. “Does the proposal contribute to **maintain local features** such as **GREEN WEDGES** and **OPEN SPACES**?”

It is therefore obvious that allowing, even in principle, for housing to be built this land, would destroy one such "GREEN" and "OPEN SPACE" and as mentioned above, there were only two such areas excluded from the current UDP, meaning that due to the size of SP860, a lot more than 50% of this currently excluded green space will in fact be lost.

2. "Does the development contribute to the **conservation and enhancement** of the landscape"?

Of course it does not. Allowing this land to be built upon will destroy the landscape for everyone from Church Road and Plas Coed Madog, Past Coed Madog Road and up past Rhiwlas Road.

3. "Does the proposal make a positive contribution to **environmental protection and improvement** for example of biodiversity, air quality and protection of water resources?"

Once again, designating this land as being within the development boundary will have a negative effect on all three of the examples mentioned in your own supplementary planning guide.

4. "Does the proposal contribute to the **reinforcement of traditional and local distinctiveness**"?

The answer here again is no, as the attraction of this part of the village is the rural outcrop which you intend to designate as building land.

In a local policy context, the Supplementary Planning Guidance – Landscape Character affects the following relevant planning policies:

1. Policy B11 – Open Spaces Between or in Villages or Towns.

This policy stipulates that "proposals that will cause significant harm to the role or importance of open spaces between or in villages or towns will be refused."

Conditions to take into consideration are:

- a. "The effects of the development on the character of the built environment;"

Due to the size of the area proposed for housing, 1.7HA, any development would have the potential to dramatically change the built environment of the surrounding area and would inevitably cause a strain on the local amenities. Especially as there would be a significant increase in traffic on the very narrow Church Road, which is only wide enough for one car width of traffic, and the same is true of Rhiwlas Road.

- b. "The effect of the development on the local landscape;"

A development on this site would dramatically change the landscape for all of the residents that encircle the land. These being the residents of Station Road, Church Road, Coed Madog Road and Rhiwlas Road, not to mention Plas Coed Madog, which would be totally surrounded by any new development.

- c. "The need for the development to be located there;"

It is my opinion that the Council is taking the easy option by proposing that a new development be located in SP860. I believe that the Council consider this to be a nice greenfield site that should be developed, despite the impact on the surrounding residents, the local landscape and the fact that it is contravention of its own planning policy (see the comments for policy C3 further down).

I say this because the Council have twice refused to allow a brownfield, waste site, to be cleared so that the land can be released for development, despite the fact that the site is within the current UDP boundary. How can the Council therefore justify the loss of one of the only remaining green spaces within the village when they have not once, but twice refused a proposal to free up a waste site for development?

The planning references for the site in question being C07A/0511/22/MW and C09A/0007/22/MW.

d. "The impact of the development on the amenities of local residents."

Any development within the proposed area will have a major impact on the amenities of all of the surrounding residents. Gone will be a tranquil rural scene only to be replaced with an urban development. I have no objection to meeting the local housing needs, but further urbanisation of green spaces within the boundaries of towns and villages does nothing for the local residents. Instead, brownfield sites and areas on the periphery of the boundaries should be sought out. In this case there has been a substitute site proposed, but the Council has turned it down twice.

2. Policy B22 - Building Design

This policy requires that any development proposal "respects the site and its surroundings". I stipulate that any development on this site would have an "unacceptable detrimental effect on the form and character of the surrounding landscape" and "on the local natural...environment."

This policy also sets out the need for planning officers to consider:

- a. "the impact with respect to the defined characteristic features and elements and people's consequent sense of place",
- b. "how will the development contribute to the policy objectives of preventing unacceptable impacts on landscape and protecting landscape character"

My opinion is that any development on this land would contravene the above mentioned as it would irreparably destroy the surrounding resident's sense of place and cause an unacceptable impact on the local landscape character.

- Other planning policies that could come into play if the proposed UDP is accepted and a planning application is subsequently submitted include:

o POLICY A1 – ENVIRONMENTAL OR OTHER IMPACT ASSESSMENTS

I do not believe any right-minded individual would believe that by allowing additional housing in this particular area that it would not have an adverse impact on the “ecological, noise, traffic, health, retail and linguistic” footprint of the said area.

o POLICY B21 – WILDLIFE CORRIDORS, HABITAT LINKAGES AND STEPPING STONES

This states that “In the landscape, habitats have become fragmented and isolated, in both rural and urban situations. Wildlife corridors and stepping stones are important for the movement of species, ensuring that populations are not isolated, facilitating genetic exchange. Wildlife corridors are often linear habitats such as hedgerows and rivers. Stepping stones are clusters of habitat patches such as ponds or woodlands near enough for species to move easily between them. Wildlife corridors help to strengthen existing habitats in the landscape by linking them together.”

I would argue that this parcel of land in the middle of the village is an important green area for local wildlife. Indeed, I myself have seen hedgehogs, rabbits and rodents similar to mice, but with stubbier tails emerge from the gate at the Church Road/Coed Madog Road junction, which indicates to me that it is used by more than just farm animals.

Its loss to a possible housing development would therefore also have a negative effect on local wildlife, which evidentially uses the fields both as their native habitat and as a corridor between the urbanised areas of the village.

o B23 Amenities

This states that “proposals that cause significant harm to the amenities of local communities will be refused. Developers will be required to demonstrate clearly that they will respond positively to the following factors, as appropriate:

1. that the development ensures the reasonable privacy of its users and nearby properties;
2. that the development will not lead to the over-development of the site;
3. that the development does not increase traffic nor the noise associated with traffic in a way that causes significant harm to local amenities”.

I am of the belief that allowing this area into the new UDP will inevitably lead to a rush to develop the site on a scale that will be in violation of this planning policy. Additionally, and to answer the individual factors mentioned above:

1. The parcel of land completely encompasses the property known as Plas Coed Madog, therefore how will their privacy be ensured?

Additionally, my own property, Number 2 Coed Madog Road, faces this land on two sides. Indeed our garden is elevated above this land by some 6 feet and therefore we would be directly overlooked by any development on the north east side of this land and would also conversely be able to look into the new development. Again, how can this loss of privacy be mitigated? I do not believe it can.

Of course, everyone on Church Road, parts of Coed Madog Road and Rhiwlas Road will be affected as any development here will directly overlook them and thus severely reduce their privacy.

2. I fear that allowing such a large green belt into the new UDP will mean a land grab by developers, who would pack the maximum allowed amount of properties onto the site in order to maximise their profits. This in turn will have a catastrophic impact on the amenities of those surrounding the land in question.
3. Any development here would obviously increase both traffic and noise in what is a quiet semi rural residential part of the village. Church Road, Coed Madog Road and Rhiwlas Road are incredibly narrow, only wide enough for one direction car travel at a time. On top of this the junction at the top of Church Road, which intersects Rhiwlas and Coed Madog Road is dangerous enough as it is as it also has a fourth opening leading to Plas Coed Madog.

I cannot see therefore how the inclusion of more housing and hence traffic in this already movement restricted area will work. Additionally, I cannot see where a safe entrance to any new development on this land can be located.

o POLICY C3 - RE-USING PREVIOUSLY DEVELOPED SITES

This states that **"priority, wherever this is feasible, to re-using previously developed land or buildings that are located within or near development boundaries, rather than utilising greenfield sites, shall be approved"**.

If this is the case, why is Cyngor Gwynedd now proposing to include this greenfield site in its updated UDP, when it has twice refused planning permission for the clearance of a brownfield site, from within the existing UDP boundary, for the purposes of development?

The refused planning applications for the area in question being C07A/0511/22/MW and C09A/0007/22/MW.

o POLICY C28 - SAFEGUARDING AGRICULTURAL LAND

This states that "proposals that will lead to the loss of grade 1, 2 or 3a agricultural land will be refused unless there is an overriding need for the development and it can be demonstrated that.... there is no previously developed land available".

The proposal to include the agricultural land labelled as SP860 within the boundary of the new UDP clearly goes against this policy as there is a brownfield site situated within the current UDP which the Council had turned down an application upon not once but twice.

o ACCESSIBILITY – STRATEGIC POLICY 11

"Development proposals accessible to all through a variety of transport modes due to their location, will be permitted providing the appropriate infrastructure, including highways, cycle routes and facilities and footways, is in place, or is to be provided; and that they do not significantly harm the environment or the amenities of nearby residents."

I believe that this policy would be relevant should any planning permission be applied for following the land's inclusion in the new UDP. As mentioned above, the roads surrounding

this parcel of land are narrow with no pavements and the important sections, such as the junction between Bryncelyn Road and Church Road cannot be widened as there are properties on both side. Thus increasing traffic flow in this area would in all likelihood also increase accidents.

In contrast, the area of land already mentioned as being with the current UDP and upon which the Council has twice turned down a planning application is situated right next to the village's main arterial road, which is still within the 30mph zone and would thus make a much more suitable area for any additional housing development. It is also right opposite the village hall, the skate park/recreational area, and a bus stop, meaning that it is closer to the village's facilities than the greenbelt area identifies as SP860.

o POLICY CH2 – SUPPLY OF LAND FOR HOUSING

This states that "the Council will ensure, through the process of monitoring and reviewing the Plan, that a minimum of 5 years supply of land is actually available in the Plan area."

This seems like a reasonable policy, but my issue is with the Council's interpretation of it in the case of Talysarn and in particular the land known as SP860. I say this because there is land already available within the current UDP and the Council has twice refused planning permission for its clearing for development purposes. This being the case, I do not see how adding an additional greenfield site, which will inevitably be developed before the existing waste site, can be thought of as reasonable in this case.

If the waste site had already been developed, then of course more land would be needed, but the Council seem to be indicating by the proposed inclusion of the fields known as SP860 that it prefers developments to be sited in green areas which is in breach of policy C28 and C3 which are mentioned above.

o POLICY CH28 – IMPACT OF DEVELOPMENT ON JOURNEYS

This policy states that "large scale developments that substantially increase the number of journeys made by private vehicles will be refused unless they include measures to reduce the environmental impact".

This policy, should the 1.7Ha proposed for inclusion within the new UDP be developed, would due to the rural location of Talysarn inevitably increase car journeys as that is the main mode of transport for the majority of the current residents. The only mitigating factor would be a vast improvement in the underfunded public transport provision for the village in compliance with POLICY CH32 – INCREASING ACCESS TO PUBLIC TRANSPORT. But as this is unlikely given the state of the public finances, any potential development should be refused on the grounds that the traffic flow on the surrounding streets would be increased significantly. Thus it makes even more sense to remove the land known as SP860 from the proposed list of development sites before any more public money is wasted.

o POLICY CH29 – SAFEGUARDING AND IMPROVING LINKS FOR PEDESTRIANS

This policy states that "proposals within centres and villages that fail to provide safe, attractive and direct links for pedestrians across and out of the site....will be refused."

The policy puts special emphasis on providing footpaths to

- "a bus stop",
- "community services and facilities in the area e.g. Schools, play area"

However, as already mentioned, the roads surrounding and possibly providing access to this land are narrow and can only accommodate on direction traffic as it is. Therefore there is no room to provide pavements etc to comply with this policy in this section of the village.

However, if the land, already mentioned and upon which the Council has already refused planning permission was to be developed, then such provisions as required to comply with this policy could be accommodated. Therefore once again a site which is already within the current UDP seems a better choice for housing development than the green site under discussion.

o POLICY CH33 – SAFETY ON ROADS NAD STREETS

As already mentioned several times, the roads surrounding the land in question are narrow and the junction between Church Road, Coed Madog Road, Rhiwlas Road and Plas Coed Madog is already difficult to navigate due to the level of traffic and the need for someone to give way to allow others to pass. Additionally, I have already cited that I cannot see where the access to any proposed development can be safely located as the roads surrounding the fields are single width, meaning that two cars cannot for the most part pass each other.

If the land in question is included in the new UDP and then developed the traffic issues in this area of the village will inevitably increase. As mentioned above, the Church Road/Bryncelyn Road junction is more or less a narrow and blind T junction due to existing properties around it meaning that when exiting Church Road onto Bryncelyn Road a vehicle must push its nose out into the road before the driver can see if it clear to continue pulling out. This junction also has the additional issue of having the entrance to a side road joining Bryncelyn Road proper right in front of it. Therefore due to the properties either side it cannot be improved and would only become more dangerous if any development on this land were to go ahead.

Policy CH33 states that "development will be approved only if they conform with all of the criteria, which include:

1. That provision will be made for vehicular access to the site, which is safe and in keeping with the local surroundings;
2. That the existing road network is of sufficient standard to deal with the flow of traffic that is likely to result from the new development or that adequate improvements can be made".

In closing therefore, I believe that the proposal to include the area of agricultural land known as SP860 within the new UDP should be dropped. This belief is based upon:

1. The fact that there is a covenant preventing the change of use of a section of the land in question from agricultural / horticultural use.

2. That the due diligence procedures used to determine if the site was suitable for inclusion within the new UDP was flawed. This being based on the fact that the abovementioned covenant was missed.
3. That the road infrastructure on the streets surrounding the land in question is not robust enough to cope with the increase in vehicular activity that would result from any proposed development.
4. That any development on this land will have a detrimental effect on the privacy and amenities of the properties surrounding it.
5. That any subsequent proposals for developing the land, if included within the new UDP, would be in contradiction to a number of the Council's own planning policies.
6. That a brownfield/slate waste site that is already located within the current UDP area has been refused planning permission for its clearance for development twice since 2007. This being in contradiction of the Council's planning policy C3 which states that previously used land should, wherever feasible be used first.

I trust therefore that you will, at least take the points raised herein under consideration when you review the UDP plan and decide upon the areas to be included within the final draft.

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

1. The fact that there is a covenant preventing the change of use of a section of the land.
2. Any development on this land will have a detrimental effect on the privacy and amenities of the properties surrounding it.
3. Any subsequent proposals for developing the land, if included within the new UDP, would be in contradiction to a number of the Council's own planning policies.
4. A brownfield site, already located within the current UDP area has been refused planning permission for its clearance for development twice since 2007. This being in contradiction of Council planning policy C3.

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

I WISH FOR THE LAND IDENTIFIED AS SP860 TO BE TAKEN OUT OF THE DEVELOPMENT PLAN.

THE REASONS FOR WHICH ARE LISTED IN SECTIONS 2c AND 2ch. ADDITIONALLY I BELIEVE THAT PROPER DUE DILIGENCE WAS NOT UNDERTAKEN AS THE COVENANTS DETAILS FOR THE LAND, THAT PREVENTS THE CHANGE OF USE OF A SECTION OF IT, WAS EASILY AVAILABLE FROM THE LAND REGISTRY.

I ALSO BELIEVE, HAVING PREPARED THIS REPRESENTATION THAT THE DEPOSIT PLAN FAILS THE TEST OF SOUNDNESS CE2 WITH REGARDS THE LAND IN QUESTION, AS THERE IS AN ALTERNATIVE SITE ALREADY IN THE CURRENT UDP, BUT THE COUNCIL HAVE TWICE REJECTED AN APPLICATION TO DEVELOP IT AFTER CLEARANCE AND THE SITE (SP860) WOULD CONTRAVENE SEVERAL EXISTING PLANNING POLICIES SHOULD A DEVELOPMENT APPLICATION BE TENDERED.

2dd. Is the Deposit Plan sound?

Yes No

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

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

Part 3: What Happens Next?

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

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

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



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: 23/3/2015

THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN

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

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

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

BY EMAIL – planningpolicy@gwynedd.gov.uk

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

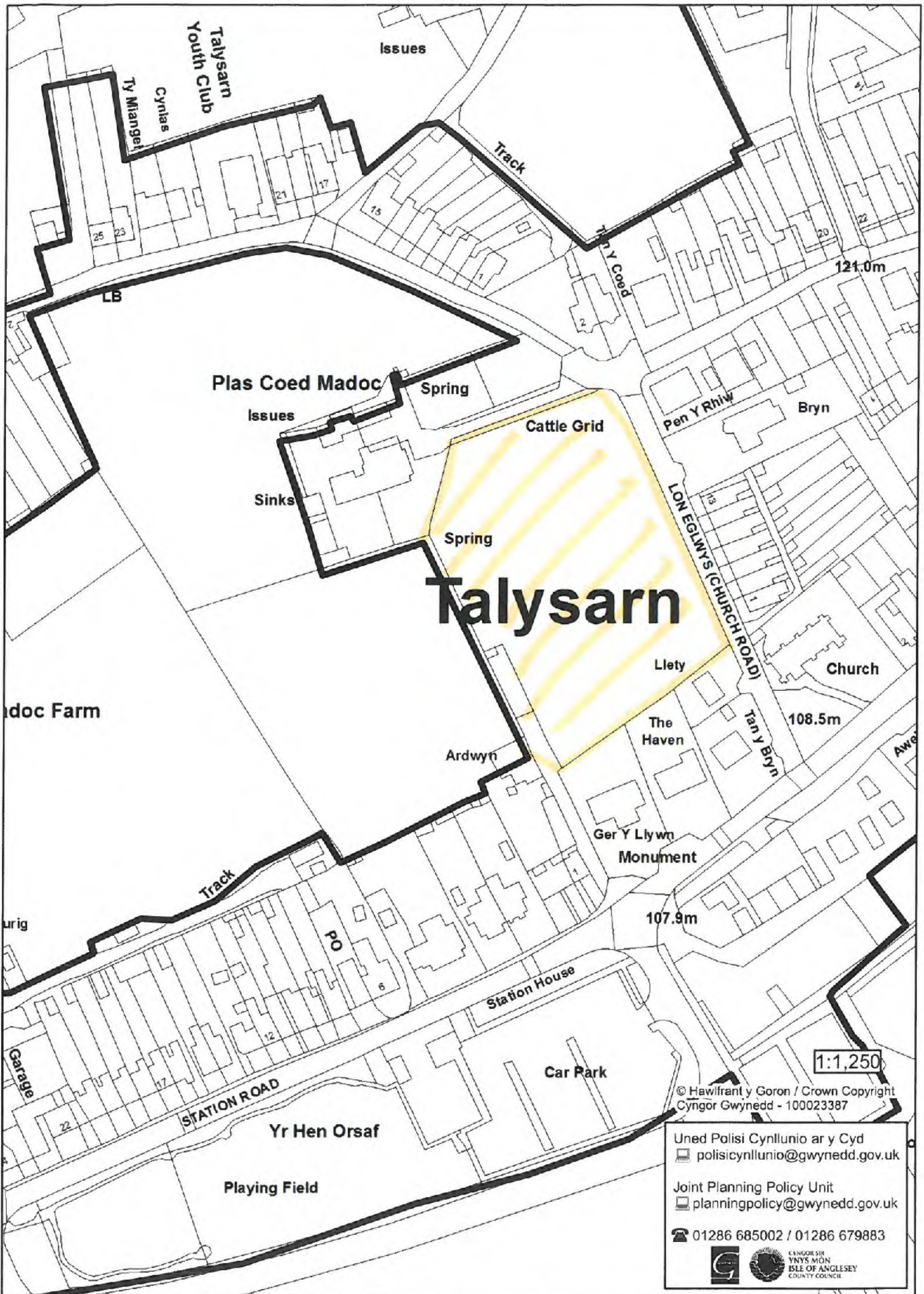
**REPRESENTATION FORMS SHOULD BE RETURNED BY NO LATER THAN 5.00pm on the 31st March 2015
REPRESENTATIONS RECEIVED AFTER THIS TIME WILL NOT BE CONSIDERED**

Test of Soundness

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

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

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



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