

Gweler rhestr o Wrthwynebwyr
See list of Objectors

SNMC032

RHAN 1/PART 1: Manylion cyswllt : Contact details:		
	Eich manylion neu manylion eich cleient <i>Your details or your client's details</i>	Manylion yr Asiant (os yn berthnasol) <i>Agent's details (If relevant)</i>
Enw <i>Name</i>	IONA FOULKES	
Sefydliad (os yn berthnasol) <i>Organisation (If relevant)</i>		
Cyfeiriad <i>Address</i>		
Côd Post <i>Postcode</i>		
Ffôn <i>Tel:</i>		
E-bost <i>Email:</i>		
Llofnodwyd <i>Signed</i>		
Dyddiad <i>Date</i>	7.3.17	

Rhowch eich sylwadau yn Rhan 2 y ffurflen hon. Defnyddiwch dudalennau ychwanegol os oes angen, gan nodi rhif y dudalen yn glir.

Please set out your comments in Part 2 of this form. Use additional sheets of paper where necessary, clearly numbering each consecutive sheet.

Dylech lenwi ffurflenni ar wahân ar gyfer pob sylw yr hoffech ei wneud.

Separate forms should be completed for each comment that you wish to make.

Os yw grŵp yn rhannu barn gyffredin ynghylch Newid Materion sy'n Codi, bydd y Cynghorau'n derbyn deiseb wedi'i llofnodi. Wrth gyflwyno ffurflen sylwadau ar ran grŵp, dylai'r ffurflen sylwadau gynnwys manylion cyswllt unigolyn arweiniol yn Rhan 1 a dylid nodi'r sylwadau'n glir ar y ffurflen sylwadau. Dylai'r ddeiseb sydd wedi'i llofnodi nodi'n glir faint o bobl sy'n cael eu cynrychioli a sut mae'r sylwadau wedi'u hawdurdodi. Nid yw llofnodi deiseb yn atal neb rhag cyflwyno ffurflenni unigol.



Where a group shares a common view on Matters Arising Changes, 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 Part 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.



The following members of "Objectors to Penhesgyn Road Travellers' Site" have indicated that they wish to be associated with the comments - concerning NMC numbers 245 and 249. Please note that email addresses have been added since it has not been feasible to secure signatures two days before the deadline of 9 March 2017. We have been working principally by email and last week, confirmation was received from all of the individuals named below that they wished to have their names on our single, summary document from which the three sets of comments have been abstracted:

Dominic Brooke	Judithbrooke@btinternet.com
Judith Brooke	Judithbrooke@btinternet.com
John Davies	jdandheul@icloud.com
Ruth Eley	ruth.eley202@btinternet.com
Alaw Evans	
Owain Evans	
Margaret Flynn	flynnandeley@btinternet.com
Eirwen Foulkes	eirwen@elsal.com
Iona Foulkes	djm.foulkes@btconnect.com
John Foulkes	eirwen@elsal.com
Glyngwyn Foukes	djm.foulkes@btconnect.com
Laurie Gane	l.gane@btinternet.com
Gareth Morgan	garethwern@btinternet.com
Haulwen Morgan	garethwern@btinternet.com
Idris Roberts – owner of the agricultural land that would have to be compulsorily purchased	Jane.roberts216@btinternet.com
Jane Roberts - owner of the agricultural land that would have to be compulsorily purchased	Jane.roberts@btinternet.com
Guy Williams	
Katherine Williams	

Please note that I am seeking permission to share the telephone details of the Evans' and the Williams' who have checked paper copies of the comments to date

		Defnydd swyddfa yn unig/ <i>Office use only</i>
		Rhif Cyn./Rep No.:
		Derbyniwyd/Received:
		Cydnabod/Acknowledged

Cynllun Datblygu Lleol ar y Cyd Ynys Môn a Gwynedd 2011-2026
FFURFLEN SYLWADAU NEWIDIADAU MATERION SY'N CODI /
Anglesey and Gwynedd Joint Local Development Plan 2011-2026
MATTERS ARISING CHANGES COMMENTS FORM
26/1/17.

RHAN 2: Eich Sylwadau a Newidiadau a Awgrymir PART 2: Your Comments and Suggested Changes	
Eich enw/Sefydliad: <i>Your name/Organisation:</i>	OBJECTORS TO THE PENHESGYN TRAVELLERS' SITE

1. Ar ba un o'r Newidiadau Materion sy'n Codi yr ydych chi'n gwneud sylwadau? (Cofiwch ddefnyddio un ffurflen ar gyfer pob sylw)
1. Which of the Matters Arising Changes are you commenting on? (Remember to use one form for each representation)

Rhif y Newid Materion sy'n Codi (NMC) <i>Matters Arising Change Number (NMC)</i>	<input type="text" value="245"/>	Cefnogi/ <i>Support</i>	<input type="checkbox"/>	Gwrthwynebu/ <i>Object</i>	<input checked="" type="checkbox"/>
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2. Cyn i chi esbonio eich sylwadau'n fanwl, byddai'n dda gwybod os ydych yn credu fod y Cynllun yn gadarn ai pheidio, o ganlyniad i'r Newidiadau Materion sy'n Codi, neu a ydych o'r farn bod rhannau ohono neu bob rhan ohono ddim yn gadarn a bod angen ei newid.
 I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd. Os ydych yn ansicr, gadewch y rhan yma yn wag.

2. Before you set out your comments in detail, it would be helpful to know whether you think that, as a result of the Matters Arising Changes, the Plan is sound or that all or parts of it are unsound. For more information on soundness and procedural requirements, see the guidance notes. If you are unsure, leave this section blank.

Cadarn/ <i>Sound</i>	<input type="checkbox"/>	Dim yn gadarn a dylid ei newid <i>/Unsound and should be changed</i>	<input checked="" type="checkbox"/>
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3. Rhowch eich sylwadau isod gan ddefnyddio tudalennau ychwanegol fel bo angen. Dylech roi eich sylwadau chi'n llawn. Bydd hynny'n helpu'r Awdurdod a'r Arolygydd i ddeall y materion y byddwch yn eu codi. Ni fyddwch chi'n cael cyflwyno rhagor o wybodaeth gerbron yr Archwiliad oni fydd yr Arolygydd yn eich gwahodd chi i egluro unrhyw faterion y bydd yn godi. Rhowch wybod os ydych chi'n cyflwyno deunyddiau eraill i ategu eich sylwadau.

3. Please set out your comments below using additional sheets as necessary. Your comments should be set out in full. This will help the Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the Examination if the Inspector invites you to address matters that he may raise. Please indicate if you are submitting other material to support your comments.

"4. Detailed site assessment which looks at environmental issues, accessibility, site context and character." Nowhere in the schedule is there any reference to the fact that the the 4 pitches on the land at Penhesgyn, Penmynedd is next to the 'tip.' A 2003 study found that 50 percent of sites were on contaminated land, with 12 percent near tips. The Equality and Human Rights Commission confirmed such unsatisfactory conditions in 2009, e.g. ...the location of sites can be poor (for instance, under motorways or next to sewage works...(page iv, EHRC Research Report 12).

Defnyddiwch dudalennau ychwanegol os bydd angen.
Nodwch faint o dudalennau ychwanegol rydych wedi'u defnyddio.....
Please use additional sheet if necessary.
Please state how many additional sheets have been used...3....

4. Os yw eich sylw yn 3 yn fwy na 100 o eiriau, darparwch grynodeb os gwelwch yn dda (dim mwy na 100 o eiriau.
4. If your response to 3 above exceeds 100 words, please provide a summary (no more than 100 words).

RHAN 3: Beth sy'n digwydd nesaf**PART 3: What happens next?**

Bydd pob un o'r sylwadau a dderbyniwyd o fewn y cyfnod ymgynghori yn cael eu hanfon ymlaen yn syth i'r Arolygydd. Rhag ofn bydd yr Arolygydd yn penderfynu dylid cynnal sesiynau gwrandawriad pellach mae angen i chwi nodi isod os ydych yn dymuno ymddangos gerbron yr Arolygydd a siarad mewn 'sesiwn gwrandawriad'. Serch hynny, mae'n bwysig nodi y bydd yr Arolygydd yn rhoi'r un pwysau i'r sylwadau ysgrifenedig yr ydych chi wedi eu cyflwyno ar y ffurflen hon â'r rheiny a wneir ar lafar mewn sesiwn gwrandawriad.

All comments received by the closing date will be forwarded directly to the Inspector for consideration. Just in case the Inspector decides that further hearing sessions are necessary please indicate whether you would want to speak at a session. It is important to note that written comments will be given the same weight by the Inspector as those made verbally at a hearing session.

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

5. 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)

Nid wyf am siarad mewn sesiwn gwrandawriad ac rwyf yn fodlon i'm sylwadau ysgrifenedig gael eu hystyried gan yr Arolygydd.

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

Hoffwn siarad mewn sesiwn gwrandawriad.

I want to speak at a hearing session.

6. Os hoffech siarad, cadarnhewch pam rydych yn ystyried ei bod hi'n angenrheidiol i chi siarad yn y Gwrandawriad.

6. 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.

7. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith hoffech chi gael eich clywed? (Ticiwch un o'r isod)

7. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard. (Please tick one of the following boxes)

Hoffwn i gael fy nghlywed yn Gymraeg
I wish to be heard in Welsh

Hoffwn i gael fy nghlywed yn Saesneg
I wish to be heard in English

DIOLCH AM EICH SYLWADAU / THANK YOU FOR YOUR COMMENTS

Re Matters Arising Change Number 245: 7.4.97

Para 7.4.97 has been removed. It begins "Local planning authorities are required to ensure that sites are sustainable economically, socially and environmentally. In order to identify the most appropriate sites, sites have been assessed..." To state that this "explanatory paragraph" is not required is puzzling. Local residents are keen to know how the prospective Penhesgyn site compares with other permanent sites.

The 30 September 2016 Hearing Session 13 notes that, *The sites identified are considered to be suitably located to meet the needs of gypsies and travellers identified in the GTANA 2016* (para 3.17). However, a 2003 study found that *50 percent of sites [for Gypsies and Travellers] were on contaminated land, with 12 percent near tips*. *The Equality and Human Rights Commission confirmed such unsatisfactory conditions in 2009.*¹

...the location of sites can be poor (for instance, under motorways or next to sewage works...(page iv)

... Despite greater health need, Gypsies and Travellers use mainstream health services less than other members of the population...the isolation of sites can create problems (p52)

... Those on poorly equipped and located public sites, often remote from public facilities will experience both geographical and attitudinal barriers to integration with the local sedentary community... The highly problematic accommodation situation of Gypsies and Travellers will therefore continue to fuel conflict and to undermine the development of cohesion (p183)

... all Gypsies and Travellers are likely to experience far-reaching inequality, prejudice, discrimination and racism from politicians, the media, the public, and from services that should be designed (in partnership with communities) to meet their needs (p253)

*... there is also a strand of evidence throughout the report of Gypsies and Travellers being resigned to the experience of discrimination and of low quality of life, health and well-being. Acceptance of second or third-class status is itself an indicator of the strength and persistence of inequality over generations, which it is the responsibility of mainstream institutions to address (p255-256).*²

...Sites have been criticised for their size and design, but particularly for their location and environment – for example, remote from services, next to industrial areas, major roads, railways or refuse tips...(p45)³

Natural Resources Wales (9 March 2016) states of the Penhesgyn site *Certain types of proposed development...may have an inherent risk of pollution of potable water supplies e.g. underground storage of hazardous substances, sub water table storage of pollutants, landfill sites and non-mains foul drainage systems...*

The selection of Penhesgyn for inclusion in the JLDP as a possible allocation to meet the accommodation needs of Gypsy Travellers in May 2016, was to be subject to the outcome of the further investigations...from a highway safety and health impact perspective. It was noted that *The*

¹ Living off Tips, Private Eye, 24 February – 9 March 2017, No. 1438

² Cemlyn, S. Greenfields, M., Burnett, S., Matthews, Z. and Whitwell, C. (2009) *Inequalities experienced by Gypsy and Traveller Communities: A Review* Manchester: Equality and Human Rights Commission, Research Report 12

³ Brown, P. and Niner, P. (2009) *Assessing local authorities progress in meeting the accommodation needs of Gypsy and Traveller communities in England* Manchester: Equality and Human Rights Commission, Research Report 13

proximity of the Council's Recycling Centre could detract from the proposed residents' enjoyment of this site...Concerns have been received about the air quality in the vicinity of the Penhesgyn Recycling Centre making the site unsuitable...the Council commissioned consultants to undertake an air quality assessment screening...the report concluded that the concentrations of airborne particulate matter and Nitrogen dioxide concentrations in the area are well below the air quality objective limit...also reviewed bioaerosol data collected since 2014...The report highlighted an exceedance of bioaerosol levels in June 2015 but none in December 2015...recommended that monitoring is continued...the significant reduction...can be explained by changes to working practice in dealing with green waste.

The Assistant Chief Executive notes,⁴ *The location in Penhesgyn is in no way a reflection of how the County Council views New Age Travellers...the Council does intend to arrange a Health Impact Assessment, which is used to assess the health impact of a physical development...it will ensure that all health issues have been identified and that a full comprehensive assessment is achieved... there is no landfill beneath the land proposed for the site and any methane gas migration issues posed from around the locality of the site would be addressed as part of the planning process.*⁵

With regard to accessibility, on 31 May 2016, **there was no alternative to Penhesgyn as a permanent site.**

The note arising from the 30 September 2016 Hearing 13 states: *With regard to the proposed allocation at Penhesgyn, part of the land is in Council ownership and part in private ownership. The Council will need to acquire some of the private land to form a vehicular access that will comply with highway requirements. The Isle of Anglesey Council intend to undertake detailed technical assessments regarding access proposals and health impact assessments to support the proposed planning application. Whilst there are some matters associated with the site that will need to be addressed, the Council is of the view that these can be adequately addressed through appropriate design and management at the planning application stage. The Housing Services intend to be in a position to progress to the planning application stage in 2017, and thereafter apply for Welsh Government grant aid (para 3.34).* This suggests that the Council perceived no need to identify an alternative, permanent site.

Capita's⁶ *Preliminary Appraisal Report (PAR) Executive Summary* is unlikely to deter the single-mindedness of the County Council, irrespective of the site having some demerits, namely: *...the site is located in a rural location with no access to local amenities or facilities within easy walking distance; access to the site would need to cross the field in private ownership and re-arrangement of the security gate for the Penhesgyn Recycling Centre; the two fields in which the four pitches would be located is steeply sloping and badly drained; a new access road to access the four pitches would be required and involve significant drainage and earthworks; earthworks will be required to form a noise attenuation bund along the western boundary; utility connections to potable water and electricity will be required; sewerage is likely to be managed using a septic tank*

⁴ 26 July 2016

⁵ UK citizens typically underestimate the impact of air pollution at a time when 38 out of 43 "air quality zones" breach legal limits for air pollution. See www.theguardian.com/environment/2017/mar/01/british-people-unaware-pollution-levels-air-breathe-friends-earth (accessed 1 March 2017)

⁶ The cost of the Capita consultancy, the compulsory purchase of private land, the *new access road that will comply with highway requirements, significant drainage and earthworks, the noise attenuation bund, utility connections to potable water and electricity, a septic tank, or the 1.8m close-boarded acoustic timber fence located around the edge of the wood crushing area compound* is not revealed. On 14 February 2017, a council officer stated, **"Cost is important for ratepayers and officers but it is the suitability of the site which is the most important thing here."**

(para 2.7). However, optimism prevails since the following paragraph notes, *There are no constraints resulting from the general site appraisal that would prevent the site being suitable as a permanent residential site for the traveller community.*

In terms of air quality, *due to the small size of the proposed development and low baseline levels of pollutants, a baseline assessment has been considered sufficient to assess the potential exposure of future users...* (para 2.9). In the light of the known underestimation of concerns about air pollution, why is “a baseline assessment” sufficient?

In terms of the Tests of Soundness, the plan in relation to the Penhesgyn site is outwith the letter and spirit of the Well-being and Future Generations (Wales) Act 2015. It does not address the goals of *a healthier Wales, a more equal Wales and a Wales of more cohesive communities*. Neither does it address concerns highlighted by research commissioned by the Westminster Labour Government and the Equality and Human Rights Commission. Anglesey County Council has identified a single site and its *Rapid Health Impact Assessment on Star and Penhesgyn based on a participatory⁷ workshop held on 23 January 2017*. The participation did not extend to local residents.⁸ This concluded, ***Overall both sites are considered to have a positive impact on the health and welfare of gypsies and travellers over the existing provision.*** This is not the comprehensive assessment promised, it does not constitute evidence. It merely endorses the County Council’s failure to identify another permanent site. The *rationale behind the plan* is the failure of the County Council to take action in November 2009 when the High Court determined that the Pentraeth Road layby could not be vacated until another site was identified. This view is shared by Penmynedd Community Council and Cwm Cadnant Community Council, the latter noting during the consultation, *“It continues to feel that this is a rushed job to comply with JDLP requirements, otherwise the local authority faces the possibility of fines being imposed.”* It cannot be claimed that *the vision and strategy* [are] positive and sufficiently aspirational. The only permanent site the County Council has identified is next to the *tip* – regardless of its belated name-change. Thus there are no *‘real’ alternatives*, and Anglesey County Council fails in terms of logic, reason and balance. Is the plan concerning the permanent site *coherent, consistent, clear and focused*? It is certainly consistent and focused and has been since the Penhesgyn site was belatedly identified. Surely the test remains for the County Council to demonstrate its willingness to consider more than a single site – as proposed at Hearing Session 13? In terms of ethics, which regrettably does not feature in the *Tests of soundness*, the plan is shameful and wrong.

⁷ NB the participants were Capita consultants (commissioned by the County Council), council officers and councillors

⁸ Local residents await a promise made by the Chief Executive on 31 May 2016 to materialise, *We remain committed to working with the local residents living near Penhesgyn and the new age travellers to support community cohesion as well as mutual understanding and respect*