

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p><i>For office use only:</i></p> <p>Representor No. 3036/871</p> <p>Date received: 27/3/15 EBW</p> <p>Date acknowledged:</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.

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	Friends of Borth-y-Gest	Tom Brooks. Joint Secretary
Address	[REDACTED]	
Postcode		
Telephone Number		
Email address		

The Friends of Borth-y-Gest is a long established organisation for residents and others with close connections with the locality. All residents are entitled to be members and others accepted as members are included in a mailing list. A committee is elected annually at a General Meeting. The committee has approved this submission.

Guidance Note.

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

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

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

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

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

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

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

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

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

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

2a. Which part of the Deposit Plan are you commenting on?	
Policy number (please specify)	Strategic Objectives Theme 1
Paragraph number (please specify)	SO1 and SO5 and Para 6.2
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"/> YES

2c. Please provide details of your representation on the Deposit Plan.
<p>The Aims and Objectives of the Friends of Borth-y Gest include:</p> <p style="padding-left: 40px;">“to seek to preserve the special nature of the area as a peaceful pretty seaside village set in an outstandingly beautiful rural setting”.</p> <p>In this regard we applaud Theme 1 of the Written Statement – Support and create safe, healthy, distinctive and vibrant communities, and Theme 5 – Protect and enhance the natural and built environment.</p> <p style="text-align: right;"><i>Please use additional sheet if necessary. Please state how many additional sheets have been used.....</i></p>

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

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

None. But we would wish to oppose any proposals by others that threaten these themes.

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

Appendix 1 – Deposit Plan

Strategic Objectives and Policies

- 1.1 NRW considers that the identification and review of key trends brought to the fore by the review of the strategies, plans and programmes identified in Chapter 3 has successfully identified the main issues that are to be tackled by the Joint LDP.
- 1.2 NRW recommends that Table 5 includes reference to National Planning Policies including Planning Policy Wales and Technical Advice Notes.
- 1.3 It is considered that the Plans' series of Strategic Objectives set out in section 5.8 will help ensure that the Plans' vision is realised and also sets out the context for the Strategic Policies and Detailed Policies to be based upon.
- 1097 { 1.4 It is acknowledged that Strategic Objective Theme 5 now also includes the need to protect, enhance and manage natural resources.
- 1.5 It is noted that it is anticipated that transformational economic change arising from the unique scale of major infrastructure projects on Anglesey and the Island's Enterprise Zone status will be the biggest driver of spatial and social change over the Plan period.

Test of Soundness

- 1.6 As explained in our covering letter NRW considers that the Deposit Plan is unsound as it fails the Procedural P2 Test of Soundness and both the CE1 and CE2 Coherence and Effectiveness Tests.

Transport Network Developments

- 1.7 The Plan outlines 4 transport schemes that will be secured during the Plan period including the A487 Caernarfon to Bontnewydd bypass, the Llangefni Link Road, a new Menai Strait Crossing and road improvements on the A5025 from Valley to Wylfa Newydd.
- 1.8 NRW would appreciate being involved in the discussions regarding these proposed schemes as early as possible in order to identify key development constraints and provide advice. For some of the above named schemes NRW has already provided Scoping advice.

2919-1111-5Theme5

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
	Vision and strategic Objectives	Support growth and regeneration	<p>appropriate to include a new strategic objective under Theme 3 which supports the development of the Wylfa Newydd Project to ensure the JLDP contains a coherent policy framework for managing the Wylfa Newydd Project.</p> <p>Please also see the accompanying "Proposed Wylfa Newydd policy framework" which has been prepared to show the Wylfa Newydd specific policy framework as a whole.</p>	<p><u>Project and associated development to maximise socio-economic opportunities for local business and sustainable employment opportunities for local people including providing for a suitable network of Wylfa Newydd Project-related associated development sites while ensuring that adverse effects of the Wylfa Newydd Project on the local communities are appropriately avoided, or mitigated and where appropriate legacy benefits are provided.</u></p>
2919 111)	8. Chapter 5 Vision and strategic Objectives	Theme 5 - Protect and enhance the natural and built environment	<p>It is stated to be a key output that "no development given planning permissions will have resulted in a loss of a site of international or national nature conservation value".</p> <p>This wording is unduly rigid. For example the Tre'r Gof SSSI is located within the Wylfa NPS Site boundary and IACC is aware of the potential for the construction of the Wylfa Newydd Project to adversely affect it. The output sought does not allow sufficient flexibility for changes in circumstance and does not acknowledge that there is a process whereby SSSIs can be denotified.</p>	<p><u>Amend this key output to read:</u></p> <p><u>Except in exceptional circumstances</u>, no development given planning permission will have resulted in a loss of a site of international or national nature conservation value.</p> <p><u>Alternative amendment:</u></p> <p>Alternatively apply the "Except in exceptional circumstance" to all of the key outputs sought.</p>