



For office use only:

Representor No. 1169 / 785

Date received:

Date acknowledged:

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

PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	Noel Davey	
Address	CPRW/Campaign for Protection of Rural Wales,	
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)

	CPRW 9 Visitor Economy Strategy and Caravans
Policy number (please specify)	PS11
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	
2b. Are you objecting or supporting the Deposi	t Plan?
Objecting	

9. Visitor Economy, Strategy and Caravans

- **9.1 Context/Introduction/PS11.** PS11 rightly acknowledges the position of tourism in the JLDP area economy and cites the large number of plans to support the sector. It is important to realise just how important tourism is to the economy of Gwynedd: 30% of all employment (half of private sector employment) is now related to tourism, about 10 times as many as in farming. Yet, it has been hard to escape the impression that tourism activities are grudgingly tolerated rather than actively embraced and nurtured as the key to the area's livelihood. The estimated annual tourism income of close to £1bn is equivalent to £15,000-£20,000 per household within Gwynedd.
- 9.2 We agree that the plan area's unique natural and historical assets are the principal draw for visitors. Priority should therefore be given to protecting the rural and coastal landscape from inappropriate development, whether from within the sector (e.g. caravan sites in exposed sites) or from other sectors (e.g. commercial wind turbines). We agree with the broad locational strategy proposed in PS11 and in particular with point 5 ('preventing development that would have an unacceptable adverse impact on tourist facilities features and areas of tourism interest .. or their setting'). The stated intention to 'maximise opportunities to restore previous landscape damage' is also very welcome, in line with a more active strategy to roll back and mitigate some of the inappropriate development in the past which damages the landscape (such as caravan sites in inappropriate locations).
- 9.3 Caravan contribution. The Topic Paper on Tourism confirms that caravans and camping play a dominant role in tourism in the JLDP area, accounting for 78% of the visitor bed stock in Gwynedd. The map (Fig 10) in the report shows dramatically how caravan sites have proliferated, especially in coastal areas (in Gwynedd over 90% of caravans are within 2 km of the coast). Caravans offer both a valuable means of supplementing rural incomes and an affordable source of holidays in the countryside or by the sea. The spread of caravan sites is important for the local economy, but has come at considerable visual cost to the landscape which visitors come to Wales to enjoy. At their worst, poorly screened sites scar the landscape in a dense, quasi-urban sprawl of white vans, whether permanent 'static' units or seasonal 'tourers'.

CPRW 9 Page 1 of 2

2ch. If your	respo	nse t	to 2c	abov	e exc	eeds	100 v	words	, plea	se pr	ovide	a su	ımma	ry (no	mor	e than	100	V-1
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CYNGOR CYMDEITHAS BOTWNNOG

3 Iain Mawrth, 2015.

Annwyl Syr,

Cynllun Datblygu Lleol ar y Cyd Gwynedd a Môn

Cyfeiriaf at y ddogfen uchod a hoffwn yn y lle cyntaf ddatgan fod yr aelod yn siomedig iawn o'r amser roddwyd iddynt hwy a'r cyhoedd gyflwyno sylwadau ar y ddogfen swmpus yma – rhaid dweud fod un neu ddau o'r aelodau heb gael cyfle i gael golwg drosti o gwbl ac felly ni allwn roi sylwadau cynhwysfawr ar y cyfryw.

Un o'r pwyntiau amlycaf sy'n dod i'r amlwg tra'n darllen y ddogfen yw fod cefn gwlad yn mynd i ddioddef yn enbyd pe gweithredir y canllawiau a nodir yn y Cynllun uchod. Bydd cefn gwlad yn marw ar ei thraed a gwelir diboblogi – os daw i hynny bydd diwylliant a'r arferion unigryw sy'n perthyn i gefn gwlad yn cael eu colli am byth. Oni fydd yn edifar gan y Cyngor golli adnodd mor werthfawr a hyn? Ym marn yr aelodau dylai'r Cyngor ail ystyried yr hawl i bobl leol ifanc gael codi tai yn eu cynefin ac hefyd peidio cyfyngu ar y maint a ganiateir ar dai a godir.

Pwyntiau eraill sydd lawn mor bwysig yw'r rhai a ganlyn:

- Mae Cynllun Gwarchod y Tirlun Newydd Arfordirol eto yn cyfyngu ar hawliau trigolion Pen Llýn drwy eu rhwystro i godi tai yn eu hardal eu hunain. Dylid ail-edrych ar y Cynllun hwn hefyd yn wyneb y sylwadau sydd yn y paragraff uchod.
- 2) Yn y cynllun cyfeirir at ddau dŷ yn unig yn cael ei ganiatau ym mhentref Bryncroes mae'r nifer yma'n gyfyngedig iawn am y nifer o flynyddoedd bydd y Cynllun arfaethedig mewn grym. Eto mae hyn yn cyfyngu ar hawliau'r unigolyn.
- 3) Mae'r Cynllun yn cyfeirio at economi ymwelwyr os yw hwn am fod yn effeithiol dylid datblygu a gwella ffyrdd, llwybrau a llwybrau beic. Mae angen dybryd ar y Cyngor ystyried y rhain er budd y trigolion lleol yn ogystal a thwristiaid. Petai gwella'r cyfleusterau sy'n arwain i'r Penrhyn arbennig yma, efallai y gellid sefydlu diwydiant yma ac felly cwtogi ar y niferoedd y rhai sydd heb waith.
- 4) Yn wyneb fod y boblogaeth yn heneiddio a'r pwyslais mawr gan y Llywodraeth i ofalu amdanynt yn eu cymuned, oni ddylai'r Cynllun arfaethedig ofalu fod tai pwrpasol ar eu cyfer yn y cymunedau lle maent yn byw. Mae'n holl bwysig fod y bobl hýn yn cael treulio gweddill eu hoes yn eu cynefin a'r amgylchfyd maent wedi arfer erioed.
- 5) Mae'r Cynllun yn cyfeirio fod yn rhaid i bopeth fod yn ddywieithiog, oni ddylai hyn fod 'Y Gymraeg' neu ddwyieithog. Rhaid cofio ein bod yn nghadarnle yr iaith Gymraeg ym Mhen Llýn.
- 6) Cyfeirir mai 3% a ganiateir o dai newydd yng nghefn gwlad yn ystod cyfnod y Cynllun hwn. Mae'r nifer yma'n isel iawn o ystyried nifer o flynyddoedd bydd y Cynllun yn weithredol. Eto rhaid ceisio denu'r ifanc i barhau yn eu cynefin a thrwy hynny bydd sicrwydd o ddyfodol i'n hysgolion, etifeddiaeth a.y.

Un pwynt arall godwyd oedd fod y tudalennau ddim yn cyferbynu a'r mapiau!

Gofynwn i chwi ystyried yn ddwys y sylwadau uchod er sicrhau dyfodol i'n hetifeddiaeth a ffyniant yn nghefn gwlad.

Anfonaf y copi caled yn y post heno.

Yn gywir,



Uned Polisi Cynllunio ar y Cyd, Llawr I af Swyddfeydd Cyngor Dinas Bangor Ffordd Gwynedd Bangor Gwynedd. LL57 IDT.

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: 184

Enw / Name: Ellesmere Sand & Gravel Company Limited [2686]

Rhan: POLISI STRATEGOL PS11

Section: STRATEGIC POLICY PS11

Math / Type: Gwrthwynebu / Object

Crynodeb o'r Sylw:

Mae defnyddiau hamdden a thwristiaeth yn ddefnyddiau hyfyw o dir sydd eisoes wedi'i ddefnyddio ar safleoedd cloddio mwynau y mae modd iddynt, unwaith y byddant wedi'u hadfer, ddarparu cyfleusterau megis cyfleusterau addysgol, llynnoedd pysgota, canolfannau chwaraeon dŵr, traciau beicio mynydd, beicio cwad, cyfleusterau gwifren uchel, cyfleoedd dringo creigiau, amffitheatr ar gyfer cyngherddau, cyfleoedd llety, gwersyllfeydd, cabanau coed a meysydd carafanau lle bo'n briodol. Bydd yr holl gyfleusterau uchod yn creu cyflogaeth ac yn cefnogi economïau gwledig a dylid eu cefnogi ar dir sydd eisoes wedi'i ddefnyddio yn yr ardal wledig.Caniatáu hyblygrwydd yn y policy ar gyfer defnyddiau terfynol amgen a hyfyw o safleoedd mwynau.

Representation Summary:

Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as educational facilities, fishing lakes, water sports centres, mountain biking tracks, quad biking, high wire facilities, rock climbing opportunities, amphitheatre for concerts, hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate. All the abovementioned facilities will create employment and support rural economies and should be supported on previously used land in the rural area.

Allow scope and flexibility in the policy for alternative and viable end uses of mineral sites where appropriate.

Sylw Llawn / Full Representation:

Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as educational facilities, fishing lakes, water sports centres, mountain biking tracks, quad biking, high wire facilities, rock climbing opportunities, amphitheatre for concerts, hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate. All the abovementioned facilities will create employment and support rural economies and should be supported on previously used land in the rural area

Newid(iadau) i'r Cynllun

Caniatáu hyblygrwydd yn y policy ar gyfer defnyddiau terfynol amgen a hyfyw o safleoedd mwynau.

Change(s) to the Plan

Allow scope and flexibility in the policy for alternative and viable end uses of mineral sites where appropriate

Profion Cadernid / Soundness Tests: x, viii, ix

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: 185

Enw / Name: Lafarge Tarmac Trading Limited [2735]

Rhan: POLISI STRATEGOL PS11

Section: STRATEGIC POLICY PS11

Math / Type: Gwrthwynebu / Object

Crynodeb o'r Sylw:

Mae defnyddiau hamdden a thwristiaeth yn ddefnyddiau hyfyw o dir sydd eisoes wedi'i ddefnyddio ar safleoedd cloddio mwynau y mae modd iddynt, unwaith y byddant wedi'u hadfer, ddarparu cyfleusterau megis cyfleusterau addysgol, llynnoedd pysgota, canolfannau chwaraeon dŵr, traciau beicio mynydd, beicio cwad, cyfleusterau gwifren uchel, cyfleoedd dringo creigiau, amffitheatr ar gyfer cyngherddau, cyfleoedd llety, gwersylloedd, cabanau coed a meysydd carafanau lle bo'n briodol. Bydd yr holl gyfleusterau uchod yn creu cyflogaeth ac yn cefnogi economïau gwledig a dylid eu cefnogi ar dir sydd eisoes wedi'i ddefnyddio yn yr ardal wledig.Caniatáu hyblygrwydd yn y policy ar gyfer defnyddiau terfynol amgen a hyfyw o safleoedd mwynau.

Representation Summary:

Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as educational facilities, fishing lakes, water sports centres, mountain biking tracks, quad biking, high wire facilities, rock climbing opportunities, amphitheatre for concerts, hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate. All the abovementioned facilities will create employment and support rural economies and should be supported on previously used land in the rural area.

Allow scope and flexibility in the policy for alternative and viable end uses of mineral sites where appropriate

Sylw Llawn / Full Representation:

Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as educational facilities, fishing lakes, water sports centres, mountain biking tracks, quad biking, high wire facilities, rock climbing opportunities, amphitheatre for concerts, hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate. All the abovementioned facilities will create employment and support rural economies and should be supported on previously used land in the rural area

Newid(iadau) i'r Cynllun

Caniatáu hyblygrwydd yn y policy ar gyfer defnyddiau terfynol amgen a hyfyw o safleoedd mwynau.

Change(s) to the Plan

Allow scope and flexibility in the policy for alternative and viable end uses of mineral sites where appropriate

Profion Cadernid / Soundness Tests: x, viii, ix

Strategic Policy PS11: The Visitor Economy

Bourne Leisure considers that there is a clear disconnect between the Context, Introduction and the subsequent tourism related policies. The Context and Introduction sections acknowledge the importance of tourism to the local area in terms of contribution to the local economy and local employment but the following tourism related policies do not logically flow and adequately reflect the above provisions.

Bourne Leisure endorses PS11 in principle as it supports the development of a year-round local tourism industry. However, Bourne Leisure considers that point 3 should be redrafted to read:

"Managing, and enhancing the provision of high quality un-serviced tourism accommodation in the form of camping, alternative luxury camping, static or touring caravan or chalet parks."

This is because static caravan and chalet parks require constant redevelopment / reconfiguration in order to maintain a product that meets visitors' expectations. Significant investment is required to maintain and enhance the viability and attractiveness of existing operations as destinations, to improve their "offer" and to respond to changing markets, including the improvement of guest facilities and sport and leisure areas.

Point 3 should provide sufficient scope for un-serviced tourism accommodation to be enhanced.

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: 456

Enw / Name: Bourne Leisure Ltd [2768]

Rhan: POLISI STRATEGOL PS11

Section: STRATEGIC POLICY PS11

Math / Type: Gwrthwynebu / Object

Crynodeb o'r Sylw:

Mae Bourne Leisure yn cefnogi PS11 mewn egwyddor gan ei fod yn cefnogi datblygiad y diwydiant ymwelwyr trwy gydol y flwyddyn. Serch hynny, mae Bourne Leisure yn ystyried y dylid ail-ddrafftio pwynt 3 i ddarllen: "Rheoli a chyfoethogi darpariaeth llety ymwelwyr hunan gynhaliol o safon uchel o ran pebyll, pebyll amgen moethus, parciau carafan statig neu deithiol neu siales.

Representation Summary:

Bourne Leisure endorses PS11 in principle as it supports the development of a year-round local tourism industry. However, Bourne Leisure considers that point 3 should be redrafted to read:

"Managing, and enhancing the provision of high quality un-serviced tourism accommodation in the form of camping, alternative luxury camping, static or touring caravan or chalet parks."

Sylw Llawn / Full Representation:

Bourne Leisure considers that there is a clear disconnect between the Context, Introduction and the subsequent tourism related policies. The Context and Introduction sections acknowledge the importance of tourism to the local area in terms of contribution to the local economy and local employment but the following tourism related policies do not logically flow and adequately reflect the above provisions.

Bourne Leisure endorses PS11 in principle as it supports the development of a year-round local tourism industry. However, Bourne Leisure considers that point 3 should be redrafted to read: "Managing, and enhancing the provision of high quality un-serviced tourism accommodation in the form of camping, alternative luxury camping, static or touring caravan or chalet parks."

This is because static caravan and chalet parks require constant redevelopment / reconfiguration in order to maintain a product that meets visitors' expectations. Significant investment is required to maintain and enhance the viability and attractiveness of existing operations as destinations, to improve their "offer" and to respond to changing markets, including the improvement of guest facilities and sport and leisure areas.

Point 3 should provide sufficient scope for un-serviced tourism accommodation to be enhanced.

Newid(iadau) i'r Cynllun

Change(s) to the Plan

Bourne Leisure endorses PS11 in principle as it supports the development of a year-round local tourism industry. However, Bourne Leisure considers that point 3 should be redrafted to read:

"Managing, and enhancing the provision of high quality un-serviced tourism accommodation in the form of camping, alternative luxury camping, static or touring caravan or chalet parks."

Profion Cadernid / Soundness Tests: x. iv

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: 340

Enw / Name: Mr Geoff Wood [2916]

Rhan: POLISI STRATEGOL PS11

Section: STRATEGIC POLICY PS11

Math / Type: Gwrthwynebu / Object

Crynodeb o'r Sylw:

Mae gan lety hunanarlwyo, megis bythynnod a fflatiau, gyfraniad sylweddol i'r economi ymwelwyr ac ni chaiff y cyfleusterau hyn eu hystyried ym Mholisi Strategol PS11ar hyn o bryd.

Representation Summary:

Self-catering accommodation, such as cottages and apartments, has a significant contribution towards the visitor economy and these types of facility are not considered within Strategic Policy PS11 at the moment.

Sylw Llawn / Full Representation:

Self-catering accommodation, such as cottages and apartments, has a significant contribution towards the visitor economy and these types of facility are not considered within Strategic Policy PS11 at the moment.

Newid(iadau) i'r Cynllun

Amend part 3 to read "Managing the provision of high quality un-serviced tourism accommodation in the for

Change(s) to the Plan

Amend part 3 to read "Managing the provision of high quality un-serviced tourism accommodation in the form of permanent buildings [such as apartments and cottages], camping, alternative luxury camping, static or touring caravan or chalet parks"

Profion Cadernid / Soundness Tests: ix





For office use only:

Representor No. 3034 / 741

Date received: 27/3/10

Date acknowledged:

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 <a href="

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 <a

PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	Tom Brooks	
Address		
Postcode		
Telephone Number		
Email address		

Tom Brooks

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)	PS11 and TWR2						
Paragraph number (please specify)							
Proposals/ Inset Map (please specify ref no.)							
Constraints Map							
Appendices (please specify)							

2b. Are you object	ting or supporting the De	posit Plan?		
Objecting		Supporting	Г	

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

Policy PS11 – The visitor economy – as drafted, threatens further development of tourist accommodation through the conversion of existing property to tourist accommodation. In Borth-y-Gest, the coastal village already has more than 60% holiday homes or tourist units.

Outside of the peak summer period, Borth-y-Gest is not quite a 'ghost' village but further holiday homes would rapidly make it so.

Much of the loss of housing units for local families has been created by the conversion of existing buildings into "permanently serviced and self-services holiday accommodation". This is a deeply damaging trend for villages such a Borth-y-Gest. TWR2 needs amending to protect against any further such loss of family accommodation. It currently carries a presumption of granting permission and the caveats are non specific and undefinable.

The explanation paragraphs in 7.3.55 are challenged in failing to be evidence based and to err in their conclusions.

Please use additional sheet if necessary.

Please state how many additional sheets have been used.......

Tom Broaks

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Tom Brooks 10





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Representor No. 305

Date received: 31 3 15

Date acknowledged:

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.gwynedd.gov.uk/ldp or www.awynedd.gov.uk/ldp or <a href="

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	Caravan Club	Duncan Parr
Address	C/O Agent	
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 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 Section1 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 Flan are you com	menting on?	
Policy number (p	lease specify)	PSS11, TWR3, TWI	R4
	er (please specify)		
	Map (please specify ref no.)		
Constraints Map			
Appendices (plea	se specify)		
2b. Are you obje	cting or supporting the Deposit	t Plan?	
Objecting	V	Supporting	Г

Please state how many additional sheets have been used......

The policy should businesses from a	on the type of develope be amended to ensure dapting to the changir	ment which is acceptable that the plan does not e ng needs of the visitor ec	onsidered to be overly restrictive an e on existing touring caravan sites. effect the ability of local tourist conomy and does not impact on the all economies, employments and
2d. Please detail t	the changes you wish t	to see made to the Depo	osit Plan.
Please see Repres	entation Letter for full	details	
2dd. Is the Deposi	t Plan sound?		

Procedural Consistency								Coherence & Effectiveness											
P1	-	P2	Г	C1	Г	C2	V	C3	Г	C4	Г	CE	P	CE	V	CE	Г	CE	V
												1		2		3		4	

Part	3.	What	Hann	ens	Next?
rait	٥.	AALIGIT	Happ	C113	IACVC:

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 represent Inspector about and why you consider it to be necessary to speak at t	어른 사람들이 나는 사람이 있어? 그렇게 되어 살아 아니는 사람들이 되었다.						
3c. Would you like to be informed about the following (Please tick the	e relevant boxes)						
Submission of documents and evidence to the examination	₩						
Publish Inspector's report	Г						
Plan's adoption							
If additional documents have been provided to support your represen	ntations, please list below:						
Site Location Plan							
Site Plan							
Indicative Lodge Layout							
Representation Letter							

Signed:	Dated: 30/03/2015

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.

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.



30 March 2015

Joint Planning Policy Unit 1st Floor Bangor City Council Offices Fford Gwynedd Bangor Gwynedd LL57 1DT

Duncan Parr BA DUPI Dip TP FRGS MRTPI Cgeog MEWI

Dear Sirs

Representation to the Joint Planning Policy Deposit Plan consultation with regards to Penrhos Caravan Club Site, Brynteg, Anglesey, LL78 7JH

This letter accompanies our representation to the Joint Deposit Plan on behalf of the Caravan Club. Penrhos is located to the south west of Brynteg and currently serves as a touring caravan site. This representation seeks for amendments and clarification on policies relating to visitor accommodation and caravan sites including policies PSS11, TWR3 and TWR4. The key theme of this representation is as to whether the development of lodges on existing caravan sites is acceptable under the emerging Joint Local Plan. Provided with this representation is a completed representation form, site location plan, site plan and indicative Lodge design.

Penrhos Caravan Club site is located to the south west of Brynteg and is accessed via a private road from the B5110. The site has an area of approximately 3.84ha and is comprised of 3 main areas, there is an open field located to the north west of the B5110 which is used for dog walking, a small field to the north of this which incorporates a number of hardstanding pitches and existing buildings and a further larger field to the west which has a mixture of hardstanding and grass pitches. The site as a whole has 89 pitches, 52 of which are hardstanding. Within the site there are a number of internal roads and existing buildings which accommodate a site shop, information room, toilet and shower blocks and a laundry. The majority of the site is set well back from the main road and is well screened by existing mature hedgerows and trees. Given the level of existing development on the site, the two main touring caravan fields constitute—previously developed, Brownfield land.

The site is located in a rural location but is surrounded by neighbouring caravan sites to the north east and south west, the wider area is characterised by open countryside. The site is located close to Brynteg which is approximately 1km from the site, this settlement offers amenities and facilities including restaurants, take aways, a convenience shop and post office. Benllech is located approximately 3.8km from the site and this settlement has a wide range of facilities. There is a bus stop located approximately 1km away in Brynteg which provides links to Amlwch, Lllannerch-y-medd, Marian Glas, Benllech, Pentraeth, Porthaethwy, Ysbyty Gwynedd and Bangor (no.63). Therefore this site is considered to be a sustainable location.

The emerging policies relating to tourism and holiday accommodation are currently unclear as to whether the development of chalet style lodges on existing touring caravan sites is acceptable. The policies as set out in the Deposit Plan appear contradictory and do not allow sufficient flexibility to allow for sensitive future development at the site to meet modern tourists needs.

National Policy Context



Planning Policy Wales 2014, is one of the key national planning policy documents for Wales and sets out the land use planning policies of the government. The following guidance is relevant to this representation.

The plan states that in Wales sustainable development means enhancing the economic, social and environmental well-being of people and communities, achieving a better quality of life for our own generations in ways which:

- · promote social justice and equality of opportunity; and
- enhance the natural and cultural environment and respect its limits using only our fair share of the earth's resources and sustaining our cultural legacy.

Paragraph 4.2.2 states that the planning system should provide for a "presumption in favour of sustainable development" to ensure that social, economic and environmental issues are balanced and integrated.

Paragraph 4.6.3 states that the priorities for rural areas are to secure:

- sustainable rural communities with access to affordable housing and high quality public services;
- a thriving and diverse local economy where agriculture-related activities are complemented by sustainable tourism and other forms of employment in a working countryside; and
- · an attractive, ecologically rich and accessible countryside in which the environment; and
- · biodiversity are conserved and enhanced.

Paragraph 4.9.1 states that previously developed (or Brownfield) land should, wherever possible, be used in preference to Greenfield sites, and that previously developed land is that which "is or was occupied by a permanent structure, excluding agricultural or forestry buildings, and associated fixed surface infrastructure".

Paragraph 7.1.1 defines economic development as "development of land and buildings for activities that generate wealth, jobs and incomes". Economic land uses include retail, tourism, and public services.

Paragraph 7.3.2 relates to employment in rural locations and states that "new development will be required in many areas" in order to create employment. Furthermore it states that the **expansion of existing businesses located in the open countryside should be supported** provided there are no unacceptable impacts on local amenity.

Paragraph 11.1.1 relates to Tourism and states that it is "vital to economic prosperity and job creation in many parts of Wales" and that "tourism can be a catalyst for environmental protection, regeneration and improvement in both rural and urban areas".

Paragraph 11.1.4 states that tourism involves a wide range of activities, facilities and types of development throughout Wales and the planning system should encourage sustainable tourism in ways which enable it to contribute to "economic development, conservation, rural diversification, urban regeneration and social inclusion, recognising the needs of visitors and those of local communities".

Paragraph 11.1.7 relates to tourism in rural areas, and states that "tourism-related development is an essential element in providing for a healthy, diverse, local and national economy". Tourism can contribute to the provision and maintenance of facilities for local communities. In rural locations development should be sympathetic in nature and scale to the local environment and to the needs of visitors and the local community. Paragraph 11.1.9 states that development for tourism, sport and leisure uses should, where appropriate, be located on previously developed land.

Emerging Local Policy Context

The emerging policy relating to tourism and caravan sites is currently unclear and the key messages appear to be conflicting.



Emerging Strategic Policy PS11 – The Visitor Economy states that whilst ensuring the compatibility with the local economy and communities and ensuring the protection of natural, built and historic environment the Councils will support the development of a year round local tourism industry by:

 Protecting and enhancing existing serviced accommodation and supporting the provision of new high quality serviced accommodation in or near the sub-regional, urban and rural service centres and villages;

 Managing the provision of high quality un-serviced tourism accommodation in the form of camping, alternative luxury camping, static or touring caravan or chalet parks.

Under this policy the development of chalet style accommodation on part of the site at Penrhos Caravan Club site would be acceptable provided it contributed to the local economy and has no negative impacts on the environment.

Emerging Strategic Policy TWR2 - Holiday Accommodation states that proposals for, the development of new permanent serviced or self serviced holiday accommodation or extending existing holiday accommodation establishments will be permitted provided they are of a high quality in terms of design, layout and appearance and that all the following criteria can be met:

- In the case of new build accommodation that the development is located within a development boundary or makes use of a suitable previously developed site;
- That the proposed development is appropriate in scale, considering the site, location and/or settlement in question;
- That the proposal will not result in a loss of permanent housing sock;
- That the development is not sited within a primarily residential area or does not significantly harm the residential character of an area;
- That the development does not lead to an over concentration of such accommodation within the area.

Under this policy Penrhos Caravan Club site can meet the criteria for the development of new holiday accommodation in the form of holiday style lodges. The site is previously developed land and the design and layout of the lodges would ensure that the scale of the development is appropriate to the site. There would be no loss of residential stock or harm to residential character. The criteria relating to development not leading to an over concentration of one type of accommodation within the area is not clear given the wide range of accommodation provision in the rural parts of the plan area this would be difficult to show. Providing this could be shown, under this policy the development of lodges on part of Penrhos Caravan Club would be acceptable.

Under emerging policy TWR3 the development for new static caravan or holiday chalet sites will be granted only under the following circumstances:

- It can be demonstrated that is doesn't lead to a significant intensification in the provision of static carevan or chalet or permanent alternative camping sites in the locality; and
- That the proposed development is of a high quality in terms of design, layout and appearance and is site in an unobtrusive location which is well screened by existing landscape features and/or where the units can be easily assimilated into the landscape in a way which does not significantly harm the visual quality of the landscape; and
- That the site is close to the main highway network and that adequate access can be provided without significantly harming the landscape characteristics and features.

It is unclear as to whether this policy is applicable to proposals for the development of chalet style lodges on existing touring caravan sites. Penrhos Caravan Club site has the potential to meet all of the criteria set out in this policy however the policy does not make it clear as to whether this would be acceptable. Should this not be acceptable under this policy this will create an overly restricted system which does not allow sufficient flexibility for rural businesses such as caravan sites to adapt to changing economic circumstance. A greater level of flexibility and clarity is sought, in order to to support the rural tourist industry which provides a significant level of employment in the local area as well as supporting other local businesses.



Emerging Policy TWR4 - Holiday Accommodation states that proposals for new self serviced accommodation, static caravan and chalets...will be granted provided it can be demonstrated that the accommodation is being used exclusively for holiday purposes and does not become the occupants main or sole place of residence.

Under this policy the development of Lodges on Penrhos caravan club site would be acceptable.

Amendments to Emerging Policies

In order to provide clarity on the development of alternative accommodation on existing caravan sites the emerging policy should be amended. The current policy is not specific to this type of development and is in places contradictory. National Policy supports development relating to tourism provided that it meets the criteria for sustainable development. If the various relevant policies are restricting the ability of tourism businesses to adapt to the changing needs of visitors this could have a negative impact on the local economy particularly in rural areas.

For example given its location and current use Penrhos Caravan Club site is considered to be a Brownfield site in a sustainable location. The development of chalet style lodges on part of this site will not result in a huge loss of touring caravan accommodation and will allow for the site to meet the needs of a wider range of visitors. Given that the site accommodates touring caravans currently, is well screened and set back from the main road the development of lodges will not have a significant impact on the surrounding environment. The chalet style lodges, an example of which is included in this representation, are easily integrated into the landscape and in many ways are more sensitive to the rural location of the site than the touring caravans that currently occupy the site. There is an increasing demand for such accommodation so having a policy framework that supports such appropriate development in sustainable locations going forward is important.

Conclusion

The emerging policies relating to the development of visitor accommodation in particular policies PSS11, TWR2, TWR3 and TWR4 are currently unclear and none relate specifically to the provision of chalet style lodges on existing touring caravan sites. Generally under these policies such a development on Penrhos caravan club site would be acceptable, however this position should be clarified within the emerging policy. Policy must ensure that it does not overly restrict development on existing caravan sites including the change in the type of accommodation. The ability of local tourism businesses to cater to the changing needs of the visitor economy is key to the continued viability of such businesses and will ensure their continued support of rural communities in terms of employment and visitor spending.

Yours faithfully



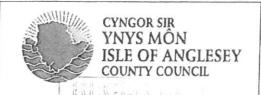
Duncan Parr BA DUPI Dip TP FRGS MRTPI Cgeog MEWI Director

Encs. Representation Form, Site Location Plan, Site Plan and Indicative Lodge Design.

Penrhos Caravan Club Site 82 83 84 85 81 86 87 SP 89 88 PENRHOS BUNGALOW MWP Site Entrance CP 1... 46 47 48 49 50 51 CEP PA 73 DOG 40 447 68 74 39 43 67 38 55 66 37 75 33 41 65 56 /63/62/61/60/ 16 Site Map Key 27 26 **Assembly Point** AW Assistant Warden Pitch 12 CEP Chemical Toilet Emptying Point Marker (1) Information Room Late Night Arrivals Area LNA MWP Motorhome Waste Point Car R Reception SP Service Point TB Toilet Block Pitch Guide W Warden Please park with offsice of caravan or motorhome to the DOG Dog Walk Pitch type Peg colour Pitch numbers numbered side of the pitch PA Play Area marker. If you wish to park Standard with awning White 2-35, 37-53, 55-89 a different way round please CP Car Park Standard without awning Blue 1, 36, 54 check with the warden.







For office use only:

Representor No. 2988 / 862

Date received:

P59

Date acknowledged:

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.awynedd.gov.uk/ldp or <a href="

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 <a

PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	BANGOR CIVIC SOCIETY C/O DON MATHEW	
Address	C/O DON MATHER	
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 comm	nenting on?		
Policy number (please specify)	-A5	BELOW	
Paragraph number (please specify)	-A5	BELOW	
Proposals/ Inset Map (please specify ref no.)			
Constraints Map			
Appendices (please specify)			

2b. Are you object	ting or supporting the Depos	sit Plan?		
Objecting	1 PANTLY	Supporting	10	M =5764!

2c. Please provide details of your representation on the Deposit Plan.
WE WISH IN PARTICULAN TO SUPPORT: - PSI: WEISH LANGUAGES & CULTURE - ISAI: INFRASTRUCTURE PROVISION - PSY: SUSTAINABLE TRANSPORT - PSG: CLIMATE CHANGE - ARNAI: COASTM CHANGE MANAGEMENT - PSII: VISITOR ECONOMY - PSI2: RETAIL (NOTING SUB-REGIONAL IMPPORTANCE - MANT: HOT FOOD TRME AWAYS (NOTING CLUSTERS & NUISANCE) - TAIZ: HMOS. WE WELCOME FINST ATTEMPT TO PUT A CAP ON NON-SHARES ACCOMMODATION - PSIG: NATURAL ENVIRONMENT - PSIT: HEMITAGE ASSETS (NOTING VENY POSITIVE SUPPORT IEON SLATE INDUSTRY WORLD HEMITAGE SITE BIB)
END_

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

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2a Do you want your comments to be considered by	y 'written representations' or do you want to speak								
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3b. If you wish to speak, please confirm which part of Inspector about and why you consider it to be necess									
3c. Would you like to be informed about the following	ng (Please tick the relevant boxes)								
Submission of documents and evidence to the examin	ation								
Publish Inspector's report	17/								
Plan's adoption	li V								
If additional documents have been provided to supp	ort your representations, please list below:								
Signed: D	Dated: 31 MANCH 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:

LL57 1DT

Part 3: What Happens Next?

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

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