



For office use only:

Representor No.

Date received:

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.

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PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	Robert Roberts	N/A
Address		
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.

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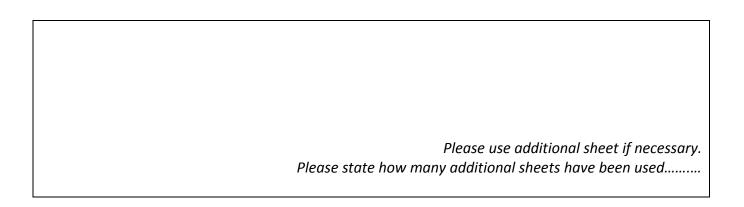
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PART 2: Your Comments and Suggested Changes. (Please use one Part 2 section for each comment that you wish to make)

20 Which nort of the D	anasit Dlan ara vau samm	outing on?	
za. which part of the D	eposit Plan are you comm	enting on?	
Policy number (please s	pecify)	POLICY TWR3	
Paragraph number (plea		NUMBER 1	
Proposals/ Inset Map (p			
Constraints Map	,,		
Appendices (please spe	cifv)		
, , , , , , , , , , , , , , , , , , , ,	777		
2b. Are you objecting o	r supporting the Deposit P	lan?	
Objecting	V	Supporting	
2c. Please provide deta	ils of your representation	on the Deposit Plan.	
	lates to proposals for the d camping accommodation"		and refers to
There is no definition of to 7.3.66 that follows Po	f "permanent alternative ca plicy statement TWR3	imping accommodation" ii	n the explanation 7.3.60
Does it mean touring ca	ravans , tents or camping,	trailer tents, motor homes	, pods, yurts, wigwams,
•	ed together and covered in ifferentiate between AONE		as.
There is therefore possi	ble ambiguity between Pol	icy TWR3 and TWR5.	



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.
Zu. Flease detail the changes you wish to see made to the Deposit Flan.
Policy TWR3 needs to provide a definition of "permanent alternative camping accommodation" in a Citation similar to 1 and 2 on page 114.
Changes cannot be suggested without being provided with a definition.

2dd. Is the Deposi	t Plan soun	ıd?											ı
Yes				No				V					1
2e. If you think th	at the Depo	osit Plan is	unsound v		of so	undn	ess d		u thin	k tha	t it fa	ils?	ı
(Please tick below)	-							, ,					ı
Procedural	Consister	ncv			Coh	eren	ce &	Effec	tivene	ess			Í
P1	C1	C2	C3 🗆	C4 🗆	CE 1	•	CE 2		CE 3		CE 4		I
Part 3: What Happ	ens Next?												
At this stage of the representations'). speak to the Insperyour written commat a hearing session	However, tector at a 'h nents on th	the Inspect nearing ses	tor may cal ssion' durir	II on thos ng the Pu	e who	war kamin	nt to ation	chanį 1. You	ge the	e Plar ıld be	n to a ear in	ppear mind	and that
3a. Do you want y at a hearing session				-	-					you v	want i	to spe	ak
I do not want to sp	eak at a he	earing sessi	on and am										
happy for my writt	ten comme	nts to be co	onsidered b	ру									
the Inspector.													
I want to speak at	a hearing s	ession.		~									
3b. If you wish to a Inspector about a			-	-	-			-		o spe	ak to	the	
Policy TWR3	Para 1 and	l Policy TW	R5										
3c. Would you like	to be info	rmed abou	it the follo	wing (Ple	ase tic	k the	relev	ant b	ooxes))			
Submission of doc	uments and	d evidence	to the exar	nination					V				
Publish Inspector's	report								~				
Plan's adoption									~				
If additional docu	ments have	been prov	vided to su	pport you	ır rep	resen	tatio	ns, p	lease	list b	elow	:	
Signed: R.G.	Roberts			Dated:		25 th I	Marc	h 201	15				

THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN

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

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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 <u>WILL NOT BE CONSIDERED</u>

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.
С3	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.

180-516 - TWR3





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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 comme	enting on?	
Policy number (please specify)	POLICY TWR3	
Paragraph number (please specify)	NUMBER 3	
Proposals/ Inset Map (please specify ref no.)		
Constraints Map		
Appendices (please specify)		

ting or supporting the	Deposit Plan?		
₩	Supporting	Г	
	ting or supporting the	ting or supporting the Deposit Plan? Supporting	

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

This paragraph relates to improvements to existing static and chalet sites located in the Anglesey and Llyn AONBs and the Special Landscape Areas.

The Policy allows minor extensions to site areas and relocation of units from prominent to less prominent locations.

The policy, however, does not allow any increase in the number of units.

I object to the Plan as this does not allow any incentive whatsoever to Park Owners to make improvements to Static and Chalet Parks.

Change I wish to make to the Deposit Plan in relation to this paragraph number is outlined in Section 2d below.

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

1 1

2ch. If your response to 2c above exceeds 100 words, please provide a summary (no more than 1 words).
2d. Please detail the changes you wish to see made to the Deposit Plan.
u. Flease detail the changes you wish to see made to the Deposit Flan.
Add:
(iii) a very minor increase in the number of units on site.
Explanations:
Winor is defined in para 7.3.66 as "should be no greater than a 10% increase on the number at the
ime of the original application".
suggest that the definition of miner should be amended to "should be no greater than a 1E9/
suggest that the definition of minor should be amended to "should be no greater than a 15% ncrease in the number at the time of the original application"
Definition of "very minor"
And "Very minor in relation to site area is not defined except in relation to an increase in the numb of units and should be no greater than a 10% increase on the number at the time of the original
application"

2dd. Is the Deposit Plan sound? Yes Ze. If you think that the Deposit Plan (Please tick below). More details are										
[사람이 그 경에 발견이 잘 다면하지 하시다이 때 그렇지 때 [2014년 사람이네]	is uncound wh	No				F				
					ess d	o you	thin	k tha	t it fa	ils?
Procedural Consistency			Coh	eren	ce & E	Effect	ivene	ess		
P1 P2 C1 C2	C3	C4	CE	Г	CE	P	CE	Г	CE	F
			1		2		3		4	12
Part 3: What Happens Next? At this stage of the Joint LDP proces representations'). However, the Inspector at a 'hearing your written comments on this form	ector may call session' during	on those the Pub	who	war amin	nt to diation	chang . You	e the	Plar	n to a ear in	ppear mind
Ba. Do you want your comments to be at a hearing session of the Public Exa	oe considered beamination? (Ple	y 'writte ase tick o	en rep	orese	ntatio	ons' o				
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180-1052 - TWR3





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2b. Are you objecting	g or supporting th	e Deposit Plan?	
Objecting		Supporting	

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

Explanation 7.3.60

The Deposit Plan quite rightly states that "Static Caravan and chalet sites are an important source of holiday accommodation within the plan area". The reason for this is that is what the consumer want and the argument that "there may be no justification for the provision of ... new static holiday caravans within coastal areas" because "some parts of the plan area" are well served by coastline sites is not well thought out. If this type of accommodation is not provided in the plan area consumers will go elsewhere to satisfy their needs.

Explanation 7.3.63

Whilst I agree with the thrust of this paragraph I feel that the last sentence should be amended to: "it is considered that there is typically no capacity for further new static or chalet parks, but there is scope for minor static and chalet park extensions as part of a general improvement plan"

Explanation 7.3.64

This is not going to happen as there is no incentive by increasing numbers in carrying out improvements. How will the site pay for improvements?

Explanation 7.3.65

This is not going to happen. See explanation 7.3.64 above.

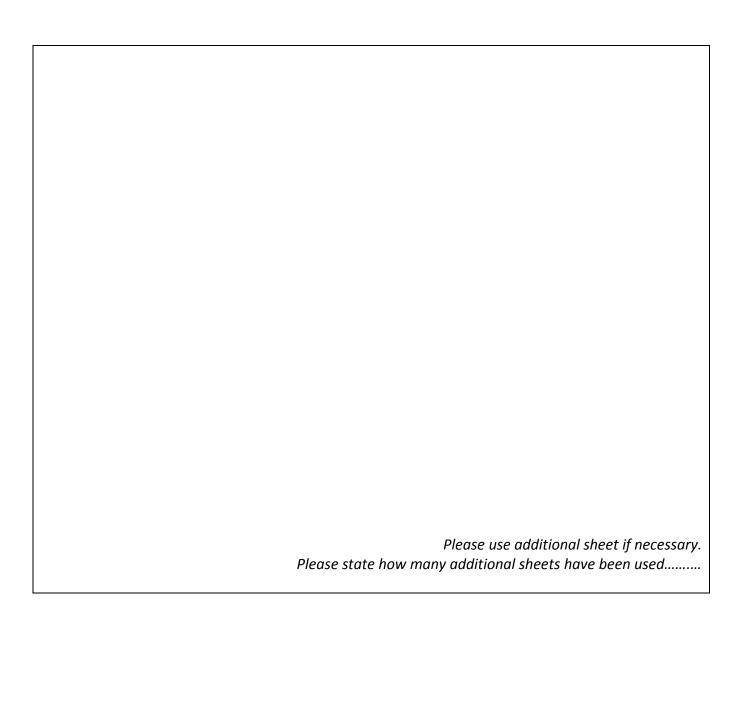
Section 7.3.46

Context states:

Both Councils' strategic/ corporate plans identify tourism as a key priority.

A policy of no extension to existing static caravan parks in AONBs contradicts this statement.

These Parks are popular because this is what the consumer wants.



	oo words, piease prov	ide a summary (no more than 100
words).		
d. Please detail the changes you wish to se	no mada ta tha Danasi	+ Dlan
u. Flease detail the changes you wish to se	e made to the Deposi	t Fiaii.
hanges outlined in Section 2c above.		
dd. Is the Deposit Plan sound?		
dd. Is the Deposit Plan sound? es	No	

Procedural				Con	Consistency						Coh	erenc	e & E	ffect	ivene	:SS			
P1		P2		C1		C2		С3		C4		CE		CE		CE		CE	
												1		2		3		4	

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 at a hearing session of the Public Examination? (Please	•
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	-
Policy TWR3 Para 3	
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	
Plan's adoption	
If additional documents have been provided to support your represe	ntations, please list below:

Signed: R G Roberts Dated: 25th March 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:

 $\textbf{ONLINE} - \text{By completing the electronic form at } \underline{\text{www.gwynedd.gov.uk/ldp}} \text{ or } \underline{\text{www.anglesey.gov.uk/ldp}}$

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 <u>WILL NOT BE CONSIDERED</u>

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.
С3	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.

1169-787 - TWR3





For office use only:

Representor No. 1169/787

Date received: 30 31

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, Caernarfonshire Branch c/o	
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 con	CPRW 10 Static Caravan Site Policy
Policy number (please specify)	TWR3
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	

2b. Are you object	ting or supporting the	P. Deposit Plan?	
Objecting	Г	Supporting	Qualified Support

10 TWR3 Static Caravan Sites

10.1 New Static Sites. We agree with a continuation of a moratorium on new static sites within the AONB and SLAs. We are concerned that there is a proposal to relax this in other areas, particularly in areas of eastern Llŷn abutting the northern part of the Llŷn AONB and the coast, where the risk of damaging visual impact is high. 7.3.60 notes particular concern about coastal areas, while the Landscape Sensitivity and Capacity Study (LSCS), referred to in 7.3.61 and 7.3.63, explicitly includes 'all areas that contribute to [the] setting' of the AONB and SLA as areas where it is considered 'there is typically no capacity for further static caravan/chalet park developments'. We note that the study concludes for other areas that 'there may be very limited capacity for static/chalet park developments typically comprising.. very infrequent, very small scale [defined as a maximum of 10 units], well sited, high quality developments.' (7.3.61). We therefore propose amendments to TWR3/1, as follows:

'Proposals for.. new static caravan.. sites.. will be refused within the [AONBs] .., Special Landscape Areas, and their settings,'

'In other locations proposals..., will only be granted where:' Add criterion iv 'The site is very small in scale (maximum 10 units) and more than 2 km from the coast'

10.2 Improving Static Sites. We agree with the aims of the proposals in TWR3/clauses 3 and 4 to allow minor extensions to and relocations of units within existing static caravan sites in return for genuine improvements, particularly in respect to 'significant and permanent improvements to the design, layout and appearance of the site and its setting in the surrounding landscape'. This continues policy GUDP D17, except that a guideline increase of up to 10% in original numbers will only be allowed outside the AONBs and SLAs. Our main concern is that this policy should be implemented more robustly to get effective changes on old sites, particularly with respect to the landscape impact of exposed sites. Two areas need special emphasis: (1) Landscaping to screen sites and (2) Permitted colouring of units.

CPRW 10 Page 1 of 3

10.3 Landscaping plans need to be much more thoroughly developed and scrutinised to ensure that they maximise the opportunity to reduce the visual impact of sites. They need to be open to consultation and review at an early stage in the application process and not relegated to a condition of consent for later discussion between the applicant and the planning office. The plans need to include details of how the landscaping will be maintained. The planning authority needs to demonstrate how it will monitor and enforce the proposals over time. We would therefore like to see amendments to TWR3/3 and 4 stipulating provision as part of the initial application of a detailed landscaping planting and maintenance plan, capable of monitoring over time, that demonstrates how visual impact on the landscape will be reduced.

10.4 Colour standards. Adoption of appropriate conservation colours should be a goal for all static caravans within the Plan area, starting with all new static sites and all existing sites within the AONBs and SLAs. This should be pursued through all planning applications related to static caravan sites as well as through site licensing conditions. Common practice is for site operators to require replacement of units every 10 years or so; thus all new statics should be required to conform to colouring conditions. Observation of existing static sites shows that the great majority of units now have light coloured cladding, varying from white to light green, which are generally highly obtrusive in the rural landscapes of the Plan area. The most successful colouring tends to be a dark 'sage' green exemplified by some more upmarket chalet sites. The Eryri Development Plan stipulates a range of conservation colours which appear to have been successful in limiting the visual impact of statics in Snowdonia National Park. We would therefore like to see amendments to TWR3/1,3,4 stipulating that all new statics brought on site will conform to specific agreed conservation colours appropriate to the site conditions.

CPRW 10 Page 2 of 3

2ch. If your words).	respo	nse 1	to 2c	abov	е ехс	eeds	100 v	words	, plea	se pro	ovide	a su	ımma	ry (n	o m	ore	than	100	
10.5 TWR 3 So concerned abo AONBs and wi are permitted areas in return colouring stan	out its thin 2 elsew n for p	relax km d here. genuir	ation of the We ne er	e coast agree wironr	where where with menta	. We : re the contir il imp	sugge great nuatio roven	st it is test pr in of a	maint essure guidel	ained s have ine lir	in ot bee nit of	herw n fel 10%	ise ur t, and on ex	prote that o pansi	ected only ons	d bu ven of e	iffer a y sma xistin	areas all nev g site	of the w sites s in all
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TWR3/2																			
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TWR3 Amend	7.3.6	5: ' //	nclud	ing vie	ws ou	it of 5	nowd	onia N	lation	al Park	' [add	d] 'ar	d the	AON	Bs'.				
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TWR3/1,3,4 ac the site condit		l new	stati	cs bro	ught (on site	e will	confo	rm to :	pecifi	c agr	eed (conser	vatio	n co	lour	s app	ropri	ate to
2dd. Is the I	lenne	it Pla	in co	und?							-			_	-				
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2e. If you th (Please tick													do y	ou th	ink t	that	it fa	ils?	
Procedural		-		Con	sister	ncv						Co	herer	ice &	Effe	ectiv	vene	ss	
P1	T	P2	1	C1	F	C2	F	C3	T	C4	Γ	CE		CE	-		CE	Г	CE

Rhif Sylw / Rep Id: 483

Enw / Name: Cadnant Planning (Mr Rhys Davies) [1366]

Rhan: POLISI TWR3

Section: **POLICY TWR3**

Math / Type: Gwrthwynebu / Object

Crynodeb o'r Sylw:

Mae'r polisi gystal a gwahardd rhagor o garafanau statig yn yr AHNE ac AGT. Nid yw hyn yn rhoi dim i ysgogi perchnogion a gweithredwyr i wneud mwy o wellianau i'w safleoedd. Mae'r gwaharddiad yma yn groes bolisi cynllunio cenedlaethol sy'n rhoi pwyslais cynyddol ar fudd economaidd ddaw o dwristiaeth.

Representation Summary:

The policy effectively places an embargo on additional static caravans within the AONB and SLA's. This provides no incentive to owners and operators to bring forward improvements to their sites. The effective embargo on additional caravans is contrary to National Planning Policy which places an increased emphasis on the economic benefits of tourism.

Sylw Llawn / Full Representation:

As currently drafted Policy TWR3 does not meet the tests of soundness in terms of consistency/coherence and effectiveness. It is widely recognised within national planning policy that the caravan sector and its tourism role is vitally important within, in particular rural areas. It is also acknowledged within he LDP Topic Paper on Tourism that across the caravan industry is important across the Plan area and that it provides significant contributions to the local economy. It is also acknowledged that many of the existing caravan parks are located within AONB and SLA's.

The policy effectively places an embargo on additional static caravans within these areas and, as such is contrary to National Planning Policy which places an increasing emphasis on the economic benefits of tourism.

There are many recent examples within Gwynedd and Anglesey where significant economic benefits have followed from the re-development and re-configuration of caravan sites within the AONB's and SLA's. These benefits have been delivered at sites such as Plas Coch, Capel Elen, and Porthllondy on Anglesey without detriment to the character and appearance of those areas> the proposals have effectively delivered economic benefits alongside wider upgrades to on-site facilities and environmental and biodiversity improvements.

The plan strategy of imposing an effective embargo on additional caravans is contrary to national policy and at odds with the approach taken by adjoining Local Planning Authorities such as Conwy CBC who have recognised specifically the benefits that the extension of such sites can deliver to the rural economy. PPW acknowledges at 11.2.7 that the development plan should encourage the diversification of farm enterprises and other

parts of the rural economy for appropriate tourism, sport, recreation and leisure uses. As currently drafted Policy TWR3 negates the contribution that a significant part of the rural economy can make towards rural diversification and employment.

Each application for either an extension to an existing caravan site or addition to the number of caravans on a particular site can be assessed against other policies within the plan which protect the AONB and SLA's. As such it is inappropriate to introduce this embargo within TWR3.

Added to the inappropriateness of imposing the cap on numbers of caravans within the AONB and SLA's it should be noted that sites within these areas are not likely to be subject to any environmental or other improvements as there will be no incentive or balancing benefit for site owners and operators to bring forward those improvements.

Newid(iadau) i'r Cynllun

Change(s) to the Plan

A consistent policy approach should apply to all static holiday caravan sites within Gwynedd and Anglesey regardless of whether sites are within the AONB or SLA.

Profion Cadernid / Soundness Tests: x, iii, vii, viii, ix

Rhif Sylw / Rep Id: 485

Enw / Name: Cadnant Planning (Mr Rhys Davies) [1366]

Rhan: **7.3.63**

Section: **7.3.63**

Math / Type: Gwrthwynebu / Object

Crynodeb o'r Sylw:

Nid yw para 7.3.63 yn gyson efo Polisi TWR3 sy'n caniatau estyniadau i safleoedd waeth beth yw casgliadau astudiaeth sensitifrwydd a chapasiti. Yn ychanegol, mae'n glir nad yw'r astudiaeth wedi ystyried capasiti'r ardal mewn digon o fanylder i allu dod i gasgliad nad oes 'dim capasiti' ar gyfer rhagor o ddatblygiadau carafan/ siale neu estyniadau.

Representation Summary:

Para 7.3.63 is inconsistent with Policy TWR3 which allows extensions to sites regardless of the conclusion of the sensitivity and capacity study.

Additionally, it is clear that the study has not considered the capacity of the area in such detail as to be able to conclude that there is "no capacity" for further static caravan/chalet park development or extensions"

Sylw Llawn / Full Representation:

We object to the wording of para 7.3.63. The sensitivity and capacity study has clearly not assessed the scope for additions to each site in detail. There are numerous recent examples of where extensions, including additional numbers of caravans, have been permitted on Anglesey and Gwynedd without detriment to the character and appearance of the AONB and SLA's. Many of these developments have delivered benefits to the appearance of the areas in general and also biodiversity and other environmental improvements. The text at para 7.3.63 is inconsistent with Policy TWR 3 as the policy allows extensions to sites within the AONB and SLA's in any event. However, we question the viability of these proposed extensions without an ability to increase the number of caravans.

Newid(iadau) i'r Cynllun

Change(s) to the Plan

Delete para 7.3.63

Profion Cadernid / Soundness Tests: x, iii, vii, viii, ix

Rhif Sylw / Rep Id: 486

Enw / Name: Cadnant Planning (Mr Rhys Davies) [1366]

Rhan: 7.3.64

Section: **7.3.64**

Math / Type: Gwrthwynebu / Object

Crynodeb o'r Sylw:

Dylid dileu hwn fel y nodir yn ein hymateb i TWR3.

Representation Summary:

This should be deleted as set out in our response to TWR3

Sylw Llawn / Full Representation:

This should be deleted as set out in our response to TWR3

Newid(iadau) i'r Cynllun

Change(s) to the Plan

Delete para. 7.3.64

Profion Cadernid / Soundness Tests: x, iii, vii, viii, ix





For office use only:

Representor No. 1674 /51

Date received: 3

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.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 <a

PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	Haulfryn Group Ltd	Jeremy Lambe Lambe Planning & Design Ltd
Address		
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/idp or www.anglesey.gov.uk/idp

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

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 commo	enting on?	
Policy number (please specify)	TWR3	
Paragraph number (please specify)	Point 3 of TWR3	
Proposals/ Inset Map (please specify ref no.)		
Constraints Map	1	
Appendices (please specify)		

2b. Are you object	ting or supporting the	Deposit Plan?		
Objecting	×	Supporting	T	

Zc. Please provide details of your representation on the Deposit Plan.

Existing Policy D17 of the Gwynedd UDP allows a minor increase in the number of static holiday caravan or holiday chalet units <u>within</u> the AONB, when the proposal is part of a scheme to improve the range and quality of tourist accommodation and facilities on the site. The proposed Policy TWR3 does not allow any minor increase.

In virtually all cases, to assist with funding the upgrading proposals on Holiday Parks, a minor increase in the number of static holiday caravans or holiday chalet units is required. The upgrading usually involves significant investment by the Holiday Park owner to increase spacing on the Park, improve landscaping, relocate pitches and upgrade facilities.

Policy D17 gives an incentive to upgrade. Without a minor increase to the number of pitches, it may not be possible to fund the upgrading proposals, particularly where this involves relocation of pitches to new areas, as major investment is required in locating services and additional landscaping.

Where Holiday Parks are located within the Coastal Change Management Zone (within the AONB) and relocation of pitches are required due to a "rollback" position from the shoreline, a minor increase in the number of pitches should be allowed to assist with funding the re-location of holiday pitches. At present Policy TWR3 does not allow this to happen.

Please use additional sheet if necessary.

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

	If you	ur res	spon	se to :	2c ab	ove e	xceed	ls 100	0 wor	ds, pl	ease	prov	ide a	sumi	nary	(no n	nore 1	than 1	100
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Part 3: What Happens Next?									
At this stage of the Joint LDP process, you can only representations'). However, the Inspector may call o speak to the Inspector at a 'hearing session' during t your written comments on this form will be given the at a hearing session.	on those who want to change the Plan to appear a the Public Examination. You should bear in mind th								
3a. Do you want your comments to be considered by	v 'written representations' or do you want to speal								
at a hearing session of the Public Examination? (Plea									
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.	F								
3b. If you wish to speak, please confirm which part of inspector about and why you consider it to be necessary.	sary to speak at the Hearing.								
3c. Would you like to be informed about the following									
Submission of documents and evidence to the examination K Publish Inspector's report K K									
Plan's adoption									
If additional documents have been provided to supp									
The second secon	and participations, product not not not								

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.

Dated: 30th March 2015

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

Signed:

 $\begin{tabular}{ll} \textbf{ONLINE-By completing the electronic form at $\underline{www.gwynedd.gov.uk/ldp}$ or $\underline{www.anglesey.gov.uk/ldp}$ BY $EMAIL-$\underline{planningpolicy@gwynedd.gov.uk}$ \\ \end{tabular}$

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





For office use only:

Representor No.

Date received:

Date acknowledged:

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

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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.awynedd.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	Haulfryn Group Ltd	Jeremy Lambe Lambe Planning & Design Ltd
Address		
Postcode		
Telephone Number		
Email address		

Guidance Note.

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2a. Which part of the Deposit Plan are you commenting on?								
Policy number (please specify)	TWR3							
Paragraph number (please specify)	Para 3 Point v of TWR3							
Proposals/ Inset Map (please specify ref no.)								
Constraints Map								
Appendices (please specify)								

2b. Are you objecting or supporting the Deposit Plan?						
Objecting	汶	Supporting	T			

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

Where Holiday Caravan Parks are located within the Coastal Change Management Zone and within the AONB / Special Landscape Area, then a specific section should be included within Policy TWR3 that allows a minor increase to the number of pitches, as part of a proposal that relocates pitches away from the shoreline affected by rising sea levels.

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The potential loss of Holiday Caravan pitches due to rising sea levels therefore needs to be addressed, with the relocation of pitches as an extension of area (to a less vulnerable location) and a minor increase in pitch numbers as enabling development.

Please use additional sheet if necessary.

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

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representations'). However, the Inspector may call o speak to the Inspector at a 'hearing session' during t your written comments on this form will be given the at a hearing session.	he Public Examination. You should bear in mind that
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	
I do not want to speak at a hearing session and am happy for my written comments to be considered by the Inspector.	TX .
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3b. If you wish to speak, please confirm which part o inspector about and why you consider it to be necess	sary to speak at the Hearing.
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Publish Inspector's report	lý.
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Completed representation forms should be returned to the Joint Planning Policy Unit at:

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

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THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN
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For office use only:

Representor No. 1674/739

Date received: 31 3 15 ebs2

Date acknowledged:

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

Data Protection

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PART 1: Contact details

	-Your details/ Your client's details	Agent's details (if relevant)
Name	Haulfryn Group Ltd	Jeremy Lambe Lambe Planning & Design Ltd
Address		
Postcode		
Telephone Number		
Email address		

Guidance Note.

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Policy number (please specify)	TWR3	
Paragraph number (please specify)	Para 3 Point v of TWR3	
Proposals/ Inset Map (please specify ref no.)		
Constraints Map		
Appendices (please specify)		

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Objecting	区	Supporting	r	

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Please use additional sheet if necessary.

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

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3c. Would you like to be informed about the following		t boxes)
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Publish Inspector's report		X
Plan's adoption		K
If additional documents have been provided to supp	ort your representations,	please list below:

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Dated: 30th March 2015

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Signed:

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Name	Haulfryn Group Ltd	Jeremy Lambe Lambe Planning & Design Ltd
Address		
Postcode		
Telephone Number		
Email address		

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Policy number (please specify)	TWR3							
Paragraph number (please specify)	Point 3 of TWR3	-						
Proposals/ Inset Map (please specify ref no.)								
Constraints Map								
Appendices (please specify)								

2b. Are you objecting or supporting the Deposit Plan?					
Objecting	X	Supporting	1		

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

Existing Policy D17 of the Gwynedd UDP allows a minor increase in the number of static holiday caravan or holiday chalet units <u>within</u> the AONB, when the proposal is part of a scheme to improve the range and quality of tourist accommodation and facilities on the site. The proposed Policy TWR3 does not allow any minor increase.

In virtually all cases, to assist with funding the upgrading proposals on Holiday Parks, a minor increase in the number of static holiday caravans or holiday chalet units is required. The upgrading usually involves significant investment by the Holiday Park owner to increase spacing on the Park, improve landscaping, relocate pitches and upgrade facilities.

Policy D17 gives an incentive to upgrade. Without a minor increase to the number of pitches, it may not be possible to fund the upgrading proposals, particularly where this involves relocation of pitches to new areas, as major investment is required in locating services and additional landscaping.

Where Holiday Parks are located within the Coastal Change Management Zone (within the AONB) and relocation of pitches are required due to a "rollback" position from the shoreline, a minor increase in the number of pitches should be allowed to assist with funding the re-location of holiday pitches. At present Policy TWR3 does not allow this to happen.

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

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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.																			
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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.	IX				
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Submission of documents and evidence to the examination	<u> </u>
Publish Inspector's report	×
Plan's adoption	×
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	550000
Signed: Dated: 30th	March 2015
K YOU FOR YOUR COMMENTS ON TH	25000000

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Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: 222

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

Rhan: POLISI TWR3

Section: **POLICY TWR3**

Math / Type: Cefnogi / Support

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 cyfleoedd llety, gwersyllfeydd, cabanau coed a meysydd carafanau lle bo'n briodol

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 hotel opportunities, camping sites, woodland lodges and caravan parks 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 hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate.

Newid(iadau) i'r Cynllun	
Change(s) to the Plan	

Profion Cadernid / Soundness Tests: None