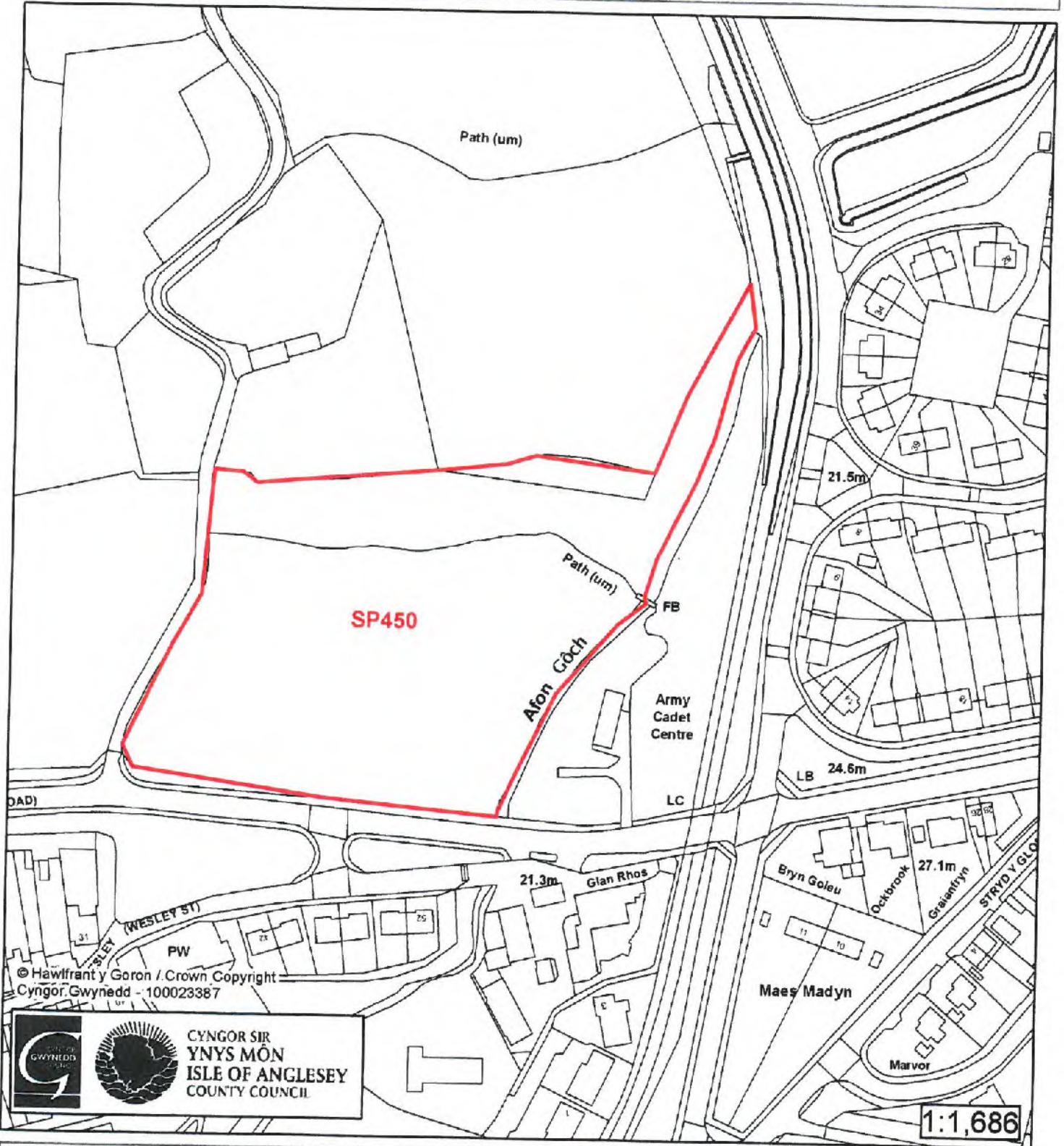


# Cynllun Datblygu Lleol ar y Cyd Joint Local Development Plan

## Cofrestr Safle Posib / Candidate Site Register



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Cyngor Gwynedd - 100023387



**CYNGOR SIR  
YNYS MÔN  
ISLE OF ANGLESEY  
COUNTY COUNCIL**

1:1,686

Cyfeirnod/ Reference	: SP450
Enw'r Safle / Site Name	: Rhos Place, Tir oddi ar Lon Parys/Land off Parys Road
Lleoliad / Location	: Amlwch
Cyfeirnod Grid / Grid Reference	: 445 932
Maint (ha) / Size (ha)	: 1.48
Defnydd â Awgrymir / Suggested Use	: Cymysg / Mixed

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p>For office use only:</p> <p>Representor No.</p> <p>Date received: 31/3/15</p> <p>Date acknowledged:</p>
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**Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026  
Representation Form**

**Data Protection**

How your representation and the information that you give us will be used. All information submitted will be seen in full by the Joint Planning Policy Unit staff dealing with the Joint Local Development Plan (Joint LDP). Your name and comments as set out in your representation form will be published together with the Councils' response. This helps to show that the consultation was carried out properly. Please note that this form may also be made available to any Public Examination on the Joint LDP.

We would prefer that you submit your representations directly online. Alternatively, an electronic version of this form can be completed online at [www.gwynedd.gov.uk/ldp](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://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](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://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	Dafydd Ioan Hughes	
Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	
Email address	[REDACTED]	

### Guidance Note.

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

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

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

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

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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)

<b>2a. Which part of the Deposit Plan are you commenting on?</b>	
Policy number (please specify)	TAI 14
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	2 Amlwch
Constraints Map	
Appendices (please specify)	

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

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

The reason for my objection is as follows in that from a consistency basis the Rhos Place development is an ideal "alternative site" to maximise the land footprint available as part of the Deposit plan. Amlwch has been designated as a primary growth area as part of the overall development plan and this particular site lends itself to mirror the SP561 development and allow for an infilling development which would enhance both the landscape, infrastructure and provide a much needed mixture of housing development right in the middle of Amlwch. Access to the highway and amenities are all walking distance and the Sustainability Matrix addresses the 11 key points.

There appears also to be planning history on this particular site in that in January 1978 Angelsey Borough Council granted themselves deemed permission as housing authority in respect of this particular site reaffirming the land's suitability for residential development.

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

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

N/A

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

Include Rhos Place SP450 based on 2c detail and SP450 Sustainability matrix

**2dd. Is the Deposit Plan sound?**

Yes  No

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

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

### Part 3: What Happens Next?

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

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

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



I want to speak at a hearing session.



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

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

Submission of documents and evidence to the examination



Publish Inspector's report



Plan's adoption



**If additional documents have been provided to support your representations, please list below:**

Letter Submission

SP450 Sustainability Appraisal Matrix

SP450 Site Plan

Signed:

Dated: 30/03/15

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.*

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

**ONLINE** – By completing the electronic form at [www.gwynedd.gov.uk/ldp](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp)

**BY EMAIL** – [planningpolicy@gwynedd.gov.uk](mailto:planningpolicy@gwynedd.gov.uk)

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

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

## Test of Soundness

Test	Procedural Tests
<b>P1</b>	It has not been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme.
<b>P2</b>	The plan and its policies have not been subjected to Sustainability Appraisal including Strategic Environmental Assessment.
	Consistency Tests
<b>C1</b>	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.
<b>C2</b>	It does not have regard to national policy.
<b>C3</b>	It does not have regard to the Wales Spatial Plan.
<b>C4</b>	It does not have regard to the relevant community strategy.
	Coherence and Effectiveness Tests
<b>CE1</b>	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.
<b>CE2</b>	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.
<b>CE3</b>	There are no clear mechanisms for implementation and monitoring.
<b>CE4</b>	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.

## Sustainability Appraisal Matrix

Site Name: Rhos Place, Tir oddi ar Lon Parys / Land off Parys Road

Grid Reference: 445 932

Site Area: 1.48

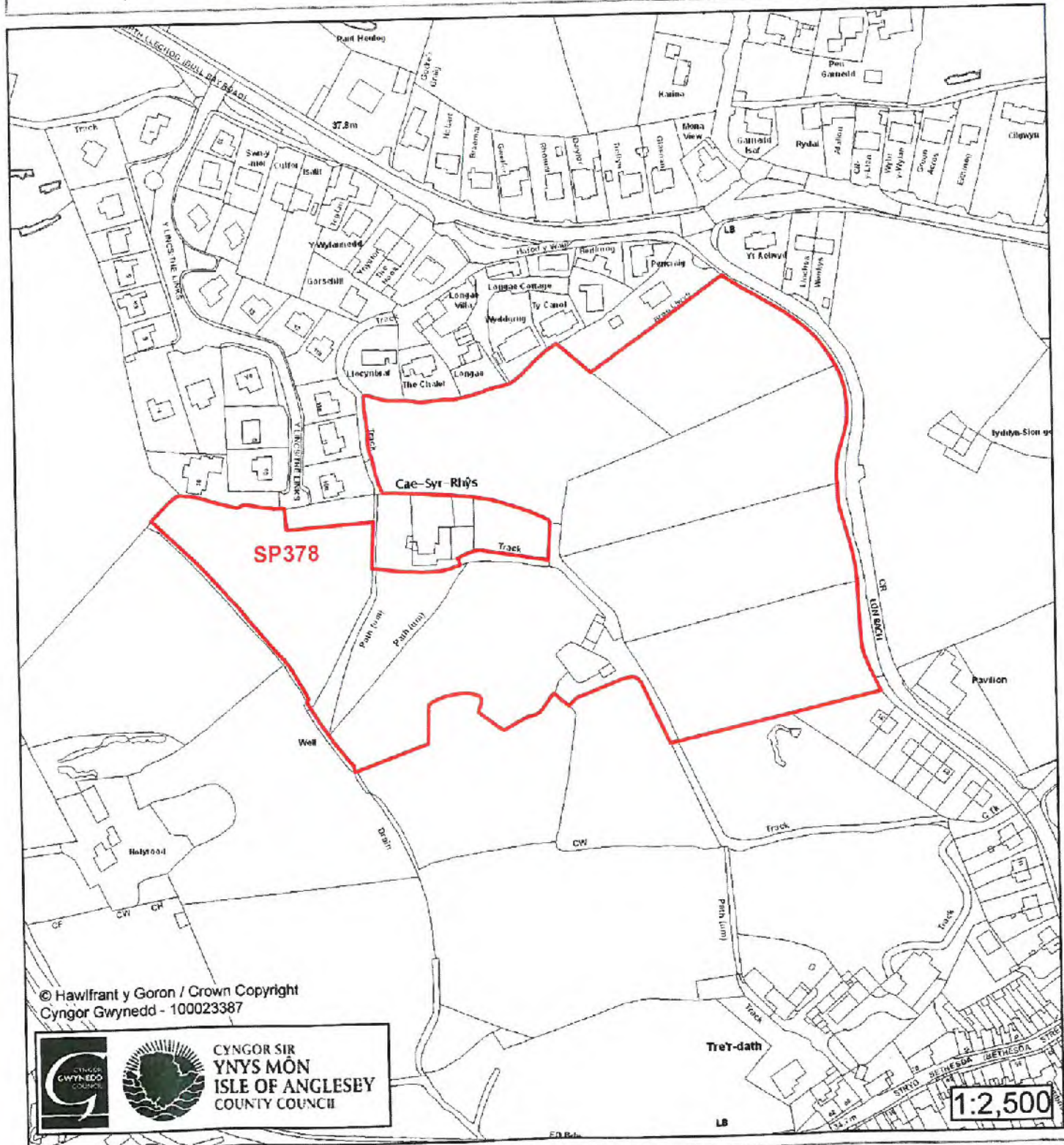
SA Objective	Assessment	Summary
1. Maintain and enhance biodiversity interests and connectivity (SEA Topics: biodiversity, fauna, flora, soil)	+	The site will contribute towards this SA Objective because it will not have any detrimental effect on trees and hedgerows. However, it will also give an opportunity to enhance the environment where practical with the appropriate architectural landscaping design.
2. Promote community viability, cohesion, health and well being (SEA Topics: human health, population)	++	The site will contribute towards this SA Objective because of its prime location in the centre of Amlwch lending itself to enhancing and enriching the community in blending into the current landscape and at the same time contributing to the local economy. Access to local services and amenities is in walking distance.
3. Manage and reduce the impacts of climate change by promoting and supporting mitigation and adaptation measures (SEA Topics: climatic factors, air)	+	The site will contribute towards this SA Objective because of the prime location within the centre of Amlwch with access direct onto the public highway. This would assist in reducing the congestion in the centre of Amlwch itself and allowing the development footprint for a small to medium size development but at the same time addressing an area which historically has been an eye sore within Amlwch and would support and encourage an energy efficient and climate change resilient.
4. Conserve, promote and enhance the Welsh language (SEA Topic: cultural heritage)	0	The site will contribute towards this SA Objective because it would provide the opportunity to cement and enhance the Welsh Language in retaining young families within Amlwch who would in turn contribute



		and take part in the community.
5. Conserve, promote and enhance cultural resources and historic heritage assets ( <i>SEA Topic: cultural heritage</i> )	++	The site will contribute towards this SA Objective because it will remove an area which has been considered an eye-sore for a number of years. It would make a major difference in enhancing the infrastructure views within the area as well as contributing to the local economy.
6. Support economic growth and facilitate a vibrant, diversified economy providing local employment opportunities ( <i>SEA Topic: Population</i> )	++	The site will contribute towards this SA Objective both in supporting the local economy by the development of the site itself, but more importantly will allow for the community to enhance and develop in providing quality housing and providing a much needed local employment opportunities. A prime location which has excellent access to the highway and walking distance to all public and retail services within Amlwch. In addition all infrastructure services are available within easy reach of the site for connection purposes.
7. Provide good quality housing, including affordable housing that meets local needs ( <i>SEA Topic: population, human health</i> )	++	The site will contribute towards this SA Objective because it will both provide an improvement in quality and availability of housing stock for deprived communities but also deliver affordable housing with minimal impact on the environment. Access to the highway, local services and local utility connection is excellent.
8. Value, conserve and enhance the plan area's rural landscapes and urban townscapes ( <i>SEA Topics: landscape</i> )	++	The site will contribute towards this SA Objective because it would remove an eye sore and would allow for regeneration. At the same time care would be taken to ensure that the development would be appropriate and sensitively integrated with the landscape

		and townscape character of the plan area.
9. Use land and mineral assets efficiently and promote mechanisms for waste minimisation, re-use and recycling <i>(SEA Topic: material assets, soil)</i>	++	The site will contribute towards this SA Objective because it would remove an eye sore and would allow for regeneration and stop the current practice of fly tipping and the knock on environmental impact etc. In addition the land is of poor agricultural quaiity
10. Promote and enhance good transport links to support the community and the economy <i>(SEA Topic: population, human health)</i>	++	The site will contribute towards this SA Objective because of its prime location within Amlwch. Infrastructure links are already in place to access the main site but also allows options and flexibility for people to use public transport where appropriate.
11. Safeguard water quality, manage water resources sustainability and minimise flood risk <i>(SEA Topic: water, biodiversity)</i>	++	The site will contribute towards this SA Objective because it allows the opportunity to safeguard this and other areas of Amlwch in improving the water defences to what is only a minor risk, but by developing the land it in effect allows to reduce the risk even further with appropriate infrastructure in place.

# Cynllun Datblygu Lleol ar y Cyu Joint Local Development Plan Cofrestr Safle Posib / Candidate Site Register



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Cyngor Gwynedd - 100023387



Cyfeirnod / Reference	: SP378
Enw'r Safle / Site Name	: Cae Syr Rhys
Lleoliad / Location	: Amlwch
Cyfeirnod Grid / Grid Reference	: 434 929
Maint (ha) / Size (ha)	: 4.26
Defnydd & Awdurdod / Suggested Use	: Tei / Housing



CYNGOR SIR  
YNYS MÔN  
ISLE OF ANGLESEY  
COUNTY COUNCIL

For office use only:

Representor No.

Date received:

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	Mr Lloyd Williams	2837 (ref). Owain Evans
Address		Russell Hughes C/A
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.

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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)

<b>2a. Which part of the Deposit Plan are you commenting on?</b>	
Policy number (please specify)	Tai 14.
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	AMCWCH INSET 2.
Constraints Map	
Appendices (please specify)	

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

<b>2c. Please provide details of your representation on the Deposit Plan.</b>
<p>PLEASE SEE ATTACHED DOCUMENT IN SUPPORT OF OUR OBJECTION / AMENDMENT.</p>
<p style="text-align: right;"><i>Please use additional sheet if necessary. Please state how many additional sheets have been used.....</i></p>

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

MY CLIENT - MR WILLIAMS HAS A PLOT OF DEVELOPMENT LAND ADJACENT TO A JLDP CONSIDERED SITE AMLWCH - T10. WE BELIEVE THAT INCLUDING THIS SITE WOULD IMPROVE THE HOUSING POLICY TAI 14.  
SEE THE ATTACHED APPRAISAL.

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

PLEASE INCLUDE THIS ARE OF LAND WITHIN POLICY TAI 14.

2dd. Is the Deposit Plan sound?

Yes  No

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

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

## 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.



**Part 3: What Happens Next?**

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

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

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



I want to speak at a hearing session.



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

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

Submission of documents and evidence to the examination



Publish Inspector's report



Plan's adoption



**If additional documents have been provided to support your representations, please list below:**

CON EACH APPRAISAL

Signed:



Dated:

30/3/15

**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.*

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

**ONLINE** – By completing the electronic form at [www.gwynedd.gov.uk/ldp](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp)

**BY EMAIL** – [planningpolicy@gwynedd.gov.uk](mailto:planningpolicy@gwynedd.gov.uk)

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

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

## **DEVELOPMENT LAND AT LON BACH, AMLWCH.**



### **Area and Description**

- 5.8 ha site adjacent to Lon Bach, Amlwch.
- To the North is the main access route to the site leading off the A5025. Here we propose some traffic calming and an improved access.
- To the south of the site lies the Local School, Ysgol Syr Thomas Jones which is within walking distance.
- East of the site lies the local Football Team Ground and Leisure Facilities.
- The town centre is within easy walking distance, with access to the new health centre, and local shops and supermarket.
- Overall this area present is an open parcel of land which is flanked on three sides by residential development with good access to local facilities, the site adjacent to the site is being considered within the current plan and is known as T10

### **Housing Potential**

- The housing potential of this parcel of land has been assessed and is considered to have potential for housing development. All main services are present within the site or within the adjacent road. The proposals would contribute to the housing need in the area and during the plan period.

### **Land Availability**

- The land proposed is available for development during the plan period.
- Land Area is 5.8ha
- The area is semi rural with small and medium sized fields bounded by predominantly trimmed hedgerows with occasional trees. To the North of the site lies the Links Housing development. A minor road runs along the edge of the site known as Lon Bach. Development is contained to the North and South by Housing creating a physical connection to the urban area.

## Development.

- Site Area 5.8ha
- Density 24.1 DPH
- Housing No 140
- Land adjacent to allocated site
- Green spaces
- Football ground parking
- Road improvements



KEY		
■	2 Bed Terrace	10 No
■	3 Bed Terrace	13 No
■	3 Bed Semi Detached	19 No
■	3 Bed Detached	52 No
■	4 Bed Detached	30 No
■	3 Bed Bungalow	10 No
		TOTAL 140

### **Landscape Impacts**

- Development within this dip would have a low impact on this landscape setting to the urban area. Development would involve the retention of existing hedgerows and trees.
- The site is adjacent to the existing housing development known as the links, creating an urban environment within this area.

### **Visual Impacts**

- Development would have a low impact on views from existing developments and other public rights of way in the area.
- The site is within a dip in the land formation, thus alleviating the impact.

### **Mitigation**

- Due to the low visual prominence of this area we propose to use the existing hedgerow and trees as mitigation.

### **Nature Conservation**

#### **Existing Conditions**

- There are several trees and hedges in the proposed site together with stone walls.
- The area is generally grazing grassland, with minimum ecological value.



### **Impacts**

- Development would not have minor effects on the existing hedges and trees.
- The grassland which is of low ecological value will be lost.

### **Mitigation**

- Buffer areas would be planted to enhance the site.
- Retention of key hedgerows and trees.

### **Suitability**

- Flood risk is a key issue. The entire site falls outside the zone of risk from Rivers or the Sea.

### **Highways**

- Redevelopment in this area offers the opportunity to improve road safety.
- Improvements to Lon Bach.
- Provide much needed Football Stadium parking.
- Parking should be provided as part of any redevelopment.

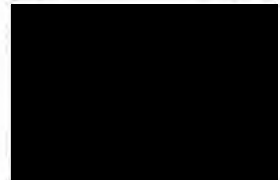
### **Availability and Achievability**

- The site is in Private ownership and is immediately available for development.
- Potential for phased development.
- Retention of suitable level of parking capacity.
- Flood risk mitigation strategy. No Flood Risk
- Ground conditions; geotechnical, contamination and archaeological studies are need establish whether there are additional constraints but on visual inspection there is no evidence.
- Achieve national densities.



**HOW**

HOW Planning LLP



Your Ref:  
Our Ref EW/GH/P11656

14<sup>th</sup> May 2015

Joint Planning Policy Unit  
1<sup>st</sup> Floor  
Bangor City Council Offices  
Ffordd Gwynedd  
Bangor  
Gwynedd  
LL57 1DT

Dear Sir/ Madam,

**EMERGING ANGLESEY AND GWYNEDD DEPOSIT JOINT LOCAL DEVELOPMENT PLAN 2011-2026**

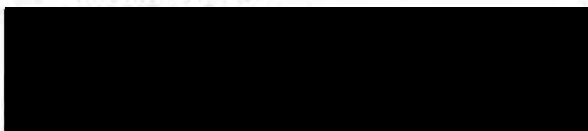
I am writing to you regarding the enclosed representations which were made in March 2015 to the emerging Deposit Joint Local Development Plan 2011-2026 by Mr Owain Evans on behalf of Mr Lloyd Williams and relate to development land at Lon Bach, Amlwch. The site, which is owned by Mr Lloyd Williams is shown on the enclosed JLDP candidate site register plan under site reference SP378 (Cae Syr Rhys).

HOW Planning are now acting on behalf of a developer who have entered in to a legal agreement with the land owner and we will now be taking forward the objections to the Deposit Plan which were made by Mr Evans on 30<sup>th</sup> March 2015. Within the enclosed representations Mr Evans opted not to speak at a hearing session, however in order to secure our client's objectives we now wish to participate in all further stakeholder engagement and JLDP hearing sessions.

I would be grateful if you could confirm receipt of this letter and provide me with written confirmation that HOW Planning can be invited to participate in all future stakeholder engagement and hearing sessions relating to the emerging JLDP.

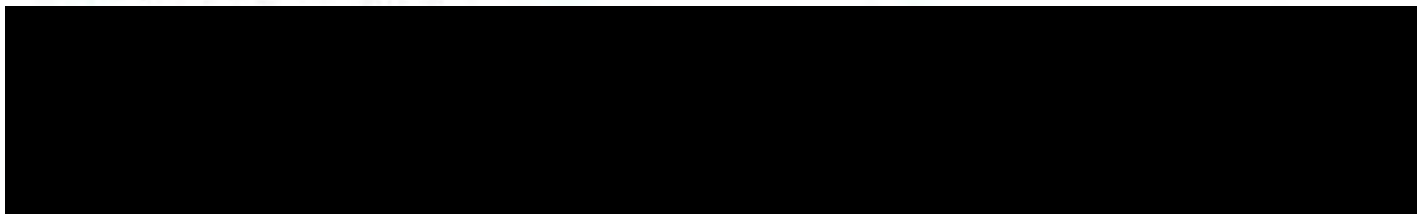
Your sincerely,

**Emma Williams**  
**Graduate Planner**



Cc. Gary Halman – HOW Planning  
Enc. Anglesey and Gwynedd Deposit Joint Local Plan 2011 – 2026 Representation Form

Planning and Environmental Advisers



Joint Local Development Plan Candidate Site Register (site ref. SP378 – Cae Syr Rhys)



CYNGOR SIR  
YNYS MÔN  
ISLE OF ANGLESEY  
COUNTY COUNCIL

Uned Polisi Cynllunio ar y Cyd Gwynedd & Môn  
Joint Planning Policy Unit Anglesey & Gwynedd  
Swyddfeydd Cyngor Dinas Bangor City Council  
Offices  
Ffordd Gwynedd  
Bangor  
Gwynedd. LL57 1DT

Uned Polisi Cynllunio ar y Cyd Gwynedd & Môn  
Joint Planning Policy Unit Anglesey & Gwynedd

☎ (01286) 685003

🌐 [www.ynysmon.gov.uk](http://www.ynysmon.gov.uk)  
🌐 [www.gwynedd.gov.uk](http://www.gwynedd.gov.uk)

Emma Williams  
Graduate Planner  
HOW Planning LLP

\* COPI \*

Gofynnwch am / Ask for: Rhodri Owen  
☎ (01286) 679532

✉ [REDACTED]

Ein Cyf / Our Ref: 2838/3309: 1395  
Eich Cyf / Your Ref: [REDACTED]

Dyddiad / Date: 22<sup>nd</sup> June, 2015

Dear Ms. Williams

**Re: Emerging Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026: Cae Syr Rhys, Amlwch**

I confirm the receipt of your letter dated 14<sup>th</sup> May, 2015 to the Anglesey and Gwynedd Joint Planning Policy Unit (JPPU) with regards to the land owned by Mr Lloyd Williams in Amlwch (Candidate Site reference number: SP378 – Cae Syr Rhys). I also refer to our subsequent telephone conversation in relation to the matter.

Specifically you noted that HOW Planning will now be responsible for the objections submitted in relation to the above site within the consultation period for the Deposit Joint Local Development Plan. You required confirmation that HOW Planning will now, as such, be invited to participate in all future stakeholder engagement and hearing sessions (that relates to the site) within the emerging JLDP.

It is noted that the information contained within the relevant database has been amended to include HOW Planning as the agent responsible for this representation. To this extent, I can confirm that HOW Planning will therefore receive any relevant correspondence from the Joint Planning Policy Unit and the Public Examination Programme Officer (who will be appointed in due course) with regards to this site, for the remainder of the plan making process.

The JPPU have been inputting all the representations received during the consultation period for the Deposit JLDP into a database. As the agents responsible for this objection, you will shortly be receiving confirmation that the representation has been registered by the JPPU. An unique representation reference number will also be given at this time, which should be referred to in any future correspondence. It is anticipated that the 5<sup>th</sup> Edition of the Joint Local Development Plan Newsletter will be issued during July 2015. This will provide: an update about the public consultation, a description of the next stages, as well as a timetable for taking the Plan forward to adoption.

Yours sincerely

**Rhodri Owen**  
**Senior Planning Officer (Policy)**

Prif Swyddfeydd / Head Office  
Cyngor Gwynedd / Gwynedd Council  
Swyddfeydd Cyngor / Council Office  
CAERNARFON  
Gwynedd LL57 1SH  
(01286) 771000



**RECEIVED**  
 15 MAY 2015

	 <p> <b>CYNGOR SIR          YNYS MÔN          ISLE OF ANGLESEY          COUNTY COUNCIL</b> </p>	<p><i>For office use only:</i></p> <p>Representor No. _____</p> <p>Date received: _____</p> <p>Date acknowledged: _____</p>
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**Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026  
Representation Form**

**Data Protection**

How your representation and the information that you give us will be used. All information submitted will be seen in full by the Joint Planning Policy Unit staff dealing with the Joint Local Development Plan (Joint LDP). Your name and comments as set out in your representation form will be published together with the Councils' response. This helps to show that the consultation was carried out properly. Please note that this form may also be made available to any Public Examination on the Joint LDP.

We would prefer that you submit your representations directly online. Alternatively, an electronic version of this form can be completed online at [www.gwynedd.gov.uk/ldp](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp) Separate forms should be completed for each comment that you wish to make.

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**PART 1: Contact details**

	Your details/ Your client's details	Agent's details (if relevant)
<b>Name</b>	Mr Lloyd Williams	2837 (re)). Cwain Evans
<b>Address</b>		Rhydolwynnau Cefn <div style="background-color: black; width: 100%; height: 100px; margin-top: 5px;"></div>
<b>Postcode</b>		
<b>Telephone Number</b>		
<b>Email address</b>		

#### 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](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp)

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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)

<b>2a. Which part of the Deposit Plan are you commenting on?</b>	
Policy number (please specify)	Tai 14.
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	AMCWCH INSET 2.
Constraints Map	
Appendices (please specify)	

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

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

PLEASE SEE ATTACHED DOCUMENT IN SUPPORT OF OUR OBJECTION / AMENDMENT.

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

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

MY CLIENT - MR WILLIAMS HAS A PLOT OF DEVELOPMENT LAND ADJACENT TO A JLDP CONSIDERED SITE ANLUWCH - T10. WE BELIEVE THAT INCLUDING THIS SITE WOULD IMPROVE THE HOUSING POLICY TAI 14.  
SEE THE ATTACHED APPRAISAL.

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

PLEASE INCLUDE THIS AREA OF LAND WITHIN POLICY TAI 14.

2dd. Is the Deposit Plan sound?

Yes  No

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

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

### 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.
	<b>Consistency Tests</b>
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.
	<b>Coherence and Effectiveness Tests</b>
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.

**Part 3: What Happens Next?**

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

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

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



I want to speak at a hearing session.



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

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

Submission of documents and evidence to the examination



Publish Inspector's report



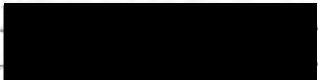
Plan's adoption



**If additional documents have been provided to support your representations, please list below:**

LION BACH APPRAISAL

Signed:



Dated:

30/3/15

**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.*

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

**ONLINE** – By completing the electronic form at [www.gwynedd.gov.uk/ldp](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp)

**BY EMAIL** – [planningpolicy@gwynedd.gov.uk](mailto:planningpolicy@gwynedd.gov.uk)

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

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

## **DEVELOPMENT LAND AT LON BACH, AMLWCH.**



### **Area and Description**

- 5.8 ha site adjacent to Lon Bach, Amlwch.
- To the North is the main access route to the site leading off the A5025. Here we propose some traffic calming and an improved access.
- To the south of the site lies the Local School, Ysgol Syr Thomas Jones which is within walking distance.
- East of the site lies the local Football Team Ground and Leisure Facilities.
- The town centre is within easy walking distance, with access to the new health centre, and local shops and supermarket.
- Overall this area present is an open parcel of land which is flanked on three sides by residential development with good access to local facilities, the site adjacent to the site is being considered within the current plan and is known as T10

### **Housing Potential**

- The housing potential of this parcel of land has been assessed and is considered to have potential for housing development. All main services are present within the site or within the adjacent road. The proposals would contribute to the housing need in the area and during the plan period.

### **Land Availability**

- The land proposed is available for development during the plan period.
- Land Area is 5.8ha
- The area is semi rural with small and medium sized fields bounded by predominantly trimmed hedgerows with occasional trees. To the North of the site lies the Links Housing development. A minor road runs along the edge of the site known as Lon Bach. Development is contained to the North and South by Housing creating a physical connection to the urban area.

## Development.

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- Density 24.1 DPH
- Housing No 140
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		TOTAL 140



### **Landscape Impacts**

- Development within this dip would have a low impact on this landscape setting to the urban area. Development would involve the retention of existing hedgerows and trees.
- The site is adjacent to the existing housing development known as the links, creating an urban environment within this area.

### **Visual Impacts**

- Development would have a low impact on views from existing developments and other public rights of way in the area.
- The site is within a dip in the land formation, thus alleviating the impact.

### **Mitigation**

- Due to the low visual prominence of this area we propose to use the existing hedgerow and trees as mitigation.

### **Nature Conservation**

#### **Existing Conditions**

- There are several trees and hedges in the proposed site together with stone walls.
- The area is generally grazing grassland, with minimum ecological value.



### **Impacts**

- Development would not have minor effects on the existing hedges and trees.
- The grassland which is of low ecological value will be lost.

### **Mitigation**

- Buffer areas would be planted to enhance the site.
- Retention of key hedgerows and trees.

### **Suitability**

- Flood risk is a key issue. The entire site falls outside the zone of risk from Rivers or the Sea.

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- Improvements to Lon Bach.
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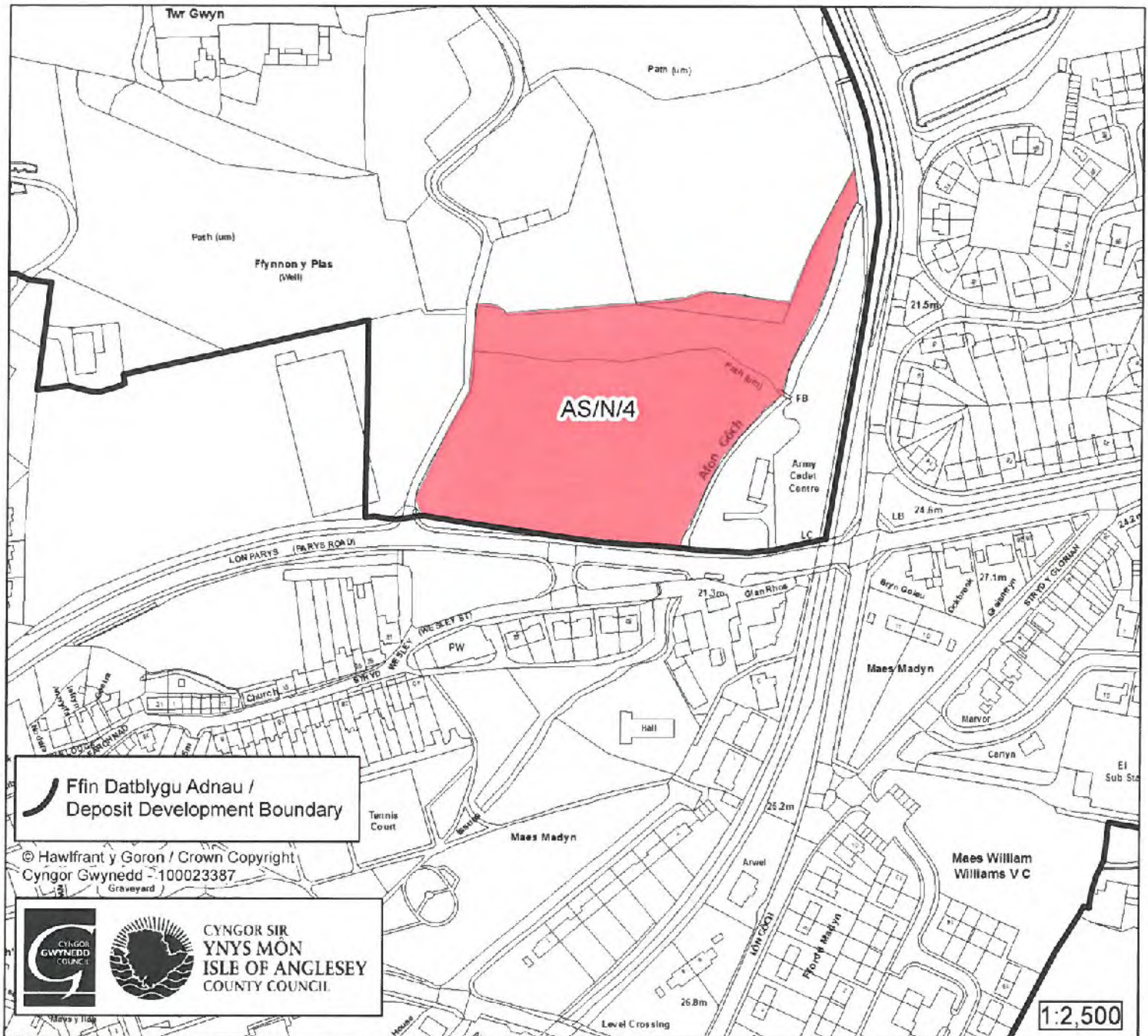
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- Flood risk mitigation strategy. No Flood Risk
- Ground conditions; geotechnical, contamination and archaeological studies are need establish whether there are additional constraints but on visual inspection there is no evidence.
- Achieve national densities.

3115-3116-931

**Cynllun Datblygu Lleol ar y Cyd Gwynedd a Môn**  
**Anglesey and Gwynedd Joint Local Development Plan**  
**2011- 2026**

**COFRESTR SAFLEOEDD AMGEN / ALTERNATIVE SITES REGISTER**



**Ffin Datblygu Adnau /**  
**Deposit Development Boundary**

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Cyngor Gwynedd - 100023387



**Math o Safle Amgen / Alternative Site Type: SAFLE NEWYDD / NEW SITE**

- Cyfeirnod / Reference: AS/N/4**
- Enw'r Safle / Site Name: Tir yn / Land at Lon Parys**
- Lleoliad / Location: Amlwch**
- Cyngor Cymuned / Community Council: Amlwch**
- Maint (ha) / Size (ha): 1.47**
- Defnydd Amgen â Awgrymir / Suggested Alternative Use: Cymysg / Mixed**

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p><i>For office use only:</i></p> <p>Representor No.</p> <p>Date received:</p> <p>Date acknowledged:</p>
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**Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026  
Representation Form**

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**PART 1: Contact details**

	Your details/ Your client's details	Agent's details (if relevant)
Name	Hugh Rowlands	Owen Rowlands
Address	[REDACTED]	
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.

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

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

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

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

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

2a. Which part of the Deposit Plan are you commenting on?	
Policy number (please specify)	TAI 14
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	2 Amlwch
Constraints Map	
Appendices (please specify)	

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

2c. Please provide details of your representation on the Deposit Plan.
<p>We are objecting on the basis that Land at Rhos Place (SP450) should be included within the development plan based on the following arguments</p> <p>We disagree with NRW assessment that the majority of the site is under flood zone 2, this is not the case the site is only <b>partially</b> covered by flood zone 2 (majority would be 51% or more). Plus flood zone 2 is classed as at medium risk of flooding from an extreme event with a 1%-0.1% annual probability, based on our local knowledge this probability is even less for this area, and any now flooding in this area would have an even greater risk to other parts of Amlwch as shown on the flood risk map.</p> <p>The site would also require some levelling work, which would mean that the area currently under flood zone 2 would not exist any longer as the surrounding area is on higher ground.</p> <p>Development of the site would also enhance the drainage system within Amlwch, and thus not only reducing the potential for flood risk at this site, but also the risk for the rest of Amlwch under flood zone 2 &amp; 3.</p> <p>Plus how much weighting can be placed on the flood risk map, anybody who knows the area of Amlwch are aware that the land SP245 at Madyn Farm is subject to flooding during extreme weather, however the flood risk map does not show this and the site has been included for development. Based on this it is suggested that a site specific appraisal should be carried out, or as mentioned in Topic Paper 1A assessing the candidates section 3.5 p18 under SP450 NRW mention that if the site was to be included a Strategic Flood Consequence assessment should be carried out beforehand.</p> <p>In comparison to other sites included in the development plan this site offers much greater scope for enhancement to the Town of Amlwch especially with site SP561 included for development, there would be less infrastructure costs and disturbance to the current residents, and with the reduce infrastructure costs the site could provide much greater affordable housing.</p> <p>Development of the site would also enhance and reduce any potential flood risk not only to the site, but also to the rest of Amlwch. Improvement to the drainage and river banks would need to take place regardless in order to accommodate the additional surface water from the development at site SP561. Including SP450 would allow the required infrastructure development costs at SP561 to be Shared, thus reducing the cost per house developed. This is also true regarding the infrastructure cost for transport access, this site along with SP561 has excellent access to a quality public road, with minimal costs and disturbance to the area, unlike the proposed development sites SP900 &amp; SP995 which would require huge transport developments at great cost and disturbance to the residents of Amlwch.</p> <p>Development of the site would also eliminate the current eyesore at the site, which if not developed</p>

would reduce the attractiveness of any development at site SP561, who wants to buy a house next to a site where fly tipping occurs? It makes perfect sense to include SP450 in the development plan along with SP561 as both sites would be developed as one.

Last argument is the inconsistency in the assessment of the site, how the Built Environment state that at site SP561 *'Any development at this site would have to be sympathetic as to not harm and impede outward views from the designated Conservation Area defined in the CACA SPG as being significant'* Whereas for SP450 they state that the site is *'Unsuitable for housing as it would harm and impede outward views from the designated Conservation Area defined in the CACA SPG as being significant'*. How can this be when both sites are located next to each other, with SP561 being on higher ground, thus you would thought to have a greater impact/harm on any outward views.

To summarise development of this site would only enhance the town of Amlwch in all aspects as shown in the attached Sustainable Appraisal Matrix.

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

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

The site is in a perfect location for development especially with the inclusion of site SP561, it would enhance all aspects of Amlwch and remove the current eyesore that affects Amlwch and the future development of SP561 (who wants to buy a house next to a site for fly tipping!!).

It would provide much needed affordable housing, with the minimum transport infrastructure development costs and disturbance to the residents. Any infrastructure development required for drainage works would only reduce the potential of flood risk not only to the site but also the rest of Amlwch.

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

Based on the arguments provided in 2. C and 2. Ch above along with the Sustainable Appraisal Matrix, we wish that site SP450 land at Rhos Place be included in the development plan as an alternative site, especially as Amlwch requires the development of 530 residents, with an estimate of 30 houses per hectar Amlwch would require a minimum of 18 hectars, and that is if all of the land is available for development. Looking at the list of proposed sites these come nowhere near the required 18 ha.

It is therefore clear to see that there is a need for alternative sites in Amlwch and SP450 land at Rhos Place is a perfect site for development in all aspects.



<b>2dd. Is the Deposit Plan sound?</b>																			
Yes				<input type="checkbox"/>				No				<input checked="" type="checkbox"/>							
<b>2e. If you think that the Deposit Plan is unsound which test of soundness do you think that it fails?</b> (Please tick below). <i>More details are provided at the back of this form.</i>																			
<b>Procedural</b>				<b>Consistency</b>								<b>Coherence &amp; Effectiveness</b>							
<b>P1</b>	<input type="checkbox"/>	<b>P2</b>	<input type="checkbox"/>	<b>C1</b>	<input type="checkbox"/>	<b>C2</b>	<input type="checkbox"/>	<b>C3</b>	<input type="checkbox"/>	<b>C4</b>	<input type="checkbox"/>	<b>CE 1</b>	<input type="checkbox"/>	<b>CE 2</b>	<input checked="" type="checkbox"/>	<b>CE 3</b>	<input type="checkbox"/>	<b>CE 4</b>	<input checked="" type="checkbox"/>

<b>Part 3: What Happens Next?</b>
<p>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.</p>

<b>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?</b> <i>(Please tick one of the following)</i>	
I do not want to speak at a hearing session and am happy for my written comments to be considered by the Inspector.	<input checked="" type="checkbox"/>
I want to speak at a hearing session.	<input type="checkbox"/>

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

<b>3c. Would you like to be informed about the following</b> (Please tick the relevant boxes)	
Submission of documents and evidence to the examination	<input checked="" type="checkbox"/>
Publish Inspector's report	<input checked="" type="checkbox"/>
Plan's adoption	<input checked="" type="checkbox"/>
<b>If additional documents have been provided to support your representations, please list below:</b>	
Sustainability Appraisal Matrix	

<b>Signed: Hugh Rowlands ag Owen Rowlands</b>	<b>Dated: 31March 2015</b>
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**THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN**  
*Please do not forget to enclose any relevant documentation (e.g. a Sustainability Appraisal) with this form.*

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

**ONLINE** – By completing the electronic form at [www.gwynedd.gov.uk/ldp](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp)

**BY EMAIL** – [planningpolicy@gwynedd.gov.uk](mailto:planningpolicy@gwynedd.gov.uk)

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

**REPRESENTATION FORMS SHOULD BE RETURNED BY NO LATER THAN 5.00pm on the 31<sup>st</sup> 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.
	<b>Consistency Tests</b>
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.
	<b>Coherence and Effectiveness Tests</b>
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.

## Sustainability Appraisal Matrix

Site Name: SP450 Land at Rhos Place - Amlwch

Site Area: Amlwch 1.48ha

SA Objective	Assessment	Summary
<p>1. Maintain and enhance biodiversity interests and connectivity (<i>SEA Topics: biodiversity, fauna, flora, soil</i>)</p>	<p>+</p>	<p>Development of the site would not lead to the fragmentation of any green corridor or the loss of any significant habitats, priority species, trees and hedgerows. Unlike the proposed development at SP245 which would require an alternative habitat for Great Crested Newts at some cost.</p>
<p>2. Promote community viability, cohesion, health and well being (<i>SEA Topics: human health, population</i>)</p>	<p>++</p>	<p>The site is well within walking distances of all community services and facilities. Development of the site will only add value to the town and eliminate the current risk of contaminated land due to fly tipping. There would be no adverse impact from the development, the site also has the added benefit of being within the built settlement of Amlwch, especially with SP561 being included as an approved/proposed site.</p>
<p>3. Manage and reduce the impacts of climate change by promoting and supporting mitigation and adaptation measures (<i>SEA Topics: climatic factors, air</i>)</p>	<p>++</p>	<p>In comparison to other sites approved for development in Amlwch (i.e SP995 &amp; SP900), it would greatly reduce the traffic issues in Amlwch. Unlike the proposed developments SP900 &amp; SP995 which would require access around the Bethesda St and Maes Mona area, which is partially one way and down to a single lane due to current residents parking along the side of the roads. Development of these sites would require massive infrastructure development of the highways, which would be very difficult and extremely costly as the area is already full with current residents with no scope for widening roads or creating new roads. There would be no need for any transport development</p>

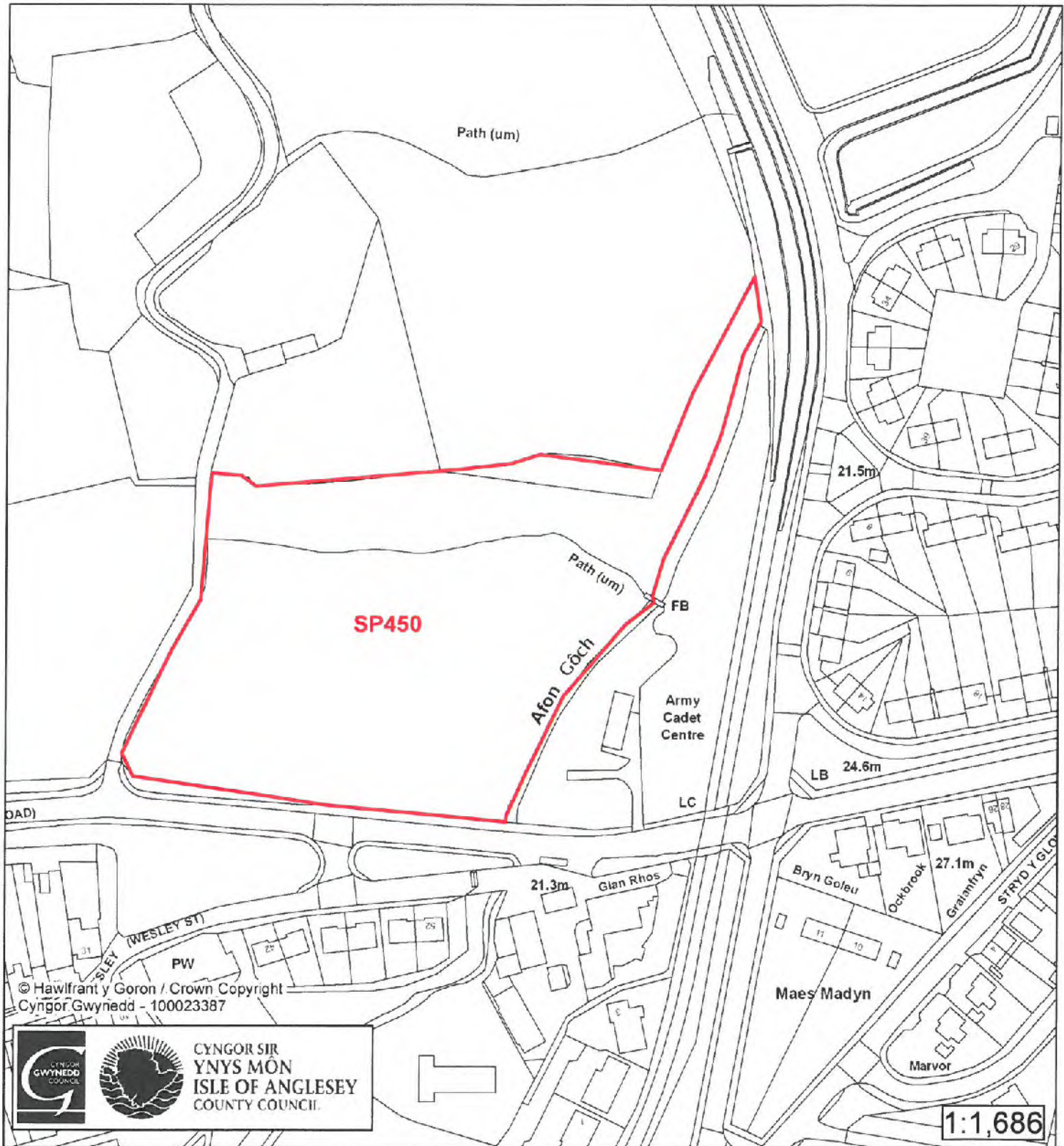
		work/costs at Rhos place due to its ideal access to Parrys Rd, unlike the proposed developments at SP900 & SP995 which would require major transport development to cope with any more traffic.
4. Conserve, promote and enhance the Welsh language ( <i>SEA Topic: cultural heritage</i> )	0	
5. Conserve, promote and enhance cultural resources and historic heritage assets ( <i>SEA Topic: cultural heritage</i> )	++	Development of the site would remove a current eye sore, and eliminate fly tipping.
6. Support economic growth and facilitate a vibrant, diversified economy providing local employment opportunities ( <i>SEA Topic: Population</i> )	+	The site is proposed as mixed used which allows the potential for employment development to take place, especially as the site has excellent access to the highway and utility connections.
7. Provide good quality housing, including affordable housing that meets local needs ( <i>SEA Topic: population, human health</i> )	++	Although the site is proposed for mixed use, this obviously includes residential housing, and the site has perfect access to a high quality highway system to deal with any potential development at no additional cost to the council. Along with its walking distance proximity to all community services/facilities and utility connections.
8. Value, conserve and enhance the plan area's rural landscapes and urban townscapes ( <i>SEA Topics: landscape</i> )	+	Development of the site would remove an eye sore, and would have no adverse impact on any outward views of conservation areas as the current site scrub impedes all views of the conservation area.
9. Use land and mineral assets efficiently and promote mechanisms for waste minimisation, re-use and recycling ( <i>SEA Topic: material assets,</i>	+	Development of the site would eliminate the current risk of contamination from fly tipping, supporting the progression towards sustainable waste management. The land is at best grade 5 agricultural and

soil)		might be more suitably classified as brownfield.
10. Promote and enhance good transport links to support the community and the economy (SEA <i>Topic: population, human health</i> )	++	As already mentioned this site has excellent access to all community services and facilities all within walking distances. Along with the excellent access to a quality highway system at pretty much no additional costs, unlike other proposed sites already mentioned SP995& SP900.
11. Safeguard water quality, manage water resources sustainability and minimise flood risk (SEA <i>Topic: water, biodiversity</i> )	++	Although the site is apparently partially category 2 flood risk, which we disagree with, based on local knowledge not some computerised model. Any area that might be at risk of flooding would be eliminated as the site would require some levelling of the ground, this would eliminate any risk of flooding. Development of the site would also provide potential to reduce any risk of flooding to the rest of Amlwch Town. However we would argue that this site does not have any land within flood zone 2, otherwise a great proportion of Amlwch Town centre will also be under water if the flood risk map is correct. In light of this we request that an actual site appraisal is carried out rather than a computer based model, to assess the site for any flood risk.

# Cynllun Datblygu Lleol ar y Cyd

## Joint Local Development Plan

### Cofrestr Safle Posib / Candidate Site Register



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 Cyngor Gwynedd - 100023387



**1:1,686**

Cyfeirnod/ Reference	: SP450
Enw'r Safle / Site Name	: Rhos Place, Tir oddi ar Lon Parys/Land off Parys Road
Lleoliad / Location	: Amlwch
Cyfeirnod Grid / Grid Reference	: 445 932
Maint (ha) / Size (ha)	: 1.48
Defnydd â Awgrymir / Suggested Use	: Cymysg / Mixed