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 | nmenting on? |
|--|---|
| | CPRW 24 Bangor Housing Sites/Boundaries |
| Policy number (please specify) | |
| Paragraph number (please specify) | |
| Proposals/ Inset Map (please specify ref no.) | Map 1 |
| Constraints Map | |
| Appendices (please specify) | |

| 2b. Are you objecting or | supporting the Deposit P | an? | |
|--------------------------|--------------------------|------------|--|
| Objecting | | Supporting | |

24. Bangor Housing Sites/Boundaries

24.1 Bangor/Housing Sites and Development Boundaries. The proposed sites in Bangor include a green field site (T5) opposite the Crematorium on the eastern outskirts of the City, adjacent to the development boundary and within the SLA; this has good access and may not be convenient for agricultural use as it is separated from other fields. T3 and T4 are small redevelopment sites which have been empty for some time. T3 would seem vulnerable to flooding and therefore inappropriate for housing, but the other two (T4/T5) are broadly acceptable to us. The area for student accommodation would seem to be too large and there are fears that the student population may not be able to fill it, thus leaving Bangor with an excess of single-person housing. With the ongoing development of T1 it would seem that the A55 has been acknowledged as the development boundary of Bangor. There are potential infill sites within or close to the existing development boundary in the Coed Mawr area (SP 37,38,39,262) which were identified in the Candidate Sites Register which we note are not now proposed. They all present considerable difficulties of access and site preparation as a result of steep slopes. It would be a pity to lose the rural feel to this southern part of the town, where development has been concentrated either along the top of the ridges or the bottom of the valley. Some infill development may be appropriate here on the more level areas, but the opportunity should be taken to enhance the amenity value of the natural woodland and scrub on the steeper slopes.

CPRW 24 Page 1 of 2

PND:

31 March 2015

NEED TO SCAN

Annwyl Nia

REPRESENTATIONS BY BANGOR CITY COUNCIL ON ANGLESEY AND GWYNEDD JOINT LOCAL DEVELOPMENT PLAN - DEPOSIT PLAN (2015)

Bangor City Council at its meeting held on the 23 March 2015 resolved to submit the following comments on the JLDP: Housing

Policy TAI14: Residential Allocation

Site Reference No. T5 - Land opposite Crematorium:

The City Council are of the opinion that:

- The site is located in a prominent and attractive rural location, divorced from the built up area of the City of Bangor and the shopping, community facilities and services that it provides. It would therefore not be sustainable development as it would encourage the use of motor cars in order to take advantage of these facilities.
- It would extend a ribbon of development into an attractive rural landscape to the detriment of the character and visual amenities of the area.
- The site occupies a prominent location when viewed from the adjoining highway and buildings erected thereon would dominate the skyline and cause serious injury to the visual amenities of the area.
- The residential allocation of the site should be re-considered and the development boundary re-drawn to exclude the site.

Policy TAI 12: Sub-division of Existing Properties into Self-contained Flats and Houses in Multiple Occupation:

The City Council welcomes the curbs and safeguards included in the JLDP regarding this type of accommodation in Bangor and also welcomes the limit imposed on the density of such accommodation in the various Wards as set out in the document. However, it is of the opinion that the definition of this type of accommodation need to be made clear and unambiguous in the Plan. The Topic Paper 16 "Student Accommodation" is welcomed as is the commitment to update the data in the Topic Paper on an annual basis.

Policy TAI 16: Purpose Built Student Accommodation:

The Council welcomes the criteria set out in this policy relating to the siting of such developments and also welcomes the inclusion of the Preferred Search Zone on the Proposals Map.

Economy and Regeneration

Living Above the Shop Proposals

The Council is of the opinion that the JLDP should include policies to encourage "Living Above the Shop" in Bangor's High Street. This would:

- Provide much-needed residential accommodation in a sustainable location.
- Give vacant upper floors of High Street shop buildings an economic use which would result in an incentive for landlords to invest in these buildings.
- Bring security and vitality back into the town centre.
- Help to regenerate the High Street.

Policy MAN7: Hot Food Takeaway Uses

The Council is of the opinion that:

- A10% limit should be imposed on the provision of hot food takeaways in the two areas where the saturation point has already been reached - the bottom of Bangor High Street below the Dean Street junction and Holyhead Road in Upper Bangor.
- Hot food takeaways should not be permitted in the designated prime retail area in the town centre as they create litter, refuse and anti-social behaviour problems which would detrimentally affect the character of the centre.

Strategic Policy PS12: Town Centre and Retail Developments

Policies to safeguard the vitality and viability of Bangor as a Sub-regional Retail Centre are welcomed as are the policies to protect Bangor by restricting the expansion of out of town and out of centre retailing and leisure developments. However the Council is of the opinion that areas of potential redevelopment should be identified within or close to the town centre so that a retailing or leisure opportunity for this area is not missed. Several sites appear ripe for redevelopment:

- The buildings on the south eastern side of the High Street from Plas Llwyd down to the Dean Street junction, including the Plas Llwyd car park at the rear.
- The buildings on the north western side of the High Street including the Rose and Crown and the White Lion.
- The University buildings and car park off James Street at the back of Dean Street, including the former Octagon building.

Employment Sites/Buildings for Small Starter/Incubator Units and Small Businesses.

The City Council is of the opinion that existing sites in Bangor accommodating such enterprises should be protected from redevelopment. Examples would be the small units at the rear of the upper part of the High Street and Station Road and the site between Sackville Road and Mentec.

More sites should be allocated for such uses in the JLDP so that small business start-ups would be encouraged in the interest of nurturing enterprise in the local economy.

Open Spaces.

The open spaces and parkland area of Pen y Bryn Park and the site of Penrhyn Arms on the south eastern end of Beach Road have been omitted from the Proposals Map.

I trust that you will take note of the above comments and amend the JLDP as suggested.

Yn gywir

Gwyn Hughes Town Clerk



| 2762-942 | REP NO: | 10 : |
|----------|----------------------------|-----------------------------|
| | CYNGOR SIR YNYS MÔ | Defnydd swyddfa yn unig: |
| | ISLE OF A COUNTY COUNTY | NGLESEY Rhif Cynrychiolydd: |
| | COUNTY LO | Dyddiad derbyn: 3{ 3 15 |
| | NEED TO SOF | |

Cynllun Datblygu Lleol ar y Cyd Adnau Ynys Môn a Gwynedd 2011-2026 Ffurflen Sylwadau

Diogelu Data - Y modd y bydd eich sylwadau a'r wybodaeth a roddwch i ni yn cael eu defnyddio. Bydd yr holl wybodaeth a gyflwynir yn cael ei gweld yn llawn gan staff yr Uned Polisi Cynllunio ar y Cyd sy'n ymdrin â'r Cynllun Datblygu Lleol ar y Cyd (CDLI ar y Cyd). Bydd eich enw a'ch sylwadau fel y maent wedi'u nodi yn eich ffurflen sylwadau yn cael eu cyhoeddi, ynghyd ag ymateb y Cyngor. Bydd hyn yn gymorth i ddangos fod yr ymgynghoriad wedi'i wneud yn iawn. Nodwch hefyd y gall y ffurflen hon gael ei rhoi i unrhyw Ymchwiliad Cyhoeddus ar y CDLI ar y Cyd.

Byddai'n well gennym pe baech yn cyflwyno'ch sylwadau'n uniongyrchol ar-lein. Fel arall, gellir llenwi fersiwn electronig o'r ffurflen hon ar-lein yn www.gwynedd.gov.uk/cdll neu www.ynysmon.gov.uk/cdll. Dylech lenwi ffurflenni ar wahân ar gyfer pob sylw yr hoffech ei wneud. Cewch ffurflenni sylwadau ychwanegol gan yr Uned Polisi Cynllunio ar y Cyd drwy ffonio 01286 685003 neu gellir eu llawr lwytho o wefan y Cyngor yn: www.gwynedd.gov.uk/cdll neu www.ynysmon.gov.uk/cdll neu gallwch lungopïo'r ffurflen hon. Wrth wneud sylwadau, defnyddiwch dudalennau ychwanegol os oes angen, gan nodi rhif y dudalen yn glir.

| | Eich manylion/ Manylion eich cleient | Manylion yr Asiant (os yw hynny'n berthnasol) |
|-----------|--------------------------------------|---|
| Enw | | |
| | Menter laith Bangor. | Elin Walker Jones (Cynghorydd ac aelod o Bwyllgor y Fenter Iaith) |
| Cyfeiriad | d/o hunaniaith | |
| | | |

RHAN 1: Manylion cyswllt

| Cod Post | | | |
|------------------|--|-------|--|
| Rhif Ffôn | | (| |
| Cyfeiriad e-bost | | | |
| | | | |

.

Nodiadau Canllaw

Rhowch eich sylwadau yn Rhan 2 y ffurflen hon. Defnyddiwch dudalennau ychwanegol os oes angen. Dylech lenwi ffurflenni ar wahân ar gyfer pob sylw yr hoffech ei wneud.

Mae Cwestiwn 2dd a 2e yn gofyn am eich barn ar gadernid y Cynllun Adnau. Rhoddir manylion am y profion cadernid a gwybodaeth ychwanegol ar sut cânt eu defnyddio ar dudalen olaf y ffurflen hon.

Os hoffech i newidiadau gael eu gwneud i'r Cynllun Adnau, gofynnwn i chi fod mor benodol â phosib. Er enghraifft, os hoffech i destun newydd gael ei ychwanegu, nodwch y testun newydd ac esboniwch ymhle yr hoffech ei weld yn y Cynllun Adnau a pham. Hefyd, os hoffech ychwanegu polisi neu baragraff newydd neu eu haddasu, nodwch yn glir beth yw'r testun newydd ac esboniwch ymhle yr ydych chi'n meddwl y dylai fynd yn y Cynllun Adnau a pham.

Os hoffech gael gwared o safle neu gynnig addasiadau i safle sydd wedi'i ddynodi yn y Cynllun Adnau neu os hoffech gynnig safle newydd, gofynnwn i chi atodi cynllun graddfa 1:1250 neu 1:2500 sy'n nodi'n glir ffiniau'r safle. Os ydych yn cynnig safle newydd (un nad yw wedi'i gynnwys yn y Cynllun Adnau) rhaid i chi gynnwys asesiad safle manwl gyda'r ffurflen sylwadau yn unol â methodoleg asesu Safle Arfaethedig y Cyngor a'r fframwaith Arfarnu Cynaliadwyedd. Cewch hyd i'r fethodoleg asesu Safle Arfaethedig a'r fframwaith Arfarnu Cynaliadwyedd ar wefan y Cyngor yn: <u>www.gwynedd.gov.uk/cdll</u> neu www.ynysmon.gov.uk/cdll.

Cewch wybodaeth bellach ar y mater hwn gan yr Uned Polisi Cynllunio ar y Cyd ar **01286 685003** neu ar wefan y Cyngor yn: <u>www.gwynedd.gov.uk/cdll</u> neu <u>www.ynysmon.gov.uk/cdll</u> yn y llyfryn 'Canllawiau Safleoedd Amgen'.

Os yw newidiadau arfaethedig i gynllun datblygu yn cael effeithiau sylweddol ar gynaliadwyedd, bydd gofyn i chi ddarparu'r wybodaeth Arfarnu Cynaliadwyedd berthnasol. Rhaid i'r wybodaeth hon fod yn gyson ag ystod a lefel manylder yr Arfarniad Cynaliadwyedd a gynhelir gan y Cynghorau. Dylai hefyd gyfeirio at yr un wybodaeth waelodlin wrth adnabod effeithiau sylweddol tebygol y polisi diwygiedig neu'r safle newydd.

Dylech gynnwys eich holl sylwadau ar y Cynllun Adnau gan nodi eich achos llawn ar y ffurflen swyddogol, gan ddefnyddio dogfennau ychwanegol os oes angen. Os ydych am weld mwy nag un newid ac yn ystyried nad yw'r Cynllun Adnau yn bodloni mwy nag un prawf cadernid, **dylech lenwi ffurflenni ar wahân ar gyfer pob sylw**. Yn yr un modd, os ydych am wneud sylwadau i gefnogi'r Cynllun Adnau neu elfennau unigol o'r Cynllun Adnau byddai'n ddefnyddiol pe baech yn gwneud y sylwadau hyn ar wahân. Nodwch os ydych yn cyflwyno deunydd arall i gefnogi'ch sylwadau.

Yr unig adeg y bydd gennych gyfle i gyflwyno gwybodaeth bellach i'r Ymchwiliad yw os yw'r Arolygwr yn eich gwahodd i ymateb i faterion y mae ef neu hi wedi'u codi. Nodwch na fydd gan yr Arolygwr sylwadau yr ydych wedi'u gwneud mewn ymateb i ymgynghoriadau blaenorol. Os nad ydych yn ystyried bod y Cynllun Adnau yn gadarn ac y dylid ei newid, esboniwch yn glir pam ydych chi'n meddwl bod angen y newidiadau. Os ydych yn meddwl bod angen gwneud newidiadau er mwyn i'r Cynllun Adnau fodloni un neu fwy o'r profion cadernid, dywedwch wrthym pa un / pa rai.

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

RHAN 2: Eich Sylwadau a Newidiadau a Awgrymir. (Defnyddiwch un adran Rhan 2 ar gyfer pob sylw yr hoffech ei wneud)

| 2a. Ar ba ran o'r Cynllun Adnau yr ydych chi'n | gwneud sylwadau? | |
|--|------------------|--|
| Polisi rhif (nodwch) | TA16 | |
| Paragraff rhif (nodwch) | 7.4.18 | |
| Cynigion/ Map Mewnosod (nodwch y rhif cyfeirnod) | | |
| Map Cyfyngiadau | | |
| Atodiadau (nodwch) | | |

| 2b. A ydych yn gwrth | nwynebu neu gefno | ogi? | | |
|----------------------|-------------------|---------|---|--|
| Gwrthwynebu | 17 | Cefnogi | Г | |

2c. Rhowch fanylion eich sylwadau ar y Cynllun Adnau.

O ran tai amlfeddiannaeth myfyrwyr mae Menter laith Bangor yn croesawu datganiad paragraff 7.4.18 "Mae'r Cynghorau yn ystyried na ddylai llety preswyl nad yw'n cael ei rannu gyfrif am fwy na 25% o'r holl eiddo preswyl yn wardiau etholiadol Menai (Bangor) a Deiniol a 10% yng ngweddill wardiau Ardal y Cynllun". Fodd bynnag galwa'r Fenter am ymrwymiad pendant iawn yn y Cynllun i wireddu'r amcan ac nid rhoi 'ystyriaeth' iddo yn unig.

Mae Cyngor Gwynedd wedi rhoi caniatâd cynllunio ar gyfer adeiladau mawr iawn yn ddiweddar sy'n cartrefu myfyrwyr mewn unedau/fflatiau ar hyd a lled dinas Bangor. O'r herwydd nid yw myfyrwyr yn llogi tai ac mae nifer o'r rhain unai yn sefyll yn wag, heb eu gosod neu'n cael eu rhoi ar werth yn rheolaidd. Gwelir bod prisiau yn gostwng oherwydd bod niferoedd uchel o dai ar gael mewn rhai ardaloedd o Fangor yn benodol.

Ydy'r Cynllun Adnau wedi ystyried oblygiadau cyllido addysg uwch i Brifysgol Bangor ac i fyfyrwyr yn y dyfodol? Beth pe bai ariannu addysg uwch yn newid yn y dyfodol agos? Beth pe bai llai o fyfyrwyr yn dod i Fangor – beth fyddai dyfodol yr adeiladau pwrpasol a adeiladwyd ar gyfer myfyrwyr? A oes perygl y bydd y llifddorau'n agor i bobl sy'n dioddef o'r 'treth llofft' symud i'r ardal yn chwilio am unedau llai? Mae perygl i lif tawel o ogledd orllewin Lloegr lifo i mewn yn ddiarwybod.

Dylid cynnal ymchwil manwl o anghenion tai pobl Bangor, gan gynnwyd ardal Penrhosgarnedd hefyd (sydd ar hyn o bryd yn ward Pentir) i sicrhau defnydd priodol o'r anheddau sydd ar gael. Mae nifer o unigolion, cyplau a theuluoedd yn aros am dai fforddadwy ym Mangor, ond yn methu talu'r rhent breifat, sydd wedi ei osod yn uwch na'r cyfarateldd oherwydd fod y landlordaid yn targedu myfyrwyr. Efallai gellid ailddefnyddio rhai o'r tai sy'n wag i greu cartrefi fforddadwy i deulueodd sy'n chwilio am le i fyw ym Mangor. Dylid cydweithio yn agos gyda'r Brifysgol i sicrhau rhagolygon cywir niferoedd myfyrwyr, a'u llety yn y dyfodol, yn hytrach na chaniatau neuaddau myfyrwyr dibendraw tra bod tai rhent yn wag.

Dylid hefyd ystyried yn ofalus pan fod landlord yn gofyn am ganiatad cynllunio i adeiladu estyniad. Os ydy ty yn cael ei rentu'n barod, adeiladu estyniad ar gyfer mwy o denantiaid ydi'r bwriad, yn amlwg, nid creu ty mwy o faint ar gyfer teulu – ac felly mae effeithiau ar fwynderau ac is-adeiledd i'r tenantiaid a gweddill trigolion y stryd.

Dylid hefyd sicrhau fod canol y ddinas hefyd yn cael ei adnabod fel ardal breswyl, ac felly mae angen datblygu'r cyfleoedd am anheddau yn y parth hwn hefyd.

Dylid hefyd feddwl am ailystyried pa ardaloedd sy'n cael eu cynnwys o fewn parth dinas Bangor – mae Penrhosgarnedd yn ran annatod o'r ddinas erbyn hyn. Defnyddiwch dudalennau ychwanegol os bydd angen. Nodwch faint o dudalennau ychwanegol rydych wedi'u defnyddio......

2ch. Os yw eich sylw yn 2c yn fwy na 100 o eiriau, darparwch grynodeb os gwelwch yn dda (dim mwy na 100 o eiriau.

Dylid rhoi ystyriaeth ofalus iawn i ganiatáu datblygiadau preswyl pellach ar gyfer myfyrwyr y Brifysgol ym Mangor. Yng ngwyneb ansicrwydd gallu myfyrwyr i gyllido eu haddysg uwch oddi cartref byddai cwymp yn y galw a gormodedd o lety gwag, mewn dwylo preifat yn andwyol tu hwnt i sefydlogrwydd cymunedau Bangor a'r Gymraeg.

Dylid cynnal ymchwiliad manwl I anghenion tai pobl Bangor.

Cynnwys Penrhosgarnedd yn y ddinas!

Dylid sicrhau fod tai rhent yn rhai fforddadwy yn hytrach na chodi rhent enchwythedig fel sy'n cael eu dalu gan fyfyrwyr.

2d Rhowch fanylion y newidiadau yr hoffech eu gweld i'r Cynllun Adnau

| 2dd | I. Ydi | 'r Cyn | lun v | n gad | arn? | | | | | | | | | | | | | | |
|-----|--------|-------------------|--------|-------|-----------------|--------|------|-------|------|---------|-------|--------|-------|-------|---------|--------|-------|--------|--|
| Ydi | | | Г | 0 | | | | | N | lac ydi | | | | Г | | | | | |
| v m | ae'n | ei fetl | nu? (1 | iciwc | h isod | d os g | weiw | ch yn | dda) | Knoad | lir m | wy o j | anyin | on am | i y pri | JION | cuuer | nia ai | |
| gef | n y ff | ei fetl urflen | hon | | | | weiw | cn yn | aaa) | кпоас | tir m | | | | | | | nia ai | |
| gef | n y ff | | hon | | h isod ondel | | weiw | cn yn | ada) | Khodd | tir m | | | | | iolrwy | | nia ai | |
| gef | n y ff | urflen | hon | | | | weiw | cn yn | | C4 | fur m | | | | | | | CE | |

+

Rhan 3: Beth sy'n digwydd nesaf?

Ar y cam hwn o broses y CDLI ar y Cyd, dim ond sylwadau ar bapur y gallwch eu gwneud (a elwir yn 'sylwadau ysgrifenedig'). Fodd bynnag, gall yr Arolygwr alw ar y rheini sydd am newid y Cynllun i ymddangos a siarad â'r Arolygwr mewn 'sesiwn gwrandawiad' yn ystod yr Ymchwiliad Cyhoeddus. Dylech gofio y bydd yr Arolygwr yn rhoi'r un pwys i'ch sylwadau ysgrifenedig ag i'r rheini a wnewch ar lafar yn y sesiwn gwrandawiad.

3a. A ydych am i'ch sylwadau gael eu hystyried fel 'sylwadau ysgrifenedig' neu a hoffech siarad mewn sesiwn gwrandawiad yn yr Ymchwiliad Cyhoeddus? (*Ticiwch un o'r isod*)

| Nid wyf am siarad mewn sesiwn gwrandawiad ac rwy'n fodlon i'm sylwadau ysgrifenedig gael eu hystyried gan yr Arolygwr. | v |
|---|----------|
| Hoffwn siarad mewn sesiwn gwrandawiad. | 2 |

3b. Os hoffech siarad, cadarnhewch pam rydych yn ystyried ei bod hi'n angenrheidiol i chi siarad yn y Gwrandawiad.

Er wmyn sicrhau fod ein barn yn cael ei ystyried, a bod newidiadau perthnasol yn digwydd i'r broses gynllunio ym Mangor

| Cyflwyno'r dogfennau a'r dystiolaeth i'r archwiliad | |
|---|------------------------|
| Cyhoeddi adroddiad yr Arolygydd | <u>र</u> |
| Mabwysiadu'r Cynllun | R |
| Os ydych wedi darparu dogfennau ychwanegol i gefnogi'ch sylwada | u, rhestrwch hwy isod: |
| | |
| | |

| Llofnod: | Dyddiedig: 30-3-15 |
|---|--------------------|
| Elin Walker Jones, ar ran Menter laith Bangor | |

DIOLCH AM EICH SYLWADAU AR Y CYNLLUN ADNAU

Cofiwch gynnwys unrhyw ddogfennau perthnasol (e.e. Arfarniad Cynaliadwyedd) gyda'r ffurflen hon.

Dylech ddychwelyd ffurflenni sylwadau wedi'u llenwi i'r Uned Polisi Cynllunio ar y Cyd:

AR-LEIN – drwy lenwi'r ffurflen electronig yn <u>www.gwynedd.gov.uk/cdll</u> neu <u>www.ynysmon.gov.uk/cdll</u> DRWY E-BOST - <u>polisicynllunio@gwynedd.gov.uk</u>

DRWY'R POST - ei hanfon i: Uned Polisi Cynllunio ar y Cyd, Llawr Cyntaf, Swyddfeydd Cyngor Dinas Bangor, Ffordd Gwynedd, Bangor, Gwynedd LL57 1DT

DYLECH DDYCHWELYD Y FFURFLENNI SYLWADAU DDIM HWYRACH NA 5.00yh ar 31 Mawrth 2015 <u>NI FYDD</u> SYLWADAU A DDERBYNNIR WEDI'R AMSER A'R DYDDIAD YMA YN CAEL EU HYSTYRIED

| Prawf | Profion Gweithdrefnol |
|-------|--|
| P1 | Nid yw wedi'i baratoi yn unol â'r Cytundeb Cyflawni yn cynnwys y Cynllun Cyswllt Cymunedol. |
| P2 | Nid yw'r cynllun a'i bolisïau wedi bod drwy Arfarniad Cynaliadwyedd yn cynnwys Asesiad Amgylcheddol Strategol. |
| | Profion Cysondeb |
| C1 | Mae'n gynllun defnydd tir nad yw'n rhoi ystyriaeth i gynlluniau, polisïau a strategaethau perthnasol eraill sy'n ymwneud â'r ardal neu ardaloedd cyfagos. |
| C2 | Nid yw'n rhoi ystyriaeth i bolisi cenedlaethol. |
| C3 | Nid yw'n rhoi ystyriaeth i Gynllun Gofodol Cymru. |
| C4 | Nid yw'n rhoi ystyriaeth i'r strategaeth gymunedol berthnasol. |
| | Profion Cydlyniad ac Effeithiolrwydd |
| CE1 | Nid yw'r cynllun yn gosod strategaeth gydlynol ble mae ei bolisïau a'i ddynodiadau yn llifo'n rhesymegol ohono a/neu pan fo materion trawsffiniol yn berthnasol, nid yw'n gydnaws â'r cynlluniau datblygu a ddarparwyd gan awdurdodau cyfagos. |
| CE2 | Nid yw'r strategaethau, y polisïau na'r dynodiadau'n realistig nac yn briodol o ystyried y dewisiadau amgen a/neu nid ydynt wedi'u seilio ar sail tystiolaeth gredadwy. |
| CE3 | Nid oes mecanwaith clir ar gyfer gweithredu a monitro. |
| CE4 | Nid yw'n rhesymol hyblyg i alluogi iddo ymdrin ag amgylchiadau sy'n newid. |

Noda Deddf Cynllunio a Phrynu Gorfodol 2004 mai pwrpas ymchwiliad i Gynllun Datblygu Lleol (y Cynllun) yw ystyried a yw'n "gadarn". Golyga hyn y dylai unrhyw un sydd am roi sylwadau ar y Cynllun Adnau neu wrthwynebu iddo geisio dweud pam nad yw'n gadarn a beth sydd ei angen er mwyn ei wneud yn gadarn. Yn y cyd-destun hwn, gellir ystyried cadarn i olygu ei ystyr gwreiddiol o "dangos barn dda" a "y gellir ymddiried ynddo". Er mwyn asesu'r Cynllun Adnau, rydym yn defnyddio'r 10 prawf uchod. Bydd y Cynllun Adnau yn cael ei archwilio gan Arolygwr annibynnol a benodir gan Lywodraeth Cymru a thasg yr Arolygwr fydd ystyried a yw'r Cynllun yn gadarn.

Os ydych yn cynnig newid i'r Cynllun Adnau, fe ddylech nodi'n glir pa brawf/brofion cadernid y credwch y mae'r Cynllun Adnau yn ei fethu/eu methu. Mae'r profion mewn tri grŵp – 'Gweithdrefnol' (dau brawf); 'Cysondeb' (pedwar prawf)' a 'Cydlyniad ac Effeithiolrwydd' (pedwar prawf). Os hoffech wneud sylwadau ar y ffordd y mae'r Cynghorau wedi paratoi'r Cynllun Adnau, mae'n debygol y byddai'ch sylwadau neu'ch gwrthwynebiadau yn disgyn o dan un o'r profion gweithdrefnol. Os hoffech wneud sylwadau neu wrthwynebu i gynnwys y Cynllun Adnau, gallai fod yn gymorth i chi edrych ar y profion 'cysondeb' a 'cydlyniad ac effeithiolrwydd'.



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 | Hughes Bros Limited | Alyn Nicholls |
| Address | c/o Agent | |
| | | |
| | | |
| | | |

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 found the Sustainability Appraisal framework can be on the Council's website at: www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp

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

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

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

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

Where a group shares a common view on how it wishes the Deposit Plan to be changed, the Councils will accept a signed petition. In submitting a representation form on behalf of a group, the representation form should include the contact details of a lead individual at Section1 and the comments should be clearly set out on the representation form. The signed petition should state clearly how many people are being represented and how the representation has been authorised. Signing a petition does not prevent the submission of individual forms.

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

wish to make)

2a. Which part of the Deposit Plan are you commenting on?Policy number (please specify)TAI6Paragraph number (please specify)Proposals/ Inset Map (please specify ref no.)Proposals/ Inset MapConstraints MapAppendices (please specify)Inset Map (please specify)

2b. Are you objecting or supporting the Deposit Plan?

 \checkmark

Objecting

Supporting

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

This policy is ambiguous because it requires the level of student accommodation within any scheme to be agreed with the Council prior to planning permission being granted.

Within the first criterion the requirement for development to be supported by a higher education is unreasonable and cannot be justified.

With regard to the third criterion, there is no justification to prohibit the development of student accommodation within a primary residential area when it can be demonstrated that the scale and design of proposals would not cause harm to residential amenity.

The policy should not preclude the development of student accommodation on sites with an extant planning permission or allocated for residential development where development would not be prejudicial to meeting housing needs or alternatively when development would contribute to regeneration and when the site would otherwise remain undeveloped.

The justification for the policy should explain that the identification of a "Preferred Search Zone" does not preclude the development of student accommodation elsewhere in circumstances where criteria of the policy are satisfied.

| | | ur re | spon | se to | 2c ab | ove | excee | ds 10 | 0 wo | rds, p | lease | prov | vide a | sum | mary | (no n | noret | han 1 | 100 |
|---|---|--------|-------|---------------------|----------|--------|------------|--------|---------|---------|---------------|--------|--------------------|-----------------|---------|--------|-----------|---------|-------|
| word | | - | | | • | | | | | 1 | | | | | | | | | |
| Some (cannot | | | | or asse | essing | prop | osals f | or pu | rpose | -built | stude | nt acc | comm | odatio | on are | unrea | asona | ble an | d |
| | | | | ne cha | _ | - | | | | le to t | he D | eposi | t Plai | n. | | | | | |
| Policy | TAI6 | shou | ld be | amen | ded to | o read | as to | llows: | | | | | | | | | | | |
| "Propo followi | | | | ırpose [.] | -built | stude | nt acc | comm | odatic | on will | be ap | oprove | ed pro | ovided | they o | confor | rm to | the | |
| 1. | The | e prop | oosal | must k | be acc | отра | inied l | by an | assess | sment | of the | e requ | ireme | ent for | r the p | ropos | ed de | velopr | nent. |
| 2. | The | e prop | oosal | is deliv | verabl | e. | | | | | | | | | | | | | |
| 3. | 3. The proposal is located within a sustainable location within a reasonable walking and cycling distance to the higher education institution campus, or alternatively, near to a high frequency bus route to the education campus. | | | | | | | | ce to | | | | | | | | | | |
| 4. | Pro are | • | ls mu | st not | lead t | o an i | unacci | eptab | le incr | ease i | n den | nand j | ^f or on | -stree | t park | ing in | the su | urroun | nding |
| 5. Appropriate management is in place to minimise potential negative impacts from occupants of the proposed development on surrounding properties and neighbourhoods, and to create a positive and safe living environment for students." | | | | | | | l safe | | | | | | | | | | | | |
| The Co accom plannii | mod | ation | and I | manag | ed ef | fectiv | ely. N | 1anag | emen | | | | | | • | | | | |
| A Prefe purpos | | | | | | | | | | | | | the F | propo | sals M | ap wł | nere n | ew | |
| | | | | : Plan | | | | | | | | | | | | | | | |
| Yes | 13 UI | | μυзιι | | | u : | | | | No | | | | | | | | | |
| | fvou | thin | k tha | t the | Depo | sit Pl | an is | unso | und w | | test (| of sou | Indne | ess do | | think | that | it fail | s? |
| | - | | | . More | - | | | | | | | | | | | | | | |
| Proce | odur | al | | Con | sisten | | | | | | | Coh | oron | ro <i>9</i> . I | Effect | iveno | | | |
| P1 | | P2 | | C1 | | C2 | | C3 | | C4 | | CE | | CE | ./ | CE | 55 | CE | ./ |
| | | | | | Patronik | | P. day and | | P. Carl | | P. Contractor | 1 | | 2 | • | 3 | Martun di | 4 | |

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. | \checkmark |

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.

We wish to speak regarding total housing provision, the location of development and policy for student accommodation.

| 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:

Signed:

Dated: 31 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:

ONLINE – By completing the electronic form at <u>www.gwynedd.gov.uk/ldp</u> or <u>www.anglesey.gov.uk/ldp</u> BY EMAIL – <u>planningpolicy@gwynedd.gov.uk</u> 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 | 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.