

	 <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**

Data Protection

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

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

Additional representation forms can be obtained from the Joint Planning Policy Unit on 01286 685003 or may be downloaded from the Council's web site at: www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp or you may photocopy this form. When making comments please use additional sheets as required clearly numbering each consecutive sheet.

PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	[REDACTED]	
Address	WELSH WATER [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 or 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)

2a. Which part of the Deposit Plan are you commenting on?	
Policy number (please specify)	TAI IS HOUSING IN LOCAL SERVICE CENTRES
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	

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

2c. Please provide details of your representation on the Deposit Plan.
<p style="text-align: right;"><i>Please use additional sheet if necessary. Please state how many additional sheets have been used.....</i></p>

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

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

2dd. Is the Deposit Plan sound?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
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2e. If you think that the Deposit Plan is unsound which test of soundness do you think that it fails? (Please tick below). More details are provided at the back of this form.

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"/>

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:

Signed:



Dated:

31/3/15.

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 or www.anglesey.gov.uk/ldp

BY EMAIL – planningpolicy@gwynedd.gov.uk

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

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

Test of Soundness

Test	Procedural Tests
P1	It has not been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme.
P2	The plan and its policies have not been subjected to Sustainability Appraisal including Strategic Environmental Assessment.
	Consistency Tests
C1	It is a land use plan which does not have regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
C2	It does not have regard to national policy.
C3	It does not have regard to the Wales Spatial Plan.
C4	It does not have regard to the relevant community strategy.
	Coherence and Effectiveness Tests
CE1	The plan does not set out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is not compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are not realistic and appropriate having considered the relevant alternatives and/or are not founded on a robust and credible evidence base.
CE3	There are no clear mechanisms for implementation and monitoring.
CE4	It is not reasonably flexible to enable it to deal with changing circumstances.

The Planning and Compulsory Purchase Act 2004 states that the purpose of the examination of a Local Development Plan (the Plan) is to consider whether it is “sound”. This means that anyone who wants to comment on or object to the Deposit Plan should seek to say how it is unsound and what is needed to make it sound. Sound may be considered in this context within its ordinary meaning of “*showing good judgement*” and “*able to be trusted*”. To assess the Deposit Plan we use 10 tests as set out above. The Deposit Plan will be examined by an independent Inspector appointed by the Welsh Government and it will be the Inspector’s job to consider whether the Plan is sound.

Where you propose a change to the Deposit Plan you should therefore make clear which test(s) of soundness you believe the Deposit Plan fails. The tests are in 3 groups - ‘Procedural’ (2 tests); ‘Conformity’ (4 tests); and ‘Coherence and Effectiveness’ (4 tests). If you wish to comment on the way in which the Councils have prepared the Deposit Plan, it is likely that your comments or objections would fall under one of the procedural tests. If you wish to comment on or object to the content of the Deposit Plan, it may help to look at the ‘consistency’ and the ‘coherence and effectiveness’ tests.

TAI15 HOUSING IN LOCAL SERVICE CENTRES

(i) ALLOCATIONS

T32 Casita, Beaumaris

- This site has planning permission as such we have no further comment to make.

T33 Adjoining Wendon, Benllech

- A water supply can be provided to serve this site.
- Potential developers need to be aware that the site is crossed by a sewer and protection measures in the form of easement widths or a diversion of the pipe would be required, which may impact upon the housing density achievable on site.
- Benllech Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

T34 Land near Llwyn Angharad, Bodedern

- A water supply can be provided to serve this site.
- The public sewerage network can accept the potential foul flows from the proposed development site.
- Bodedern Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

T35 Land to rear of Holyhead Road, Cemaes

- A water supply can be provided to serve this site.
- The public sewerage network can accept the potential foul flows from the proposed development site.
- The proposed growth being promoted for this settlement may require improvements at Cemaes Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

T36 Land near Bryn Eira, Llanfairpwll

- Potential developers need to be aware that this site is crossed by a water main and protection measures in the form of easement widths or a diversion of the pipe would be required, which may impact upon the density achievable on site.
- Off-site sewers would be required to connect to the public sewerage network. These can be provided through the sewer requisition scheme under Sections 98-101 of the Water Industry Act 1991
- Llanfairpwll Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

T37 Land near Penmynydd Road, Llanfairpwll

- This site has planning permission as such we have no further comment to make.

T38 Ty Mawr, Porthaethwy

- This site has planning permission as such we have no further comment to make.

T39 Tyddyn Mostyn, Porthaethwy

- This site has planning permission as such we have no further comment to make.

T40 Land near Lon Gamfa, Porthaethwy

- A water supply can be provided to serve this site.

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **450**

Enw / Name: **Mr B Pritchard [2951]**

Rhan: **Map 10 - Benllech**

Section: **Map 10 - Benllech**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Nid yw'n glir pam fod ffin ddatblygu Benllech wedi'i thynnu i gau allan yr ardal dai o amgylch Tynyngongl i'r gorllewin. Mae hon yn rhan o ardal drefol Benllech ac mae'n gweithredu fel rhan o'r dref. Nid oes rheswm da dros ddiffinio'r ardal hon yn bentref clwstwr o gofio ei pherthynas â gweddill Benllech. Mae modd cael datblygiadau tai yn y dyfodol ym Menllech ar safleoedd eraill ar wahân i'r rhai a ddangosir ar y map cynigion, sef safle SP161 ar y Gofrestr Safleoedd Arfaethedig. Mae hwn yn dir addas i ymestyn y dref.

Representation Summary:

It is not clear why the development boundary for Benllech has been drawn to exclude the housing area around Tynyngongl to the west. This forms part of the urban area of Benllech and functions as part of the town. There is no logical reason to define this area as a cluster village given its relationship with the rest of Benllech. Future housing development within Benllech can be accommodated on sites other than that shown on the proposals map, namely site SP161 on the Candidate Site register. This is suitable land for the expansion of the town.

Sylw Llawn / Full Representation:

It is not clear why the development boundary for Benllech has been drawn to exclude the housing area around Tynyngongl to the west. This forms part of the urban area of Benllech and functions as part of the town. There is no logical reason to define this area as a cluster village given its relationship with the rest of Benllech. Future housing development within Benllech can be accommodated on sites other than that shown on the proposals map, namely site SP161 on the Candidate Site register. This is suitable land for the expansion of the town.

Newid(iadau) i'r Cynllun

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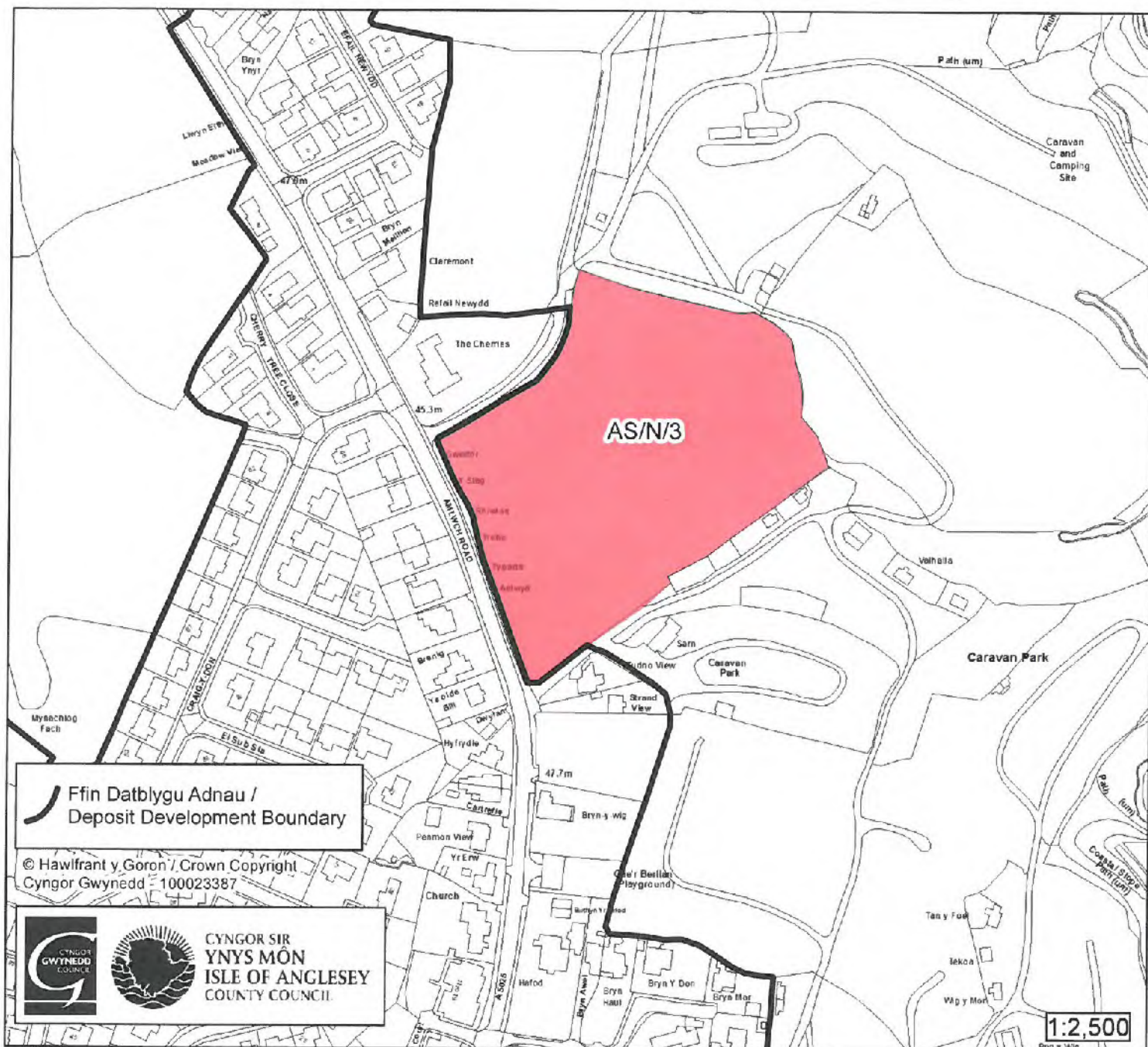
Change(s) to the Plan

That the development boundary of Benllech be extended to include all of the urban area of Tynyngongl and that site SP161 from the Candidate Site Register be allocated for new housing.

Profion Cadernid / Soundness Tests: x, vii

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



1:2,500
Pen y Wig

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

Cyfeirnod / Reference: AS/N/3

Enw'r Safle / Site Name: Tir ger / Land adj Ffordd Amlwch

Lleoliad / Location: Benllech

Cyngor Cymuned / Community Council: Llanfair ME

Maint (ha) / Size (ha): 1.80

Defnydd Amgen â Awgrymir / Suggested Alternative Use: Tai / Housing

AS/N/3

		<p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p>For office use only:</p>
			<p>Representor No.</p>
			<p>Date received:</p>
			<p>Date acknowledged:</p>

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PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	Mr M. Williams-Bulkeley	ERWCONSULTING CHARTERED SURVEYORS
Address	c/o Agents	[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.

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

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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)	
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	BENLLECH . Inset 10
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>The Deposit JLDP allocates T33 for Housing in Benllech, which is classed as a Local Service Village.</p> <p>It is a popular settlement of some growing size and population.</p> <p>There is a growing market housing need here, and an even greater local affordable housing need.</p> <p>Allocation T33 is insufficient in size/density, and inappropriate in location, and is by its beach-side location is patently more attractive and appropriate for in-migrant retiree/holiday homes, for which there is intense demand, to the detriment of local persons in real housing need.</p> <p>The needs of local persons should override the demands of affluent in-migrants.</p> <p>Such needs are not recognised in the Plan.</p>

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.

According to need, Benllech should be allocated a more appropriately sized and located Housing site. An Alternative Site for Housing is proposed, at Ffordd Amlwch, Benllech. Please refer to the comprehensive Supplementary Information document on the proposed site, dated March 20, 2015, as attached.

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

Part 3: What Happens Next?

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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.	<input checked="" type="checkbox"/>
I want to speak at a hearing session.	<input type="checkbox"/>

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	<input checked="" type="checkbox"/>
Publish Inspector's report	<input checked="" type="checkbox"/>
Plan's adoption	<input checked="" type="checkbox"/>
If additional documents have been provided to support your representations, please list below:	
Supplementary Information : Alternative Site Proposal. Ffordd Amlwch, Benllech.. March 20 2015	
Signed:	Dated: March 20, 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.

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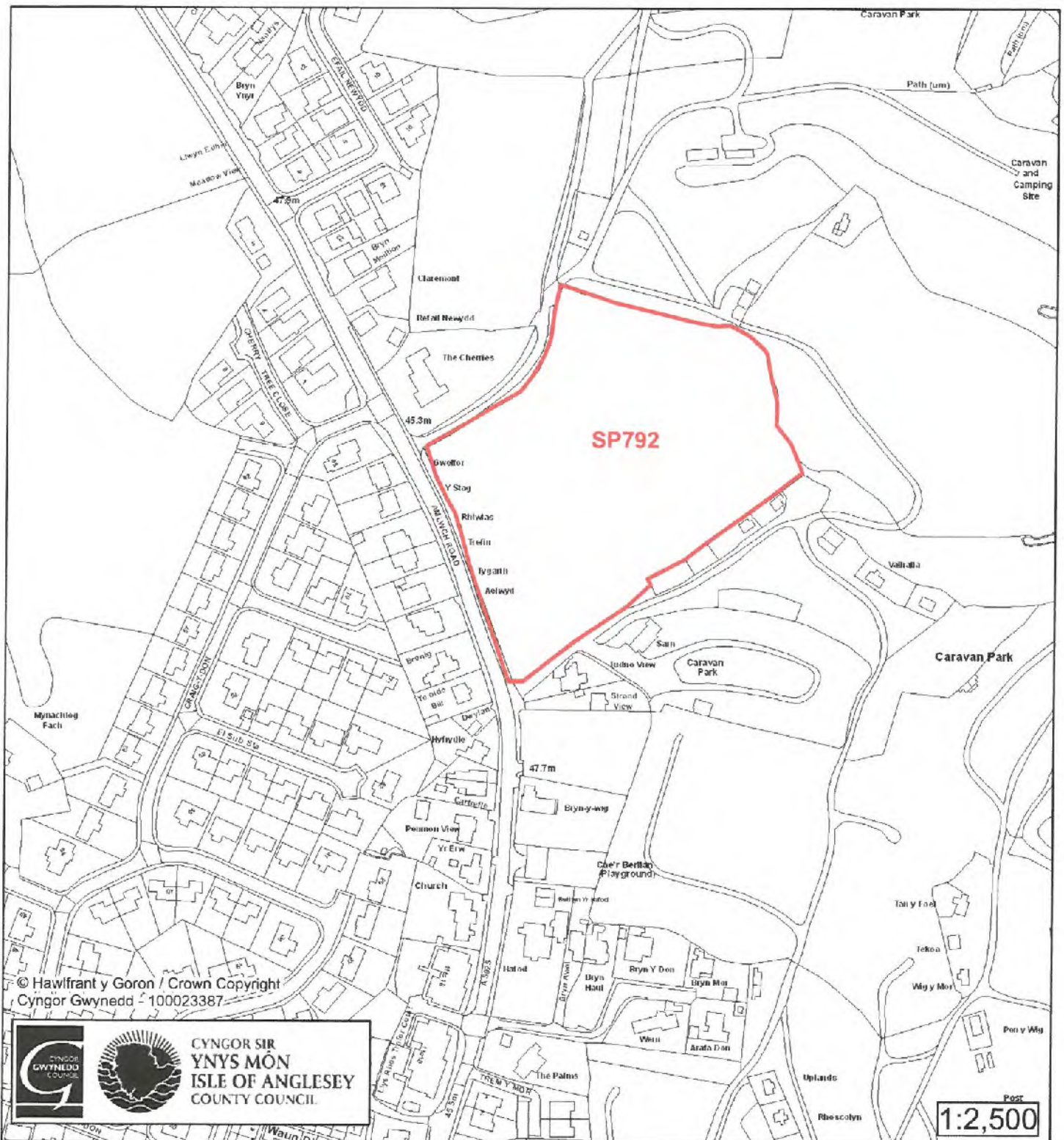
Test of Soundness

Test	Procedural Tests
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Cynllun Datblygu Lleol ar y Cyd Joint Local Development Plan Cofrestr Safle Posib / Candidate Site Register



Cyfeirnod/ Reference	: SP792
Enw'r Safle / Site Name	: Tir ger / Land adj Tudno View
Lleoliad / Location	: Benllech
Cyfeirnod Grid / Grid Reference	: 519 833
Maint (ha) / Size (ha)	: 1.8
Defnydd â Awgrymir / Suggested Use	: Tai / Housing

ALTERNATIVE SITE PROPOSAL

Sustainability Appraisal Matrix : Please refer to the Supplementary Information

Site Name: LAND AT FFORDD AMLWCH, BENLLECH, ANGLESEY , LL74 8ST, OS GRID REF. SH 51871 83221		
Site Area: 1.8ha		
SA Objective	Assessment	Summary
1. Maintain and enhance biodiversity interests and connectivity (<i>SEA Topics: biodiversity, fauna, flora, soil</i>)	+	There are no biodiversity or connectivity or sustainability constraints and development is acceptable
2. Promote community viability, cohesion, health and well being (<i>SEA Topics: human health, population</i>)	++	The site can deliver greater choice and more appropriate smaller type housing, including AH, for local persons on a larger area than allocation T33. Its development will contribute to greater social cohesion and wellbeing locally, than site T33.
3. Manage and reduce the impacts of climate change by promoting and supporting mitigation and adaptation measures (<i>SEA Topics: climatic factors, air</i>)	0	Neutral
4. Conserve, promote and enhance the Welsh language (<i>SEA Topic: cultural heritage</i>)	++	Benllech is highly popular with in-migrant retirees and holiday-home seekers, to the detriment of the Welsh language and local culture and character. The site proposed is more likely to conserve and enhance the language, than the waters-edge location of allocation T33, which will attract outsiders.
5. Conserve, promote and enhance cultural resources and historic heritage assets (<i>SEA Topic: cultural heritage</i>)	0	Neutral
6. Support economic growth and facilitate a vibrant, diversified economy providing local employment opportunities (<i>SEA Topic: Population</i>)	0	Neutral
7. Provide good quality housing, including affordable housing that meets local needs (<i>SEA Topic: population, human health</i>)	++	As 2 above – greater choice, more locally-appropriate type of housing and density, including AH, will more facilitate local needs, than allocation T33.
8. Value, conserve and enhance the plan area's rural landscapes and urban townscapes (<i>SEA Topics: landscape</i>)	0	Neutral

9. Use land and mineral assets efficiently and promote mechanisms for waste minimisation, re-use and recycling (SEA Topic: material assets, soil)	0	Neutral
10. Promote and enhance good transport links to support the community and the economy (SEA Topic: population, human health)	++	With its direct frontage to the A5025, the site is more accessible to the road network than allocation T33.
11. Safeguard water quality, manage water resources sustainability and minimise flood risk (SEA Topic: water, biodiversity)	0	Neutral

Key

++	Development actively encouraged as it would resolve an existing sustainability problem	+/-	Potential sustainability issues; mitigation and / or negotiation possible
+	No sustainability constraints and development acceptable	-	Problematical and improbable because of known sustainability issues; mitigation or negotiation difficult and / or expensive
0	Neutral	--	Absolute sustainability constraints
?	Unknown/uncertain effect		

SUPPLEMENTARY INFORMATION

ALTERNATIVE SITE PROPOSAL

Site –

**LAND AT FFORDD AMLWCH
BENLLECH
ANGLESEY
CSR REF. SP792
LL74 8ST
OS GRID REF. 519 833**

MARCH 20, 2015

ERWCONSULTING | CHARTERED SURVEYORS | DEVELOPMENT CONSULTANTS

1. PREAMBLE

Following the publication of the Anglesey-Gwynedd Deposit JLDP the site described in this document (or any part thereof), in the Local Service Centre of BENLLECH, is offered as an Alternative Site for Housing, in preference to allocation T33 of the Deposit JLDP.

2. THE LAND OWNER

Mr Michael Williams-Bulkeley
c/o ERWCONSULTING | CHARTERED SURVEYORS

3. THE PROPOSED SITE

1. It is shown edged RED on the attached plan.
2. It lies on the NE edge of the settlement of Benllech.
3. It is served by a good road network.
4. It directly adjoins established residential estates.
5. It is mainly level in topography.
6. It directly fronts Ffordd Amlwch, being the A5025 road.
7. The area in total is approx. 1.8ha.
8. A Bus Stop is located immediately in front of the site.
9. It is offered as a whole, or in phased part(s).

4. EXISTING / PROPOSED LAND USE

1. It is a green-field site used for long term pasture.
2. It is not classed in the Agricultural Land Classification context.
3. It is not part of any agricultural holding.
4. The proposal is for HOUSING at minimum density of 30 per hectare.
5. There are no existing buildings on the site.
6. There are no restrictive covenants.
7. There are no extant planning permissions.

5. PHYSICAL / ENVIRONMENTAL CONSTRAINTS

1. The site is not near a watercourse.
2. It has never been subject to flooding, or is likely to in the future.
3. It is not within or close to an area of flood risk.
4. There are no designations affecting the site.
5. There are no landscape, wildlife, habitats, historic or archaeological issues.
6. Development would not lead to the loss of Grade 1, 2 or 3 agricultural land.
7. Development would not lead to the removal of trees or hedge banks, other than for road access and visibility lines.
8. No public or private rights of way affect the site.
9. The topography is mainly level with no unmanageable development constraints.
10. So, there are no physical or environmental constraints.

6. INFRASTRUCTURE / UTILITIES

1. The site is directly accessible from the public highway, which is Ffordd Amlwch, the A5025.
2. It is immediately connected to the public transport system.
3. The nearest utility connections are estimated at –

Electricity 10m
Gas 10m
Water 10m
Sewerage 10m
Telecoms 10m

4. So, connectivity to infrastructure and utilities is favourable.

7. PROXIMITY TO LOCAL SERVICES

1. The following are estimated distances –

Post Office 500m

Convenience Store 500m
Ysgol Gynradd 700m
Secondary School, at Porthaethwy, 1km
Supermarket, at Porthaethwy 1.5km
GP Surgery 600m
Dentist 600m
Pharmacy 600m
Play Area 600m
Public Houses 600m

2. There are established pedestrian footways to all such services.

3. So, access to local services is favourable.

8. JUSTIFICATION

1. The site directly adjoins the existing settlement boundary and is a virtual infill site.

2. It is not subject to any negative development constraints.

3. It is a highly sustainable and accessible location.

4. It is ripe for medium-high density housing development

5. It is demonstrably more sustainable and accessible than the T33 allocated site in Benllech, proposed to date.

6. The site is offered as a whole, or in phased parts.

7. Its development would be a logical and sustainable *rounding-off* of the settlement in this location.

8. It may be developed for low-medium value housing at minimum 30dph, including affordable housing (AH), and a higher percentage of AH and thus greater choice than that which allocation T33 by its site area is capable of delivering.

9. CRITIQUE OF ALLOCATED SITE T33

1. The pattern and developer-preference of existing development in and around the T33 location is higher-end holiday and retiree dwellings, which are substantially higher priced than the local affordability level, so there is less choice of housing.

2. Those in this settlement in housing need on lower incomes will be excluded if T33 succeeds. The Deposit JLDP appears not to have considered this fact so, in this context, is unsound for potential ineffectiveness and social exclusion.

3. The acceptance of the Alternative Site will provide sufficient land for local housing need for the next 5-10 years at a number/density greater than is possible with allocation T33, and will provide a higher number of affordable housing than T33.

4. T33 is located by Benllech Beach, a scenic waterside location highly favoured by in-migrants for holiday and retirement homes, thus potentially excluding local persons in need and degrading local culture and character and the general sustainability of the Welsh language.

Proposed by -

ERWCONSULTING | CHARTERED SURVEYORS | DEVELOPMENT CONSULTANTS

