

REP NO: 719

ID: 1169

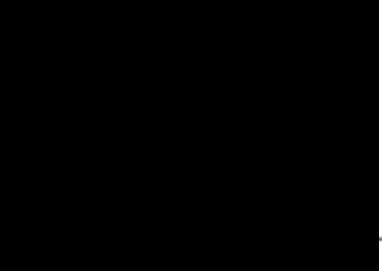



NEED TO SCAN

		For office use only:
		Representor No.
		Date received: 27/3/11 eb
		Date acknowledged:

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

NO SUMMARY EMAIL NEEDED

PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	Noel Davey	
Address	CPRW/Campaign for Protection of 	
Postcode		
Telephone Number		
Email address		

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

2a. Which part of the Deposit Plan are you commenting on?			
CPRW 27 Nefyn Housing Sites/Boundaries			
Policy number (please specify)			
Paragraph number (please specify)			
Proposals/ Inset Map (please specify ref no.)		Map 25	
Constraints Map			
Appendices (please specify)			
2b. Are you objecting or supporting the Deposit Plan?			
Objecting	<input type="checkbox"/>	Supporting	<input type="checkbox"/>

27. Nefyn Housing Sites and Boundaries

27.1 We have no objection to site T47 which involves a logical extension to the eastern boundary of the town. There is no explanation of why Land near the Holborn Estate included in the GUDP for housing has been deleted and the boundary redrawn. Similarly, an isolated development area to the SE of the town in the GUDP has been deleted from the JLDP.

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"/>						
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

2a. Which part of the Deposit Plan are you commenting on?	
CPRW 28 Abersoch Housing Sites/Boundaries	
Policy number <i>(please specify)</i>	
Paragraph number <i>(please specify)</i>	
Proposals/ Inset Map <i>(please specify ref no.)</i>	Map 20 /SP830
Constraints Map	
Appendices <i>(please specify)</i>	

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

28. Abersoch/Housing Sites and Boundaries

28.1 We support the principle of limiting new housing to affordable and local use in coastal villages under particular pressure from second homes. We note that substantial housing needs are still predicted, in the case of Abersoch 65 units, but that all are to come from unspecified windfall or infill sites within the existing development boundary. We question whether this is feasible and are concerned about the lack of explicit housing site proposals if additional housing is in fact needed on this scale. The Candidate Site Register for the JLDP includes only one small site (SP455) within the development boundary and most of those proposed outside such as along the Sarn Bach road or at Machroes we would consider quite unsuitable. Were an extension to the village development boundary needed to accommodate housing and other urgent wants (such as retirement/sheltered houses), then we would support the southern section of the Hendy Farm proposal (SP830) as a reasonably sensible and logical development that would minimise landscape impact if designed sympathetically. This is an area of some 3 ha occupying a form of plateau on the western edge of the village. It would present some access limitations, but there are few other sites close to the village which would not also do so.

	 <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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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 <i>(please specify)</i>	TAI IS HOUSING IN LOCAL SERVICE CENTRES
Paragraph number <i>(please specify)</i>	
Proposals/ Inset Map <i>(please specify ref no.)</i>	
Constraints Map	
Appendices <i>(please specify)</i>	

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.

- The public sewerage network can accept the potential foul flows from the proposed development site.
- The proposed growth being promoted within the catchment area of Treborth WwTW would require improvements at the treatment works which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

T41 Former Cattle Market Site, Valley

- 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.
- Holyhead Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figures.

T42 Land near North Terrace, Criccieth

- 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.
- The proposed growth being promoted for this settlement may require improvements at Criccieth Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

T43 Land near Victoria Hotel, Llanberis

- 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.
- Llanberis Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

T44 Land near Ty Du Road, Llanberis

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

T45 Church Field, Llanrug

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

T46 Land near Rhuthallt Road, Llanrug

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

T47 Land near Helyg, Nefyn

- A water supply can be provided to serve this site.
- There are isolated incidents of flooding in the public sewerage system that will need to be resolved to allow development to proceed. Potential developers can either wait for DCWW to resolve the flooding, subject to funding being approved by our regulator Ofwat, or progress the improvements through the sewerage requisition provisions of the Water Industry Act 1991 or S106 of the Town & Country Planning Act 1990.
- Nefyn Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

T48 Former Allotments, Nefyn

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

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Constraints Map	
Appendices <i>(please specify)</i>	

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

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Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
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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.

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- The public sewerage network can accept the potential foul flows from the proposed development site.
- The proposed growth being promoted within the catchment area of Treborth WwTW would require improvements at the treatment works which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

T41 Former Cattle Market Site, Valley

- 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.
- Holyhead Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figures.

T42 Land near North Terrace, Criccieth

- 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.
- The proposed growth being promoted for this settlement may require improvements at Criccieth Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

T43 Land near Victoria Hotel, Llanberis

- A water supply can be provided to serve this site.
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- This site has planning permission as such we have no further comment to make.

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

T46 Land near Rhuthallt Road, Llanrug

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

T47 Land near Helyg, Nefyn

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T48 Former Allotments, Nefyn

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Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **69**

Enw / Name: **Cyngor Tref Nefyn (Liz Saville Roberts) [2710]**

Rhan: **POLISI TAI15**

Section: **POLICY TAI15**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Nid yw Cyngor Tref Nefyn o'r farn bod angen 37 o dai ychwanegol yn Nefyn rhwng nawr a 2016, sef y nifer a nodir yn y fersiwn Adnau, Mawrth 2015. Teimlir bod y 30 o dai sydd yn y banc tir yn ddigonol ar gyfer anghenion lleol. Tystiolaeth - 21 o dai a godwyd yn Nefyn rhwng 2001 a 2011. Yn ystod y cyfnod hwnnw, bu lleihad o 3% yng nghanran y siaradwyr Cymraeg yn Nefyn. Gwerthfawrogir nad oes cysylltiad uniongyrchol rhwng canran siaradwyr Cymraeg a datblygiadau tai, ond mae'r Cyngor o'r farn bod perthynas rhyngddynt yn yr ardal hon. Lleihau lefel twf Nefyn i adlewyrchu graddfa twf rhwng 2001 a 2011 er mwyn i ddatblygiadau tai adlewyrchu anghenion lleol.

Representation Summary:

Reduce the growth level of Nefyn to reflect the growth scale between 2001 and 2011 so that housing developments reflect local needs. Nefyn Town Council is not of the opinion that there is a need for 37 additional houses in Nefyn between now and 2016, which is the number noted in the Deposit version, March 2015. It is felt that the 30 houses on the landbank are sufficient for local need. Evidence - 21 houses were built in Nefyn between 2001 and 2011. During that period, there was a reduction of 3% in the percentage of Welsh speakers in Nefyn. It is appreciated that there is no direct link between the percentage of Welsh speakers and housing developments, but the Council is of the opinion that a correlation exists between them in this area.

Sylw Llawn / Full Representation:

Nid yw Cyngor Tref Nefyn o'r farn bod angen 37 o dai ychwanegol yn Nefyn rhwng nawr a 2016, sef y nifer a nodir yn y fersiwn Adnau, Mawrth 2015. Teimlir bod y 30 o dai sydd yn y banc tir yn ddigonol ar gyfer anghenion lleol.

Tystiolaeth - 21 o dai a godwyd yn Nefyn rhwng 2001 a 2011. Yn ystod y cyfnod hwnnw, bu lleihad o 3% yng nghanran y siaradwyr Cymraeg yn Nefyn. Gwerthfawrogir nad oes cysylltiad uniongyrchol rhwng canran siaradwyr Cymraeg a datblygiadau tai, ond mae'r Cyngor o'r farn bod perthynas rhyngddynt yn yr ardal hon.

Newid(iadau) i'r Cynllun

Lleihau lefel twf Nefyn i adlewyrchu graddfa twf rhwng 2001 a 2011 er mwyn i ddatblygiadau tai adlewyrchu

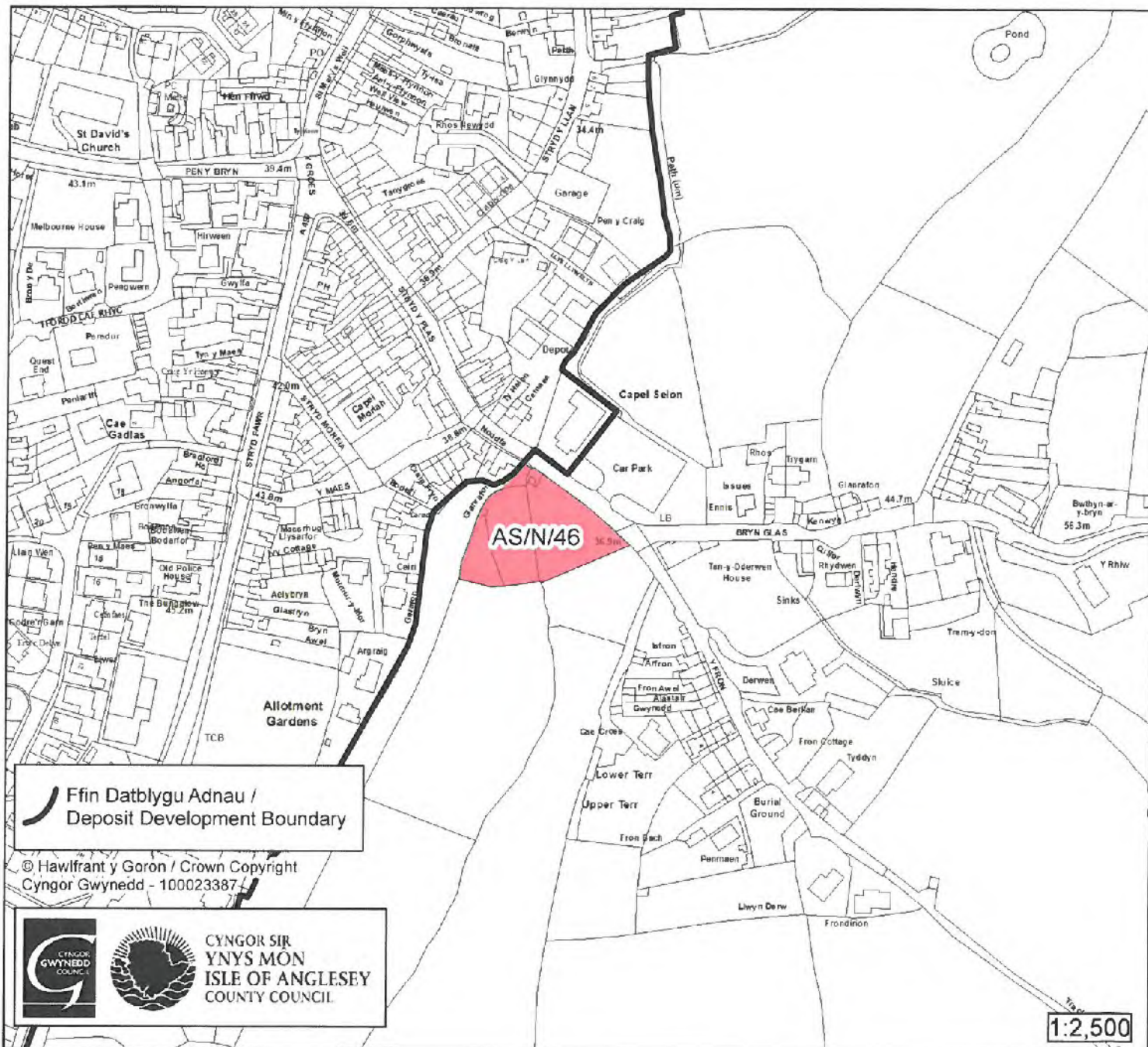
Change(s) to the Plan

Reduce the growth level of Nefyn to reflect the growth scale between 2001 and 2011 so that housing developments reflect local needs.

Profion Cadernid / Soundness Tests: None

**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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Cynghor Gwynedd - 100023387



CYNGOR SIR
YNYS MÔN
ISLE OF ANGLESEY
COUNTY COUNCIL

1:2,500

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

Cyfeirnod / Reference: AS/N/46

Enw'r Safle / Site Name: Tir i'r gorllewin / Land to the West Y Fron

Lleoliad / Location: Nefyn

Cynghor Cymuned / Community Council: Nefyn

Maint (ha) / Size (ha): 0.24

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

AS/N/46

	 <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: 31/3/10 <i>el</i></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.

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PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	Lord Newborough	Mrs Charlene Sussums-Lewis
Address	c/o Agent	
Postcode		
Telephone Number		
Email address		

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

2a. Which part of the Deposit Plan are you commenting on?	
Policy number (please specify)	TAI15
Paragraph number (please specify)	6.41/6.42
Proposals/ Inset Map (please specify ref no.)	Inset 25
Constraints Map	
Appendices (please specify)	

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

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

2ch. If your response to 2c above exceeds 100 words, please provide a summary (no more than 100 words).
The proposed allocation of alternative site known as Land at Nefyn (East of Y Fron) for 16 residential units. Site is supported for the following reasons: <u>Deliverability – Positive Planning.</u> <u>Allocated Housing Numbers</u> <u>Development Principle</u> <u>Opportunities and Constraints</u> – As attached at Appendix 1 <u>Indicative Masterplan</u> – As attached at Appendix 2 <u>Positive Sustainability Appraisal</u>

2d. Please detail the changes you wish to see made to the Deposit Plan.
Allocation of additional site known as Land at Nefyn (East of Y Fron) to provide 16 residential units as indicated on the Opportunities and Constraints Plan. A Sustainability Appraisal has been carried out and is included in the supporting documentation.

2dd. Is the Deposit Plan sound?
Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Y

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	P2	C1	C2	C3	C4	CE 1	CE 2	CE 3	CE 4	Y			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<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.

Representation of landowner with regards Settlement Hierarchy, Projected Housing numbers & Settlement of Nefyn (Map Inset 25)

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:

Supporting Statement with Sustainability Appraisal

Opportunities and Constraints Plan

Indicative Masterplan

Signed:

[Redacted Signature]

Dated: 30/03/2015

THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN

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

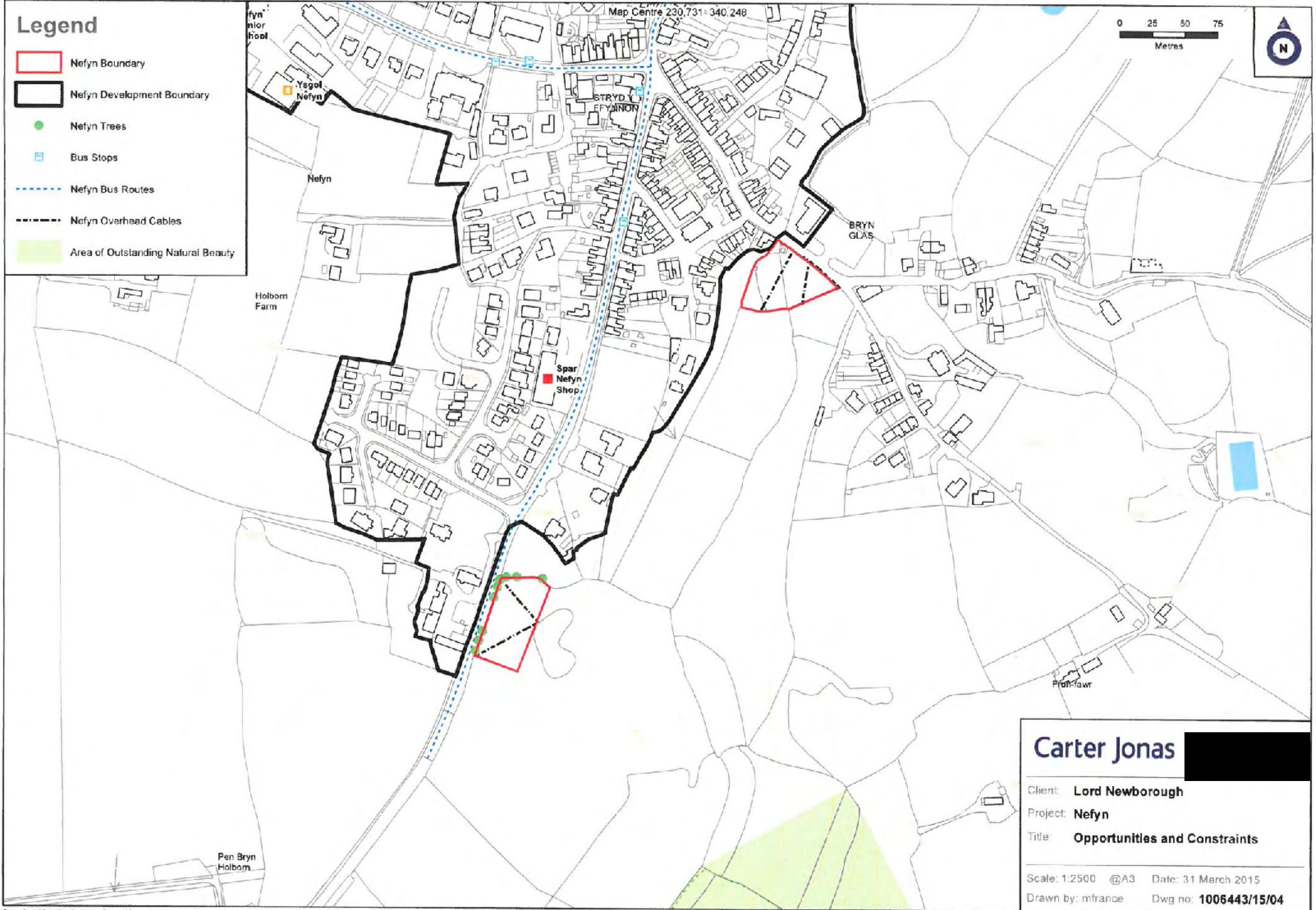
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BY EMAIL – planningpolicy@gwynedd.gov.uk

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**



Carter Jonas

Client: Lord Newborough

Project: Nefyn

Title: Opportunities and Constraints

Scale: 1:2500 @A3 Date: 31 March 2015

Drawn by: mfrance Dwg no: 1006443/15/04

ANGLESEY & GWYNEDD JOINT LOCAL DEVELOPMENT PLAN (2011-2026)

DEPOSIT PLAN (2015) PUBLIC CONSULTATION RESPONSE

Title:	Alternative Site – Land at Nefyn (East of Y Fron)
Client:	Lord Newborough
Agent:	Charlene Sussums-Lewis Chris Bell
Contact:	
Email:	

1. Introduction

1.1. These representations have been prepared in response to the Deposit Plan (2015) of the Joint Local Development Plan – Anglesey & Gwynedd (2011-2026).

2. Soundness

2.1. We consider that the Deposit Plan is unsound due to reason 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.*

3. Deposit Plan

3.1. In the Deposit Plan, **Nefyn** is classified as a **Local Service Centre**. The Deposit Plan recognises in Paragraph **7.4.122** the complimentary role of the Local Service Centres, providing the essential service needs of their own population and immediate rural catchment areas as well as some employment and retail opportunities. It goes on to states that over the Plan period housing growth will be directed to land within or on the fringe of these Local Service Centres. Development will be delivered through completions, commitments, windfall and, where appropriate, new allocations.

3.2. Under **Policy TAI15** Nefyn has two site allocations and an indicative windfall allowance. The allocations are for Site T47 (Land near Helyg) for 19 units and Site T48 (Former Allotments) for 10 units (Although this site already has planning consent). In addition, an indicative windfall provision of 37 units (on sites within the development boundary) has been allowed over the plan period (2011-2026).

3.3. These representations are submitted in order to promote the inclusion of an alternative site known as '**Land at Nefyn (East of Y Fron)**' for residential development.

4. Site Assessment

CRITERIA	SITE DETAILS & COMPLIANCE
Site Ref	Land at Nefyn (East of Y Fron)
Settlement	Nefyn

Proposal	Residential Development
Current Use	Agricultural
Area	0.4 ha
Density	30 dwellings per hectare
Approx Total Yield	16 dwellings, mixed
HIERARCHY OF SETTLEMENTS	
Located within Settlement Boundary Limit	Site adjoins existing settlement boundary
Previously Developed Land	No
Position in Settlement Hierarchy	Local Village
ACCESS TO KEY SERVICES	
Distance to Post Office	200m
Convenience Store	400m
Primary School	350m
Secondary School	10km
Supermarket	400m
Doctors Surgery	550m
Pharmacy	150m
Play Area	500m
CONSTRAINTS AND DELIVERABILITY	
ENVIRONMENTAL CONSTRAINTS	
Impact of landscape and countryside	No – site developed to West and East – natural extension

Impact on local village character	No – opportunity to enhance area
Impact on views	No – site well screened
Impact on Biodiversity	No – Opportunity to increase biodiversity as currently used for agriculture.
Impact on Historic Environment	No
<i>PHYSICAL CONSTRAINTS</i>	
Flood Risk	No
Ownership	Private ownership
Ground Conditions	Site capable for development
Archaeology	None known. Understood an assessment would be required at planning application stage.
Highways	Access satisfactory (see Indicative Plan)
Availability	Available for development and deliverable within plan period.

5. Alternative Site Justification

5.1. With regards the proposed development boundary drawn for **Nefyn**, it is considered that the development boundary should include for the site known as **Land at Nefyn (East of Y Fron)**.

The sound reasoning for the proposed alteration to the development boundary includes:

5.1.1. Deliverability – Positive Planning. The Site is under single ownership which allows for effective disposal and deliverability. The inclusion of The Site within the development boundary would also allow for positive planning in accordance with National Planning Policy as The Site is available, deliverable and located on the edge of a settlement suitable for growth.

5.1.2. Allocated Housing Numbers - Policy **TAI15** of the Deposit Plan states that residential allocation in **Local Service Centres** including **Nefyn** will count towards the delivery of housing growth identified in the Plan's strategy. Paragraph **6.41** states that the overall housing land requirement stands at 7,902 for the Plan area during the Plan period (2011-2026). This equates to 3,817 housing units to Anglesey and 4,084 to Gwynedd. Paragraph **6.42** states that in line with the spatial strategy, up to 55% of the overall housing land requirement identified for the Plan area is directed to Bangor (Sub-Regional Centre) and the Urban Service Centres combined and at least 20% to the Local Service Centres. These are the largest settlements where there are concentrations of facilities. The remainder (no more than 25%) is expected to be delivered in Villages, Clusters and the countryside. The proposed allocation is therefore in accordance with **TAI15, 6.41 & 6.42**.

5.1.3. Development Principle & Proposed Additional Site – Policy **TAI15** of the Deposit JLDP states that Sites T47 and T48 can accommodate 29 dwellings over the plan period (2011-2026). There is a further allowance of 37 windfall units to be found within the development boundary. It is suggested that the provision of 37 units is too high within the tightly formed development boundary and that it would be more beneficial in terms of spatial planning and creating a higher quality environment and development to allocate further stand alone sites which would absorb a proportion of the high windfall allowance.

5.1.4. To that end, the submitted Opportunities & Constraints Plan identifies a further potential site known as **Land at Nefyn (East of Y Fron)**. Upon examining the Deposit Plan and the accompanying Opportunities & Constraints Plan and Indicative Masterplan, **16** dwellings could be accommodated upon The Site whilst resulting in a positive enhancement to the area and provision of housing. Spatially, it is considered that The Site would create a natural extension to the settlement and would not lead to an unacceptable intrusion into the open countryside.

5.1.5. Opportunities and Constraints – As attached at Appendix 1, the plan demonstrates that the development of The Site is feasible and that no major constraints would inhibit the development of it.

5.1.6. Indicative Masterplan – As attached at Appendix 2, it is demonstrated that The Site could be developed and delivered with minimal adverse impacts on the surrounding settlement. It is noted that the development of the site would allow for a well designed and sustainable scheme on the edge of the settlement of **Nefyn**.

5.1.7. Positive Sustainability Appraisal – The proposed site known as **Land at Nefyn (East of Y Fron)** is in accordance with the Deposit LDP Strategy and also in accordance with the Sustainability Appraisal. (See Section 6)

6. Sustainability Appraisal

Site Name: **Land at Nefyn (East of Y Fron)**

Site Area: **0.4Ha**

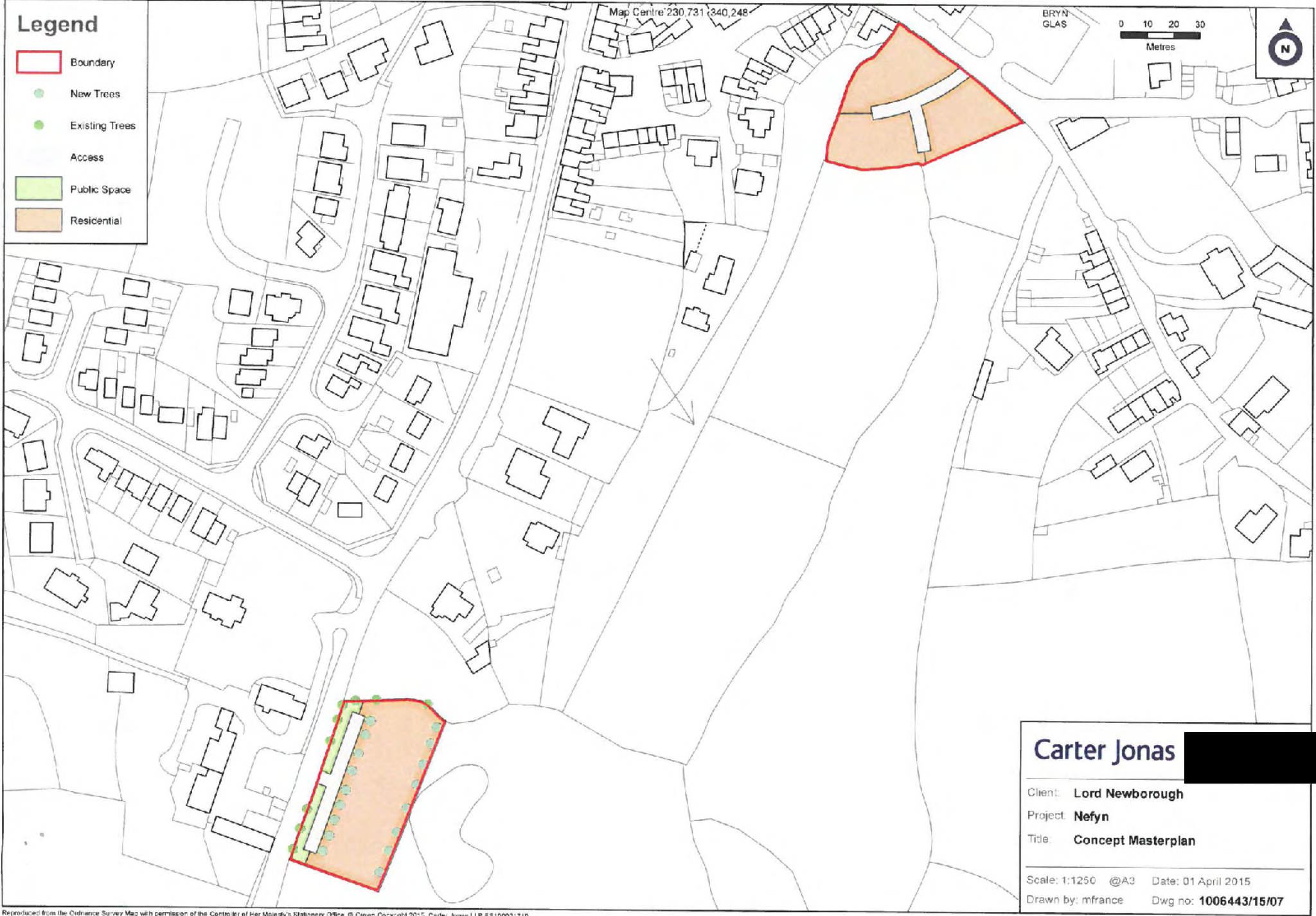
SA Objective	Assessment	Summary
<p>1. Maintain and enhance biodiversity interests and connectivity (SEA) <i>Topics: biodiversity, fauna, flora, soil)</i></p>	+	<p>The Site will contribute towards this SA Objective because The Site is not within a protected area and the development of The Site will not lead to adverse impacts regarding contamination. The development of The Site can include for enhancement of biodiversity with the planting of trees and hedges where appropriate.</p> <p>The site is currently agricultural with little benefit to wildlife. It is hoped that the development of open space provision and occupiers gardens will be of benefit to the environment.</p>
<p>2. Promote community viability, cohesion, health and well being (SEA) <i>Topics: human health, population)</i></p>	++	<p>The Site will contribute towards this SA Objective because The Site is on the edge of the settlement and will provide for the opportunity of new housing stock designed and built to good sustainable modern standards.</p> <p>Development of the site would ensure that local services and facilities are supported.</p>

		<p>The site would enable local people to remain living in their local area by providing a mix of housing sizes and tenure.</p> <p>The site will support children, young people, working age and retired people through the mix in housing sizes and tenure.</p>
<p>3. Manage and reduce the impacts of climate change by promoting and supporting mitigation and adaptation measures (SEA Topics: climatic factors, air)</p>	++	<p>The Site will contribute towards this SA Objective because The Site will provide for modern housing with high insulation and efficiency levels resulting in low emissions and heat/energy losses. The Site can also utilise renewable energy sources.</p>
<p>4. Conserve, promote and enhance the Welsh language (SEA Topic: cultural heritage)</p>	++	<p>The Site will contribute towards this SA Objective because The Site is on the edge of the development boundary and will offer accommodation suitable for all.</p>
<p>5. Conserve, promote and enhance cultural resources and historic heritage assets (SEA Topic: cultural heritage)</p>	++	<p>The Site will contribute towards this SA Objective because The Site will not have an adverse impact on historic or cultural heritage upon development.</p>
<p>6. Support economic growth and facilitate a vibrant, diversified economy providing local employment opportunities (SEA Topic: Population)</p>	+	<p>The Site will contribute towards this SA Objective because The Site will offer employment opportunities during the construction process and it will also offer good quality new housing stock that may encourage people to stay in the area and work locally, which will further strengthen the local economy.</p>
<p>7. Provide good quality housing, including affordable housing that meets local needs (SEA Topic: population, human health)</p>	++	<p>The Site will contribute towards this SA Objective because The Site will be built out to modern building regulation standards to allow for energy efficient modern housing.</p>
<p>8. Value, conserve and enhance the plan area's rural landscapes and</p>	++	<p>The Site will contribute towards this SA Objective because The Site is located on the edge of the settlement and would allow for good quality</p>

urban townscapes (SEA Topics: landscape)		design in keeping with the surrounding area.
9. Use land and mineral assets efficiently and promote mechanisms for waste minimisation, re-use and recycling (SEA Topic: material assets, soil)	++	The Site will contribute towards this SA Objective because The Site would incorporate recycling and sustainable drainage solutions at the Full Planning Application stage.
10. Promote and enhance good transport links to support the community and the economy (SEA Topic: population, human health)	++	The Site will contribute towards this SA Objective because the development of The Site would allow for additional customers to use the existing facilities and bus service which will further strengthen its viability for future operation.
11. Safeguard water quality, manage water resources sustainability and minimise flood risk (SEA Topic: water, biodiversity)	++	The Site will contribute towards this SA Objective because The Site is not within an area liable to flooding and sustainable drainage solutions would be incorporated at the Full Planning Application Stage.

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		



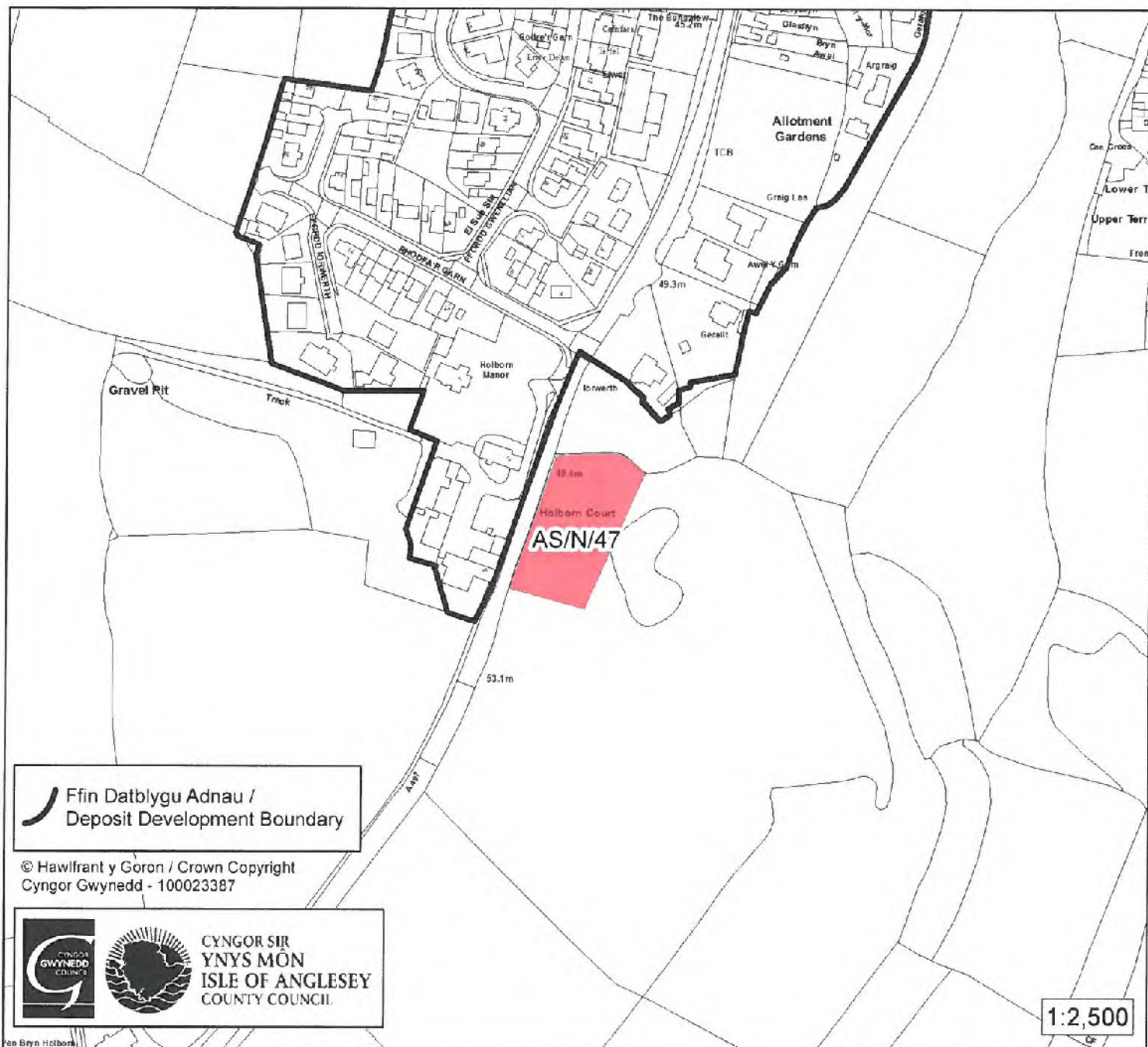
Carter Jonas

Client: Lord Newborough
Project: Nefyn
Title: Concept Masterplan

Scale: 1:1250 @A3 Date: 01 April 2015
Drawn by: mfrance Dwg no: 1006443/15/07

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

COFRESTR SAFLEOEDD AMGEN / ALTERNATIVE SITES REGISTER



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

Cyfeirnod / Reference: AS/N/47

Enw'r Safle / Site Name: Tir ger / Land adj Holbourn Court

Lleoliad / Location: Nefyn

Cyngor Cymuned / Community Council: Nefyn

Maint (ha) / Size (ha): 0.25

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

AS/N/47

	 <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: 31/3/15 </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	Lord Newborough	Mrs Charlene Sussums-Lewis
Address	c/o Agent	[REDACTED]
Postcode		
Telephone Number		
Email address		

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

2a. Which part of the Deposit Plan are you commenting on?	
Policy number (please specify)	TAI15
Paragraph number (please specify)	6.41/6.42
Proposals/ Inset Map (please specify ref no.)	Inset 25
Constraints Map	
Appendices (please specify)	

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Objecting	Y	Supporting	

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

2ch. If your response to 2c above exceeds 100 words, please provide a summary (no more than 100 words).
The proposed allocation of alternative site known as Site South of Nefyn off A497 for 16 residential units. Site is supported for the following reasons: <u>Deliverability – Positive Planning.</u> <u>Allocated Housing Numbers</u> <u>Development Principle</u> <u>Opportunities and Constraints – As attached at Appendix 1</u> <u>Indicative Masterplan – As attached at Appendix 2</u> <u>Positive Sustainability Appraisal</u>

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Allocation of additional site known as Site South of Nefyn off A497 to provide 16 residential units as indicated on the Opportunities and Constraints Plan. A Sustainability Appraisal has been carried out and is included in the supporting documentation.

2dd. Is the Deposit Plan sound?	
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

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

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Plan's adoption

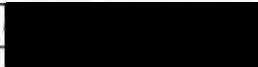
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Indicative Masterplan

Signed:



Dated: 30/03/2015

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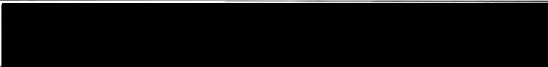
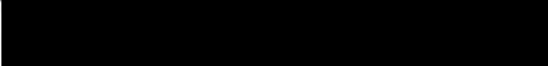
BY EMAIL – planningpolicy@gwynedd.gov.uk

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

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ANGLESEY & GWYNEDD JOINT LOCAL DEVELOPMENT PLAN (2011-2026)

DEPOSIT PLAN (2015) PUBLIC CONSULTATION RESPONSE

Title:	Alternative Site – Land at Nefyn (South off A497)
Client:	Lord Newborough
Agent:	Charlene Sussums-Lewis Chris Bell
Contact:	
Email:	

1. Introduction

1.1. These representations have been prepared in response to the Deposit Plan (2015) of the Joint Local Development Plan – Anglesey & Gwynedd (2011-2026).

2. Soundness

2.1. We consider that the Deposit Plan is unsound due to reason 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.*

3. Deposit Plan

3.1. In the Deposit Plan, **Nefyn** is classified as a **Local Service Centre**. The Deposit Plan recognises in Paragraph **7.4.122** the complimentary role of the Local Service Centres, providing the essential service needs of their own population and immediate rural catchment areas as well as some employment and retail opportunities. It goes on to states that over the Plan period housing growth will be directed to land within or on the fringe of these Local Service Centres. Development will be delivered through completions, commitments, windfall and, where appropriate, new allocations.

3.2. Under **Policy TAI15** Nefyn has two site allocations and an indicative windfall allowance. The allocations are for Site T47 (Land near Helyg) for 19 units and Site T48 (Former Allotments) for 10 units (Although this site already has planning consent). In addition, an indicative windfall provision of 37 units (on sites within the development boundary) has been allowed over the plan period (2011-2026).

3.3. These representations are submitted in order to promote the inclusion of an alternative site known as '**Site South of Nefyn off A497**' for residential development.

4. Site Assessment

CRITERIA	SITE DETAILS & COMPLIANCE
Site Ref	Site South of Nefyn off A497
Settlement	Nefyn

Proposal	Residential Development
Current Use	Agricultural
Area	0.4 ha
Density	30 dwellings per hectare
Approx Total Yield	16 dwellings, mixed
HIERARCHY OF SETTLEMENTS	
Located within Settlement Boundary Limit	Site adjoins existing settlement boundary
Previously Developed Land	No
Position in Settlement Hierarchy	Local Village
ACCESS TO KEY SERVICES	
Distance to Post Office	350m
Convenience Store	150m
Primary School	350m
Secondary School	10km
Supermarket	150m
Doctors Surgery	550m
Pharmacy	150m
Play Area	500m
CONSTRAINTS AND DELIVERABILITY	
ENVIRONMENTAL CONSTRAINTS	
Impact of landscape and countryside	No – site developed to North and West – natural extension

Impact on local village character	No – opportunity to enhance area
Impact on views	No – site well screened
Impact on Biodiversity	No – Opportunity to increase biodiversity as currently used for agriculture.
Impact on Historic Environment	No
PHYSICAL CONSTRAINTS	
Flood Risk	No
Ownership	Private ownership
Ground Conditions	Site capable for development
Archaeology	None known. Understood an assessment would be required at planning application stage.
Highways	Access satisfactory (see Indicative Plan)
Availability	Available for development and deliverable within plan period.

5. Alternative Site Justification

5.1. With regards the proposed development boundary drawn for **Nefyn**, it is considered that the development boundary should include for the site known as **Site South of Nefyn off A497**. The sound reasoning for the proposed alteration to the development boundary includes:

5.1.1. Deliverability – Positive Planning. The Site is under single ownership which allows for effective disposal and deliverability. The inclusion of The Site within the development boundary would also allow for positive planning in accordance with National Planning Policy as The Site is available, deliverable and located on the edge of a settlement suitable for growth.

5.1.2. Allocated Housing Numbers - Policy **TAI15** of the Deposit Plan states that residential allocation in **Local Service Centres** including **Nefyn** will count towards the delivery of housing growth identified in the Plan's strategy. Paragraph **6.41** states that the overall housing land requirement stands at 7,902 for the Plan area during the Plan period (2011-2026). This equates to 3,817 housing units to Anglesey and 4,084 to Gwynedd. Paragraph **6.42** states that in line with the spatial strategy, up to 55% of the overall housing land requirement identified for the Plan area is directed to Bangor (Sub-Regional Centre) and the Urban Service Centres combined and at least 20% to the Local Service Centres. These are the largest settlements where there are concentrations of facilities. The remainder (no more than 25%) is expected to be delivered in Villages, Clusters and the countryside. The proposed allocation is therefore in accordance with **TAI15, 6.41 & 6.42**.

5.1.3. Development Principle & Proposed Additional Site – Policy **TAI15** of the Deposit JLDP states that Sites T47 and T48 can accommodate 29 dwellings over the plan period (2011-2026). There is a further allowance of 37 windfall units to be found within the development boundary. It is suggested that the provision of 37 units is too high within the tightly formed development boundary and that it would be more beneficial in terms of spatial planning and creating a higher quality environment and development to allocate further stand alone sites which would absorb a proportion of the high windfall allowance.

5.1.4. To that end, the submitted Opportunities & Constraints Plan identifies a further potential site known as **Site South of Nefyn off A497**. Upon examining the Deposit Plan and the accompanying Opportunities & Constraints Plan and Indicative Masterplan, **16** dwellings could be accommodated upon The Site whilst resulting in a positive enhancement to the area and provision of housing. Spatially, it is considered that The Site would create a natural extension to the settlement and would not lead to an unacceptable intrusion into the open countryside.

5.1.5. Opportunities and Constraints – As attached at Appendix 1, the plan demonstrates that the development of The Site is feasible and that no major constraints would inhibit the development of it.

5.1.6. Indicative Masterplan – As attached at Appendix 2, it is demonstrated that The Site could be developed and delivered with minimal adverse impacts on the surrounding settlement. It is noted that the development of the site would allow for a well designed and sustainable scheme on the edge of the settlement of **Nefyn**.

5.1.7. Positive Sustainability Appraisal – The proposed site known as **Site South of Nefyn off A497** is in accordance with the Deposit LDP Strategy and also in accordance with the Sustainability Appraisal. (See Section 6)

6. Sustainability Appraisal

Site Name: **Site South of Nefyn off A497**

Site Area: **0.4Ha**

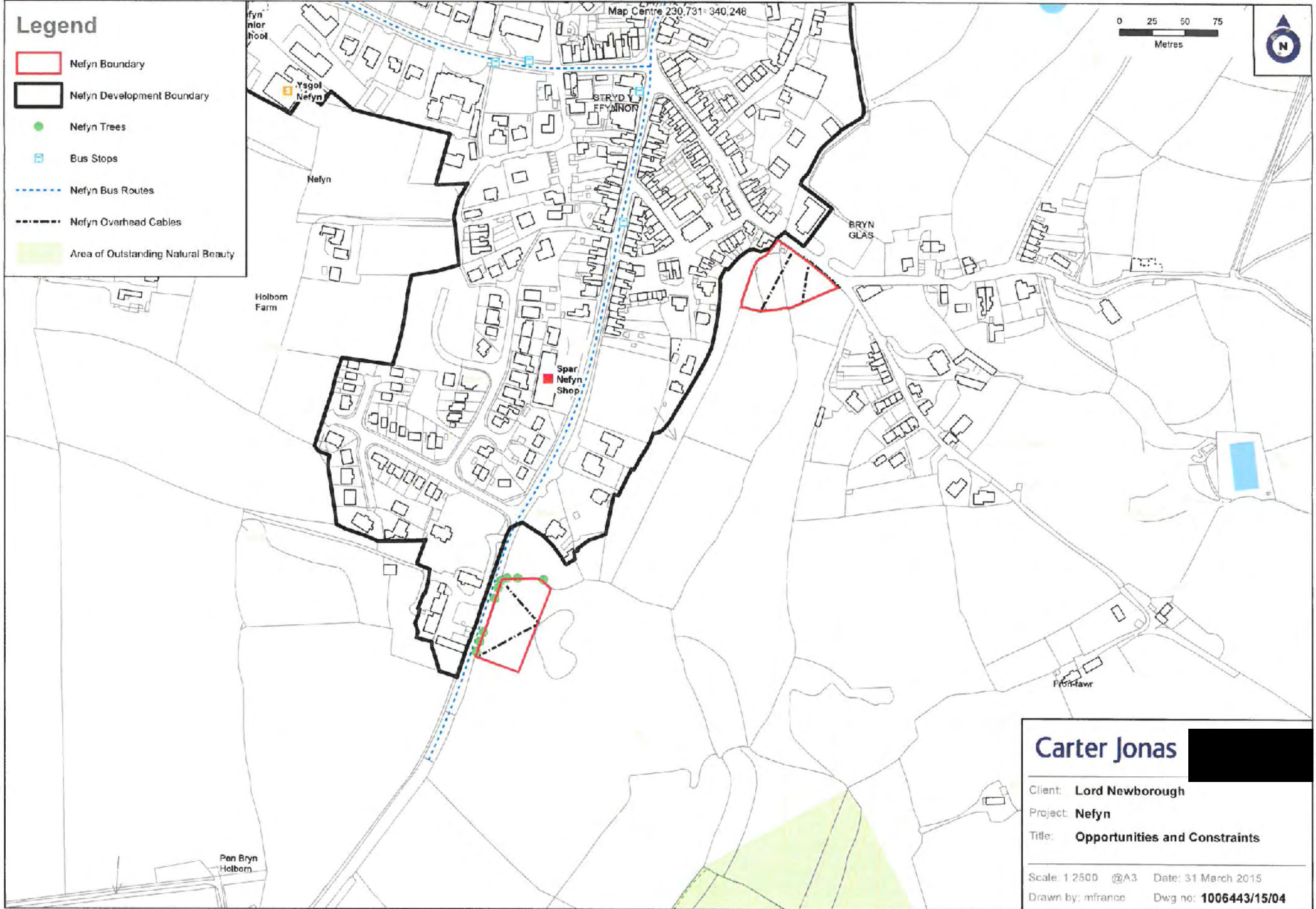
SA Objective	Assessment	Summary
<p>1. Maintain and enhance biodiversity interests and connectivity (SEA) <i>Topics: biodiversity, fauna, flora, soil)</i></p>	+	<p>The Site will contribute towards this SA Objective because The Site is not within a protected area and the development of The Site will not lead to adverse impacts regarding contamination. The development of The Site can include for enhancement of biodiversity with the planting of trees and hedges where appropriate.</p> <p>The site is currently agricultural with little benefit to wildlife. It is hoped that the development of open space provision and occupiers gardens will be of benefit to the environment.</p>
<p>2. Promote community viability, cohesion, health and well being (SEA) <i>Topics: human health, population)</i></p>	++	<p>The Site will contribute towards this SA Objective because The Site is on the edge of the settlement and will provide for the opportunity of new housing stock designed and built to good sustainable modern standards.</p> <p>Development of the site would ensure that local services and facilities are supported.</p>

		<p>The site would enable local people to remain living in their local area by providing a mix of housing sizes and tenure.</p> <p>The site will support children, young people, working age and retired people through the mix in housing sizes and tenure.</p>
<p>3. Manage and reduce the impacts of climate change by promoting and supporting mitigation and adaptation measures (SEA Topics: climatic factors, air)</p>	++	<p>The Site will contribute towards this SA Objective because The Site will provide for modern housing with high insulation and efficiency levels resulting in low emissions and heat/energy losses. The Site can also utilise renewable energy sources.</p>
<p>4. Conserve, promote and enhance the Welsh language (SEA Topic: cultural heritage)</p>	++	<p>The Site will contribute towards this SA Objective because The Site is on the edge of the development boundary and will offer accommodation suitable for all.</p>
<p>5. Conserve, promote and enhance cultural resources and historic heritage assets (SEA Topic: cultural heritage)</p>	++	<p>The Site will contribute towards this SA Objective because The Site will not have an adverse impact on historic or cultural heritage upon development.</p>
<p>6. Support economic growth and facilitate a vibrant, diversified economy providing local employment opportunities (SEA Topic: Population)</p>	+	<p>The Site will contribute towards this SA Objective because The Site will offer employment opportunities during the construction process and it will also offer good quality new housing stock that may encourage people to stay in the area and work locally, which will further strengthen the local economy.</p>
<p>7. Provide good quality housing, including affordable housing that meets local needs (SEA Topic: population, human health)</p>	++	<p>The Site will contribute towards this SA Objective because The Site will be built out to modern building regulation standards to allow for energy efficient modern housing.</p>
<p>8. Value, conserve and enhance the plan area's rural landscapes and</p>	++	<p>The Site will contribute towards this SA Objective because The Site is located on the edge of the settlement and would allow for good quality</p>

urban townscapes (SEA Topics: landscape)		design in keeping with the surrounding area.
9. Use land and mineral assets efficiently and promote mechanisms for waste minimisation, re-use and recycling (SEA Topic: material assets, soil)	++	The Site will contribute towards this SA Objective because The Site would incorporate recycling and sustainable drainage solutions at the Full Planning Application stage.
10. Promote and enhance good transport links to support the community and the economy (SEA Topic: population, human health)	++	The Site will contribute towards this SA Objective because the development of The Site would allow for additional customers to use the existing facilities and bus service which will further strengthen its viability for future operation.
11. Safeguard water quality, manage water resources sustainability and minimise flood risk (SEA Topic: water, biodiversity)	++	The Site will contribute towards this SA Objective because The Site is not within an area liable to flooding and sustainable drainage solutions would be incorporated at the Full Planning Application Stage.

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		



Carter Jonas

Client: Lord Newborough
Project: Nefyn
Title: Opportunities and Constraints

Scale: 1:2500 @A3 Date: 31 March 2015
Drawn by: mfrance Dwg no: 1006443/15/04

