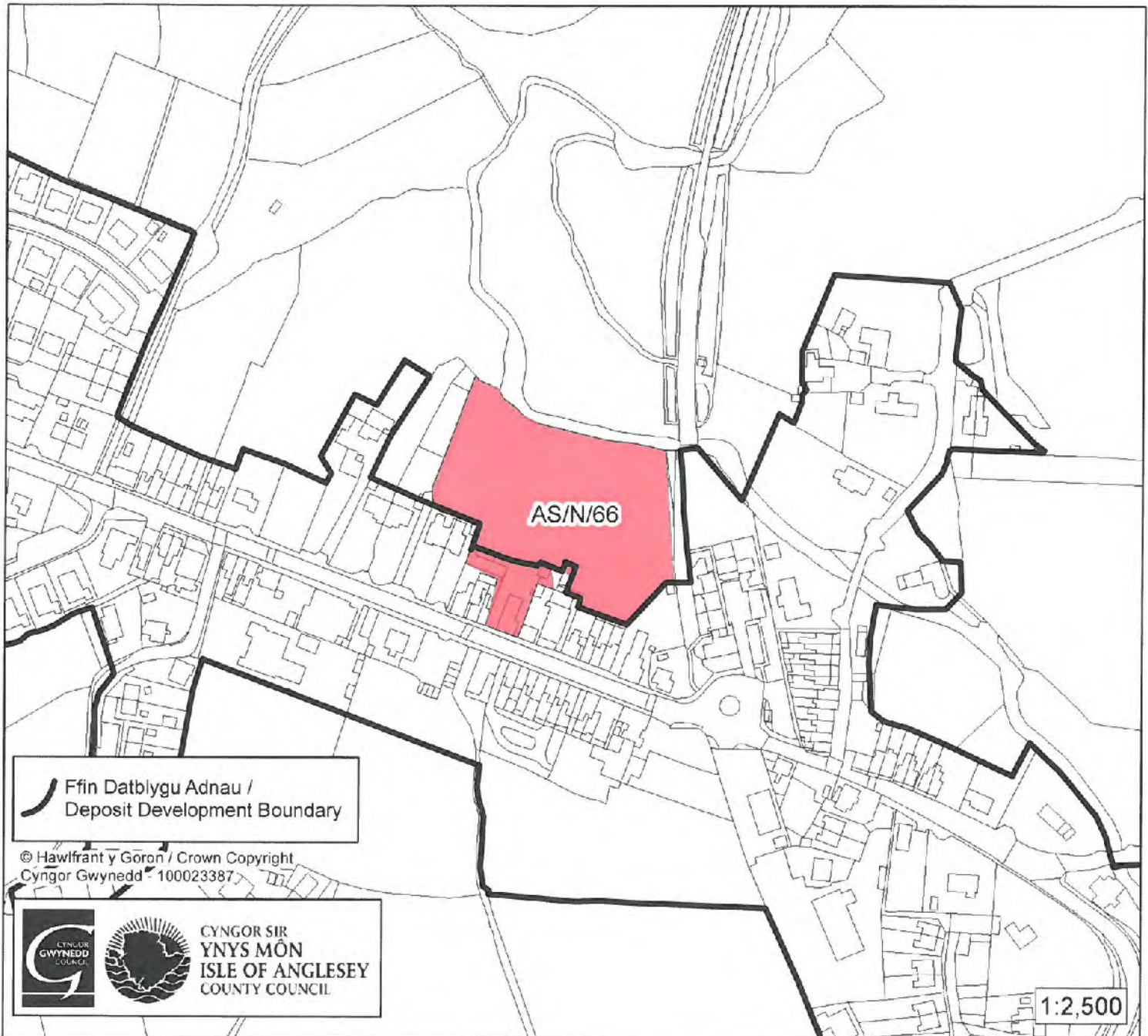


**Cynllun Datblygu Lleol ar y Cyd Gwynedd a Môn
Anglesey and Gwynedd Joint Local Development Plan
2011- 2026**

COFRESTR SAFLEOEDD AMGEN / ALTERNATIVE SITES REGISTER



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

Cyfeirnod / Reference: AS/N/66

Enw'r Safle / Site Name: Tir yn / Land at Madryn Terrace

Lleoliad / Location: Chwilog

Cyngor Cymuned / Community Council: Llanystumdwy

Maint (ha) / Size (ha): 0.8

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

AS/N/66

		<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>
--	---	--	---

**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	DAPHNE MARINI	
Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	
Email address	[REDACTED]	

Guidance Note.

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

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

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

If you wish to delete a site that is allocated in the Deposit Plan or suggest amendments to it or you wish to propose a new site, please attach a 1:1250 or 1:2500 scale plan that clearly identifies the site boundaries. If you are proposing a new site (one that is not included within the Deposit Plan) the comment form must be accompanied by a detailed site assessment in accordance with the Council's Candidate Site assessment methodology and the Sustainability Appraisal framework. The Candidate Site assessment methodology and the Sustainability Appraisal framework can be found on the Council's website at www.gwynedd.gov.uk/ldp 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: www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp 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 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)	
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	✓ SH4338 35-CHWILOG.
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.

The current deposit plan omits approximately 1.7 acres of unused land to the rear of our property (Brookside, Meadwyn Terrace) which is ideally suited for new build residences, community parking space (either for the residents and or the public in general) or light commercial development and is positioned within easy access of the centre of the village, its amenities, recreational facilities and a public transport node. Our suggested changes to the 2015 Deposit Plan align with the objectives of the Sustainability Appraisal Report and would significantly support a number of the S.A objectives in particular 2/3/6/7/10 whilst incurring none of the negative outcomes mentioned therein.

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

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

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

As Above.

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?

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:

29/3/2015

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 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) 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.

ORDNANCE SURVEY
PLAN REFERENCE

SH 4338

SECTION C

Scale 1/1
Enlarged from

ADMINISTRATIVE AREA

GWYNEDD

© Crown cop



Sustainability Appraisal Matrix

Site Name: Land to rear of Brookside, Madryn Terrace, Chwillog. LL53 6SH Site Area: 1.7 acres		
SA Objective	Assessment	Summary
1. Maintain and enhance biodiversity interests and connectivity (<i>SEA Topics: biodiversity, fauna, flora, soil</i>)	++	No loss of trees and hedgerows. No impact on views/vistas.
2. Promote community viability, cohesion, health and well being (<i>SEA Topics: human health, population</i>)	++ ++ ++ ++	The site does not have any value as an open space or recreational importance. There is no risk of contamination. The site is within walking distance of a range of facilities. There is no impact arising from potentially conflicting land uses. Site is immediately adjoining residential area and borders onto the village park/playground. The site is within the built form of a settlement.
3. Manage and reduce the impacts of climate change by promoting and supporting mitigation and adaptation measures (<i>SEA Topics: climatic factors, air</i>)	++ ++ ++ ++	No risk of flooding. Within built form. Accessible to a highway – borders onto one; which is of sufficient quality to deal with potential development Access can easily be arranged.
4. Conserve, promote and enhance the Welsh language (<i>SEA Topic: cultural heritage</i>)	++	Within walking distance of a range of facilities; Primary School. Village post office/convenience store and village hall.
5. Conserve, promote and enhance cultural resources and historic heritage assets (<i>SEA Topic: cultural heritage</i>)	0 ++ ++ ++	No designation. Opportunity to remove a rundown, rusty steel shed. No impact on views or vistas. No impact on character of settlement within residential area
6. Support economic growth and facilitate a vibrant, diversified economy providing local employment opportunities (<i>SEA Topic: Population</i>)	++ ++ ++	The highway system is of sufficient quality to deal with the potential development of the site. Post Office/Convenient store 100 yards. Primary school 150 yards Community Hall 100 yards Supermarket, pharmacy, surgery and dentist within 4 miles (Pwllheli) Play area borders on to site. All utilities border onto the site with the exception of gas which is not available in the village No adverse impact from conflicting land uses. <i>The village is on a main bus route.</i>
7. Provide good quality housing, including affordable housing that meets local needs (<i>SEA Topic: population, human health</i>)	++	Highway system is of sufficient quality to deal with site Distance to nearest service/ facilities etc. as stated above. Distance to nearest utility connections – as stated above. No impact from conflicting land uses.

<p>8. Value, conserve and enhance the plan area's rural landscapes and urban townscapes (SEA Topics: landscape)</p>	<p>++</p>	<p>The site is not protected by landscape, ecological, geological, historical or cultural designations. The site does not have any value as an open space or recreation. The development of the site would present an opportunity to remove an eyesore i.e. a rusty shed.</p> <p>No impact on views and vistas. The development of the site would not have any impact on the character of the settlement</p>
<p>9. Use land and mineral assets efficiently and promote mechanisms for waste minimisation, re-use and recycling (SEA Topic: material assets, soil)</p>	<p>+</p>	<p>The development of the site would not lead to a loss of best agricultural land. The site does not constitute of brown field land. There is no risk of the of the land being contaminated. There will not be any adverse impact from conflicting land uses</p>
<p>10. Promote and enhance good transport links to support the community and the economy (SEA Topic: population, human health)</p>	<p>+</p>	<p>The site is within 200 yards of transport terminal (Bus Stop) across flat even land. The nearest recreational walking/cycling route is approximately half a mile away. The site borders on a public highway which is of sufficient quality for potential development.</p>
<p>11. Safeguard water quality, manage water resources sustainability and minimise flood risk (SEA Topic: water, biodiversity)</p>	<p>+</p>	<p>There is no risk of flooding as the land is elevated. The site is not within ground water or surface protection area There is a watercourse on the border of the land which would aid natural drainage.</p>

aid natural drainage.

2a. Which part of the Deposit Plan are you commenting on?			
CPRW 32 Chwilog 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 35	
Constraints Map			
Appendices <i>(please specify)</i>			
2b. Are you objecting or supporting the Deposit Plan?			
Objecting	<input type="checkbox"/>	Supporting	<input type="checkbox"/>

32. Chwilog/ Housing Sites and Boundaries

32.1 Why has a 0.7 ha GUDP site near Ty'n Rhos estate on the northern side of the village been deleted and the boundary redrawn to exclude the area? The old Afon Wen laundry site was safeguarded as a redevelopment site in the GUDP but is not included in the JLDP. A proposal for 13 houses was refused here in 2014 (C14/0210/44/AM) mainly because it was not allocated for housing. It is proposed for housing in the CSR (SP839). Although the site is well outside the Chwilog village boundary, it is close to the main road and the new laundry premises. The site is a derelict eyesore and urgently needs redevelopment. We would advocate flexible treatment in respect of its re-use.

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

		<p><i>For office use only:</i></p> <p>Representor No.</p> <p>Date received: 27/3/15 <i>elton</i></p> <p>Date acknowledged:</p>
--	--	--

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

PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	Noel Davey	
Address	CPRW/Campaign for Protection of Rural Wales, Caernarfonshire Branch c/o [REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	
Email address	[REDACTED]	

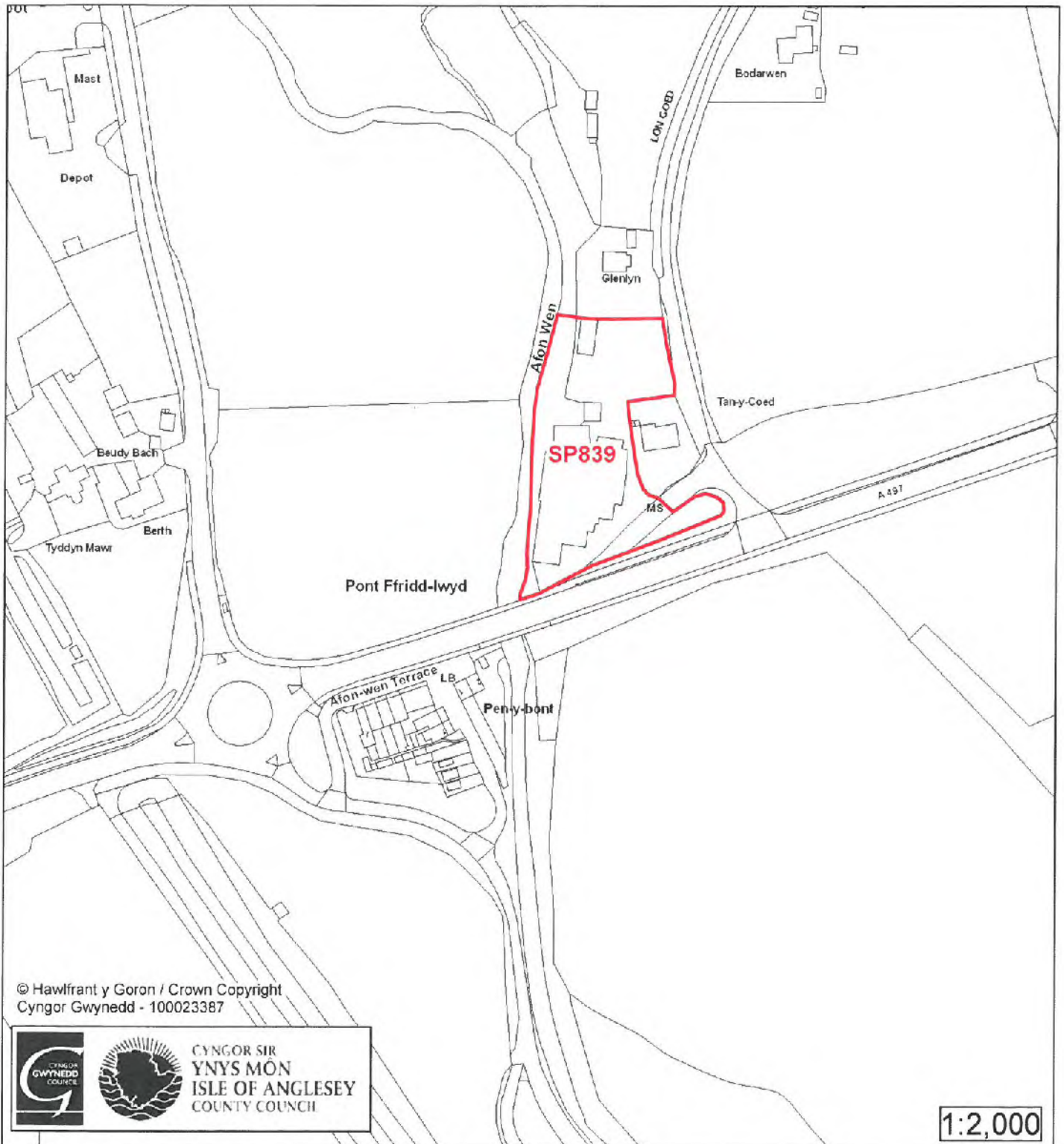
2a. Which part of the Deposit Plan are you commenting on?			
CPRW 32 Chwilog Housing Sites/Boundaries			
Policy number (please specify)			
Paragraph number (please specify)			
Proposals/ Inset Map (please specify ref no.)	Map 35		
Constraints Map			
Appendices (please specify)			
2b. Are you objecting or supporting the Deposit Plan?			
Objecting	<input type="checkbox"/>	Supporting	<input type="checkbox"/>

32. Chwilog/ Housing Sites and Boundaries

32.1 Why has a 0.7 ha GUDP site near Ty'n Rhos estate on the northern side of the village been deleted and the boundary redrawn to exclude the area? The old Afon Wen laundry site was safeguarded as a redevelopment site in the GUDP but is not included in the JLDP. A proposal for 13 houses was refused here in 2014 (C14/0210/44/AM) mainly because it was not allocated for housing. It is proposed for housing in the CSR (SP839). Although the site is well outside the Chwilog village boundary, it is close to the main road and the new laundry premises. The site is a derelict eyesore and urgently needs redevelopment. We would advocate flexible treatment in respect of its re-use.

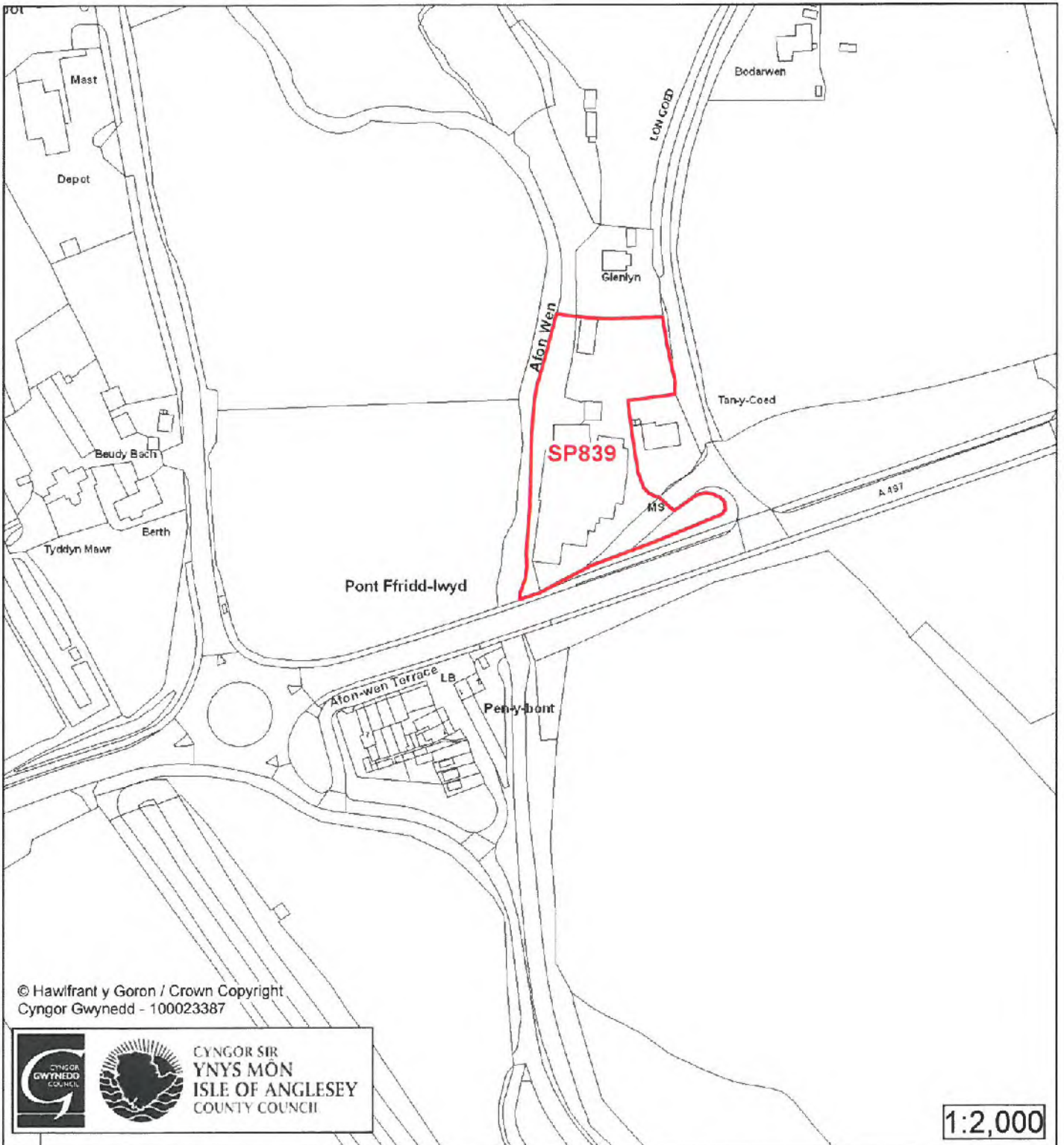
2ch. If your response to 2c above exceeds 100 words, please provide a summary (no more than 100 words).																			
2d. Please detail the changes you wish to see made to the Deposit Plan.																			
2dd. Is the Deposit Plan sound?																			
Yes				<input type="checkbox"/>				No				<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	<input type="checkbox"/>

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



Cyfeirnod/ Reference	: SP839
Enw'r Safle / Site Name	: Tir Afonwen Land
Lleoliad / Location	: Chwilog
Cyfeirnod Grid / Grid Reference	: 439, 376
Maint (ha) / Size (ha)	: 0.42
Defnydd â Awgrymir / Suggested Use	: Tai / Housing

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



Cyfeirnod/ Reference	: SP839
Enw'r Safle / Site Name	: Tir Afonwen Land
Lleoliad / Location	: Chwilog
Cyfeirnod Grid / Grid Reference	: 439, 376
Maint (ha) / Size (ha)	: 0.42
Defnydd â Awgrymir / Suggested Use	: Tai / Housing

	 <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 cbw</p> <p>Date acknowledged:</p>
---	--	---

**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	[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

Further information about this matter can be obtained from the Joint Planning Policy Unit on **01286 685003** or on the Council's web site at: www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp 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 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)

Enway suggested

2a. Which part of the Deposit Plan are you commenting on?	
Policy number (please specify)	TAI 16 HOUSING IN SERVICE VILLAGES
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>

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.

TAI16 HOUSING IN SERVICE VILLAGES

(i) ALLOCATIONS

T55 Land near A5, Gwalchmai

- A water supply can be provided to serve this site.
- Potential developers need to be aware that this 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.
- Gwalchmai Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

T56 Tyn Cae Estate, Newborough

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

T57 Land near Tyn y Ffynnon, Llanerchymedd

- A water supply can be provided to serve this 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.
- The proposed growth being promoted for this settlement would require improvements at Llanerchymedd Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

T58 Land near Saron, Bethel

- A water supply can be provided to serve this site.
- The foul flows would lead to Bethel Sewage Pumping Station (SPS) and an assessment of this SPS may be needed to establish whether the flows can be accommodated or whether improvements to the SPS will be required to allow development to proceed.
- The proposed growth being promoted for this settlement would require improvements at Treborth Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

T59 Land near Glanrafon Estate, Bontnewydd

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

T60 Land near Pont Glan Beuno, Bontnewydd

- A water supply can be provided to serve this 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.
- The proposed growth being promoted for this settlement would require improvements at Llanfaglan Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

T61 Land near Cefn Capel, Botwnnog

- A water supply can be provided to serve this 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.

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

T62 Land near Pentre, Botwnnog

- A water supply can be provided to serve this 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.
- Botwnnog Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

T63 Land to Rear of Madryn Arms, Chwilog

- A water supply can be provided to serve this 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.
- Chwilog Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

T64 Land near Cae Capel, Chwilog

- Potential developers need to be aware that this site is crossed by 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.
- The public sewerage network can accept the potential foul flows from the proposed development site.
- Chwilog Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

T65 Land near Pentre Helen, Deiniolen

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

T66 Land near Maes Bleddyn, Rachub

- A water supply can be provided to serve this site.
- Potential developers need to be aware that this 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 would require improvements at Bethesda Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

T67 Land near Tyn Lon, Y Ffor

- 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 would require improvements at Y Ffor Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

T68 Land near the school, Y Ffor

- 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 would require improvements at Y Ffor Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

1352

T69 Land near Bro Gwystil, Y Ffor

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

1353

(ii) WINDFALLS

- The proposed windfall growth for these settlements may impact upon DCWW water and sewerage assets. As the location of any windfall development is not yet known we will make an assessment and comment on proposed development sites at the time of the planning application.
- There are isolated incidents of flooding in the public sewerage system in the following settlements that may need to be resolved to allow development to proceed:

Newborough

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.

- The proposed growth being promoted within the catchment area of the following WwTW would require improvements at the treatment works:

Llanerchymedd, Bethel (Treborrh Bangor WwTW), Bontnewydd (Llanfaglan WwTW), Rachub (Bethesda WwTW).

The improvements would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

	 <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 cbw</p> <p>Date acknowledged:</p>
---	--	---

**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	[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

Further information about this matter can be obtained from the Joint Planning Policy Unit on **01286 685003** or on the Council's web site at: www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp 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 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)

Enway suggested

2a. Which part of the Deposit Plan are you commenting on?	
Policy number (please specify)	TAI 16 HOUSING IN SERVICE VILLAGES
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>

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.

TAI16 HOUSING IN SERVICE VILLAGES

(i) ALLOCATIONS

T55 Land near A5, Gwalchmai

- A water supply can be provided to serve this site.
- Potential developers need to be aware that this 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.
- Gwalchmai Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

T56 Tyn Cae Estate, Newborough

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

T57 Land near Tyn y Ffynnon, Llanerchymedd

- A water supply can be provided to serve this 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.
- The proposed growth being promoted for this settlement would require improvements at Llanerchymedd Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

T58 Land near Saron, Bethel

- A water supply can be provided to serve this site.
- The foul flows would lead to Bethel Sewage Pumping Station (SPS) and an assessment of this SPS may be needed to establish whether the flows can be accommodated or whether improvements to the SPS will be required to allow development to proceed.
- The proposed growth being promoted for this settlement would require improvements at Treborth Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

T59 Land near Glanrafon Estate, Bontnewydd

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

T60 Land near Pont Glan Beuno, Bontnewydd

- A water supply can be provided to serve this 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.
- The proposed growth being promoted for this settlement would require improvements at Llanfaglan Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

T61 Land near Cefn Capel, Botwnnog

- A water supply can be provided to serve this 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.

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

T62 Land near Pentre, Botwnnog

- A water supply can be provided to serve this 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.
- Botwnnog Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

1342

T63 Land to Rear of Madryn Arms, Chwilog

- A water supply can be provided to serve this 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.
- Chwilog Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

1343

T64 Land near Cae Capel, Chwilog

- Potential developers need to be aware that this site is crossed by 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.
- The public sewerage network can accept the potential foul flows from the proposed development site.
- Chwilog Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

1348

T65 Land near Pentre Helen, Deiniolen

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

1349

T66 Land near Maes Bleddyn, Rachub

- A water supply can be provided to serve this site.
- Potential developers need to be aware that this 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 would require improvements at Bethesda Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

1350

T67 Land near Tyn Lon, Y Ffor

- 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 would require improvements at Y Ffor Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

1351

T68 Land near the school, Y Ffor

- 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 would require improvements at Y Ffor Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

1352

T69 Land near Bro Gwystil, Y Ffor

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

1353

(ii) WINDFALLS

- The proposed windfall growth for these settlements may impact upon DCWW water and sewerage assets. As the location of any windfall development is not yet known we will make an assessment and comment on proposed development sites at the time of the planning application.
- There are isolated incidents of flooding in the public sewerage system in the following settlements that may need to be resolved to allow development to proceed:

Newborough

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.

- The proposed growth being promoted within the catchment area of the following WwTW would require improvements at the treatment works:

Llanerchymedd, Bethel (Treborrh Bangor WwTW), Bontnewydd (Llanfaglan WwTW), Rachub (Bethesda WwTW).

The improvements would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **382**

Enw / Name: **WYG/Alliance Planning (Mr Mark Walton) [2905]**

Rhan: **POLISI TAI16, T63 - Tir tu cefn i'r Madryn Arms, Chwilog**

Section: **POLICY TAI16, T63 - Land to rear of Madryn Arms, Chwilog**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Dileu Dynodiad T63 gan fod hwn yn safle efo caniatad cynllunio (Ebrill 2015) ar gyfer 15 o unedau tai a dynodi tir cyfagos i'r de ar gyfer tai yn y dyfodol. Newid y lefel twf dangosol i 10 - 30.

Representation Summary:

Delete Allocation T63 as this is now a committed Site with planning approval (April 2015) for 15 homes and allocated the adjacent land to the south for future housing.

Amend indicative growth levels to 10-30

Sylw Llawn / Full Representation:

See attached letter dated 31st March 2015

Newid(iadau) i'r Cynllun

.

Change(s) to the Plan

Delete Allocation T63 as this is now a committed Site with planning approval (April 2015) for 15 homes and allocated the adjacent land to the south for future housing.

Amend indicative growth levels to 10-30

Profion Cadernid / Soundness Tests: x, vii, viii

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **441**

Enw / Name: **WYG/Alliance Planning (Mr Mark Walton) [2905]**

Rhan: **POLISI TAI16, T63 - Tir tu cefn i'r Madryn Arms, Chwilog**

Section: **POLICY TAI16, T63 - Land to rear of Madryn Arms, Chwilog**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Ymestyn dynodiad T63 i gynnwys y tir i'r dde o'r dynodiad.

Representation Summary:

Extend allocation T63 to include land to the south of the proposed allocation.

Sylw Llawn / Full Representation:

See attached letter dated 31st March 2015

Newid(iadau) i'r Cynllun

Amend allocation T63

Change(s) to the Plan

Amend allocation T63

Profion Cadernid / Soundness Tests: vii, viii

		<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>
---	---	--	--

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	Admiral Taverns	
Address	c/o WYG/Alliance Planning	WYG/Alliance Planning
Postcode		
Telephone Number		
Email address		

Guidance Note.

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

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

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

If you wish to delete a site that is allocated in the Deposit Plan or suggest amendments to it or you wish to propose a new site, please attach a 1:1250 or 1:2500 scale plan that clearly identifies the site boundaries. If you are proposing a new site (one that is not included within the Deposit Plan) the comment form must be accompanied by a detailed site assessment in accordance with the Council's Candidate Site assessment methodology and the Sustainability Appraisal framework. The Candidate Site assessment methodology and the Sustainability Appraisal framework can be found on the Council's website at: www.gwynedd.gov.uk/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: www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp 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 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)	Policy CP13 (Object), Policy TAI16 (Object); Policy CP15 (Support)
Paragraph number (please specify)	Paragraph No 4.7 and 5.8 (Support)
Proposals/ Inset Map (please specify ref no.)	Inset 35
Constraints Map	N/A
Appendices (please specify)	N/A

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

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

See attached letter dated 31st March 2015

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

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

Empty response box for question 2ch.

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

See attached letter dated 31st March 2015

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 checked="" type="checkbox"/>	CE 2	<input checked="" type="checkbox"/>	CE 3	<input type="checkbox"/>	CE 4	<input checked="" type="checkbox"/>

Part 3: What Happens Next?

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

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

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

I want to speak at a hearing session.

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

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

Submission of documents and evidence to the examination

Publish Inspector's report


Plan's adoption

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

Letter dated 31st March 2015

Madryn Arms Land Ownership Plan

SA Matrix for Land to the rear of Madryn Arms

Signed: 

Dated: 31st 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 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.

H. M. LAND REGISTRY

TITLE NUMBER

WA891199

ORDNANCE
SURVEY
PLAN REFERENCE

SH 4338

Scale : 1/2500

ADMINISTRATIVE AREA:
GWYNEDD

© CROWN COPYRIGHT



FILED PLAN
11 96

Sustainability Appraisal Matrix

Site Name: Land to the Rear of Madryn Arms, Chwilog		
Site Area: 1Ha (approx.) or part of		
SA Objective	Assessment	Summary
1. Maintain and enhance biodiversity interests and connectivity (<i>SEA Topics: biodiversity, fauna, flora, soil</i>)		The land represents a greenfield Site comprising semi-improved grassland with no isolated tree species. The land is defined by a ditch and Clawdd Wall to the west and a copse of tree to the south. The Clawdd Wall is an acknowledged habitat and will be maintained, following discussions with NRW, by the provision of a minimum 7 metre buffer between the wall and the edge of any development. The land is not designations as an important area for nature conservation. The land has been the subject of recent ecological assessment confirming the absence of protected species or features of biodiversity interest (except the Clawdd Wall). The proposals will maintain the existing green corridors on the boundary of the land and thus the development of the Site would result in a neutral effect on this sustainability objective.
2. Promote community viability, cohesion, health and well being (<i>SEA Topics: human health, population</i>)		The Site represents open land to the rear of the Madryn Arms and is located centrally within the village of Chwilog. In terms of existing services and facilities, the village benefits from having a Primary School, Village Hall, Church, Public House and good public transport links. All of the above are within walking distance of the site. The owners of the Madryn Arms are keen to see this important local community facility thrive and believe that sustainable housing growth in the village can contribute on-going viability of the Public House. It is acknowledged that economic opportunities and service choices are limited in Chwilog and it is therefore important to protect the existing facilities.
	+	The provision of a range of housing will also have positive effects to promote social inclusion and community cohesion. Improving the provision of new housing stock should also be beneficial to the health of local residents. There are no conflicting land uses or significant issues that are likely to affect human health. Based on the above, the development of the Site would result in a neutral to slight positive effect on this sustainability objective.
3. Manage and reduce the impacts of climate change by promoting and supporting mitigation and adaptation		There is the potential for increased levels of traffic; however, given the size of the sites it is unlikely that any increase would be significant. However, while traffic is not considered likely to increase significantly, there is the potential to increase greenhouse gas emissions with a minor negative effect on climate change in the

Alternative Sites Guidance

<p>measures (SEA Topics: climatic factors, air)</p>		<p>short term. In the longer-term it is likely that greenhouse gas emissions from general activities including vehicles usage will reduce as a result of stringent emissions controls on new vehicles via Euro standards. However, at this stage this is uncertain. Based on the above, the development of the Site would result in a neutral effect on this sustainability objective.</p>
<p>4. Conserve, promote and enhance the Welsh language (SEA Topic: cultural heritage)</p>		<p>The provision of a range of housing will have a positive indirect effect on social inclusion and community cohesion. Improving the provision of new affordable housing stock should also be beneficial to the health of local residents and the social and cultural importance of the Welsh Language. Based on the above, the development of the Site would result in a neutral effect on this sustainability objective.</p>
<p>5. Conserve, promote and enhance cultural resources and historic heritage assets (SEA Topic: cultural heritage)</p>		<p>There are no designated heritage assets within or adjacent to the Site. The Site has been the subject of recent archaeological assessment confirming the absence of features of cultural heritage. Based on the above, the development of the Site would result in a neutral effect on this sustainability objective.</p>
<p>6. Support economic growth and facilitate a vibrant, diversified economy providing local employment opportunities (SEA Topic: Population)</p>	<p>+</p>	<p>Development would not lead to the loss of any existing employment and there are no significant differences in terms of access to existing employment opportunities in the village. However, the development of the Site for residential uses will have an indirect positive effect on the viability of the existing employment opportunities in the village, namely the Public House and PO/Village Shop.</p> <p>Based on the above, the development of the Site would result in a minor positive effect on this sustainability objective.</p>
<p>7. Provide good quality housing, including affordable housing that meets local needs (SEA Topic: population, human health)</p>		<p>The provision of a range of housing will have a positive effect on social inclusion and community cohesion. Improving the provision of new affordable housing stock should also be beneficial to the health of local residents. Based on the above, the development of the Site would result in a major positive effect on this sustainability objective.</p>
<p>8. Value, conserve and enhance the plan area's rural landscapes and urban townscapes (SEA Topics: landscape)</p>		<p>The site is not protected by a landscape designation or is identified as having high visual importance. Development of the site has the potential for the loss of greenfield land and therefore a minor long-term negative effect against this SA Objective through the development of a previously undeveloped area.</p>

Alternative Sites Guidance

<p>9. Use land and mineral assets efficiently and promote mechanisms for waste minimisation, re-use and recycling <i>(SEA Topic: material assets, soil)</i></p>	-	<p>The loss of greenfield land also has the potential for a minor long-term negative effect against SA Objective but it should be noted that the site does not contain best and most versatile agricultural land.</p>
<p>10. Promote and enhance good transport links to support the community and the economy <i>(SEA Topic: population, human health)</i></p>		<p>The site is within 400m of a bus stop; however, given the lack of existing facilities/services available and relative isolation of Chwolog, it is considered that development will not reduce the need to travel. Residents will still need to travel to the larger settlements to access a greater range of facilities/services and employment opportunities. Based on the above, the development of the Site would result in a neutral effect on this sustainability objective.</p>
<p>11. Safeguard water quality, manage water resources sustainability and minimise flood risk <i>(SEA Topic: water, biodiversity)</i></p>	U	<p>The Site is not within a flood risk area or other water protection designation. Any proposals will include integrated SuDs measures. Based on the above, the development of the Site would result in a neutral effect on this sustainability objective.</p>

Summary

The land to the rear of Madryn Arms has been assessed against each of the SA objectives. Overall the development of the Site for residential uses will result in an overall neutral to positive effect on the sustainability objectives of the Deposit Joint Local Development Plan. The land represent a viable and sustainable replace Site to Allocation T63.

ASL/af

AlliancePlanning



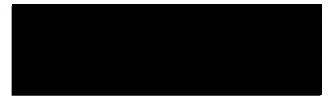
part of the WYG
group of companies

Our Ref: AP5656

Your Ref:

31st March 2015

Joint Planning Policy Unit
1st Floor
Bangor City Council Offices
Ffordd Gwynedd
Bangor
Gwynedd
LL57 1DT



Dear Sirs

ANGLESEY AND GWYNEDD DEPOSIT JOINT LOCAL DEVELOPMENT PLAN 2011-2026

REPRESENTATIONS ON BEHALF OF ADMIRAL TAVERNS – LAND TO THE REAR OF MADRYN ARMS, CHWILOG, GWYNEDD

Alliance Planning/WYG has been retained by Admiral Taverns to make representations on the Anglesey and Gwynedd Deposit Joint Local Development Plan (LDP) 2011-2016. Our representations seek to promote land to the rear of Madryn Arms, Chwilog for alternative land uses, namely residential. Admiral Taverns are the owners of the Madryn Arms Public House and associated land. The extent of their land ownership is shown outlined in red on the attached plan.

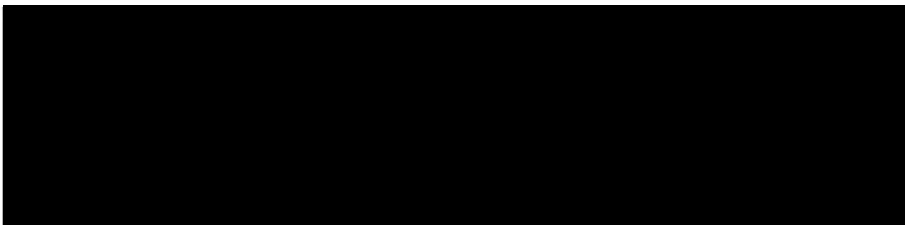
The Site

The Site represents open land to the rear of the Madryn Arms and is located centrally within the village of Chwilog. The Madryn Arms Public House is a Grade II listed building. In terms of existing services and facilities, the village benefits from having a Primary School, Village Hall, Church, Public House and good public transport links. All of the above are within walking distance of the site.

Chwilog is defined in the Gwynedd Council adopted Unitary Development Plan as a sustainable village in terms of shops and services where new housing growth is directed. This designation has been carried forward into the Deposit Joint LDP as a 'Service Village' and a preferred location to deliver up to 25% the identified housing growth for the Joint Authorities area (Draft Policy PS15).



creative minds safe hands



Formal Representations

Support Key Issue 6 and Strategic Objective SO14 and SO15

Our Client supports the premise that the Deposit Joint LDP must deliver a sufficient and appropriate range and mix of deliverable housing sites in sustainable locations to meet the housing requirements of all sections of the population, support the social and cultural fabric of the area and contribute to the delivery of the economic objectives of the Plan.

Object to Policy CP13 – Housing Provision

The proposed 10% slippage allowance in housing growth is insufficient to take full account of potential barriers to the delivery of housing site in the Joint Authorities Area by potential developers bringing sites forward. More flexibility in terms of the location and choice of available housing sites (allocations) should be provided in the LDP. The policy is, therefore, unsound as it is unable to respond quickly to changing circumstances.

Proposed amendments to the Deposit Joint LDP – Policy CP13

The slippage allowance should be increase to at least 15% preferably 20% to provide greater flexibility and choice of housing sites.

Object to allocation (T63) and Policy TAI16 and propose amendments - land to the rear of the Madryn Arms PH, Chwillog

Site Allocation T63 was previously identified in the Gywnedd UDP and the Llyn Development Brief (2009) for residential development. Outline Planning Permission (Ref: C14/0061/41/AM) for 15 units including 5 affordable housing units was granted on the Site in March 2015 and therefore this allocation should be deleted as it will no longer comprises an allocation, but a committed Site, within the village.

Similarly Site Allocation T64 is the subject of a separate application for outline planning application (Ref C14/01134/41/AM) for 17 houses which is currently the subject of discussions regarding the provisions of a Section 106 agreement. It is highly likely that this application will also be granted during 2015. The status of both of these sites should be reviewed and updated prior to the publication of the Submission version of the Joint LPD.

Policy TAI16 (i) envisages that both allocations (T63 and T64) will deliver 38 units with a further windfall property in the village proposed under criterion (ii). The current permission and application for these sites will bring forward only 32 units leaving a shortfall on the Councils current predictions of 7 units. The Service Village

has limited previously developed land opportunities available within the proposed development boundary and thus any shortfall will need to be accommodated on suitable land adjacent to the development boundary.

The Deposit Plan envisages a significant increase in the population and number of households in Gwynedd over the next 20 years and Draft Policy PS13 seeks to escalate housing growth between the period 2018 and 2026 in accordance with the delivery of the wider economic strategy for the area. Given that the two allocations in Chwilog will have, in all probability, been consented in 2015 the Deposit Plan is unrealistic in assuming that this important Service Village will not deliver any further housing, and associated economic, growth for the remainder of the plan period. The plan is, therefore, unable to respond quickly to changing circumstances in the Chwilog area.

Moreover, based on the envisaged economic and housing growth for the Joint Authorities area post 2018 as set out elsewhere in the Deposit Joint LDP, including Draft Policy CP13, the proposed housing distribution scenario will mean that existing community facilities (Primary School, Post office/shop, Public House) based in Chwilog may become less viable in the longer term.

For the reasons set out above, it is concluded that the Deposit Joint LDP is unsound on the basis of Tests CE1, CE2 and CE4.

Proposed amendments to the Deposit Joint LDP

It is proposed that the Development Boundary of Chwilog should be amended and a further allocation of land for residential uses identified to bring forward residential units during the plan period.

Our client owns a further parcel of land (approx. 1.1ha) to the south of allocation T63 that can be safely accessed via the consented enhanced junction onto Madryn Terrace (B5234). The land comprises generally flat, semi-improved grassland that is defined by a ditch and Clawdd Wall to the west and a copse of tree to the south. Existing residential and other buildings define the eastern boundary of the Site. The Site represents a logical and definable boundary to the Village.

The Site is not the subject of flooding, landscape or other designations and has been the subject of recent ecological and archaeological assessment confirming the absence of features of biodiversity or cultural heritage. An updated Sustainability Appraisal matrix has been prepared for the Site that shows the land accords with the sustainability scoring as Allocation T63 and therefore comprises a suitable and sustainable replacement.

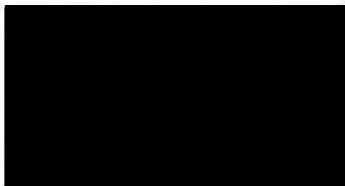
It is acknowledged that the Site, if allocated in its entirety, would represent a large extension to the village of Chwilog bringing forward, potentially, 30 units albeit 10 would be affordable housing units in an area where there is currently an inadequate provision of such houses. Our Client, therefore, considers that the majority of the Site could be released in a phased manner during the latter part of the plan period (post 2018) and beyond but with an initial phase, say 10 units (3 of which are affordable), to address the immediate shortfall identified above. The Client is happy to provide draft layout drawings of the how the proposed Site could be developed in a phased manner if this would be helpful.

Conclusion

The Deposit Joint LDP is currently unsound in the distribution of housing development in the Chwilog Service Village and should allocate all or part of the land to the rear of the Madryn Arms, Chwilog for residential use. Accordingly, please find attached a plan showing the extent of our client's land ownership, a completed Representation Form and associated updated Sustainability Matrix.

We would be grateful if you could consider the above site as part of the preparation of the Submission Deposit Joint LDP. In the meantime, should you wish to discuss any aspect of this letter, please contact us on 0121 456 7444.

Yours faithfully

A large black rectangular redaction box covering the signature area.

Mark Walton

Associate Director

Enc.

	 <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>
---	--	--

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	Admiral Taverns	
Address	c/o WYG/Alliance Planning	WYG/Alliance Planning
Postcode		
Telephone Number		
Email address		

Guidance Note.

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

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

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

If you wish to delete a site that is allocated in the Deposit Plan or suggest amendments to it or you wish to propose a new site, please attach a 1:1250 or 1:2500 scale plan that clearly identifies the site boundaries. If you are proposing a new site (one that is not included within the Deposit Plan) the comment form must be accompanied by a detailed site assessment in accordance with the Council's Candidate Site assessment methodology and the Sustainability Appraisal framework. The Candidate Site assessment methodology and the Sustainability Appraisal framework can be found on the Council's website at: www.gwynedd.gov.uk/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: www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp 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 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)	Policy CP13 (Object), Policy TAI16 (Object); Policy CP15 (Support)
Paragraph number (please specify)	Paragraph No 4.7 and 5.8 (Support)
Proposals/ Inset Map (please specify ref no.)	Inset 35
Constraints Map	N/A
Appendices (please specify)	N/A

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

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

See attached letter dated 31st March 2015

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

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

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

See attached letter dated 31st March 2015

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 checked="" type="checkbox"/>	CE 2	<input checked="" type="checkbox"/>	CE 3	<input type="checkbox"/>	CE 4	<input checked="" type="checkbox"/>

Part 3: What Happens Next?

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

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

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

I want to speak at a hearing session.

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

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

Submission of documents and evidence to the examination

Publish Inspector's report

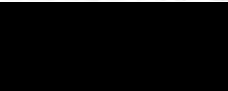
Plan's adoption

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

Letter dated 31st March 2015

Madryn Arms Land Ownership Plan

SA Matrix for Land to the rear of Madryn Arms

Signed: 

Dated: 31st 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 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.

H. M. LAND REGISTRY

TITLE NUMBER

WA891199

ORDNANCE
SURVEY
PLAN REFERENCE

SH 4338

Scale : 1/2500

ADMINISTRATIVE AREA:
GWYNEDD

© CROWN COPYRIGHT



Sustainability Appraisal Matrix

Site Name: Land to the Rear of Madryn Arms, Chwilog		
Site Area: 1Ha (approx.) or part of		
SA Objective	Assessment	Summary
1. Maintain and enhance biodiversity interests and connectivity (SEA Topics: biodiversity, fauna, flora, soil)		The land represents a greenfield Site comprising semi-improved grassland with no isolated tree species. The land is defined by a ditch and Clawdd Wall to the west and a copse of tree to the south. The Clawdd Wall is an acknowledged habitat and will be maintained, following discussions with NRW, by the provision of a minimum 7 metre buffer between the wall and the edge of any development. The land is not designations as an important area for nature conservation. The land has been the subject of recent ecological assessment confirming the absence of protected species or features of biodiversity interest (except the Clawdd Wall). The proposals will maintain the existing green corridors on the boundary of the land and thus the development of the Site would result in a neutral effect on this sustainability objective.
2. Promote community viability, cohesion, health and well being (SEA Topics: human health, population)		The Site represents open land to the rear of the Madryn Arms and is located centrally within the village of Chwilog. In terms of existing services and facilities, the village benefits from having a Primary School, Village Hall, Church, Public House and good public transport links. All of the above are within walking distance of the site. The owners of the Madryn Arms are keen to see this important local community facility thrive and believe that sustainable housing growth in the village can contribute on-going viability of the Public House. It is acknowledged that economic opportunities and service choices are limited in Chwilog and it is therefore important to protect the existing facilities.
	+	The provision of a range of housing will also have positive effects to promote social inclusion and community cohesion. Improving the provision of new housing stock should also be beneficial to the health of local residents. There are no conflicting land uses or significant issues that are likely to affect human health. Based on the above, the development of the Site would result in a neutral to slight positive effect on this sustainability objective.
3. Manage and reduce the impacts of climate change by promoting and supporting mitigation and adaptation		There is the potential for increased levels of traffic; however, given the size of the sites it is unlikely that any increase would be significant. However, while traffic is not considered likely to increase significantly, there is the potential to increase greenhouse gas emissions with a minor negative effect on climate change in the

Alternative Sites Guidance

<p>measures (SEA Topics: climatic factors, air)</p>		<p>short term. In the longer-term it is likely that greenhouse gas emissions from general activities including vehicles usage will reduce as a result of stringent emissions controls on new vehicles via Euro standards. However, at this stage this is uncertain. Based on the above, the development of the Site would result in a neutral effect on this sustainability objective.</p>
<p>4. Conserve, promote and enhance the Welsh language (SEA Topic: cultural heritage)</p>	0	<p>The provision of a range of housing will have a positive indirect effect on social inclusion and community cohesion. Improving the provision of new affordable housing stock should also be beneficial to the health of local residents and the social and cultural importance of the Welsh Language. Based on the above, the development of the Site would result in a neutral effect on this sustainability objective.</p>
<p>5. Conserve, promote and enhance cultural resources and historic heritage assets (SEA Topic: cultural heritage)</p>	0	<p>There are no designated heritage assets within or adjacent to the Site. The Site has been the subject of recent archaeological assessment confirming the absence of features of cultural heritage. Based on the above, the development of the Site would result in a neutral effect on this sustainability objective.</p>
<p>6. Support economic growth and facilitate a vibrant, diversified economy providing local employment opportunities (SEA Topic: Population)</p>	+	<p>Development would not lead to the loss of any existing employment and there are no significant differences in terms of access to existing employment opportunities in the village. However, the development of the Site for residential uses will have an indirect positive effect on the viability of the existing employment opportunities in the village, namely the Public House and PO/Village Shop.</p> <p>Based on the above, the development of the Site would result in a minor positive effect on this sustainability objective.</p>
<p>7. Provide good quality housing, including affordable housing that meets local needs (SEA Topic: population, human health)</p>	++	<p>The provision of a range of housing will have a positive effect on social inclusion and community cohesion. Improving the provision of new affordable housing stock should also be beneficial to the health of local residents. Based on the above, the development of the Site would result in a major positive effect on this sustainability objective.</p>
<p>8. Value, conserve and enhance the plan area's rural landscapes and urban townscapes (SEA Topics: landscape)</p>	-	<p>The site is not protected by a landscape designation or is identified as having high visual importance. Development of the site has the potential for the loss of greenfield land and therefore a minor long-term negative effect against this SA Objective through the development of a previously undeveloped area.</p>

Alternative Sites Guidance

<p>9. Use land and mineral assets efficiently and promote mechanisms for waste minimisation, re-use and recycling (SEA Topic: material assets, soil)</p>	-	<p>The loss of greenfield land also has the potential for a minor long-term negative effect against SA Objective but it should be noted that the site does not contain best and most versatile agricultural land.</p>
<p>10. Promote and enhance good transport links to support the community and the economy (SEA Topic: population, human health)</p>		<p>The site is within 400m of a bus stop; however, given the lack of existing facilities/services available and relative isolation of Chwolog, it is considered that development will not reduce the need to travel. Residents will still need to travel to the larger settlements to access a greater range of facilities/services and employment opportunities. Based on the above, the development of the Site would result in a neutral effect on this sustainability objective.</p>
<p>11. Safeguard water quality, manage water resources sustainability and minimise flood risk (SEA Topic: water, biodiversity)</p>		<p>The Site is not within a flood risk area or other water protection designation. Any proposals will include integrated SuDs measures. Based on the above, the development of the Site would result in a neutral effect on this sustainability objective.</p>

Summary

The land to the rear of Madryn Arms has been assessed against each of the SA objectives. Overall the development of the Site for residential uses will result in an overall neutral to positive effect on the sustainability objectives of the Deposit Joint Local Development Plan. The land represent a viable and sustainable replace Site to Allocation T63.

AS/1/10/14

AlliancePlanning



part of the WYG
group of companies

Our Ref: AP5656

Your Ref:

31st March 2015

Joint Planning Policy Unit
1st Floor
Bangor City Council Offices
Ffordd Gwynedd
Bangor
Gwynedd
LL57 1DT



Dear Sirs

ANGLESEY AND GWYNEDD DEPOSIT JOINT LOCAL DEVELOPMENT PLAN 2011-2026

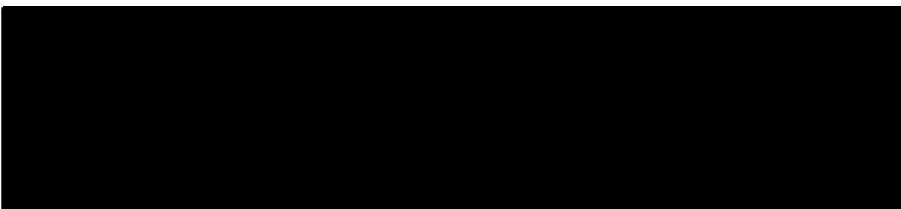
REPRESENTATIONS ON BEHALF OF ADMIRAL TAVERNS – LAND TO THE REAR OF MADRYN ARMS, CHWILOG, GWYNEDD

Alliance Planning/WYG has been retained by Admiral Taverns to make representations on the Anglesey and Gwynedd Deposit Joint Local Development Plan (LDP) 2011-2016. Our representations seek to promote land to the rear of Madryn Arms, Chwilog for alternative land uses, namely residential. Admiral Taverns are the owners of the Madryn Arms Public House and associated land. The extent of their land ownership is shown outlined in red on the attached plan.

The Site

The Site represents open land to the rear of the Madryn Arms and is located centrally within the village of Chwilog. The Madryn Arms Public House is a Grade II listed building. In terms of existing services and facilities, the village benefits from having a Primary School, Village Hall, Church, Public House and good public transport links. All of the above are within walking distance of the site.

Chwilog is defined in the Gwynedd Council adopted Unitary Development Plan as a sustainable village in terms of shops and services where new housing growth is directed. This designation has been carried forward into the Deposit Joint LDP as a 'Service Village' and a preferred location to deliver up to 25% the identified housing growth for the Joint Authorities area (Draft Policy PS15).



creative minds safe hands

Formal Representations

Support Key Issue 6 and Strategic Objective SO14 and SO15

Our Client supports the premise that the Deposit Joint LDP must deliver a sufficient and appropriate range and mix of deliverable housing sites in sustainable locations to meet the housing requirements of all sections of the population, support the social and cultural fabric of the area and contribute to the delivery of the economic objectives of the Plan.

Object to Policy CP13 – Housing Provision

The proposed 10% slippage allowance in housing growth is insufficient to take full account of potential barriers to the delivery of housing site in the Joint Authorities Area by potential developers bringing sites forward. More flexibility in terms of the location and choice of available housing sites (allocations) should be provided in the LDP. The policy is, therefore, unsound as it is unable to respond quickly to changing circumstances.

Proposed amendments to the Deposit Joint LDP – Policy CP13

The slippage allowance should be increase to at least 15% preferably 20% to provide greater flexibility and choice of housing sites.

Object to allocation (T63) and Policy TAI16 and propose amendments - land to the rear of the Madryn Arms PH, Chwilog

Site Allocation T63 was previously identified in the Gywnedd UDP and the Llyn Development Brief (2009) for residential development. Outline Planning Permission (Ref: C14/0061/41/AM) for 15 units including 5 affordable housing units was granted on the Site in March 2015 and therefore this allocation should be deleted as it will no longer comprises an allocation, but a committed Site, within the village.

Similarly Site Allocation T64 is the subject of a separate application for outline planning application (Ref C14/01134/41/AM) for 17 houses which is currently the subject of discussions regarding the provisions of a Section 106 agreement. It is highly likely that this application will also be granted during 2015. The status of both of these sites should be reviewed and updated prior to the publication of the Submission version of the Joint LPD.

Policy TAI16 (i) envisages that both allocations (T63 and T64) will deliver 38 units with a further windfall property in the village proposed under criterion (ii). The current permission and application for these sites will bring forward only 32 units leaving a shortfall on the Councils current predictions of 7 units. The Service Village

has limited previously developed land opportunities available within the proposed development boundary and thus any shortfall will need to be accommodated on suitable land adjacent to the development boundary.

The Deposit Plan envisages a significant increase in the population and number of households in Gwynedd over the next 20 years and Draft Policy PS13 seeks to escalate housing growth between the period 2018 and 2026 in accordance with the delivery of the wider economic strategy for the area. Given that the two allocations in Chwilog will have, in all probability, been consented in 2015 the Deposit Plan is unrealistic in assuming that this Important Service Village will not deliver any further housing, and associated economic, growth for the remainder of the plan period. The plan is, therefore, unable to respond quickly to changing circumstances in the Chwilog area.

Moreover, based on the envisaged economic and housing growth for the Joint Authorities area post 2018 as set out elsewhere in the Deposit Joint LDP, including Draft Policy CP13, the proposed housing distribution scenario will mean that existing community facilities (Primary School, Post office/shop, Public House) based in Chwilog may become less viable in the longer term.

For the reasons set out above, it is concluded that the Deposit Joint LDP is unsound on the basis of Tests CE1, CE2 and CE4.

Proposed amendments to the Deposit Joint LDP

It is proposed that the Development Boundary of Chwilog should be amended and a further allocation of land for residential uses identified to bring forward residential units during the plan period.

Our client owns a further parcel of land (approx. 1.1ha) to the south of allocation T63 that can be safely accessed via the consented enhanced junction onto Madryn Terrace (B5234). The land comprises generally flat, semi-improved grassland that is defined by a ditch and Clawdd Wall to the west and a copse of tree to the south. Existing residential and other buildings define the eastern boundary of the Site. The Site represents a logical and definable boundary to the Village.

The Site is not the subject of flooding, landscape or other designations and has been the subject of recent ecological and archaeological assessment confirming the absence of features of biodiversity or cultural heritage. An updated Sustainability Appraisal matrix has been prepared for the Site that shows the land accords with the sustainability scoring as Allocation T63 and therefore comprises a suitable and sustainable replacement.

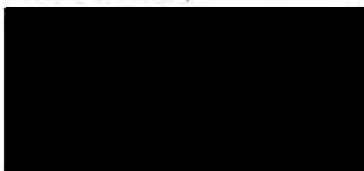
It is acknowledged that the Site, if allocated in its entirety, would represent a large extension to the village of Chwilog bringing forward, potentially, 30 units albeit 10 would be affordable housing units in an area where there is currently an inadequate provision of such houses. Our Client, therefore, considers that the majority of the Site could be released in a phased manner during the latter part of the plan period (post 2018) and beyond but with an initial phase, say 10 units (3 of which are affordable), to address the immediate shortfall identified above. The Client is happy to provide draft layout drawings of the how the proposed Site could be developed in a phased manner if this would be helpful.

Conclusion

The Deposit Joint LDP is currently unsound in the distribution of housing development in the Chwilog Service Village and should allocate all or part of the land to the rear of the Madryn Arms, Chwilog for residential use. Accordingly, please find attached a plan showing the extent of our client's land ownership, a completed Representation Form and associated updated Sustainability Matrix.

We would be grateful if you could consider the above site as part of the preparation of the Submission Deposit Joint LDP. In the meantime, should you wish to discuss any aspect of this letter, please contact us on 0121 456 7444.

Yours faithfully



Mark Walton

Associate Director

Enc.

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **423**

Enw / Name: **Dr Richard Roberts [2938]**

Rhan: **POLISI TAI16**

Section: **POLICY TAI16**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Dim tystiolaeth o angen lleol am dai sy'n cyfiawnhau'r nifer a ddynodir ar gyfer Chwilog a'r Ffo^r. Effaith andwyol codi cymaint o dai ar y Gymraeg.

Representation Summary:

No evidence of local housing need which justifies the number designated for Chwilog and Y Ffor. Building this much houses would have a detrimental impact on the Welsh language.

Sylw Llawn / Full Representation:

Dim tystiolaeth o angen lleol am dai sy'n cyfiawnhau'r nifer a ddynodir ar gyfer Chwilog a'r Ffo^r. Effaith andwyol codi cymaint o dai ar y Gymraeg.

Newid(iadau) i'r Cynllun

Dileu'r dynodiadau.

Change(s) to the Plan

Abolish the designations.

Profion Cadernid / Soundness Tests: vii, viii