

c. (continued)

- iii) I am beginning to wonder about Wyifa 2 - MONEY
- iv) of course there is much opposition to the high wind turbines

D Landscape/Water Drainage

880  
AMG1

- i) Delighted to see 5 New Conservation areas in Anglesey
- ii) The Uplands - Moor - a lot are overgrazed. Would like to see more "regreening" - to stop the IMMEDIATE "RUN-OFF" & flooding. Also CO2 collect with Trees.

881  
PCYFF2  
13

E Employment/Housing

PS9

882

- i) The contractors on Wyifa B to employ 25% + - local people
- ii) The main supplies to set up a big Training School (As did C.E.G.B.)
- iii) The N.D.A will begin to dismantle Wyifa A. Enson they set up a commensurate Training School!
- iv) Aim for Holyhead to develop industry

883  
CYF1

Farming & Kishij

884

- i) Explore Wyifa 'B' - power to smelt & soil - main port from Ireland
- ii) Commend Anglesey Salt & many farm outlets.
- iii) I particularly feel sad about the mussels being exported to Holland for destruction

885  
CYF5

Welsh

Remember need to protect the language. Not enough done for that.

took at LEAT AGENDA 21 P.T.O

Perhaps use of asterisks with  
an Appendix page!

---

## Sylwadau Dros y We / Representations via the Internet

---

Rhif Sylw / Rep Id: **375**

Enw / Name: **Welsh Highland Railway (Mr Graham Farr) [254]**

Rhan: **POLISI AMG1**

Section: **POLICY AMG1**

Math / Type: **Cefnogi / Support**

---

### Crynodeb o'r Sylw:

Mae'r Cwmni'n cefnogi'r polisi fel y'i geirir. Gweler sylwadau ar wahân y Cwmni yng nghyswllt yr ardal y mae'n berthnasol iddi.

### Representation Summary:

The Company supports the Policy as worded. See the Company's separate representation in respect of the area to which it applies.

---

### Sylw Llawn / Full Representation:

The Company supports the Policy as worded. See the Company's separate representation in respect of the area to which it applies.

### Newid(iadau) i'r Cynllun

.

### Change(s) to the Plan

.

---

Profion Cadernid / Soundness Tests: None

## Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **376**

Enw / Name: **Welsh Highland Railway (Mr Graham Farr) [254]**

Rhan: **POLISI AMG1**

Section: **POLICY AMG1**

Math / Type: **Gwrthwynebu / Object**

### Crynodeb o'r Sylw:

Mae'r Cwmni'n ystyried y dylai'r ardal sy'n cael ei chynnwys a) gael ei dangos ar y Map Cynigion (fel y nodir yn y polisi), a b) gael ei hymestyn i gynnwys yr holl dir a gynhwysir gan Safle Arfaethedig cyfeirnod cyflwyniad: SP870 a'r ardal gyfagos, gan gynnwys tir agored ar y ddwy ochr i ffordd osgoi newydd yr A487(C) (ynghlwm mae copïau o'r cyflwyniad hwn a chyflwyniad cynt oedd yn ymwneud â Safle Arfaethedig cyf: SP552).

### Representation Summary:

The Company considers that the area covered should a) be shown on the Proposals Map (as indicated in the policy), and b) be extended to include all of the land covered by Candidate Site submission ref: SP870 and surrounding area, including open land on both sides of the new A487(T) bypass road (copies of this submission and earlier related Candidate Site submission ref: SP552 attached).

### Sylw Llawn / Full Representation:

The Company considers that the area covered should a) be shown on the Proposals Map (as indicated in the policy), and b) be extended to include all of the land covered by Candidate Site submission ref: SP870 and surrounding area, including open land on both sides of the new A487(T) bypass road (copies of this submission and earlier related Candidate Site submission ref: SP552 attached).

### Newid(iadau) i'r Cynllun

.

### Change(s) to the Plan

As above.

Profion Cadernid / Soundness Tests: **viii**

# CYNGOR CYMDEITHAS BOTWNNOG

3 Iain Mawrth, 2015.

*ebon*

Annwyl Syr,

## Cynllun Datblygu Lleol ar y Cyd Gwynedd a Môn

Cyfeiriaf at y ddogfen uchod a hoffwn yn y lle cyntaf ddatgan fod yr aelod yn siomedig iawn o'r amser roddwyd iddynt hwy a'r cyhoedd gyflwyno sylwadau ar y ddogfen swmpus yma – rhaid dweud fod un neu ddau o'r aelodau heb gael cyfle i gael golwg drosti o gwbl ac felly ni allwn roi sylwadau cynhwysfawr ar y cyfryw.

Un o'r pwyntiau amlycaf sy'n dod i'r amlwg tra'n darllen y ddogfen yw fod cefn gwlad yn mynd i ddiodeff yn enbyd pe gweithredir y canllawiau a nodir yn y Cynllun uchod. Bydd cefn gwlad yn marw ar ei thraed a gwelir diboblogi – os daw i hynny bydd diwylliant a'r arferion unigryw sy'n perthyn i gefn gwlad yn cael eu colli am byth. Oni fydd yn edifar gan y Cyngor golli adnodd mor werthfawr a hyn? Ym marn yr aelodau dylai'r Cyngor ail ystyried yr hawl i bobl leol ifanc gael codi tai yn eu cynefin ac hefyd peidio cyfyngu ar y maint a ganiateir ar dai a godir.

Pwyntiau eraill sydd lawn mor bwysig yw'r rhai a ganlyn:

- 1) Mae **Cynllun Gwarchod y Tirlun Newydd Arfordirol** eto yn cyfyngu ar hawliau trigolion Pen Llŷn drwy eu rhwystro i godi tai yn eu hardal eu hunain. Dylid ail-edrych ar y Cynllun hwn hefyd yn wyneb y sylwadau sydd yn y paragraff uchod. *AMG1?*
- 2) Yn y cynllun cyfeirir at ddau dŷ yn unig yn cael ei ganiatau ym mhentref Bryncroes – mae'r nifer yma'n gyfyngedig iawn am y nifer o flynyddoedd bydd y Cynllun arfaethedig mewn grym. Eto mae hyn yn cyfyngu ar hawliau'r unigolyn.
- 3) Mae'r Cynllun yn cyfeirio at economi ymwelwyr – os yw hwn am fod yn effeithiol dylid datblygu a gwella ffyrdd, llwybrau a llwybrau beic. Mae angen dybryd ar y Cyngor ystyried y rhain er budd y trigolion lleol yn ogystal a thwristiaid. Petai gwella'r cyfleusterau sy'n arwain i'r Penrhyn arbennig yma, efallai y gellid sefydlu diwydiant yma ac felly cwtogi ar y niferoedd y rhai sydd heb waith.
- 4) Yn wyneb fod y boblogaeth yn heneiddio a'r pwyslais mawr gan y Llywodraeth i ofalu amdanynt yn eu cymuned, oni ddylai'r Cynllun arfaethedig ofalu fod tai pwrpasol ar eu cyfer yn y cymunedau lle maent yn byw. Mae'n holl bwysig fod y bobl hyn yn cael treulio gweddill eu hoes yn eu cynefin a'r amgylchfyd maent wedi arfer erioed.
- 5) Mae'r Cynllun yn cyfeirio fod yn rhaid i bopeth fod yn ddywieithiog, oni ddylai hyn fod 'Y Gymraeg' neu ddwyieithog. Rhaid cofio ein bod yn nghadarnle yr iaith Gymraeg ym Mhen Llŷn.
- 6) Cyfeirir mai 3% a ganiateir o dai newydd yng nghefn gwlad yn ystod cyfnod y Cynllun hwn. Mae'r nifer yma'n isel iawn o ystyried nifer o flynyddoedd bydd y Cynllun yn weithredol. Eto rhaid ceisio denu'r ifanc i barhau yn eu cynefin a thrwy hynny bydd sicrwydd o ddyfodol i'n hysgolion, etifeddiaeth a.y.

Un pwynt arall godwyd oedd fod y tudalennau ddim yn cyferbynu a'r mapiau!

Gofynwn i chwi ystyried yn ddwys y sylwadau uchod er sicrhau dyfodol i'n hetifeddiaeth a ffyniant yn nghefn gwlad.

Anfonaf y copi caled yn y post heno.

Yn gywir,



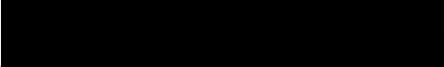
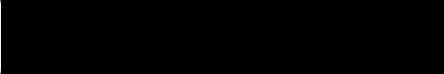
Clarc

**Uned Polisi Cynllunio ar y Cyd,  
Llawr Iaf Swyddfeydd Cyngor Dinas Bangor  
Ffordd Gwynedd  
Bangor  
Gwynedd.  
LL57 IDT.**

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p><i>For office use only:</i></p> <p>Representor No. 1169/901</p> <p>Date received: 30/3/15 02</p> <p>Date acknowledged:</p>
---	--	---

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

**PART 1: Contact details**

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

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

<b>2a. Which part of the Deposit Plan are you commenting on?</b>	
<b>CPRW 14 Special Landscape Areas</b>	
Policy number (please specify)	AMG1
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	

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

## 14. Special Landscape Areas

**14.1 AMG1 Special Landscape Areas.** We support the concept of Special Landscape Areas (SLAs) which replace the former Landscape Conservation Areas (LCAs). We welcome the proposed new emphasis on these areas and their increased significance in planning decisions. Of the 10 SLAs specified for Gwynedd most serve as valuable visual buffers for the AONBs or National Park, while also protecting local landscapes of high merit. This buffering role is not mentioned but should be. The Western Llŷn SLA is particularly valuable in this respect, in that it is almost entirely surrounded by the Llŷn AONB on the coast and inland hills. We are concerned that the north-eastern section of the Llŷn AONB is not similarly protected by a buffer SLA south of Yr Eifl and the Clynog Hills. Consideration should be given to creating an additional SLA here (see CPRW submission 17). The Menai shore on the Gwynedd side is partly protected by proposed SLAS 8,9,10 of which 8 (Foryd Bay) is new. We welcome this. However, sections of the Menai coastal belt, especially west of Caernarfon are still left without any local protection. We argued in a Candidate Sites submission (SP361) that the entire Menai shore should be covered by an SLA, to protect both the local landscape and provide a buffer to protect the Anglesey AONB on the opposite shore. (See more detailed comments under CPRW submission 15).

**14.2 AMG2: Protecting and Enhancing Features and Qualities that are Unique to the Local Landscape Character.** We support this policy, but its scope and intentions as distinct from AMG 1 need to be clarified. The SLAs and Landscape Character Areas both derive in large part from analysis of the LANDMAP data as reflected in the Gwynedd Landscape Strategy. This policy presumably has intentions similar to those for AMG1, but is directed more at areas outside the SLAs. We are glad to note reference is made here to the character and settings of the AONBs and National Park.

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

**14.3** We support the new emphasis on local protection through the SLAs (AMG1). Their role as providing buffers to protect the settings of the AONB should be emphasised and reinforced by extending SLAs close to areas of AONB without that protection. The scope and intentions of AMG2 as distinct from AMG1 need clarification.

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

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

Yes  No

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

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

		<p><i>For office use only:</i></p> <p>Representor No.</p> <p>Date received: 30/3/12</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)
<b>Name</b>	Noel Davey	
<b>Address</b>	CPRW/Campaign for Protection of Rural Wales, Caernarfonshire Branch c/o	
<b>Postcode</b>		
<b>Telephone Number</b>		
<b>Email address</b>		

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

<b>2a. Which part of the Deposit Plan are you commenting on?</b>	
<b>CPRW 16 SLA 1 Western Llŷn</b>	
Policy number (please specify)	AMG 1
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	YES
Appendices (please specify)	

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

**16.1 SLA 1 Western Llŷn.** We support the proposal of this area as an SLA replacing the former LCA , particularly in respect of its role as a buffer for the surrounding AONB. The original SLA review document refers to exclusion (from the former LCA area) of small areas of developed land in the south on the fringes of Pwllheli and Abersoch. Details of these proposed modifications are not fully clear from the online constraints map. However, they appear to exclude sections along the coast either side of the A499, which are for the most part essentially rural, rather than ‘developed’. We think it important to retain these in the SLA as the coastal zone is particularly vulnerable to inappropriate development and of high importance to the visitor economy through the coastal path, planned cycle routes and other recreational uses of the shore. The SLA should abut the AONB and extend fully to the coastline to avoid inadvertent ‘holes’ in the protected area such as that between Mynytho and Abersoch, which have resulted in developments with damaging impact on the nationally designated landscape.

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

Clarify details of and reasons for proposed changes in Western Llŷn SLA compared to former Western Llŷn LCA near Abersoch and Pwllheli.

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

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

Yes  No

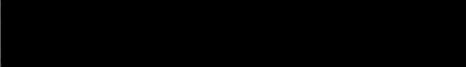
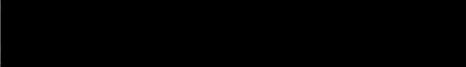
**2e. If you think that the Deposit Plan is unsound which test of soundness do you think that it fails? (Please tick below). More details are provided at the back of this form.**

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

	 <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: 30/3/15 Ebon</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)
<b>Name</b>	Noel Davey	
<b>Address</b>	CPRW/Campaign for Protection of Rural Wales, Caernarfonshire Branch c/o 	
<b>Postcode</b>		
<b>Telephone Number</b>		
<b>Email address</b>		

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

<b>2a. Which part of the Deposit Plan are you commenting on?</b>	
<b>CPRW 17 Buffer SLA North Llŷn</b>	
Policy number (please specify)	AMG 1
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	YES
Appendices (please specify)	

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

## **17 Needs for Buffer SLA for North Llŷn AONB.**

**17.1** Proposed SLAs 1,2, 3, 7, 8,9, and 10 all have an important role in providing locally designated buffer areas protecting adjacent nationally designated landscapes. We argue that a similar buffer area is required to protect the northern part of the Llŷn AONB, comprising (for example) a 2 km belt to form the southern backdrop of Yr Eifl and the Clynog Hills, extending east towards the Bryncir valley. This is a tranquil and exposed rural area with far-reaching views both into and out of the AONB. Preservation of its setting is also important for its considerable archaeological value, while it is in part covered by the Llŷn and Bardsey Area of Outstanding Historic Interest. The area has been under pressure recently from proposals for wind turbines and solar farms which would be damaging to the setting of the AONB. It was not recommended as an SLA in the Review Study, but this in part reflects the relatively large and undifferentiated LANDMAP zone here which includes the quite separate Bryncir zone where there are detractors of no relevance to this more westerly area. The quality of landscape in this westerly area is generally high. This proposal should be seen in the context of the Llŷn AONB JAC request for NRW to consider extending the present AONB to the whole of the Llŷn Peninsula.

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

Provide for an SLA as a buffer area to protect the northern part of the Llŷn AONB, comprising (for example) a 2km belt to form the southern backdrop of Yr Eifl and the Clynnog Hills.

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

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

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p><i>For office use only:</i></p>
		<p><i>Representor No.</i></p>
		<p><i>Date received:</i> 30/3/12 <i>[Signature]</i></p>
		<p><i>Date acknowledged:</i></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)
<p><b>Name</b></p>	<p>Noel Davey</p>	
<p><b>Address</b></p>	<p>CPRW/Campaign for Protection of Rural Wales, Caernarfonshire Branch c/o </p>	
<p><b>Postcode</b></p>		
<p><b>Telephone Number</b></p>		
<p><b>Email address</b></p>		

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

<b>2a. Which part of the Deposit Plan are you commenting on?</b>			
<b>CPRW 15 Menai Shore SLA Extension</b>			
Policy number (please specify)			
Paragraph number (please specify)			
Proposals/ Inset Map (please specify ref no.)			
Constraints Map	YES		
Appendices (please specify)			
<b>2b. Are you objecting or supporting the Deposit Plan?</b>			
Objecting	<input type="checkbox"/>	Supporting	<input type="checkbox"/>

## 15 Menai Shore SLA Extension

**15.1 Menai Shore SLA Extension Proposal.** We made a proposal (SP361) for locally designated protection of a strip along the whole of the south Menai Strait shore as part of the Candidate Sites consultation in July 2012. This would have reinstated a former Local Conservation Area (LCA) to the entire Gwynedd side of the Strait, from the Llŷn AONB at Aberdesach to the Conwy border at Llanfairfechan, and included a suggested commitment to conduct studies towards converting this coastal belt to a full statutory AONB in due course, to match the status already accorded to the Anglesey shore of the Menai and following the recommendations of the 1947 Hobhouse Report setting up the statutory designated areas. We welcome the partial fulfilment of this proposal through the proposed new SLA8 (Foryd Bay) and the modified former LCAs, now SLA9 (Menai, covering Vaynol and Bangor foreshore) and SLA10 (Bangor Mountain). We assume the proposed boundaries of these are as proposed in the SLA Review Study, although it is difficult to verify details on the online Constraints Map. This would leave the intervening areas without any local protection, notably the areas between Foryd Bay and Felinheli either side of the World Heritage site in Caernarfon.

**15.2 Menai Shore Buffer for AONB.** As well as protecting the high quality local landscape, a key role of these extended SLAs would be to provide a buffer for the Anglesey AONB within a few hundred yards on the opposite shore. The Menai area has frequently been described as having high visual and scenic value and provides the foreground to southward views of Snowdonia from Anglesey. The views into Gwynedd from Ynys Môn are crucial to the landscape setting of Snowdonia and are arguably of greater value than the northward view into the AONB. The GUDP acknowledges (3.3.4) that 'areas along the Menai Strait are central to the setting of parts of the Anglesey AONB'. The Gwynedd Landscape Design Guide states that: 'The main environmental consideration in the Bangor and Caernarfon Catchment Areas will be to ensure that development will not adversely affect the visual amenities or the biodiversity of the Menai Strait area. There will also be an emphasis on safeguarding visual amenities towards, from and along the fringes of the Snowdonia National Park and the Anglesey AONB.'

**15.3 Menai Shore Planning Control.** There have been numerous developments in recent years along the Strait which have had a significant adverse visual impact and suggest that the effective level of planning protection in the Menai area needs strengthening. Examples include: the oversized Doc Victoria flats and shops in Caernarfon, wind turbines at Dinas Dinlle, stadium and hostel in Bangor, clinic in Felinheli, and a 67m high wind turbine at Hendy Farm in Y Foryd; the latter was eventually refused on appeal, but a proposal for a 3 storey hotel at Glan Menai on the Aber foreshore was allowed on appeal, in spite of local planning refusal and widespread public opposition largely on grounds of visual impact. Moreover, a commitment in the GUDP to consult with Anglesey on planning developments on the Gwynedd shore affecting views from the island has been overlooked in some recent applications. Extended SLAs would not exclude development, but would offer a valuable counterbalance to pressures for development in the Menai Hub zone. At the same time better protection should ensure that such developments would meet the highest environmental standards in a region where landscape values are paramount in attracting both high-value businesses and tourism.

<b>2ch. If your response to 2c above exceeds 100 words, please provide a summary (no more than 100 words).</b>																		
15.4 Menai Shore Proposal Summary: SLAs 8 and 9 protecting the south Menai Strait shore should be extended to include unprotected areas on the Gwynedd side of the Menai, between Foryd Bay and Felinheli, either side of the World Heritage site in Caernarfon. Apart from protecting a valuable and vulnerable local landscape, reinstating a former Landscape Conservation Area, their key role would be to provide a buffer for the Anglesey AONB on the north side of the Strait.																		
<b>2d. Please detail the changes you wish to see made to the Deposit Plan.</b>																		
<b>2dd. Is the Deposit Plan sound?</b>																		
Yes				<input type="checkbox"/>				No				<input type="checkbox"/>						
<b>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.</b>																		
<b>Procedural</b>				<b>Consistency</b>								<b>Coherence &amp; Effectiveness</b>						
<b>P1</b>	<input type="checkbox"/>	<b>P2</b>	<input type="checkbox"/>	<b>C1</b>	<input type="checkbox"/>	<b>C2</b>	<input type="checkbox"/>	<b>C3</b>	<input type="checkbox"/>	<b>C4</b>	<input type="checkbox"/>	<b>CE 1</b>	<input type="checkbox"/>	<b>CE 2</b>	<input type="checkbox"/>	<b>CE 3</b>	<input type="checkbox"/>	<b>CE 4</b>

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p>For office use only:</p> <p>Representor No.</p> <p>Date received: 31/3/15</p> <p>Date acknowledged:</p>
---	--	--

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

**Data Protection**

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

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

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

**PART 1: Contact details**

	Your details/ Your client's details	Agent's details (if relevant)
Name		Mark Roberts
Address		Barton Willmore
Postcode		[REDACTED]
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](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://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](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://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)

<b>2a. Which part of the Deposit Plan are you commenting on?</b>	
Policy number (please specify)	Policy AMG1 Special Landscape Areas
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	

<b>2b. Are you objecting or supporting the Deposit Plan?</b>			
Objecting	x	Supporting	Γ

<b>2c. Please provide details of your representation on the Deposit Plan.</b>	
<p><b>Policy AMG1 Special Landscape Areas</b></p> <p>This policy seeks to ensure that development within SLAs has <b>"no detrimental impact on the landscape."</b></p> <p>However, this test and requirement is overly onerous and disproportionate to the SLA status, which is not a National Park or Area of Outstanding Natural Beauty, where one would expect the highest level of protection. It is also practically impossible in delivering any development not to have an impact of some form on the landscape. Indeed, PPW advises at paragraph 5.3.11 that:</p> <p><b><u>Non-statutory designations, such as Special Landscape Areas or Sites of Interest for Nature Conservation, should be soundly based on a formal scientific assessment of the nature conservation, landscape or geological value of the site. Local non-statutory sites can add value to the planning process particularly if such designations are informed by community participation and reflect community values. Local planning authorities should apply these designations to areas of substantive conservation value where there is good reason to believe that normal planning policies cannot provide the necessary protection. Such designations should not unduly restrict acceptable development.</u></b></p> <p>Significantly the policy as drafted requires <b>"no detrimental impact on the landscape"</b>. The policy does not embody the presumption in favour of sustainable development, as required by PPW, as development whilst potentially having an adverse landscape impact, may deliver significant economic, social or other environmental benefits, which outweigh the adverse impact on the SLA.</p> <p>The Policy therefore does not comply with Test of Soundness C2 as it does not comply with Planning Policy Wales &amp; CE2 as it is not realistic having regard to other alternatives.</p>	

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

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

Reference should be made to the presumption in favour of sustainable development.

Reference to "no detrimental impact" should be deleted and replaced with "no significant impact" and a further balance provided in that any impact may be outweighed by the positive effects of the development in terms of economic, social or environmental benefits.

**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"/>

**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:31/03/15

**THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN**

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

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

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

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

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

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

## Test of Soundness

Test	Procedural Tests
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.

# Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **54**

Enw / Name: **Oaktree Environmental Ltd (John Williams) [2594]**

Rhan: **POLISI AMG1**

Section: **POLICY AMG1**

Math / Type: **Gwrthwynebu / Object**

## Crynodeb o'r Sylw:

Mae'r Ardaloedd Tirwedd Arbennig a nodir ar y Map Cynigion yn gorgyffwrdd â dynodiadau tirwedd eraill sy'n ymddangos bod ganddynt yr un pwrpas o warchod y dirwedd. Pan geir y cyfryw gorgyffwrdd, dylid rhoi ystyriaeth i ostwng maint yr Ardal Tirwedd Arbennig er mwyn osgoi dyblygu ardaloedd dynodedig. O ran safle ein cleient, sydd o fewn Ardal Tirwedd Arbennig 07 arfaethedig, mae'r dirwedd yn nodweddiadol o'r diwydiant cloddio mwynau sydd yn yr ardal ac ni ddylai fod yn ormod o faich ar gloddio mwynau yn yr ardal yn y dyfodol.

## Representation Summary:

The SLAs identified on the Proposals Map overlap other landscape designations which appear to have the same purpose of landscape protection. Where such overlap occurs, consideration should be given to reducing the extent of the SLA in order to avoid duplication of designated areas. In terms of our client's site, which is contained within proposed SLA 07, the landscape is characteristic of the mineral extraction industry in the area and should not be an excessive burden on the future extraction of mineral in the area

## Sylw Llawn / Full Representation:

The SLAs identified on the Proposals Map overlap other landscape designations which appear to have the same purpose of landscape protection. Where such overlap occurs, consideration should be given to reducing the extent of the SLA in order to avoid duplication of designated areas. In terms of our client's site, which is contained within proposed SLA 07, the landscape is characteristic of the mineral extraction industry in the area and should not be an excessive burden on the future extraction of mineral in the area

## Newid(iadau) i'r Cynllun

.

## Change(s) to the Plan

Look to reduce the area covered by SLA 07 to avoid overlap with designated RHL areas.

**Profion Cadernid / Soundness Tests:** None

## Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **234**

Enw / Name: **Ellesmere Sand & Gravel Company Limited [2686]**

Rhan: **POLISI AMG1**

Section: **POLICY AMG1**

Math / Type: **Gwrthwynebu / Object**

### Crynodeb o'r Sylw:

Dylid bod pwyslais cadarnhaol ar safleoedd cloddio mwynau presennol neu estyniadau i'r safleoedd hynny dros safleoedd newydd. Dylid edrych ar effeithiau amgylcheddol dros dro yn wahanol i effeithiau amgylcheddol tymor hir. Dylid bod pwyslais cadarnhaol ar safleoedd cloddio mwynau presennol neu estyniadau i'r safleoedd hynny dros safleoedd newydd. Dylid edrych ar effeithiau amgylcheddol dros dro yn wahanol i effeithiau amgylcheddol tymor hir. Dylai'r polisi gael ei ddiwygio i gynnwys y geiriau effaith "hir dymor" sydd yn galluogi echdynnu mwynau gymryd lle dros dro gan gyfeirio at gynigion adfer fod yn "unol â'r" nod "hir dymor" i ddiogelu ardaloedd tirlun arbennig.

### Representation Summary:

There should be a positive emphasis toward existing mineral extraction sites, or extensions to those sites over new sites. Temporary environmental effects should be viewed differently to long term environmental effects. The policy should be amended to include the words "long-term" effects thus allowing for mineral extraction in the interim and refer to restoration proposals being "in accordance" with the "long-term" objectives of the protection of special landscape areas.

### Sylw Llawn / Full Representation:

There should be a positive emphasis toward existing mineral extraction sites, or extensions to those sites over new sites. Temporary environmental effects should be viewed differently to long term environmental effects.

### Newid(iadau) i'r Cynllun

Dylai'r polisi gael ei ddiwygio i gynnwys y geiriau effaith "hir dymor" sydd yn galluogi echdynnu mwynau gym

### Change(s) to the Plan

The policy should be amended to include the words "long-term" effects thus allowing for mineral extraction in the interim and refer to restoration proposals being "in accordance" with the "long-term" objectives of the protection of special landscape areas.

Profion Cadernid / Soundness Tests: x, viii, ix

# Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **235**

Enw / Name: **Lafarge Tarmac Trading Limited [2735]**

Rhan: **POLISI AMG1**

Section: **POLICY AMG1**

Math / Type: **Gwrthwynebu / Object**

## Crynodeb o'r Sylw:

Dylid bod pwyslais cadarnhaol ar safleoedd cloddio mwynau presennol neu estyniadau i'r safleoedd hynny dros safleoedd newydd. Dylid edrych ar effeithiau amgylcheddol dros dro yn wahanol i effeithiau amgylcheddol tymor hir. Dylid bod pwyslais cadarnhaol ar safleoedd cloddio mwynau presennol neu estyniadau i'r safleoedd hynny dros safleoedd newydd. Dylid edrych ar effeithiau amgylcheddol dros dro yn wahanol i effeithiau amgylcheddol tymor hir. Dylai'r polisi gael ei ddiwygio i gynnwys y geiriau effaith "hir dymor" sydd yn galluogi echdynnu mwynau gymryd lle dros dro gan gyfeirio at gynigion adfer fod yn "unol â'r" nod "hir dymor" i ddiogelu ardaloedd tirlun arbennig.

## Representation Summary:

There should be a positive emphasis toward existing mineral extraction sites, or extensions to those sites over new sites. Temporary environmental effects should be viewed differently to long term environmental effects.

The policy should be amended to include the words "long-term" effects thus allowing for mineral extraction in the interim and refer to restoration proposals being "in accordance" with the "long-term" objectives of the protection of special landscape areas.

## Sylw Llawn / Full Representation:

There should be a positive emphasis toward existing mineral extraction sites, or extensions to those sites over new sites. Temporary environmental effects should be viewed differently to long term environmental effects.

## Newid(iadau) i'r Cynllun

Dylai'r polisi gael ei ddiwygio i gynnwys y geiriau effaith "hir dymor" sydd yn galluogi echdynnu mwynau gym

## Change(s) to the Plan

The policy should be amended to include the words "long-term" effects thus allowing for mineral extraction in the interim and refer to restoration proposals being "in accordance" with the "long-term" objectives of the protection of special landscape areas.

Profion Cadernid / Soundness Tests: x, viii, ix

# Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **460**

Enw / Name: **Bourne Leisure Ltd [2768]**

Rhan: **POLISI AMG1**

Section: **POLICY AMG1**

Math / Type: **Gwrthwynebu / Object**

## Crynodeb o'r Sylw:

Mae Bourne Leisure yn ystyried y dylai AMG1 ddweud yn glir bod yna bosibilrwydd cryf y bydd cyfleusterau ymwelwyr mewn AGT oherwydd yr angen eu lleoli yn agos i'r arfordir. Mae cyfleusterau ymwelwyr o hyd yn newid, gyda ailddatblygu a gwella safleoedd yn digwydd trwy gydol yr amser, er mwyn cwrdd a marchnad ymwelwyr dynamig. Mae Bourne Leisure yn ystyried y gall datblygiad priodol ddod ymlaen hyd yn oed mewn lleoliadau AGT os gellir gweithredu mesurau lliniaru priodol i ymdopi gydag ardrawiadau uniongyrchol ac anuniongyrchol.

## Representation Summary:

Bourne Leisure considers that AMG1 should explicitly set out that due to the need for tourism facilities to be located near the coast there is a high probability that they will also be located in a SLA. Tourist facilities are in a constant state of change, with redevelopment and site rationalisation taking place at all times, to meet the needs of the dynamic tourism market. Bourne Leisure considers that even for sites located in the SLA, appropriate development can come forward providing that commensurate mitigation measures can be implemented to mitigate both direct and indirect impacts.

## Sylw Llawn / Full Representation:

The underpinning vision of the Gwynedd Destination Management Plan (GDMP) is:

"Gwynedd as a top class integrated quality visitor destination valued for its internationally renowned special landscapes, its spectacular built environment and its unique Welsh culture."

The GDMP therefore considers the special landscapes to be important and directly linked to tourism. Bourne Leisure endorses policy AMG1 in principle as it considers that protecting the natural landscape is important in terms of attracting tourists to the local area.

AMG1 allows development to come forward as long as its scale and nature is appropriate and that there is no detrimental impact on the landscape.

Policy AMG1 therefore provides a positive policy basis for appropriate development come forward in the SLAs.

As many of Bourne Leisure's sites are located in rural and/or coastal areas, incorporating or adjacent to environmentally and ecologically sensitive sites, Bourne Leisure has significant experience of operating within and adjacent to sensitive environmental locations and takes the need for their protection and enhancement fully into account in day to day operations and when drawing up development proposals for its sites.

Bourne Leisure would like to stress that not all development has the potential to negatively impact on key landscape, public views and open spaces. For example, a number of Bourne Leisure's recent developments and current proposals have rationalised caravan plots and / or reconfigured site layouts, resulting in improved public views, positive impacts on the landscape and the provision of enhanced planting and open space.

Bourne Leisure considers that AMG1 should explicitly set out that due to the need for tourism facilities to be located near the coast there is a high probability that they will also be located in a SLA. Tourist facilities are in a constant state of change, with redevelopment and site rationalisation taking place at all times, to meet

---

## Sylwadau Dros y We / Representations via the Internet

---

the needs of the dynamic tourism market. Bourne Leisure considers that even for sites located in the SLA, appropriate development can come forward providing that commensurate mitigation measures can be implemented to mitigate both direct and indirect impacts.

### Newid(iadau) i'r Cynllun

.

### Change(s) to the Plan

Bourne Leisure considers that AMG1 should explicitly set out that due to the need for tourism facilities to be located near the coast there is a high probability that they will also be located in a SLA. Tourist facilities are in a constant state of change, with redevelopment and site rationalisation taking place at all times, to meet the needs of the dynamic tourism market. Bourne Leisure considers that even for sites located in the SLA, appropriate development can come forward providing that commensurate mitigation measures can be implemented to mitigate both direct and indirect impacts.

---

**Profion Cadernid / Soundness Tests:** None

2768/2767/898

Bourne Leisure 31/3/15  
(e-bow)

2768-2767-898-PS16



### **Strategic Policy PS16: Conserving and Enhancing the Natural Environment**

Bourne Leisure endorses PS16 in principle as it seeks to conserve and enhance the natural environment. The exceptional natural environment of Gwynedd, comprises the key visitor attraction of the area and therefore the desire to protect and where possible enhance the natural environment is supported by Bourne Leisure. Indeed the Destination Management Plan 2013-2020 states that 54% of visitors visited Gwynedd because of the scenery/landscape.

As many of Bourne Leisure's sites are located in rural and/or coastal areas, incorporating or adjacent to environmentally and ecologically sensitive sites, Bourne Leisure has significant experience of operating within and adjacent to sensitive environmental locations and takes the need for their protection and enhancement fully into account in day to day operations and when drawing up development proposals for its sites.

Greenacres and Hafan y Môr holiday parks are both located in environmentally sensitive locations. Bourne Leisure comments that this should not rule out development at these sites providing that the development is appropriate to the location and that commensurate mitigation measures can be implemented to mitigate both direct and indirect impacts.

Bourne Leisure would like to stress that not all development has the potential to negatively impact on key landscape, public views and open spaces. For example, a number of Bourne Leisure's recent developments and current proposals have rationalised caravan plots and / or reconfigured site layouts, resulting in improved public views, positive impacts on the landscape and the provision of enhanced planting and open space.

## Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **291**

Enw / Name: **Mr Myrddin Roberts [2858]**

Rhan: **POLISI AMG1**

Section: **POLICY AMG1**

Math / Type: **Gwrthwynebu / Object**

### Crynodeb o'r Sylw:

Nid yw'r Swyddogion sy'n llunio'r Cynllun Datblygu Lleol ar y cyd wedi dwyn i mewn yn ddigonol randdeiliaid lleol megis cynghorau cymuned, ffermwyr, tiffeddianwyr a thrigolion cyn dynodi Ardaloedd o Dirwedd Arbennig ar fap Ynys Môn, yn enwedig felly ar gyfer yr Ardal Tirwedd Arbennig o'r enw Llethrau Coediog Biwmares a Glen Llangoed. Fi sy'n digwydd bod yn Gadeirydd Cyngor Cymuned Llanddona, felly gwn nad oes yr un swyddog wedi bod yn ein cyfarfodydd. Fel trigolion, dylem fod wedi cael gwybod am y newid mawr arfaethedig yn y polisi hwn. Ni chafwyd trafodaeth ystyrion yn amlinellu'r goblygiadau ar fusnesau, tir a chartrefi. Bod Polisi AMG1 yn cael ei ddileu tan fod pob rhanddeilwyr wedi cael ei hysbysu am y cyflwyniad arfaethedig o'r ATAAu a bod trafodaeth a chytundeb yn cael ei gyrraedd gan bob parti perthnasol, yn enwedig y gymuned leol a swyddogion y Cynllun ar y Cyd.

### Representation Summary:

The officers who are drawing up the new Joint Local Development Plan have not adequately involved local stakeholders such as community councils, farmers, landowners and residents before designating Special Landscape Areas on the map of Anglesey especially for the SLA named Beaumaris Wooded Slopes and Llangoed Vale. I happen to be the current chairman of Llanddona Community Council, so I know that no officer has attended any of our meetings. We as residents, should have been alerted to this proposed major change in policy. Meaningful dialogue, outlining the implications on businesses, land and homes has not happened.

That Policy AMG1 be deleted until such time that all stakeholders have been informed of the proposed introduction of SLA's and discussion and agreement reached by all relevant parties, especially the local community and officers of the Joint Development Plan.

### Sylw Llawn / Full Representation:

The officers who are drawing up the new Joint Local Development Plan have not adequately involved local stakeholders such as community councils, farmers, landowners and residents before designating Special Landscape Areas on the map of Anglesey especially for the SLA named Beaumaris Wooded Slopes and Llangoed Vale. I happen to be the current chairman of Llanddona Community Council, so I know that no officer has attended any of our meetings. We as residents, should have been alerted to this proposed major change in policy. Meaningful dialogue, outlining the implications on businesses, land and homes has not happened.

### Newid(iadau) i'r Cynllun

Bod Polisi AMG1 yn cael ei ddileu tan fod pob rhanddeilwyr wedi cael ei hysbysu am y cyflwyniad arfaethedi

### Change(s) to the Plan

That Policy AMG1 be deleted until such time that all stakeholders have been informed of the proposed introduction of SLA's and discussion and agreement reached by all relevant parties, especially the local community and officers of the Joint Development Plan.

### Profion Cadernid / Soundness Tests: i

	 <b>CYNGOR SIR YNYS MÔN</b> <b>ISLE OF ANGLESEY</b> <b>COUNTY COUNCIL</b>	<i>For office use only:</i>  <i>Representor No.</i>  <i>Date received: 31/3/15</i> <i>(elms)</i>  <i>Date acknowledged:</i>
--	--	--

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

**Data Protection**

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

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

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

**PART 1: Contact details**

	Your details/ Your client's details	Agent's details (if relevant)
Name	Paul Madden	
Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	
Email address	[REDACTED]	

### Guidance Note.

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

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

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

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

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

<b>2a. Which part of the Deposit Plan are you commenting on?</b>	
Policy number (please specify)	AMG1
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	

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

<p><b>2c. Please provide details of your representation on the Deposit Plan.</b></p> <p>In the Ynys Môn Local Development Plan 1996 section 31 on Landscape is the following:          .26 The Council considers that <b>all</b> parts of Ynys Môn have special landscape qualities” (my emphasis)</p> <p><b>“31. With the exception of the AONB, and that land which falls within the settlement boundaries as defined in the Plan, the island is designated as a Special Landscape Area.”</b></p> <p>Anglesey is indeed a special place. And yet in the new plan Special Landscape Area status is confined to a few areas of the island rather than the whole. Are the rest of the island’s landscapes outside of the SLAs as apparently now designated not special. Why? What has changed? Is the island no longer special? The criteria now used to designate Special Landscape areas in this plan could equally apply in part or wholly to the island, as per the LDP 1996. The new policy is strange and unfounded. For instance the isle of Anglesey is recognised as a region of unique geological, environmental and cultural significance, both in the UK and internationally. There is a distinct possibility that UNESCO later this year will award Anglesey enhanced global geopark status, the equivalent status of a World Heritage Site.</p> <p>This Joint Local Plan is inadequate in not recognising the uniqueness of all Anglesey’s landscapes and therefore does not offer sufficient protection to them against unsuitable developments and in that regard is unsound. It reverses longstanding policy without adequate justification, mandate or evidence.</p> <p style="text-align: right;"><i>Please use additional sheet if necessary.              Please state how many additional sheets have been used.....</i></p>
---

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

Inadequate and unspecified list of SPGs.

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

Policy PS7

"This will be achieved by:

- i. ensuring that installations in areas covered by international or national landscape designations and visible beyond their boundaries, or areas of local landscape value, in accordance with Strategic Policy PS16 do not individually or cumulatively compromise the objectives of the designations especially with regard to landscape character, visual impact and residential and tourist amenity;
- ii. that installations in areas covered by international, national or local nature conservation designations in accordance with PS17 do not individually or cumulatively compromise the objectives of the designations;
- iii. supporting installations outside designated areas provided that the installation would not cause significant demonstrable harm to landscape character, biodiversity, residential and tourist amenity, either individually or cumulatively

AMG 1

Anglesey as a whole to be designated a Special Landscape Area.

Appendix 9

Full specified list of SPGs currently in force, and whether they are to be revised or to be replaced by new guidance.

--

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

Yes <input checked="" type="checkbox"/>	No <input checked="" type="checkbox"/>
---	--

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

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

**Part 3: What Happens Next?**

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

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

I do not want to speak at a hearing session and am happy for my written comments to be considered by the Inspector.	<input checked="" type="checkbox"/>
I want to speak at a hearing session.	<input type="checkbox"/>

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

--

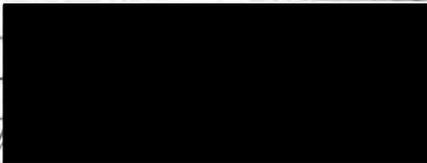
**3c. Would you like to be informed about the following** (Please tick the relevant boxes)

Submission of documents and evidence to the examination	<input checked="" type="checkbox"/>
Publish Inspector's report	<input checked="" type="checkbox"/>
Plan's adoption	<input checked="" type="checkbox"/>

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

--

**Signed:**



**Dated:**

31/3/15

**Cydbwyllgor Ymgynghorol Ardal o Harddwch Naturiol Eithriadol Llŷn**

Dynodwyd Ardal o Harddwch Naturiol Eithriadol (AHNE) Llŷn yn 1957 o dan Ddeddf Parciau Cenedlaethol a Mynediad i Gefn Gwlad 1949. AHNE Llŷn oedd yr 3ydd ardal i'w dynodi drwy Gymru, Lloegr a Gogledd Iwerddon.

Sefydlwyd Cydbwyllgor Ymgynghorol Ardal o Harddwch Naturiol Eithriadol Llŷn yn 1997 yn dilyn cyfarfod rhwng Cyngor Gwynedd, Cyngor Cefn Gwlad Cymru ac amrywiol sefydliadau eraill. Un o gyfrifoldebau'r Cydbwyllgor yw cyngor ar Gynlluniau Datblygu, strategaethau a rhaglenni gwaith yr awdurdod lleol a chyrrff eraill i'r graddau eu bod yn ymwneud â'r AHNE.

Yn y cyfarfod o'r Cydbwyllgor Ymgynghorol AHNE Llŷn a gynhaliwyd ar 25ain o Fawrth 2015 trafodwyd y Cynllun Datblygu Lleol Gwynedd a Môn 2011-26 a gwnaed y sylwadau canlynol:

1. **AHNE** - nid oes polisi penodol o ran cynnal a gwarchod yr AHNE. Yn hytrach mae polisiâu cyffredinol a chyfeiriad at ddeddwriaeth a pholisi cenedlaethol. Credir fod angen polisi penodol ar gyfer cynnal a chadw'r AHNE, tebyg i Bolisi B8 yn y Cynllun presennol.
2. **AMG 1** - Ardaloedd Tirwedd Arbennig. Mewn rhai manau mae'r ardal yma (ATA Gorllewin Llŷn) yn ffinio gyda AHNE Llŷn ac yn creu gwarchodiad i osodiad yr AHNE. Fodd bynnag, mae rhai rhannau o'r AHNE heb y warchodaeth yma. Credir felly dylid cyfeirio at warchod gosodiad yr AHNE yn y polisiâu perthnasol felly (gweler 5 isod).
3. **AMG 2** - Mae'n bolisi canmoladwy ond braidd yn gymhleth a chredir y gall fod yn anodd ei weithredu.
4. **AMG 3** - Dynodiad lleol yw'r Arfordir Treftadaeth sydd yn dilyn ffin arfordirol yr AHNE i raddau helaeth yn Llŷn. Credir y dylai'r polisi adlewyrchu'r dynodiad yn fwy cadarnhaol drwy roi mwy o warchodaeth i'r AT.
5. **Polisi ADN 1** – Ynni Gwynt ar y Tir. Anghytunir â'r polisi:
  - Credir y dylid cadw at y polisi presennol (C26) o ddim tyrbinau yn yr AHNE.
  - Hefyd peidio a chaniatau tyrbeini uwch na 11m o fewn gweledd yr AHNE.
  - Dylid defnyddio'r term "tyrbin" yn hytrach na "melin" sydd yn wahanol.
  - Credir y dylai maen prawf 2 gyfeiro at warchod gosodiad yr AHNE.
  - Mae pryder am y categorïau a dynodi datblygiadau dan 5MW fel rhai "Bach".
6. **Polisi ADN 2** – Technoleg Ynni Adnewyddadwy arall. Credir fod y polisi hwn yn rhy benagored o ran cynigion tu allan i ffiniau datblygu a dylid ei gryfhau.
7. **Polisi TWR 3** - Carafanau Sefydlog a Siale a Llety Gwersylla Amgen Parhaol. Cefnogir y polisi hwn gan y bwriedir gwrthod safleoedd newydd ac estyniadau o fewn yr AHNE a'r ATA.

# Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **55**

Enw / Name: **Oaktree Environmental Ltd (John Williams) [2594]**

Rhan: **7.5.9**

Section: **7.5.9**

Math / Type: **Gwrthwynebu / Object**

## Crynodeb o'r Sylw:

Ni ddylid fod angen gwarchodaeth arbennig os yw ardaloedd o dir eisoes wedi'u gwarchod gan ddynodiadau tirwedd eraill sy'n cydnabod ansawdd y dirwedd dan sylw. Chwarel weithio yw safle ein cleient sydd mewn ardal a chaiff ei chydabod am werth ei thirlun hanesyddol ac mae wedi'i dynodi yn hynny o beth. Ni ddylid fod angen rhoi i'r ardal warchodaeth tirwedd ychwanegol pan fo'r cyfryw warchodaeth eisoes yn bodoli.

## Representation Summary:

There should be no need for additional protection if areas of land are already protected by other landscape designations which recognise the quality of the landscape concerned. Our client's site is a working quarry which is located in an area recognised for its historic landscape value and so designated. There should be no need to afford the area additional landscape protection when such already exists.

## Sylw Llawn / Full Representation:

There should be no need for additional protection if areas of land are already protected by other landscape designations which recognise the quality of the landscape concerned. Our client's site is a working quarry which is located in an area recognised for its historic landscape value and so designated. There should be no need to afford the area additional landscape protection when such already exists.

## Newid(iadau) i'r Cynllun

.

## Change(s) to the Plan

Look to reduce the area covered by SLA 07 to avoid overlap with designated RHL areas.

**Profion Cadernid / Soundness Tests:** None

231-365-7.5.10		<i>For office use only:</i> <i>Submitor no : 231</i> <i>Representor No. 365</i>  <i>Date received: 30/3/15</i> <i>(260 nr)</i> <i>Date acknowledged:</i>
----------------	--	--

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

**Representation Form**

**Data Protection**

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

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

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

**PART 1: Contact details**

	<b>Your details/ Your client's details</b>	<b>Agent's details (if relevant)</b>
<b>Name</b>	Morag McGrath	
<b>Address</b>		
<b>Postcode</b>		
<b>Telephone Number</b>		
<b>Email address</b>		

**Guidance Note.**

Please set out your comments in Part 2 of this form. Use additional sheets of paper where necessary.

**Separate forms should be completed for each comment** that you wish to make.

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

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

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

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

<b>2a. Which part of the Deposit Plan are you commenting on?</b>	
Policy number (please specify)	AMG1
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	

<b>2b. Are you objecting or supporting the Deposit Plan?</b>		
Objecting	<b>objecting</b>	Supporting

<b>2c. Please provide details of your representation on the Deposit Plan.</b>	
	<p>It is difficult to see how any development can <b>'add'</b> to the historical, visual, geographical, ecological and cultural features of an SLA</p>
<p><i>Please use additional sheet if necessary. Please state how many additional sheets have been</i></p>	

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

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

Change the wording to 'maintain, enhance or restore the recognised character and qualities' as in 7.5.10

--

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

Yes

--

No

--

**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.**

<b>Procedural</b>			<b>Consistency</b>						<b>Coherence &amp; Effectiveness</b>									
<b>P1</b>		<b>P2</b>		<b>C1</b> x		<b>C2</b>		<b>C3</b>		<b>C4</b>		<b>CE1</b>		<b>CE2</b> x		<b>CE3</b>		<b>CE4</b>

**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.  x

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: Morag McGrath	Date 29.3.15	D a t e : 2 9. 3. 1 5
-----------------------	--------------	--

THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN

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

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

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

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

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

**REPRESENTATION FORMS SHOULD BE RETURNED BY NO LATER THAN 5.00pm on the 31<sup>st</sup> March 2015**

**REPRESENTATIONS RECEIVED AFTER THIS TIME WILL NOT BE CONSIDERED**

## Test of Soundness

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

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

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

## Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **56**

Enw / Name: **Oaktree Environmental Ltd (John Williams) [2594]**

Rhan: **7.5.10**

Section: **7.5.10**

Math / Type: **Gwrthwynebu / Object**

### Crynodeb o'r Sylw:

Lle bo'r dirwedd eisoes yn cael ei gwarchod, bydd eisoes gofyn i gynigion datblygu ystyried cynnal, gwella neu adfer cymeriad ac ansawdd cydnabyddedig yr ardaloedd. O'r herwydd, mae rhoi statws Ardal Tirwedd Arbennig yn rhywbeth diangen nad oes fawr ddim pwrpas iddo o gofio lefel bresennol y warchodaeth a roddir i'r dirwedd.

### Representation Summary:

Where landscape protection already exists, development proposals should already be required to give consideration to maintaining, enhancing or restoring the recognised character and quality of the areas. Conferring SLA status to such areas is therefore an unnecessary exercise which serves little purpose given the existing level of landscape protection.

### Sylw Llawn / Full Representation:

Where landscape protection already exists, development proposals should already be required to give consideration to maintaining, enhancing or restoring the recognised character and quality of the areas. Conferring SLA status to such areas is therefore an unnecessary exercise which serves little purpose given the existing level of landscape protection.

### Newid(iadau) i'r Cynllun

.

### Change(s) to the Plan

Look to reduce the area covered by SLA 07 to avoid overlap with designated RHL areas

**Profion Cadernid / Soundness Tests:** None

---

## Sylwadau Dros y We / Representations via the Internet

---

Rhif Sylw / Rep Id: **426**

Enw / Name: **Cyngor Tref Ffestiniog (Mrs Ann Coxon) [2940]**

Rhan: **7.5.10**

Section: **7.5.10**

Math / Type: **Cefnogi / Support**

---

### Crynodeb o'r Sylw:

Rydym yn cefnogi'r polisi yma i ddiogelu Ardaloedd Tirwedd Arbennig. Ond yn ein barn ni, dylid cynnwys Cwmorthin ymysg y rhain. Mae'r ardal hon yn yn sicr yn ardal sy'n arbennig o drawiadol a hardd, ac sy'n haeddu cael ei gwarchod yn arbennig.

### Representation Summary:

We support this policy to safeguard Special Landscape Areas. But in our opinion, Cwmorthin should be included amongst these. This area is certainly one which is incredibly striking and beautiful, and deserves to be specifically protected.

---

### Sylw Llawn / Full Representation:

Rydym yn cefnogi'r polisi yma i ddiogelu Ardaloedd Tirwedd Arbennig. Ond yn ein barn ni, dylid cynnwys Cwmorthin ymysg y rhain. Mae'r ardal hon yn yn sicr yn ardal sy'n arbennig o drawiadol a hardd, ac sy'n haeddu cael ei gwarchod yn arbennig.

### Newid(iadau) i'r Cynllun

.

### Change(s) to the Plan

.

---

Profion Cadernid / Soundness Tests: None

# Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **275**

Enw / Name: **Mr Myrddin Roberts [2858]**

Rhan: **7.5.11**

Section: **7.5.11**

Math / Type: **Gwrthwynebu / Object**

## Crynodeb o'r Sylw:

Ni chafwyd trafodaethau gyda'r Cynghorau Cymuned a'r tîrfeiddianwyr perthnasol yng nghyswllt yr Ardal Tirwedd Arbennig o'r enw Llethrau Coediog Biwmares a Glen Llangoed. Does bosib y dylid fod wedi rhoi gwybod i bawb oedd â diddordeb am y dynodiad newydd hwn a'i oblygiadau ar eu busnesau, eu tir a'u cartrefi. Mae'r newid a'r ychwanegiad pwysig hwn i bolisiau cynllunio yn haeddu mwy o fewnbwn gan randdeiliaid. Nid yw'n ddigon datgan mai hwn yw'r amser am sylwadau'r cyhoedd pan nad yw'r wybodaeth fanwl wedi bod ar gael i ni ac na chafwyd y trafodaethau angenrheidiol gydag aelodau o Uned y Cynllun Datblygu ar y Cyd.

## Representation Summary:

No discussions have taken place with the relevant Community Councils and landowners in respect of the new SLA named Beaumaris Wooded Slopes and Llangoed Vale. Surely all interested parties should have been made aware of this new designation and its implications on their businesses, land and homes. This major change and addition to planning policy merits more stakeholder input. It is insufficient to state that this is the time for public comment when we have not had detailed information readily available and had the necessary discussions with members of the Joint Development Plan.

## Sylw Llawn / Full Representation:

No discussions have taken place with the relevant Community Councils and landowners in respect of the new SLA named Beaumaris Wooded Slopes and Llangoed Vale. Surely all interested parties should have been made aware of this new designation and its implications on their businesses, land and homes. This major change and addition to planning policy merits more stakeholder input. It is insufficient to state that this is the time for public comment when we have not had detailed information readily available and had the necessary discussions with members of the Joint Development Plan.

## Newid(iadau) i'r Cynllun

That this proposed Special Landscape Area be deleted from the Plan until such time where all stakeholders

## Change(s) to the Plan

That this proposed Special Landscape Area be deleted from the Plan until such time where all stakeholders have been informed of the proposed change and discussion and agreement between the Joint Development Plan members and the local community have taken place.

## Profion Cadernid / Soundness Tests: i