

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **481**

Enw / Name: **Mr Geoff Wood [2916]**

Rhan: **7.4.130**

Section: **7.4.130**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Nid yw'r paragraff yn ystyried amgylchiadau pryd y gallai fod yn briodol creu neu ailsefydlu annedd yn y cefn gwlad pe byddai'n arwain at adfer ased treftadaeth neu adeilad gwerinol lleol a fyddai o gymorth i ddiogelu diwylliant Cymreig. Yn yr amgylchiadau hynny, dylai'r Cynllun gydnabod na allai fod yn bosib nac yn hyfyw i weithiwr gwledig fyw yn yr adeilad nac i'r adeilad weithredu fel annedd fforddiadwy.

Representation Summary:

The paragraph does not take consideration of circumstances when it may be appropriate to create or re-establish a dwelling in the countryside if it would lead to the restoration of a heritage asset or a local vernacular building which would help to preserve the Welsh culture. In those circumstances the Plan should recognise that it may not be feasible or viable for the building to be occupied by a rural worker or function as an affordable dwelling.

Sylw Llawn / Full Representation:

The paragraph does not take consideration of circumstances when it may be appropriate to create or re-establish a dwelling in the countryside if it would lead to the restoration of a heritage asset or a local vernacular building which would help to preserve the Welsh culture. In those circumstances the Plan should recognise that it may not be feasible or viable for the building to be occupied by a rural worker or function as an affordable dwelling.

Newid(iadau) i'r Cynllun

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Change(s) to the Plan

The paragraph should be amended to read "Development in the open countryside will have to satisfy National Policy and TAN6 in relation to new rural enterprise dwelling or one planet development. In some cases, it may be acceptable to create a new dwelling or re-establish a previous dwelling in the open countryside if it involves the sensitive repair or refurbishment of a heritage asset that helps preserve local character or the Welsh culture. In line with Policy TAI9 in the future should there be no eligible occupier for a rural enterprise dwelling then it would be considered for occupation by those eligible for affordable dwelling, if it is viable to do so".

Profion Cadernid / Soundness Tests: x



CYNGOR SIR
YNYS MÔN
ISLE OF ANGLESEY
COUNTY COUNCIL

For office use only:

Representor No.

Date received:

Date acknowledged:

**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	Cadnant Planning Ltd	Cadnant Planning Ltd
Address		<div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 150px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 80px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 40px; height: 15px;"></div>
Postcode		<div style="background-color: black; width: 60px; height: 15px;"></div>
Telephone Number		<div style="background-color: black; width: 100px; height: 15px;"></div>
Email address		<div style="background-color: black; width: 200px; height: 15px;"></div>

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)	TAI19, PS15
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 checked="" type="checkbox"/>	Supporting	<input type="checkbox"/>

2c. Please provide details of your representation on the Deposit Plan.	
<p>Policy TAI19: Conversion of traditional buildings in open countryside states that;</p> <p><i>“In the open countryside the conversion of traditional buildings for residential use will be permitted when the following criteria are met:</i></p> <ol style="list-style-type: none"> <i>1. There is evidence that employment use of the building is not viable;</i> <i>2. The development provides an affordable unit for the community’s local need for an affordable dwelling or the residential use is a subordinate element associated with a wider scheme for business re-use;</i> <i>3. The structure is structurally sound;</i> <i>4. No extensive alterations are required to enable the development;</i> <i>5. Any architectural characteristics of merit and traditional materials are retained and that the proposal does not lead to the loss of the original structure’s character”</i> <p>It is considered that restricting conversion of traditional buildings for residential use to provide affordable units for the community’s local need for affordable dwellings is unviable and undeliverable as there is an increase in building/development costs for conversion schemes. This policy will fail in its delivery on viability ground as it is inevitable that the affordable housing requirement cannot be delivered in conversion schemes. Also it is considered that the policy should allow for minor extensions to the building to enable the development. It is considered that first requirement to provide evidence that employment use of the building is not viable is unreasonable and unnecessary providing additional cost on developers when the policy clearly restricts development to conversion of traditional buildings only.</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).

It is considered that restricting conversion of traditional buildings for residential use to provide affordable units for the community's local need for affordable dwellings is unviable and undeliverable as there is an increase in building/development costs for conversion schemes. This policy will fail in its delivery on viability ground as it is inevitable that the affordable housing requirement cannot be delivered in conversion schemes.

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

We wish to seek the following changes:

1. The requirement of affordable housing within conversion schemes should be removed.
2. The policy should allow for minor extensions to the building to enable the development.
3. The requirement to provide evidence that employment use of the building is not viable should be removed.

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.

We wish to test the Council's reasoning for the policy requirements through discussion and clarification 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 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.

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **358**

Enw / Name: **Mr Geoff Wood [2916]**

Rhan: **POLISI TAI19**

Section: **POLICY TAI19**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Awgrymu cyflwyno prawf hyfywedd ar gyfer y meini prawf fforddiadwy yng nghyswllt rhan 2 y polisi hwn. Dylid gwneud i ffwrdd â'r term 'israddol' gan fod y prawf hwn yn rhy feichus. At hyn, ni ddylai'r prawf strwythurol fod yn berthnasol lle byddai atgyweirio neu ailwampio'r strwythur yn diogelu ased treftadaeth.

Representation Summary:

Suggest that for part 2 of this policy, a viability test is introduced for the affordable criteria. The term 'sub-ordinate' should be deleted as this test is too onerous. Further, the structural test should not apply where repairing or refurbishing the structure would preserve a heritage asset.

Sylw Llawn / Full Representation:

Suggest that for part 2 of this policy, a viability test is introduced for the affordable criteria. The term 'sub-ordinate' should be deleted as this test is too onerous. Further, the structural test should not apply where repairing or refurbishing the structure would preserve a heritage asset.

Newid(iadau) i'r Cynllun

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Change(s) to the Plan

Part 2 - amend to read "Subject to being viable, the development provides an affordable unit for the community's local need for an affordable dwelling or the residential use is an element associated with a wider scheme for business re-use;"

Part 3 - amend to read "The building is structurally sound or involves the repair or refurbishment of a heritage asset that helps to preserve local character and/or the Welsh culture"

Profion Cadernid / Soundness Tests: x

Cynllun Datblygu Lleol Gwynedd a Môn

Hoffai NFU Cymru wneud y sylwadau cyffredinol canlynol ar y Polisiâu Rheoli Datblygu sydd wedi ei gynnwys yn y Cynllun drafft

Cyfleoedd na fyddai'n rhwystro'r datblygiadau canlynol:-

1. Ehangu busnesau priodol
2. Ailddefnyddio adeiladau gwledig sy'n addas ar gyfer creu cyflogaeth
3. Darparu unedau gwaith trwy addasu adeiladau gwledig traddodiadol
4. Arallgyfeirio yn yr economi amaethyddol
5. Mentrau sy'n gysylltiedig â thwristiaeth briodol
6. Hamdden ond dim ond pan fyddant yn briodol i leoliad cefn gwlad a defnydd arall o dir yn yr ardal yn cynnwys amaethu
7. Caniatáu datblygiadau technolegol i hwyluso datblygiad cyflogaeth mewn ardaloedd gwledig
8. Mentrau yn angenrheidiol i gwrdd ag anghenion ffermio a choedwigaeth gyfoes. Hefyd isadeiledd yn cynnwys egni gwyrdd, twristiaeth a mentrau eraill a fydd yn helpu i gefnogi'r economi gwledig cynaliadwy.
9. Byddai'n darparu cyfleusterau cymunedol sy'n diwallu angen lleol
10. Mewn amgylchiadau, lle y byddai'n helpu i fodloni angen lleol am dai, gan gynnwys cynlluniau sy'n gyson â'r Polisi Tai Fforddiadwy.
11. Byddai'n gwneud darpariaeth ar gyfer cynhyrchu ynni adnewyddadwy, sy'n briodol o raddfa a dyluniad i'w leoliad
12. Byddai'n cefnogi adfywiad cymdeithasol ac economaidd ardaloedd gwledig
13. Adeiladau amaethyddol newydd sy'n addas ar gyfer amaethu cyfoes wedi ystyried eu graddfa, lleoliad, dyluniad a'r deunyddiau lleihau'r effaith weledol ar y dirwedd
14. Lle mae'n bosib dylai adeiladau newydd yn cael eu grwpio gydag unrhyw adeiladau presennol er mwyn lleihau eu heffaith weledol ar y dirwedd. Fodd bynnag, dylai adeiladau ynysig cael eu caniatáu lle mae eu lleoliad yn hanfodol i'r gweithgaredd amaethyddol sy'n cael ei wneud lle nad ydynt yn cael eu lleoli mewn man amlwg.

15. Dylai'r addasu neu newid defnydd adeiladau gwledig segur y tu allan i unrhyw ffin datblygu tai yn cael eu caniatáu ar gyfer defnydd cyflogaeth.

Dylai'r Cynllun hefyd

1. Wneud defnydd mwyaf effeithiol o dir yr ardal ac mae angen cyfeiriad penodol yn y Cynllun o werth amaethyddiaeth a chynnyrch lleol.
2. Annog nid gwrthod twf ffermio ac arallgyfeirio
3. Caniatáu cymysgedd o dai gan gynnwys yr hawl i ddatblygu hen adfeilion nid yn unig i ymwelwyr ond i'r boblogaeth gynhenid gael byw ynddynt.
4. Hyrwyddo tirwedd o safon uchel a chydabyddiaeth mae amaethyddiaeth yn ei chwarae yn hyn
5. Gydabod gwerth manddaliadau Môn a Gwynedd fel modd i ffermwyr ifanc gychwyn a datblygu ei busnesau
6. Cydnabyddiaeth o werth amaeth a'r diwydiannau bwyd lleol i'r economi wledig, cyfleon, cyflogaeth a'r iaith Gymraeg.
7. Gefnogi gweithio o gartref a mesurau a fydd yn gwella'r band eang a chyfathrebu yn yr ardaloedd anghysbell yn arbennig
8. Cynllun hyfyw sydd a gallu i addasu i ofynion cyfredol ffermio a busnesau i ffynnu yng nghefn gwlad.