



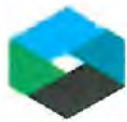
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- 1.23 Regulations 9(1) and 9(5) of the Conservation of Habitats and Species Regulations 2010 (as amended) requires public bodies in exercise of their functions, to have regard to and to secure compliance with the provisions of the 1992 'Habitats' Directive (92/43/EEC) and the 2009 'Birds' Directive ([2009/147/EC](#)) so far that they might be affected by those functions.
- 1.24 When assessing allocations, the other requirements of the Habitats Directive should also be considered where appropriate. This includes provision and management of stepping stone and linear features; prevention of incidental capture/killing of European Species; protection of European protected species including consideration of deterioration and ensuring compliance of Article 16 in respect of whether the proposal satisfies a listed derogation criterion; and if the two mandatory tests are satisfied.
- 1.25 We consider that land use planning and proposed land use change within Anglesey and Gwynedd needs to adequately consider and audit the relevant provisions of the Birds Directive (as set out in Regulation 9(A) of the 2012 amendments to The Conservation of Habitats and Species Regulations 2010). In the context of the wider countryside, this specifically relates to the upkeep, management and creation of habitat for wild birds. The LPA is reminded of NRW's duty to report on the implementation of this legislation (Regulation 9(B)).
- 1.26 Where a European Protected Species is present, a development may only proceed provided that derogation provisions of Article 16 of the Habitats Directive are satisfied.

#### **Natural Environment and Rural Communities (NERC) Act (2006)**

- 1.27 Please note that we have not considered possible effects on all local or regional interests. Therefore, you should not rule out the possibility of adverse effects on such interests, which would be relevant to your Authority's general duty to have regard to conserving biodiversity, as set out in section 40 of the Natural Environment and Rural Communities (NERC) Act (2006). This advice includes any consideration of the planned provision of "linear" and "stepping stone" habitats as defined in Article 10 of the Habitats Directive.
- 1.28 To comply with your authority's duty under section 40 of the NERC Act, to have regard to conserving biodiversity, your decision should take account of possible adverse effects on such interests. We recommend that you seek further advice from your authority's internal ecological adviser and/or third sector nature conservation organisations such as the local wildlife trust, RSPB, etc. The Wales Biodiversity Partnership's web site has guidance for assessing proposals that have implications for section 42 habitats and species ([www.biodiversitywales.org.uk](http://www.biodiversitywales.org.uk)).

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## **Annex 1 Habitat and Wildlife Sites**

1.29 We advise that you consult your internal ecologist and Cofnod in respect of the potential presence of any Annex 1 habitats within the boundaries of any of the proposed allocations.

### **Protected Sites**

1.30 Proposed allocation C16 – Bae Hiraef, Bangor is located directly adjacent Traeth Lafan Special Protection Area (SPA), Y Fenai a Bae Conwy Special Area of Conservation (SAC), Traeth Lafan Site of Special Scientific Interest (SSSI) and Traeth Lafan Local Nature Reserve. Any proposal to develop this site will need to demonstrate that it will not have an adverse effects on the site features.

1.31 We remind you that, as a competent authority for the purposes of the 2010 Regulations, your authority must not normally agree to include any of the proposed allocations and the plan unless you are sure beyond reasonable scientific doubt that any of the proposed allocations will not adversely affect the integrity of a SAC, SPA or Ramsar site.

1.32 We advise that drainage proposals for developments will need to take into account the proximity of protected sites and in particular any nearby watercourses are hydrologically connected to protected sites. Where a hydrological connection exists, there is a need to ensure that any proposed discharges do not affect water quality within the protected site.

1.33 In addition, part of proposed allocation C22 – Former Bron y Garth Hospital Site, Penrhydeudraeth is located within Ysbyty Bron y Garth Site of Special Scientific Interest (SSSI).

1.34 We would recommend that a design guide is prepared to guide development at the former Bron y Garth Hospital Site.

### **Protected Landscapes**

1.35 A number of the allocated land are located within, adjacent or in close proximity to the Llyn Area of Outstanding Natural Beauty (AONB) and Ynys Mon Area of Outstanding Natural Beauty (AONB).

1.36 We remind you of your Authority's duty under Section 85 of the Countryside and Rights of Way Act 2000 which required public bodies to have regard to the purposes of conserving and enhancing the natural beauty of the AONB. The

### Protecting Biodiversity

- 1.9 With regards to Policy PS16 AND AMG4 NRW questions the need for both these policies and if they should be incorporated into a single 'Biodiversity' Policy.
- 1.10 We suggest that you refer to Conwy County Council's adopted Local Development Plan and in particular to policy NTE/3 – Biodiversity and its explanatory text.
- 1.11 This single policy provides the policy structure for safeguarding species of European, national and local importance as well as referring to the need to achieve the targets of the Local Biodiversity Action Plan.
- 1.12 Conwy's adopted policy in particular identifies that new development should aim to conserve and where possible enhance biodiversity through;
- *Sensitive siting of development*
  - *Sensitive layout and design which avoids impacts or mitigates through an agreed programme*
  - *Creating, enhancing and managing wildlife habitats and natural landscapes including connectivity*
  - *Integrating biodiversity measures into the built environment*
  - *Providing for a management agreement with the Local Planning Authority to secure the retention and long term future of biodiversity interests where applicable*
- 1.13 It is considered that providing a more comprehensive Biodiversity policy will help ensure that development proposals are presented with sensitive layout and designs which avoid impacts or mitigate for any identified adverse impact on biodiversity and also ensure that the developer is aware through the policy inclusion of the need to enter into a long term management agreement with the LPA to secure retention and long term future of biodiversity interests where applicable.
- 1.14 In addition, the policy should include a hierarchy that clearly defines the level of protection afforded to sites and species and include reference to species included within Section 42 of the Wildlife and Countryside Act 1991 which the Authority has a duty to protect under the Natural Environment and Rural Communities (NERC) Act (2006).



- 1.15 It is considered that amending policy PS16 as recommended would help to meet test of soundness C2.

### **Proposed Employment and Housing Site Allocations**

- 1.16 NRW is satisfied with the strategy's aim to disperse development proportionately around the plan area. The focus being on locating development within those locations that provide the best opportunity for achieving sustainable development i.e. developing the Sub regional, urban and local service centres, and an appropriate amount of development in villages with a focus on service villages and then some development in Clusters.
- 1.17 NRW welcomes that housing within the rural clusters will be 100% affordable housing.
- 1.18 It is acknowledged that the Plan does not propose any housing allocations in Porthmadog due to large parts of the settlement being categorised as being within Zone C1 and with no alternative sites identified as being available beyond the flood risk areas. Criccieth and Penrhyndeudraeth have therefore been identified as being appropriate to meet the housing requirement of Porthmadog.
- 1.19 NRW has reviewed the allocations included under the following policies;
- CYF1: Safeguarding and Allocating Land and Units for Employment Use,  
TAI14: Housing in Sub-Regional Centre and Urban Service Centres,  
TAI15: Housing in Local Service Centre  
TAI16: Housing in Service Villages and;  
TAI17 Housing in Local, Rural and Coastal Villages.*
- 1.20 In addition to the sites referred to in our covering letter we also provide the following advice with regards to the allocations proposed under the above listed policies.

### **Protected Species**

- 1.21 The possible impact of development on the favourable conservation status of protected species needs further consideration. Species present in Gwynedd and Ynys Mon include otters, bats and water voles.
- 1.22 It is assumed that none of the proposed allocations have been subject to ecological assessments.

Cynaliadwy newydd: <http://llyw.cymru/topics/planning/policy/dear-cpo-letters/strategic-monitoring-framework/?skip=1&lang=cy>

a'r

Adroddiad Mireinio:

<http://wales.gov.uk/topics/planning/policy/guidanceandleaflets/ldp-process-refinement-report/?lang=en>

<http://llyw.cymru/topics/planning/policy/guidanceandleaflets/ldp-process-refinement-report/?skip=1&lang=cy>

**D. Materion ynglŷn ag eglurder y cynllun yn gyffredinol, y tybiwn y gallent fod o gymorth i'ch awdurdod ac i'r Arolygydd wrth ystyried newidiadau priodol.**

**Materion technegol penodol:**

**Tabl 13** – Mae dau o'r meini prawf atodol yn debyg iawn 'mawr/ yn fawr iawn', mae angen egluro'r gwahaniaeth rhwng y ddau.

**Gwahanol hierarchaeth i fanwerthu a thai** – beth yw'r rhesymeg dros y gwahaniaeth?

**Polisi PS12** – nid yw'n glir ble fydd y ddarpariaeth o ofod manwerthu'n cael ei leoli.

**Methodoleg Asesu Safleoedd** - Er mwyn i'r asesiad hwn fod yn effeithiol, bydd angen i'r awdurdodau egluro faint yn union o'r safle sydd ar dir a ddynodwyd fel Tir Gorau a Mwyaf Amlbwrrpas, a sut mae hyn wedi effeithio ar benderfyniadau ynghylch defnydd o dir o'r fath.

**Paragraff 7.2.34** - Er bod Llywodraeth Cymru'n cefnogi'r egwyddor o sicrhau manteision cymunedol cynaliadwy drwy drefniadau gwirfoddol, rhaid iddynt beidio ag amharu ar y broses benderfynu ac ni ddylid eu trin fel ystyriaeth berthnasol oni bai eu bod yn bodloni'r profion a nodir yng Nghylchlythyr 13/97.

**ARNA 1** - Cefnogir y Polisi mewn egwyddor ond byddai'n fuddiol ei fân olygu i sicrhau eglurder. Cymal 1 - awgrymir cynnwys "y rhagwelir y bydd dan fygythiad" yn lle "sydd dan fygythiad", er mwyn sicrhau cysylltiad â'r SMP. Cymal 2 - egluro a oes rhaid i'r cynigion fodloni'r ddau is-gymal, (i) a (ii), neu ddim ond un neu'r llall. Cymal 6 - nid yw'n glir pam fod y gofyniad am ganiatâd Cyfoeth Naturiol Cymru yn benodol ac yn unigryw i'r cymal hwn. Cymal 8 - Mae'r testun o fewn y cromfachau'n aneglur, ymddengys fel petai'n awgrymu y byddai rhai datblygiadau penodol yn dderbyniol ar ôl y cyfnod polisi cychwynol (2025). Nid yw'n glir sut mae hynny'n cyfateb i bolisi sy'n dod i ben yn 2026.

**Polisi TRA2** - Dylid nodi bod Polisi Cynllunio Cymru'n datgan y dylai awdurdodau lleol sicrhau bod datblygiadau newydd yn darparu lefelau is o ofod parcio na'r hyn a wnaed yn y gorffennol. Mae TAN 18 yn datgan y dylid defnyddio uchafswm safonau parcio ceir fel ffordd o reoli'r galw.

**'gormodedd' neu 'orddarpariaeth'** - Nid yw'n glir sut y bydd Cynghorau'n dangos bod gorddarpariaeth o ofod agored, fel sy'n cael ei ddisgrifio yng nghymal 1 a pharagraff 7.1.21.

**Polisi TWR2 – Llety Gwyliau-** Byddai'r polisi'n gryfach pe bai'n cynnwys esboniad o'r hyn y byddai Cynghorau'n ei ystyried fel perygl o 'ormodedd' (Cymal 8) o lety penodol.

**Polisi AMG 4** (Cadwraeth Bioamrywiaeth Leol) - angen ailddrafftio pellach. Mae'r polisi drafft ar hyn o bryd yn ymddangos yn rhy feichus ar gyfer ystyried cynigion datblygu ar dir dynodedig lle mae materion cadwraeth natur lleol anstatudol.

**Materion technegol ynghylch gwybodaeth am Sipsiwn a Theithwyr**

▪ Paragraff 7.4.97 - mae angen eglurhad pellach ynghylch cam 4 (mewn perthynas â'r 'asesiad manwl o safleoedd') ac fe ddylai'r polisi hefyd adlewyrchu'r ffaith bod y broses

- In the context of LDP manual guidance (section 9.5) the implications of the recently published Sustainable Development Indicators to be collected from April 2013 onwards and the ongoing LDP Process Refinement Exercise should be considered in finalising the MF; see at following links: new SD indicators link: <http://gov.wales/topics/planning/policy/dear-cpo-letters/strategic-monitoring-framework/?skip=1&lang=en> and PRE Report link: <http://gov.wales/topics/planning/policy/guidanceandleaflets/ldp-process-refinement-report/?lang=en>

**D. Matters relating to clarity of the plan generally which we consider may be of assistance to your authority and to the Inspector in considering suitable changes.**

**Specific technical issues:**

**Table 13** – Two of the supplementary criteria are very similar 'large/ very large', clarity required on the difference between these two.

**Different hierarchy to retail and housing** – what is the rationale for the difference?

**Policy PS12** – it is unclear where the provision of retail space will be located.

**SA Methodology** - For this assessment to be effective, the authorities will need to clarify exactly how much of the site is BMV and how it has influenced decisions regarding uses on such lands.

**Paragraph 7.2.34** - While the Welsh Government supports the principle of securing sustainable community benefits for communities through voluntary arrangements, they must not impact on the decision making process and should not be treated as a material consideration unless it meets the tests set out in Circular 13/97.

**ARNA 1** - The Policy is supported in principle but would benefit from minor editing to ensure clarity. Clause 1 - suggest insertion of "predicted to be" immediately before "threatened", to ensure link to SMP. Clause 2 - clarify whether proposals must meet both sub-clauses (i) and (ii), or either one of the sub-clauses. Clause 6 - it is not clear why the requirement for NRW consent is specific and unique to this clause. Clause 8 - The text within brackets is unclear, as it appears to suggest that after the first policy epoch (2025) certain developments would be acceptable. It is not clear how that fits with a plan with an end date of 2026.

**Policy TRA2** - It should be noted that PPW sets out that local authorities should ensure that new developments provide lower levels of parking than have generally been achieved in the past. TAN 18 states that maximum car parking standards should be used as a form of demand management.

**'surplus provision' or 'over provision'** - It is not clear how the Councils will demonstrate surplus/ over provision of open space, as described at clause 1 and in Para 7.1.21.

**Policy TWR2 – Holiday Accommodation** - The policy would be strengthened with an explanation of where the Councils consider 'over-concentration' (Clause 8) of certain accommodation might be a risk.

**Policy AMG 4** (Local Biodiversity Conservation) requires further re-drafting. As drafted the policy seems overly onerous for the consideration of development proposals on local non-statutory nature conservation designations.

**Technical issues relating to information on Gypsies and Travellers**

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## Sylwadau Dros y We / Representations via the Internet

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Rhif Sylw / Rep Id: **333**

Enw / Name: **North Wales Wildlife Trust (Mr Chris Wynne) [2626]**

Rhan: **POLISI AMG4**

Section: **POLICY AMG4**

Math / Type: **Cefnogi / Support**

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### Crynodeb o'r Sylw:

Rydym yn croesawu'r warchodaeth a roddir i fioamrywiaeth trwy'r polisi hwn.

### Representation Summary:

We welcome the protection given to local biodiversity through this policy

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### Sylw Llawn / Full Representation:

We welcome the protection given to local biodiversity through this policy

### Newid(iadau) i'r Cynllun

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### Change(s) to the Plan

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Profion Cadernid / Soundness Tests: None

## Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **238**

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

Rhan: **POLISI AMG4**

Section: **POLICY AMG4**

Math / Type: **Gwrthwynebu / Object**

### Crynodeb o'r Sylw:

Awgrymu bod y polisi'n ailadrodd polisi cenedlaethol, yn anhylaw ac mae angen i'r geiriad fod yn hyblyg gan na roddwyd diffiniad na hierarchaeth o ran safleoedd cloddio mwynau. Awgrymir cyfuno gyda Pholisi AMG5 a newid yr eirfa yn y frawddeg gyntaf i "Dylai cynigion, os yn briodol, gwarchod, a gwella bioamrywiaeth sydd wedi ei adnabod i fod yn bwysig i'r ardal leol".

### Representation Summary:

Suggest the policy is repetitive of national policy, unwieldy and requires flexibility in the wording as no definition or hierarchy is set out in regard to mineral extraction sites. Would suggest merge with Policy AMG5 and change in wording to first sentence to read "Proposals should where appropriate protect and enhance biodiversity that has been identified as being important to the local area.

### Sylw Llawn / Full Representation:

Suggest the policy is repetitive of national policy, unwieldy and requires flexibility in the wording as no definition or hierarchy is set out in regard to mineral extraction sites.

### Newid(iadau) i'r Cynllun

Awgrymir cyfuno gyda Pholisi AMG5 a newid yr eirfa yn y frawddeg gyntaf i "Dylai cynigion, os yn briodol, g

### Change(s) to the Plan

Would suggest merge with Policy AMG5 and change in wording to first sentence to read "Proposals should where appropriate protect and enhance biodiversity that has been identified as being important to the local area.

Profion Cadernid / Soundness Tests: x, viii, ix



## Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **239**

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

Rhan: **POLISI AMG4**

Section: **POLICY AMG4**

Math / Type: **Gwrthwynebu / Object**

### Crynodeb o'r Sylw:

Awgrymu bod y polisi'n ailadrodd polisi cenedlaethol, yn anhylaw ac mae angen i'r geiriad fod yn hyblyg gan na roddwyd diffiniad na hierarchaeth o ran safleoedd cloddio mwynau. Awgrymir cyfuno gyda Pholisi AMG5 a newid yr eirfa yn y frawddeg gyntaf i "Dylai cynigion, os yn briodol, gwarchod, a gwella bioamrywiaeth sydd wedi ei adnabod i fod yn bwysig i'r ardal leol".

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### Sylw Llawn / Full Representation:

Suggest the policy is repetitive of national policy, unwieldy and requires flexibility in the wording as no definition or hierarchy is set out in regard to mineral extraction sites.

### Newid(iadau) i'r Cynllun

Awgrymir cyfuno gyda Pholisi AMG5 a newid yr eirfa yn y frawddeg gyntaf i "Dylai cynigion, os yn briodol, g

### Change(s) to the Plan

Would suggest merge with Policy AMG5 and change in wording to first sentence to read "Proposals should where appropriate protect and enhance biodiversity that has been identified as being important to the local area.

Profion Cadernid / Soundness Tests: x, viii, ix

# Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **462**

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

Rhan: **POLISI AMG4**

Section: **POLICY AMG4**

Math / Type: **Gwrthwynebu / Object**

## Crynodeb o'r Sylw:

Newid pwynt 1 i ddatgan mai dim ond safleoedd amgen sydd a pherthynas rhesymol i safle'r cais sydd angen eu hystyried i fodloni'r polisi yma. Dylid newid pwynt 2 i gydnabod bod rhai safleoedd eisoes o fewn ardaloedd o bwysigrwydd bioamrywiaeth rhyngwladol, cenedlaethol a lleol. Dylid caniatáu rhagor o ddatblygu yn y lleoliadau yma cyn belled a bod bioamrywiaeth yn cael ei warchod a'i wella.

## Representation Summary:

Point 1 should be amended to state that only alternative sites that are reasonably related to the application site should need to be considered to satisfy this policy. Point 2 should be amended to acknowledge that some developments already exist within areas of international, national and local biodiversity importance. Further development at these locations should be permitted as long as biodiversity is protected and enhanced.

## Sylw Llawn / Full Representation:

Bourne Leisure objects to AMG4. Policy AMG4 does not provide a positive basis for appropriate development to come forward.

Point 1 should be amended to state that only alternative sites that are reasonably related to the application site should need to be considered to satisfy this policy. Bourne Leisure considers that it is inappropriate to assess alternative sites that are not reasonably related to the existing site. For example it would be unreasonable to consider an extension to a caravan park at a location that is not reasonably related to the existing caravan park.

Point 2 should be amended to acknowledge that some developments already exist within areas of international, national and local biodiversity importance. Further development at these locations should be permitted as long as biodiversity is protected and enhanced.

Bourne Leisure considers it important for Anglesey and Gwynedd to take a balanced, pragmatic approach with regard to development proposals that have the potential to affect biodiversity. Bourne Leisure considers that whilst vitally important, biodiversity considerations should not be 'packaged' so as to present an overly onerous policy approach that results in appropriate development being potentially stifled. Bourne Leisure considers that there should be a balance between maintaining biodiversity and permitting development that presents tangible economic, social and environmental benefits.

Bourne Leisure notes that specific developments also have the potential to generate net gain in biodiversity value through habitat creation. This is especially true with proposals relating to caravan holiday parks such as at Greenacres and Hafan-y-Mor, where development proposals often have the potential to improve the layout and landscaping of the Park in question - which in turn can provide new habitats and a net gain in biodiversity value.

As currently drafted, policy AMG4 could stifle appropriate development.

## Newid(iadau) i'r Cynllun

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## Change(s) to the Plan

Point 1 should be amended to state that only alternative sites that are reasonably related to the application

## Sylwadau Dros y We / Representations via the Internet

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site should need to be considered to satisfy this policy. Bourne Leisure considers that it is inappropriate to assess alternative sites that are not reasonably related to the existing site. For example it would be unreasonable to consider an extension to a caravan park at a location that is not reasonably related to the existing caravan park.

Point 2 should be amended to acknowledge that some developments already exist within areas of international, national and local biodiversity importance. Further development at these locations should be permitted as long as biodiversity is protected and enhanced

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**Profion Cadernid / Soundness Tests:** iv, viii

## 2768-2767-897-AMG4

**Policy AMG4: Local Biodiversity Conservation**

Bourne Leisure objects to AMG4. Policy AMG4 does not provide a positive basis for appropriate development to come forward.

Point 1 should be amended to state that only alternative sites that are reasonably related to the application site should need to be considered to satisfy this policy. Bourne Leisure considers that it is inappropriate to assess alternative sites that are not reasonably related to the existing site. For example it would be unreasonable to consider an extension to a caravan park at a location that is not reasonably related to the existing caravan park.

Point 2 should be amended to acknowledge that some developments already exist within areas of international, national and local biodiversity importance. Further development at these locations should be permitted as long as biodiversity is protected and enhanced.

Bourne Leisure considers it important for Anglesey and Gwynedd to take a balanced, pragmatic approach with regard to development proposals that have the potential to affect biodiversity. Bourne Leisure considers that whilst vitally important, biodiversity considerations should not be 'packaged' so as to present an overly onerous policy approach that results in appropriate development being potentially stifled. Bourne Leisure considers that there should be a balance between maintaining biodiversity and permitting development that presents tangible economic, social and environmental benefits.

Bourne Leisure notes that specific developments also have the potential to generate net gain in biodiversity value through habitat creation. This is especially true with proposals relating to caravan holiday parks such as at Greenacres and Hafan-y-Mor, where development proposals often have the potential to improve the layout and landscaping of the Park in question - which in turn can provide new habitats and a net gain in biodiversity value.

As currently drafted, policy AMG4 could stifle appropriate development.

= 2768/2767/899

Bourne Leisure 31/3/15 ebs2

## 2768-2767-899-AMG1

### **AMG1: Special Landscape Areas**

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 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.

		<b>CYNGOR SIR YNYS MON ISLE OF ANGLESEY COUNTY COUNCIL</b>	<i>For office use only:</i> <b>Representor No.</b> 3036/888/8878 88 <b>Date received:</b> 27/3/15 & 889 <i>ebod</i> <b>Date acknowledged:</b>
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**Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026  
Representation Form**

**Data Protection**

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

We would prefer that you submit your representations directly online. Alternatively, an electronic version of this form can be completed online at [www.gwynedd.gov.uk/ldp](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)
<b>Name</b>	Friends of Borth-y-Gest	Tom Brooks. Joint Secretary
<b>Address</b>	[REDACTED]	
<b>Postcode</b>		
<b>Telephone Number</b>		
<b>Email address</b>		

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The Friends of Borth-y-Gest is a long established organisation for residents and others with close connections with the locality. All residents are entitled to be members and others accepted as members are included in a mailing list. A committee is elected annually at a General Meeting. The committee has approved this submission.

Friends of Borth-y-Gest

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

<b>2a. Which part of the Deposit Plan are you commenting on?</b>	
Policy number <i>(please specify)</i>	AMG 2, AMG 3, AMG 4 and AMG 5
Paragraph number <i>(please specify)</i>	
Proposals/ Inset Map <i>(please specify ref no.)</i>	
Constraints Map	
Appendices <i>(please specify)</i>	

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

<p><b>2c. Please provide details of your representation on the Deposit Plan.</b></p> <p>Policies AMG2, AMG3 and AMG4 related to features and qualities that are unique to the local landscape, coastal protection local biodiversity conservations.</p> <p>We support these policies which are in line with the objectives of the Friends of Borth-y-Gest.”</p> <p>We would wish AMG5, which makes specific reference to local nature reserves, made reference to a table in which such reserves were listed.</p> <p style="text-align: right;"><i>Please use additional sheet if necessary. Please state how many additional sheets have been used.....</i></p>
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2c. 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.

None in respect of policies AMG2, AMG3 and AMG4: But we would wish to oppose any proposals by others that threaten these themes

We would wish AMG5, which makes specific reference to local nature reserves, to make reference to a table in which such reserves are listed.

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 type="checkbox"/>	CE 3	<input type="checkbox"/>	CE 4	<input type="checkbox"/>
												1		2		3		4	