

	<p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p>For office use only:</p> <p>Representor No. 300/615</p> <p>Date received: 31/3/15</p> <p>Date acknowledged:</p>
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**Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026
Representation Form**

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	ROBERT LLEWELYN JONES	
Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	
Email address	[REDACTED]	

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.

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.

The concerns re coverage of Nuclear waste.

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: *21.3.15*

THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN

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

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

ONLINE – By completing the electronic form at www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp

BY EMAIL – planningpolicy@gwynedd.gov.uk

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

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

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.

*Clarification on the storage of
Nuclear waste and how the policies
refer to the proposed Wylfa Newydd.*

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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		

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)	GWA3
Paragraph number (please specify)	Page 191
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>This Policy is leaving the residents of Angliam ^{is worried} in danger of becoming a dumping ground for radioactive waste treatment and storage.</p> <p>The statement that low level radioactive waste generated in existing business is made. Does this take out the new Nuclear Plant that is being prepared or is it only our present Wylfa that this applies to?</p> <p>Our County Council have not voted to store radioactive material on site and this should be made clear in the Policy number GWA3.</p> <p style="text-align: right;">Please use additional sheet if necessary. Please state how many additional sheets have been used.....</p>

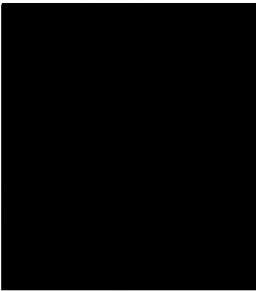
Davies Nia Haf (Rh-CTGC)

From: robbooth2000@yahoo.com
Sent: 30 March 2015 19:43
To: Polisi Cynllunio
Subject: LDP comments
Attachments: LDP.doc

The attached document are my written representations on the joint LDP for Gwynedd and Mon.

I do not wish to speak at the hearing session.

Rob Booth



Page 191 GWA3 is a policy for radioactive waste treatment and storage. This highlights one of the main problems of having a nuclear power station. The waste is extremely hazardous and difficult dangerous and had to store. The radioactive waste cannot be neutralized, when the half-life of Plutonium is 24,000 years. There is a need for the definition of low level and very low level radioactive waste; what type of radioactive waste? I suggest that if this policy is retained it must lists which radioactive isotopes e.g. plutonium 239. If a radioactive waste is required to be stored it should be stored at the power station.

Pages 201 onwards monitoring and implementation

p.203 I agree with the monitoring indicators for public transport(D4, D6,D7) however I disagree with the indicator D5 for a decrease on car journey times. Why is one of the indicators a decrease in journey times? The faster cars travel the more fuel they use and the more dangerous the journey. Also increases the likelihood of people using cars rather than buses. Also an indicator should be the public transport network is retained as it is or increased the number of buses has not declines, but increased. The times available for bus services are e.g. early morning and late buses enhanced.

Health Impact Assessment Feb 2015. This document fails to mention the potential main impact to health in the area which is the building of a new nuclear power station. We have seen from the recent disaster at Fukushima in Japan that the risk to our community is too great. The towns and villages in a 30km radius round Fukushima have had to be permanently abandoned due to radioactive levels. The risk is not just to the current communities but the future population of the area. I would like to contest to the completeness of this document because it does not include the possible impact of a nuclear disaster at the power station and during transport of radioactive waste.

Ant In general I am pleased to see that the documents refer to sustainable developments and seeks to ensure that communities are healthy and vibrant places with natural landscapes and culture.

Written Statement

Key Issues10, on page 36, is "rationalization and centralization of education and health facilities" will not benefit communities and it will result in a decrease in facilities for the local community, especially communities with an aging population. The rationalization and centralization of health and education facilities will lead to a greater number of people requiring to travel and more car journeys. Key Issue 10 is conflicting with Key Issue 11 "Promote opportunities for people to live healthy lives and have reasonable health care, especially in a healthy population". Again Key Issue 10 for the rationalization of schools and health care is not appropriate for one of the strategic policies under PS5 on p.75 point 4 "Promote greater self-containment of centres and villages by contributing to balanced communities that are supported by sufficient services..." I want Key Issue 10 removed.

p.37 Key Issue 20 is the decline in the prosperity and vitality of town centres. This has occurred due to large supermarkets and business parks being built out of town centres. Out of town shops and offices encourage the use of cars. I suggest a policy that favours retaining shops and business in town centres and does not increase the development of business parks and supermarkets outside of towns and villages.

Page 40. It is very disappointing to see that Gwynedd and Anglesey Council have a vision that includes a new nuclear power station, the building of a new nuclear power station has great risks as we have seen in the recent disaster at Fukushima. The enormous risk to our homes, culture and tourism is great. A new power station would need many major associated developments such as housing for the construction workers and infrastructure (e.g. roads, pipers and pylons). The building of the nuclear power station will affect the Welsh culture due to the influx of temporary construction workers. Nuclear power is not sustainable, it requires toxic fuel and the waste is very problematic.

On p. 46 in table 8 on of the main elements of the strategy is economic growth. Economic growth is not sustainable. I suggest that the main strategy should seek to maintain economic status.

Housing: there should be more housing that is part of a housing association. The policies should emphasize the requirement for social and mixed housing. All housing developments should include a proportion of social housing i.e. houses that belong to housing associations.

Policy TAI10 p.146 there should be NO open market houses outside the development boundary.

p.156 Policy TAI14 &TAI 15 should state that developments of more than 9 houses must include at least 10% of houses that are affordable. Developments of more than 20 houses must include at least 20% of affordable houses, developments of more than 50 houses should include 30% of affordable housing/housing association houses and developments of 100 or more should include 50% of affordable/housing association houses.