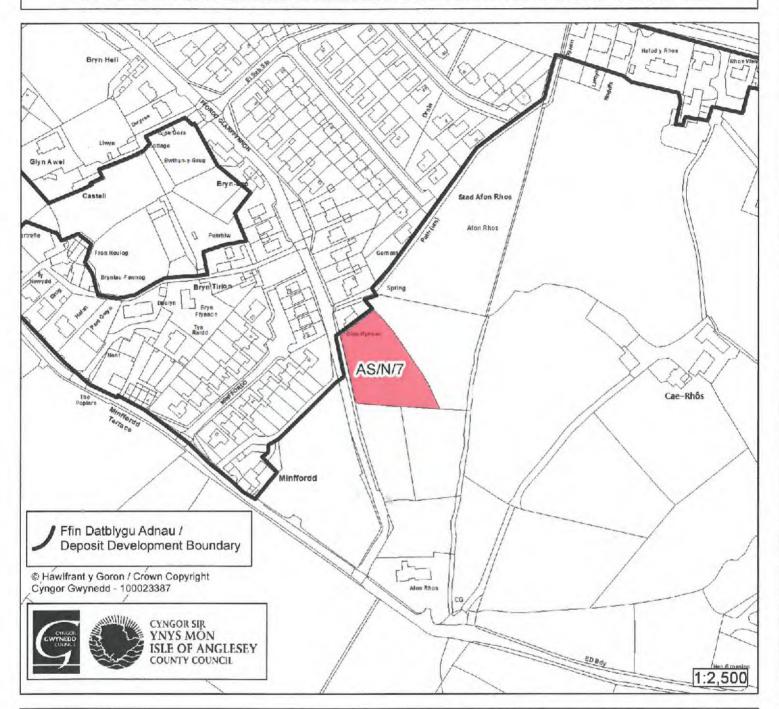
Cynllun Datblygu Lleol ar y Cyd Gwynedd a Môn Anglesey and Gwynedd Joint Local Development Plan 2011- 2026

COFRESTR SAFLEOEDD AMGEN / ALTERNATIVE SITES REGISTER



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

Cyfeirnod / Reference: AS/N/7

Enw'r Safle / Site Name: Tir ger / Land adj Glan Ffynnon

Lleoliad / Location: Llanrug

Cyngor Cymuned / Community Council: Llanrug

Maint (ha) / Size (ha): 0.27

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

AS/N/7





Defnydd swyddfa yn unig:

Rhif Cynrychiolydd:

Dyddiad derbyn:

Dyddiad cydnabod:

Cynllun Datblygu Lleol ar y Cyd Adnau Ynys Môn a Gwynedd 2011-2026 Ffurflen Sylwadau

Diogelu Data - Y modd y bydd eich sylwadau a'r wybodaeth a roddwch i ni yn cael eu defnyddio. Bydd yr holl wybodaeth a gyflwynir yn cael ei gweld yn llawn gan staff yr Uned Polisi Cynllunio ar y Cyd sy'n ymdrin â'r Cynllun Datblygu Lleol ar y Cyd (CDLI ar y Cyd). Bydd eich enw a'ch sylwadau fel y maent wedi'u nodi yn eich ffurflen sylwadau yn cael eu cyhoeddi, ynghyd ag ymateb y Cyngor. Bydd hyn yn gymorth i ddangos fod yr ymgynghoriad wedi'i wneud yn iawn. Nodwch hefyd y gall y ffurflen hon gael ei rhoi i unrhyw Ymchwiliad Cyhoeddus ar y CDLI ar y Cyd.

Byddai'n well gennym pe baech yn cyflwyno'ch sylwadau'n uniongyrchol ar-lein. Fel arall, gellir llenwi fersiwn electronig o'r ffurflen hon ar-lein yn www.gwynedd.gov.uk/cdll neu www.ynysmon.gov.uk/cdll. Dylech lenwi ffurflenni ar wahân ar gyfer pob sylw yr hoffech ei wneud. Cewch ffurflenni sylwadau ychwanegol gan yr Uned Polisi Cynllunio ar y Cyd drwy ffonio 01286 685003 neu gellir eu llawr lwytho o wefan y Cyngor yn: www.gwynedd.gov.uk/cdll neu www.ynysmon.gov.uk/cdll neu gallwch lungopïo'r ffurflen hon. Wrth wneud sylwadau, defnyddiwch dudalennau ychwanegol os oes angen, gan nodi rhif y dudalen yn glir.

RHAN 1: Manylion cyswllt

	Eich manylion/ Manylion eich cleient	Manylion yr Asiant (os yw hynny'n berthnasol)
Enw	Mr D M Price	
Cyfeiriad		
		* /
Cod Post		-
Rhif Ffôn		
Cyfeiriad e-bost		

Nodiadau Canllaw

Rhowch eich sylwadau yn Rhan 2 y ffurflen hon. Defnyddiwch dudalennau ychwanegol os oes angen. **Dylech lenwi ffurflenni ar wahân ar gyfer pob sylw** yr hoffech ei wneud.

Mae Cwestiwn 2dd a 2e yn gofyn am eich barn ar gadernid y Cynllun Adnau. Rhoddir manylion am y profion cadernid a gwybodaeth ychwanegol ar sut cânt eu defnyddio ar dudalen olaf y ffurflen hon.

Os hoffech i newidiadau gael eu gwneud i'r Cynllun Adnau, gofynnwn i chi fod mor benodol â phosib. Er enghraifft, os hoffech i destun newydd gael ei ychwanegu, nodwch y testun newydd ac esboniwch ymhle yr hoffech ei weld yn y Cynllun Adnau a pham. Hefyd, os hoffech ychwanegu polisi neu baragraff newydd neu eu haddasu, nodwch yn glir beth yw'r testun newydd ac esboniwch ymhle yr ydych chi'n meddwl y dylai fynd yn y Cynllun Adnau a pham.

Os hoffech gael gwared o safle neu gynnig addasiadau i safle sydd wedi'i ddynodi yn y Cynllun Adnau neu os hoffech gynnig safle newydd, gofynnwn i chi atodi cynllun graddfa 1:1250 neu 1:2500 sy'n nodi'n glir ffiniau'r safle. Os ydych yn cynnig safle newydd (un nad yw wedi'i gynnwys yn y Cynllun Adnau) rhaid i chi gynnwys asesiad safle manwl gyda'r ffurflen sylwadau yn unol â methodoleg asesu Safle Arfaethedig y Cyngor a'r fframwaith Arfarnu Cynaliadwyedd. Cewch hyd i'r fethodoleg asesu Safle Arfaethedig a'r fframwaith Arfarnu Cynaliadwyedd ar wefan y Cyngor yn: www.gwynedd.gov.uk/cdll neu www.ynysmon.gov.uk/cdll.

Cewch wybodaeth bellach ar y mater hwn gan yr Uned Polisi Cynllunio ar y Cyd ar **01286 685003** neu ar wefan y Cyngor yn: www.gwynedd.gov.uk/cdll neu www.ynysmon.gov.uk/cdll yn y llyfryn 'Canllawiau Safleoedd Amgen'.

Os yw newidiadau arfaethedig i gynllun datblygu yn cael effeithiau sylweddol ar gynaliadwyedd, bydd gofyn i chi ddarparu'r wybodaeth Arfarnu Cynaliadwyedd berthnasol. Rhaid i'r wybodaeth hon fod yn gyson ag ystod a lefel manylder yr Arfarniad Cynaliadwyedd a gynhelir gan y Cynghorau. Dylai hefyd gyfeirio at yr un wybodaeth waelodlin wrth adnabod effeithiau sylweddol tebygol y polisi diwygiedig neu'r safle newydd.

Dylech gynnwys eich holl sylwadau ar y Cynllun Adnau gan nodi eich achos llawn ar y ffurflen swyddogol, gan ddefnyddio dogfennau ychwanegol os oes angen. Os ydych am weld mwy nag un newid ac yn ystyried nad yw'r Cynllun Adnau yn bodloni mwy nag un prawf cadernid, dylech lenwi ffurflenni ar wahân ar gyfer pob sylw. Yn yr un modd, os ydych am wneud sylwadau i gefnogi'r Cynllun Adnau neu elfennau unigol o'r Cynllun Adnau byddai'n ddefnyddiol pe baech yn gwneud y sylwadau hyn ar wahân. Nodwch os ydych yn cyflwyno deunydd arall i gefnogi'ch sylwadau.

Yr unig adeg y bydd gennych gyfle i gyflwyno gwybodaeth bellach i'r Ymchwiliad yw os yw'r Arolygwr yn eich gwahodd i ymateb i faterion y mae ef neu hi wedi'u codi. Nodwch na fydd gan yr Arolygwr sylwadau yr ydych wedi'u gwneud mewn ymateb i ymgynghoriadau blaenorol. Os nad ydych yn ystyried bod y Cynllun Adnau yn gadarn ac y dylid ei newid, esboniwch yn glir pam ydych chi'n meddwl bod angen y newidiadau. Os ydych yn meddwl bod angen gwneud newidiadau er mwyn i'r Cynllun Adnau fodloni un neu fwy o'r profion cadernid, dywedwch wrthym pa un / pa rai.

Os yw grŵp yn rhannu barn gyffredin ynghylch sut mae'n dymuno i'r Cynllun Adnau gael ei newid, bydd y Cynghorau'n derbyn deiseb wedi'i llofnodi. Wrth gyflwyno ffurflen sylwadau ar ran grŵp, dylai'r ffurflen sylwadau gynnwys manylion cyswllt unigolyn arweiniol yn Adran 1 a dylid nodi'r sylwadau'n glir ar y ffurflen sylwadau. Dylai'r ddeiseb sydd wedi'i llofnodi nodi'n glir faint o bobl sy'n cael eu cynrychioli a sut mae'r sylwadau wedi'u hawdurdodi. Nid yw llofnodi deiseb yn atal neb rhag cyflwyno ffurflenni unigol.

RHAN 2: Eich Sylwadau a Newidiadau a Awgrymir. (Defnyddiwch un adran Rhan 2 ar gyfer pob sylw yr hoffech ei wneud)

2a. Ar ba ran o'r Cynllun Adnau yr ydych chi'n	gwneud sylwadau?
Polisi rhif (nodwch)	
Paragraff rhif (nodwch)	
Cynigion/ Map Mewnosod (nodwch y rhif cyfeirnod)	Safle amgen ar gyfer datblygu o fewn pentref Llanrug
Map Cyfyngiadau	Cynllun Safle Atodol
Atodiadau (nodwch)	Matrics Arfarniad Cynaladwyedd

2b. A ydych yn gwrt	hwynebu neu gefno	ogi?		
Gwrthwynebu	₽	Cefnogi	Г	

2c.	Rhowch	fanylion	eich	sylwadau	ar v C	ynllun Adnau.
man or a	water on or and and a					A RANK AND A STATE OF STATE AND ADDRESS.

Rwyf yn gwrthwynebu i'r cynllun ar sail y ffiniau datblygu sydd wedi eu gosod o fewn pentref Llanrug a byddwn yn dymuno safle amgen i'w chynnwys o fewn y cynllun.

Defnyddiwch dudalennau ychwanegol os bydd angen. Nodwch faint o dudalennau ychwanegol rydych wedi'u defnyddio........

	Os y 100 o			w yn 2	2c yn	fwy n	a 100	o eir	iau, c	darpa	rwch	grynd	deb (os gw	elwcl	yn d	lda (d	im m	wy
2d F	Rhow	ch far	ylion	y ne	widia	dau y	r hof	fech e	eu gw	eld i'	r Cyn	llun A	dnau	V I	-				
Bua	swn y	n dyr	nuno	i cyfl	wyno	safle	amge	n i'w	ystyr	ied o	fewn	у суп	llun a	r gyfe	r pen	tref L	lanru	g.	
				fewr b i yn													gu Ui	nedol	yn
				lleoli gystal														syste	mau
				ddiad															au
				daf ei orddia															
2dd Ydi	. Ydi'	r Cyn	lun y	n gad	arn?				N	lac ydi		-	-	P		-			
	Os vd	lych c	hi'n r	nedd	wl na	d vw'	r Cvn	llun A				ı, pa k	rawf	cade	rnid y	dych	chi'n	med	dwl
y m	ae'n	ei fetl	nu? (1	Ticiwc															
_	n y ffu eithdi			Cys	onde	b						Cydl	yniad	ac Ej	ffeith	iolrwy	ydd		
P1	Г	P2	Г	C1	V	C2	Г	C3	Г	C4	Е	CE	Г	CE	Г	CE	Г	CE	F
										100		1	12.1	2		3		4	

Ar y cam hwn o broses y CDLI ar y Cyd, dim ond 'sylwadau ysgrifenedig'). Fodd bynnag, gall yr Ar ymddangos a siarad â'r Arolygwr mewn 'sesiwn gwr gofio y bydd yr Arolygwr yn rhoi'r un pwys i'ch sylw sesiwn gwrandawiad.	olygwr alw ar y rheini sydd am randawiad' yn ystod yr Ymchwiliad	newid y Cynllun i Cyhoeddus. Dylech
3a. A ydych am i'ch sylwadau gael eu hystyried fel '	sylwadau ysgrifenedig' neu a hoffed	h siarad mewn
sesiwn gwrandawiad yn yr Ymchwiliad Cyhoeddus?		
Nid wyf am siarad mewn sesiwn gwrandawiad ac rwy	y'n fodlon i'm sylwadau	₽
ysgrifenedig gael eu hystyried gan yr Arolygwr.		
Hoffwn siarad mewn sesiwn gwrandawiad.		Г
Gwrandawiad. 3c. A fyddech yn hoffi cael gwybod am y canlynol (T	Figiush y blychau porthpasol	
Cyflwyno'r dogfennau a'r dystiolaeth i'r archwiliad	reliwent y bryenau pertimasory	1
Cyhoeddi adroddiad yr Arolygydd	Iv.	ï
Mabwysiadu'r Cynllun	IV.	
Os ydych wedi darparu dogfennau ychwanegol i gef	fnogi'ch sylwadau, rhestrwch hwy is	sod:
Matrics Arfarniad Cynaladwyedd		
Cynllun Lleoliad		
		and the second
Llofnod:	Dyddiedig: 25.03.2015	

Rhan 3: Beth sy'n digwydd nesaf?

DIOLCH AM EICH SYLWADAU AR Y CYNLLUN ADNAU

Cofiwch gynnwys unrhyw ddogfennau perthnasol (e.e. Arfarniad Cynaliadwyedd) gyda'r ffurflen hon.

Dylech ddychwelyd ffurflenni sylwadau wedi'u llenwi i'r Uned Polisi Cynllunio ar y Cyd:

AR-LEIN – drwy lenwi'r ffurflen electronig yn <u>www.gwynedd.gov.uk/cdll</u> neu <u>www.ynysmon.gov.uk/cdll</u> DRWY E-BOST - polisicynllunio@gwynedd.gov.uk

DRWY'R POST - ei hanfon i: Uned Polisi Cynllunio ar y Cyd, Llawr Cyntaf, Swyddfeydd Cyngor Dinas Bangor, Ffordd Gwynedd, Bangor, Gwynedd LL57 1DT

DYLECH DDYCHWELYD Y FFURFLENNI SYLWADAU DDIM HWYRACH NA 5.00yh ar 31 Mawrth 2015
NI FYDD SYLWADAU A DDERBYNNIR WEDI'R AMSER A'R DYDDIAD YMA YN CAEL EU HYSTYRIED

Profion Cadernid

Prawf	Profion Gweithdrefnol
P1	Nid yw wedi'i baratoi yn unol â'r Cytundeb Cyflawni yn cynnwys y Cynllun Cyswllt Cymunedol.
P2	Nid yw'r cynllun a'i bolisïau wedi bod drwy Arfarniad Cynaliadwyedd yn cynnwys Asesiad Amgylcheddol Strategol.
	Profion Cysondeb
C1	Mae'n gynllun defnydd tir nad yw'n rhoi ystyriaeth i gynlluniau, polisïau a strategaethau perthnasol eraill sy'n ymwneud â'r ardal neu ardaloedd cyfagos.
C2	Nid yw'n rhoi ystyriaeth i bolisi cenedlaethol.
C3	Nid yw'n rhoi ystyriaeth i Gynllun Gofodol Cymru.
C4	Nid yw'n rhoi ystyriaeth i'r strategaeth gymunedol berthnasol.
	Profion Cydlyniad ac Effeithiolrwydd
CE1	Nid yw'r cynllun yn gosod strategaeth gydlynol ble mae ei bolisïau a'i ddynodiadau yn llifo'n rhesymegol ohono a/neu pan fo materion trawsffiniol yn berthnasol, nid yw'n gydnaws â'r cynlluniau datblygu a ddarparwyd gan awdurdodau cyfagos.
CE2	Nid yw'r strategaethau, y polisïau na'r dynodiadau'n realistig nac yn briodol o ystyried y dewisiadau amgen a/neu nid ydynt wedi'u seilio ar sail tystiolaeth gredadwy.
CE3	Nid oes mecanwaith clir ar gyfer gweithredu a monitro.
CE4	Nid yw'n rhesymol hyblyg i alluogi iddo ymdrin ag amgylchiadau sy'n newid.

Noda Deddf Cynllunio a Phrynu Gorfodol 2004 mai pwrpas ymchwiliad i Gynllun Datblygu Lleol (y Cynllun) yw ystyried a yw'n "gadarn". Golyga hyn y dylai unrhyw un sydd am roi sylwadau ar y Cynllun Adnau neu wrthwynebu iddo geisio dweud pam nad yw'n gadarn a beth sydd ei angen er mwyn ei wneud yn gadarn. Yn y cyd-destun hwn, gellir ystyried cadarn i olygu ei ystyr gwreiddiol o "dangos barn dda" a "y gellir ymddiried ynddo". Er mwyn asesu'r Cynllun Adnau, rydym yn defnyddio'r 10 prawf uchod. Bydd y Cynllun Adnau yn cael ei archwilio gan Arolygwr annibynnol a benodir gan Lywodraeth Cymru a thasg yr Arolygwr fydd ystyried a yw'r Cynllun yn gadarn.

Os ydych yn cynnig newid i'r Cynllun Adnau, fe ddylech nodi'n glir pa brawf/brofion cadernid y credwch y mae'r Cynllun Adnau yn ei fethu/eu methu. Mae'r profion mewn tri grŵp – 'Gweithdrefnol' (dau brawf); 'Cysondeb' (pedwar prawf)' a 'Cydlyniad ac Effeithiolrwydd' (pedwar prawf). Os hoffech wneud sylwadau ar y ffordd y mae'r Cynghorau wedi paratoi'r Cynllun Adnau, mae'n debygol y byddai'ch sylwadau neu'ch gwrthwynebiadau yn disgyn o dan un o'r profion gweithdrefnol. Os hoffech wneud sylwadau neu wrthwynebu i gynnwys y Cynllun Adnau, gallai fod yn gymorth i chi edrych ar y profion 'cysondeb' a 'cydlyniad ac effeithiolrwydd'.

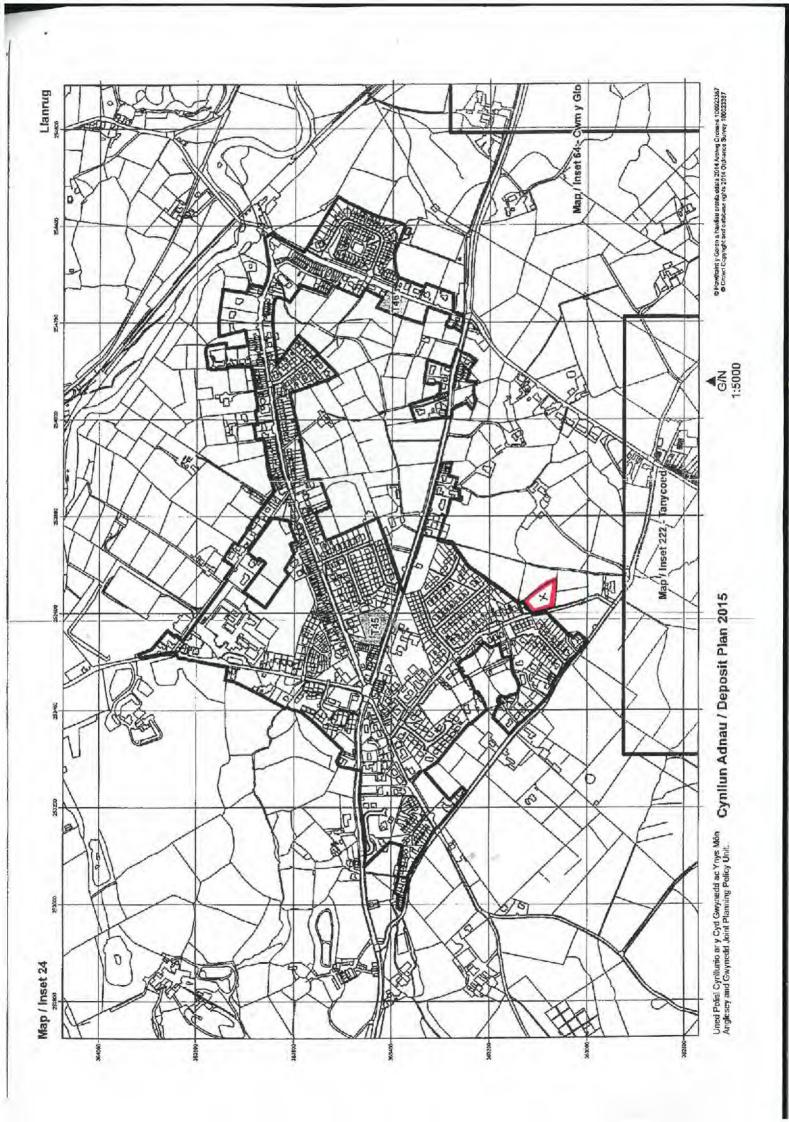
Matrics Arfarniad Cynaladwyedd

Enw'r Safle: Tir Ger Glan Ffynnon, Llanrug (Rhif y Teitl WA982038)

Ardal y Safle: LLanrug

Amcan AC	Asesiad	Crynodeb
Cynnal a mwyhau buddion a chysylltedd bioamrywiaeth (Pynciau AAS: bioamrywiaeth, ffawna, fflora, pridd)	?	
2. Hyrwyddo hyfywdra, cydlyniant, ac iechyd a lles cymunedol (Pynciau AAS: iechyd bodau dynol, y boblogaeth)	++	Gan fod y tir wedi ei leoli yng nghanol y pentref a'r gymuned.
3. Rheoli a lleihau effeithiau newid hinsawdd drwy hyrwyddo a chefnogi mesurau lliniaru ac addasu (Pynciau AAS: ffactorau hinsawdd, aer)	++	Byddai datblygiad o dai fforddiadwy yn cyrraedd o leiaf cod lefel 3 o safon tai cynailiadwy a byddai hyn yn lleihau effaithiau newid hinsawdd.
4. Cadw, hyrwyddo a mwyhau'r iaith Gymraeg (Pwnc AAS: treftadaeth ddiwylliannol)	++	Byddai datblygiad o dai fforddiadwy yng nghanol pentref Llanrug yn ychwanegu at y gymuned glos sy'n bodoli yn y pentref ac yn hyrwyddo'r defnydd o'r iaith Gymraeg.
5. Cadw, hyrwyddo a mwyhau adnoddau diwylliannol ac asedau treftadaeth hanesyddol (Pwnc AAS: treftadaeth ddiwylliannol)	?	
6. Cefnogi twf economaidd a hwyluso economi fywiog, amrywiol sy'n darparu cyfleoedd cyflogaeth lleol (Pwnc AAS: Poblogaeth)	++	Byddai datblygu cynllun tai fforddiadwy yn cefnogi twf economaidd y pentref gan byddai arian yn cael ei wario yn yr adral tra'n datblygu'r cynllun a byddai cynyddu'r nifer o dai fforddiadwy yn hybu busnesau lleol.
7. Darparu tai o ansawdd da, yn cynnwys tai fforddiadwy sy'n bodloni angen lleol (Pwnc AAS: y boblogaeth, iechyd bodau dynol)	++	Byddai datblygu tai fforddiadwy o ansawdd da y diwallu'r angen am dai o'r fath sydd wedi ei adnabod o fewn y ddogfen ymgynghorol.
8. Gwerthfawrogi, cadw a mwyhau tirweddau gwledig a threfweddau ardal y cynllun (Pwnc AAS: y dirwedd)	?	
9. Defnyddio'r tir ac asedau mwynol yn effeithlon a hyrwyddo mecanweithiau ar gyfer lleihau, ailddefnyddio ac ailgylchu gwastraff (Pynciau AAS: asedau deunyddiau, pridd)	+	Wrth ddatblygu'r safle byddai'r datblygwr yn ystyrol iawn o ran hyrwyddo mecanweithiau ar gyfer lleihau, ailddefnyddio ac ailgylchu gwastraff.
10. Cefnogi a mwyhau cysylltiadau trafnidiaeth da i gefnogi'r gymuned a'r economi (Pwnc AAS: y boblogaeth,	++	Byddai datblygiad o dai fforddiadwy ar y safle yn mwynhau cysylltiadau trefniadaeth da sydd eisoes yn bodoli i llanrug gan fod y tir wedi ei

iechyd bodau dynol)	leoli ynghanol y pentref.
11. Diogelu ansawdd dŵr, rheoli cynaladwyedd adnoddau dŵr a lleihau'r risg o lifogydd (Pwnc AAS: dŵr, bioamrywiaeth)	Byddai ansawdd datblygiad y tai fforddiadwy yn sicrhau bod ansawdd dwr yn cael ei ddiogelu drwy gysylltu a'r prif systemau garffosiaeth sydd eisoes yn bodoli yn y pentref. Nid oes unrhyw hanes llifogydd yn bodoli ar y tir dan sylw.







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.gwynedd.gov.uk/ldp or www.gwynedd.gov.uk/ldp or www.gwynedd.gov.uk/ldp or www.gwynedd

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		
Address	WELSH WATER	
Postcode		
Telephone Number		
Email address		

Guidance Note.

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

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

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

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

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

Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant Sustainability Appraisal information. This information must be consistent with the scope and level of detail of the Sustainability Appraisal conducted by the Authority. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site.

You should include all your comments on the Deposit Plan and set out your full case on the official form, using accompanying documents where necessary. If you seek more than one change and consider that the Deposit Plan fails to meet more than one test of soundness **separate forms should be completed for each representation.** Similarly, if your representation is in support of the Deposit Plan or individual elements of the Deposit Plan it would be helpful if separate representations were made. Please indicate if you are submitting other material to support your comments.

You will only be able to submit further information to the Examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you have made in response to previous consultations. If you do not consider the Deposit Plan to be sound and that it should be changed, please explain clearly why you think the changes are needed. If you think a change is needed for the Deposit Plan to meet one or more of the tests of soundness, please tell us which one(s).

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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)

2a. Which part of the De	eposit Plan are you con	nmenting on?		
Policy number (please s	necify)	TAL IS	HOUCINIC	IN LOCAL SERVICE
Paragraph number (plea			CENT	
Proposals/ Inset Map (pa			CENT	ices .
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representations'). However, the Inspector may call of speak to the Inspector at a 'hearing session' during	make comments in writing (these are called 'written on those who want to change the Plan to appear and the Public Examination. You should bear in mind that a same weight by the Inspector as those made verbally
3a. Do you want your comments to be considered by	•
at a hearing session of the Public Examination? (Plea	ise 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.	r
3b. If you wish to speak, please confirm which part of Inspector about and why you consider it to be necess	
3c. Would you like to be informed about the following	
Submission of documents and evidence to the examin	nation
Publish Inspector's report	
Plan's adoption	T
If additional documents have been provided to supp	ort your representations, please list below:
Signed:	Dated: $3//3//5$.

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:

Part 3: What Happens Next?

 $\begin{tabular}{ll} \textbf{ONLINE}-By completing the electronic form at $\underline{www.gwynedd.gov.uk/ldp}$ or $\underline{www.anglesey.gov.uk/ldp}$ \\ \textbf{BY EMAIL}-$\underline{planningpolicy@gwynedd.gov.uk}$ \\ \end{tabular}$

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 <u>WILL NOT BE CONSIDERED</u>

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.
С3	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.

- The public sewerage network can accept the potential foul flows from the proposed development site.
- The proposed growth being promoted within the catchment area of Treborth WwTW would require improvements at the treatment works which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

T41 Former Cattle Market Site, Valley

- A water supply can be provided to serve this site.
- The public sewerage network can accept the potential foul flows from the proposed development site.
- Holyhead Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figures.

T42 Land near North Terrace, Criccieth

- A water supply can be provided to serve this site.
- Potential developers need to be aware that the site is crossed by a sewer and protection measures in the form of easement widths or a diversion of the pipe would be required, which may impact upon the housing density achievable on site.
- The proposed growth being promoted for this settlement may require improvements at Criccieth Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

T43 Land near Victoria Hotel, Llanberis

- A water supply can be provided to serve this site.
- The public sewerage network can accept the potential foul flows from the proposed development site.
- Llanberis Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

T44 Land near Ty Du Road, Llanberis

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

T45 Church Field, Llanrug

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

T46 Land near Rhuthallt Road, Lianrug

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

T47 Land near Helyg, Nefyn

- A water supply can be provided to serve this site.
- There are isolated incidents of flooding in the public sewerage system that will need to be resolved to allow development to proceed. Potential developers can either wait for DCWW to resolve the flooding, subject to funding being approved by our regulator Ofwat, or progress the improvements through the sewerage requisition provisions of the Water Industry Act 1991 or \$106 of the Town & Country Planning Act 1990.
- Nefyn Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

T48 Former Allotments, Nefyn

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





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.gwynedd.gov.uk/ldp or www.gwynedd.gov.uk/ldp or www.gwynedd.gov.uk/ldp or www.gwynedd

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		
Address	WELSH WATER	
Postcode		
Telephone Number		
Email address		

Guidance Note.

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

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

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

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

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

Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant Sustainability Appraisal information. This information must be consistent with the scope and level of detail of the Sustainability Appraisal conducted by the Authority. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site.

You should include all your comments on the Deposit Plan and set out your full case on the official form, using accompanying documents where necessary. If you seek more than one change and consider that the Deposit Plan fails to meet more than one test of soundness **separate forms should be completed for each representation.** Similarly, if your representation is in support of the Deposit Plan or individual elements of the Deposit Plan it would be helpful if separate representations were made. Please indicate if you are submitting other material to support your comments.

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Policy number (please s	necify)	TAL IS	HOUCINIC	IN LOCAL SERVICE
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Proposals/ Inset Map (pa			CENT	ices .
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at a hearing session of the Public Examination? (Plea	ise tick one of the following)
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happy for my written comments to be considered by	
the Inspector.	
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Submission of documents and evidence to the examin	nation
Publish Inspector's report	
Plan's adoption	T
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Signed:	Dated: $3//3//5$.

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T41 Former Cattle Market Site, Valley

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- Holyhead Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figures.

T42 Land near North Terrace, Criccieth

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T45 Church Field, Llanrug

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

T46 Land near Rhuthallt Road, Lianrug

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

T47 Land near Helyg, Nefyn

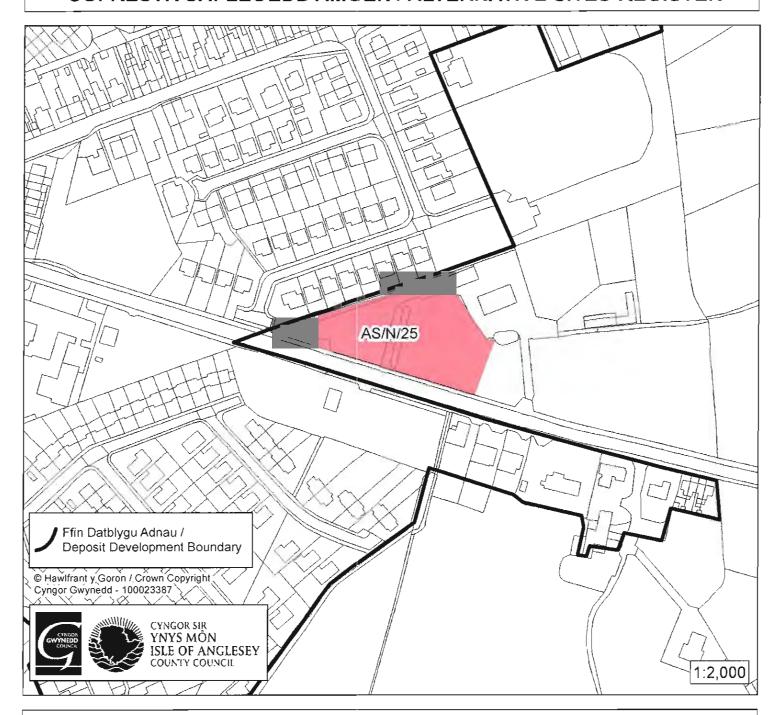
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T48 Former Allotments, Nefyn

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

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

COFRESTR SAFLEOEDD AMGEN / ALTERNATIVE SITES REGISTER



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

Cyfeirnod / Reference: AS/N/25

Enw'r Safle / Site Name: Tir gyf / Land opp Hafod Garage

Lleoliad / Location: Llanrug

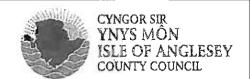
Cyngor Cymuned / Community Council: Llanrug

Maint (ha) / Size (ha): 0.4

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







For office use only:

Representor No.

Date received:

Date acknowledged:

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

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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 <a

PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	MR IAN TREVOR.	MR BERWYN OWEN
Address		OWEN DEVEN PORT LIP
Postcode		
Telephone Number		
Email address		
<u></u>		

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)	TAI 15				
Paragraph number (please specify)					
Proposals/ Inset Map (please specify ref no.)	24				
Constraints Map	· ·				
Appendices (please specify)					

2b. Are you objecting or	supporting the Deposit P	lan?	
Objecting	√	Supporting	

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

PROPOSED ALTERNATURE SITE IN LLANGUE ENPLACE OF SITE 146.
INCLUSION OF SITE WITHIN DEVELOPMENT BOUNDARY
SEE ATTACHED STATEMENT FOR GREATER DETAIL.

Please use additional sheet if necessary.

Please state how many additional sheets have been used.........

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I do not want to speak at a hearing session and am	□ □
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Publish Inspector's report	
Plan's adoption	17
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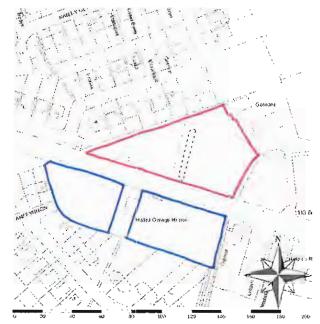
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ONLINE – By completing the electronic form at www.anglesey.gov.uk/ldp BY EMAIL – planningpolicy@gwynedd.gov.uk

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

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REPRESENTATIONS ON ANGLESEY AND GWYNEDD JOINT LOCAL DEVELOPMENT PLAN - DEPOSIT PLAN (2015) & SUSTAINABILITY APPRAISAL

Proposed Housing Allocation & Inclusion within Development Boundary of
Llanrug
of
Land opposite Former Hafod Garage, Llanrug

Prepared on behalf of Mr. Ian Trevor

Agents Ref: - 819/03/13



Chartered Town Planning Consultants Chartered Surveyors



REPRESENTATIONS ON ANGLESEY AND GWYNEDD JOINT LOCAL DEVELOPMENT PLAN - DEPOSIT PLAN (2015) & SUSTAINABILITY APPRAISAL

LAND OPPOSITE FORMER HAFOD GARAGE, LLANRUG: PROPOSED HOUSING ALLOCATION & INCLUSION WITHIN DEVELOPMENT BOUNDARY OF LLANRUG

SUMMARY

- Proposed site is a sustainable development proposal.
- The suggested site is an appropriate addition to the settlement, and would perform better against the LDP's criteria than site T46.

1.0 INTRODUCTION

- 1.1 The purpose of this statement is to examine the Land opposite the Former Hafod Garage, Llanrug, to demonstrate that the site is in fact entirely suitable for inclusion within the development boundary of Llanrug, and should also be included as an allocated housing development site within the Anglesey and Gwynedd Joint (Deposit) Local Development Plan (AGJLDP).
- 1.2 The site was not examined at candidate sites stage and as such has not been subject to an assessment by the Authority as to its suitability for inclusion within the plan as an allocation, or to a Sustainability Appraisal as part of that process.
- 1.3 As such this report will provide an assessment of the general merits of this site and a comparison against other sites put forward for allocation within the plan in order to demonstrate the merits of this site. It will also provide a Sustainability Appraisal of this site against the criteria set out within Topic Paper 1 and Topic Paper 1A, and an assessment of the site against the AGJLDP's Vision, Objectives and Preferred Strategy.

2.0 SITE ASSESSMENT

- 2.1 This section examines and assesses the merits of the site, demonstrating that the site is in fact worthy of inclusion within the development boundary of Llanrug, and as a housing allocation within the AGJLDP.
- 2.2 A full Sustainability Appraisal against the criteria set within the relevant documents accompanying the LDP is provided in the following section.

SITE MERITS

- 2.3 The site is roughly triangular in shape and is a level site with a good road frontage. The site is vacant previously developed/Brownfield land as it is covered with concrete hard standings and has previously been used as a used car storage and display lot for over 30 years. As such its use to accommodate development reflects National and Local Policy objectives for the use of such sites in preference to greenfield locations.
- 2.4 It is bounded on both sites by existing development, with further development lying to the East and effectively enclosing and separating the site from the open countryside beyond (as shown by the location plan of the site provided with these submissions).
- 2.5 As such the site is entirely acceptable for inclusion within the development boundary of Llanrug, as it is distinct in character from the countryside to the East, and it would not extend the developed area of the settlement to an unacceptable degree. Indeed the adjoining development results in the site being physically and visually separate from the open countryside to the East, and as such it would appear as a logical form of infilling amongst development forming part of the settlement.
- 2.6 Notwithstanding this, the site is also suited to inclusion within the plan as a housing allocation as its development would provide a modest number of dwellings (with 6-10 units put forward as an appropriate allocation size for the site) and would be entirely acceptable in its context.
- 2.7 The appeal site lies in the centre of the village, and its location is within 300 metres of the village school and some 500-600 metres from the village shops, and within easy reach of regular bus services to Caernarfon and Bangor and other local settlements. As such the site has the potential to encourage the adoption of non-car modes of transport.
- 2.8 A reasonable range of shops and services are available to the site: with a good range available within Llanrug; and easy access to the broader range of shops and services available in Caernarfon and Bangor, via public transport or via bicycle in the former case.
- 2.9 In addition the site is also within easy reach of main employment sites in Bangor and Caernarfon.
- 2.10 As such the site is ideally located in relation to: existing built development; nearby settlements; and transport links, and should therefore be included as a housing allocation within the AGJLDP.
- 2.11 The site could also be developed without compromising the amenities enjoyed by the occupiers of adjacent dwellings, as sufficient separation

- distances could be achieved to prevent any overlooking or other harm to amenities.
- 2.12 The site, if allocated, would assist in meeting an identified need for market and affordable housing within the area, which would aid in ensuring the future economic and social sustainability of the village.
- 2.13 The site could easily be provided with an acceptable access onto the highway, as a good standard of visibility is available onto the A4086 which runs directly across the front of the site. The highway is also of entirely sufficient capacity to accommodate the small number of additional vehicle movements generated by the proposal.
- 2.14 In conclusion, the site would form an appropriate and logical addition to the settlement, which would be suited to its context and setting and would utilise a previous developed site. The site is accessible via non-car modes of transport, and is situated within easy reach of the goods, services and employers available within Llanrug and the areas' other main settlements. Its development would not harm any acknowledged interests, and it complies with the requirements for inclusion as a housing allocation within the plan. As such it should be allocated in order to meet the housing needs of Llanrug and the County as a whole.

COMPARISON AGAINST ALLOCATION T46

- 2.15 It is submitted that the site subject of this representation should be allocated in favour of the site included as allocation T46 (Land adjacent Tan Tan Rhyhallt SP931), as this site performs better on a number of criteria than T46.
- 2.16 Site T46 appears to have been considered for allocation on the basis that it has permission for the development of 6 dwellings (under outline permission C09A/0361/23/AM and reserved matters approval C13/0732/23/MG issued on the 03/09/2013). This permission was granted as the site as the site forms part of a larger allocation for 12 dwellings in the Unitary Development Plan. An application for erection of 2 dwellings (rather than the allocated 6) of the southern half of the site is currently under consideration (C13/0710/23/LL).
- 2.17 The slow take up of the site after its allocation within the UDP is suggestive of a lack of interest in the development of the site, as is the fact that the numbers of dwellings brought forward in applications do not reflect the levels allocated on the site (8 rather than the 12 units set within the UDP).
- 2.18 In any event it is considered that it is necessary to assess the allocated site against this suggested alternative site, as the alternative site benefits from several features that mean that it more closely reflects the AGJLDP strategy.
- 2.19 A key consideration in the comparison of the two sites is that site T46 is a Greenfield site, which also has the potential for impacts upon mature trees, hedgerows, and other habitat that would form part of the network of green corridors in the area.
- 2.20 The land opposite the Former Hafod Garage is on the other hand a brownfield site and therefore there is a higher preference for its use over

greenfield sites. As such it would comply with National Policy as set out in Para. 4.7, section 4.9, and Chapter 9 (in particular para's 9.1.1, 9.2.6, 9.2.8-10) of Planning Policy Wales which prioritise the development of previously developed land over greenfield sites, and the plans preferred strategy which also sets a preference for the use of brownfield sites for housing development. It would also be more sustainable when measured against Candidate Site Assessment Criteria 2, 6, 9 and Sustainability Appraisal Criteria 9.

- 2.21 It also has limited biodiversity value. It also has the potential for smaller impacts upon green corridors in the area due to its location on the edge of the centre of the village.
- 2.22 As such it would comply with the requirements of Chapter 5 of PPW, and Strategic Objective SO16, and with the preferences within the preferred strategy to protect the natural & built environment and green networks & habitats. It would also be more sustainable when measured against Candidate Site Assessment Criteria 4 and Sustainability Appraisal Criteria 1.
- 2.23 Site T46 is also set on the edge of the village and in a more open location, and would appear as an addition at the end of existing development. In comparison the proposed alternative site is set within the built form of the village and would adjoin existing development on its eastern and northern/north western sides, and on-going new build development to the south. As a result it is contained and separated from the countryside to the east and would appear as an addition within the existing built form of the settlement. It would therefore have a lower visual and landscape impact than site T46. As such it would comply with Chapter 5 of PPW and the requirements of Strategic Objective SO16, and preferences within the preferred strategy to protect the natural and built environment. It would also be more sustainable when measured against Candidate Site Assessment Criteria 18 and Sustainability Appraisal Criteria 5 and 8.
- 2.24 The proposed alternative site is also set close to the centre of the village and to key services that it provides (such as the primary and secondary schools, post office and village shop, playgrounds/recreation areas). As such it would be more accessible on foot and by bicycle and therefore would be better placed to foster the use of these non-car modes of transport by residents than site T46. As such it would comply with para. 4.7.4 and Chapter 8 (in particular para. 8.1.4) of PPW and the requirements of Strategic Objective SO5, and preferences within the preferred strategy to promote sustainable development & accessibility and to integrate development with existing community infrastructure. It would also be more sustainable when measured against Candidate Site Assessment Criteria 15 and Sustainability Appraisal Criteria 2.
- 2.25 It is also noted that the assessment of site T46 in Topic Paper 1A (SP931) states that Dŵr Cymru highlighted that the site is set approximately 40 metres from the sewer, and that as such an off-site connection would be required. This could present barrier to the development of the site as it would require that this issue is resolved. In contrast a mains sewer connection is available to the proposed site within the highway, and as a result it would not suffer from the potential barrier to development that is present at site T46. As such it would score more highly against criteria 7 of the Candidate Site Assessment methodology.

- 2.26 As such it is clear that the proposed alternative site would be better suited to allocation than site T46 as it performs better on a number of key criteria than that site. It allocation would therefore result in the AGJLDP being more sound than if site T46 was allocated.
- 2.27 It is noted that site T46 does have an extant permission, and that this might be considered a reason for allocation of the site in order to reflect that permission. However, this is set to expire on the 03/09/2015 (based on the approval of reserved matters on the 03/09/2013) which would be before the LDP could be adopted, and it is submitted that bearing in mind the advantages of the proposed alternative site over site T46 there is no reason why site T46 should be allocated in the AGJLDP.

3.0 SUSTAINABILITY APPRAISAL

3.1 The following section assesses the proposed alternative site against the plan's strategy, the Candidate Site Assessment Methodology, and the Sustainability Appraisal requirements set out within the Deposit Plan and its accompanying documents.

COMPATABILITY WITH PLAN STRATEGY

3.2 The following section assesses the proposal against a summary of the AGJLDP vision, objectives, and preferred strategy:-

Vision

- **3.3 Strengthen communities in Gwynedd and Anglesey** The site would contribute to this strategy by providing dwellings that would assist in meeting an identified need for housing in the locality.
- 3.4 By 2026, Anglesey and Gwynedd will be recognized for their vibrant and lively communities that celebrate their unique culture, heritage and environment and for being places where people choose to live, work and visit The site would make a positive contribution to this objective as it would be an appropriate addition to the settlement that would assist in promoting a lively community and would retain the area's unique culture, heritage and environment, and would assist in providing an area in which people will choose to live.

That the JLDP plan area will be one:-

- 3.5 Which adapts and responds positively to the challenges of climate change Any dwellings delivered on the site would be designed to respond to climate change, and would not be at risk from climate change effects.
- 3.6 Where the Welsh language is an integral part of communities The provision of dwellings within the village would assist in meeting the needs of local people for housing, and thus will help to cement the role of the Welsh Language as an integral part of the community.
- **3.7** Which boasts an appropriately skilled workforce Any housing allocation will have a neutral to small beneficial impact upon this criterion as it will provide housing that will help to accommodate the local workforce.
- 3.8 Where its residents and businesses are able to grasp new transformational economic opportunities in order to thrive and prosper Any housing allocation will have a neutral impact upon this criterion as it will involve housing only.
- **3.9** Which promotes economic activity amongst young people Any housing allocation will have a neutral impact upon this criterion as it will involve housing only.
- 3.10 Which has a varied, well connected, sustainable and broad economic base that makes the best use of local strengths and opportunities, and where the benefits deriving from the varied economic base are kept local Any housing allocation will have a neutral impact upon this criterion as it will involve housing only.

- 3.11 Which is recognized as a leading location for a variety of renewable and low carbon energy sectors and knowledge based industries, which will have contributed to transforming the local economy Any housing allocation will have a neutral impact upon this criterion as it will involve housing only, however there is the potential for use of renewable/low carbon energy sources in any housing built on the site.
- 3.12 Where the housing needs of local communities in the area are better addressed in terms of supply, type, quality, energy efficiency, location and affordability The provision of dwellings within the village would assist in meeting the needs of local people for housing, any dwellings would be energy efficient, its location close to the centre of the village would mean that it is well located, and any development would comply with Authority's affordable housing policies.
- 3.13 That is home to vibrant networks of inclusive communities where residents enjoy good health and well-being Any housing allocation will have a neutral to small beneficial impact upon this criterion as it will provided housing that will help to accommodate the existing community and contribute to its vibrancy.
- 3.14 Where the unique character of its built and cultural heritage, its countryside and landscape, and its environment is valued, protected and enhanced The site is well placed to preserve the countryside and landscape as it is screened and contained from them and would be seen as being within the existing built form of the settlement. Similarly its brownfield status would ensure that it would have no or a very limited impact upon the environment (with only a limited amount of vegetation on the site), and any development could provide opportunities for enhancement of the value of the site. Any scheme would also respect the built and cultural character of the locality.
- 3.15 A place where the transport infrastructure, particularly Holyhead port and the A487 and A5025 have been developed in order to support and grow businesses locally Any allocation or development on the site would have no impact upon the future development of local transport infrastructure.
- 3.16 The rural areas around the Sub-regional Centre and the Urban Service Centres will be a network of flourishing, sustainable communities. The Local Service Centres will have good links with the Urban Service Centres or the Sub-regional Centre. They will provide a range of local services and facilities for the rural communities around them. They will have received an appropriate level of additional housing units and employment opportunities to assist in maintaining community services and facilities. The allocation of this site would accord with this objective for Llanrug as a local service centre, as it would provide an appropriate site that would contribute to meeting the additional housing needs identified for the settlement, and would therefore assist in maintaining the role and functions of the settlement.

Strategic Objectives

3.17 SO1 Safeguard and strengthen the Welsh language and culture and promote its use as an essential part of community life - The provision of

- dwellings within the village would assist in meeting the needs of local people for housing, and thus will help to cement the role of the Welsh Language as an integral part of the community.
- 3.18 SO2 Ensure that the appropriate physical or community infrastructure is in place e.g. water supply, health facilities, schools, community facilities or that it can be provided (e.g. by means of developer contributions) to cope with every kind of development If allocated the site would not impact upon existing or potential future provision of community infrastructure within the community;
- 3.19 SO3 Improve and maintain safe, efficient, high quality, modern and integrated transport networks to employment, services and education/ training facilities particularly by foot, bicycle and public transport, thus reducing where possible the number of journeys in private cars Similarly there would be no harmful impact upon the existing transport network in the area, and the site would be accessible via range of modes of transport and would be well placed to foster use of non-car modes. Indeed it would be an improvement from site T46 in this respect;
- 3.20 SO4 Maximise the opportunities of Holyhead as a major international gateway and the A55, E22 Trans European network route and the A5025, A487, A470 as key transportation corridors This objective is not relevant to this site due to its location;
- 3.21 SO5 Ensuring that development in the Plan area supports the principles of sustainable development and creates sustainable communities whilst respecting the varied role and character of the centres, villages and countryside The allocation of this brownfield site close to the centre of the village and local facilities would accord with sustainable development principles, and would accord with the role and character of the settlement;
- 3.22 SO6 Minimize, adapt and mitigate the impacts of climate change (specific criteria excluded for the sake of brevity) This site is well suited to meeting this objective (and its criterion as:- it is not at risk of flooding; any development would be designed to reduce resource usage; renewable and low carbon energy production could be accommodated in any development; it is a previously developed site (in contrast to site T46); there would be no impact upon the water environment, and any development would include measures to reduce water usage);
- 3.23 SO7 Ensure that all new development meets high standards in terms of quality of design, energy efficiency, safety, security (persons and property) and accessibility, relates well to existing development, enhances public realm and develops locally distinctive quality places. Any development on the site would be designed to accord with the criteria set out in this objective, and the site is well related to existing development and the use of the site would enhance the public realm by making use of a brownfield site;
- 3.24 SO8 Ensure that settlements are sustainable, accessible and meet all the needs of their communities in accordance with their role in the settlement hierarchy The settlement is sustainable and accessible, as is the site, and the site is well placed to meet the identified need for housing within Llanrug;

- 3.25 SO9 Ensure that a network of employment sites and premises of a size and quality is safeguarded and allocated in sustainable locations that best meet the needs of existing businesses and are able to support the growing sectors of the local economy, attracting investment, and retaining and increasing the number of indigenous jobs Any housing allocation will have a neutral impact upon this criterion as it will involve housing only;
- 3.26 SO10 Secure opportunities to improve the workforce's skills and education Any housing allocation will have a neutral impact upon this criterion as it will involve housing only;
- 3.27 SO11 Diversify the Plan area's rural economy, building on opportunities, offering local employment opportunities with good quality jobs that are suitable for the local community and respects environmental interests Any housing allocation will have a neutral impact upon this criterion as it will involve housing only;
- 3.28 SO12 Promote vital and vibrant town centres in Amlwch, Bangor, Blaenau Ffestiniog, Holyhead, Caernarfon, Llangefni, Porthmadog and Pwllheli, that have either maintained or rediscovered their purpose as centres for work and services, and that are vibrant and attractive places for residents and visitors This objective is not relevant as the site is not set within any of the listed settlements;
- 3.29 SO13 Manage the area as an alternative and sustainable destination for tourists by providing facilities of a high standard that meet modern day needs and offer benefits throughout the year - Any housing allocation will have a neutral impact upon this criterion as it will involve housing only;
- 3.30 SO14 To ensure that a sufficient and appropriate range of housing sites are available in sustainable locations in accordance with the settlement hierarchy The site would make a positive contribution to this objective as it would be a suitable housing site in a sustainable location, and would contribute to meeting the identified need for housing within Llanrug;
- 3.31 SO15 To provide a mixture of good quality and affordable housing units, of a range of types and tenures to meet the housing requirements of all sections of the population Any development of the site would comply with Authority's affordable housing policies and any requirements for a mix of types and tenures.
- 3.32 SO16 Protect, enhance and manage the natural and heritage assets of the Plan area, including its natural resources, wildlife habitats, and its landscape character and historic environment The site is well placed to preserve the countryside and landscape as it is screened and contained from them and would be seen as being within the existing built form of the settlement. Similarly its brownfield status and the limited amount of vegetation within the site would ensure that it would have a limited impact upon the environment, and any development could provide opportunities for enhancement of the value of the site. Any scheme would also respect the built and cultural character of the locality;

- 3.33 SO17 Encourage waste management based on the hierarchy of reduce, re-use, recovery and safe disposal Suitable space can be provided within the site to accommodate recycling measures;
- 3.34 SO18 Meet the needs of minerals locally and regionally in a sustainable manner The site is not set within a mineral safeguarding area, and as such it would not impact upon this objective.

Preferred strategy

3.35 The following section examines the relevant sections of the strategy set out in section of the AGJLDP

Sustainable Communities

- 3.36 Match physical and social infrastructure to sustainable development and economic growth needs If allocated the site would not impact upon existing or potential future provision of community infrastructure within the community;
- 3.37 Sustainable movement through consideration of land use and promotion of active and sustainable travel The site is well placed to encourage active and sustainable travel, and indeed is better placed than allocation T46 to do so;
- 3.38 Safeguarding land for future infrastructure provision, including routes If allocated the site would not prevent future infrastructure provision.

Economic Growth and Regeneration

3.39 Criteria listed under this heading are not relevant as a housing allocation is sought. The site would not have a harmful impact upon the objectives set out under this heading is allocated.

Quality Housing

- 3.40 An effective supply of land for housing The site is suited to use for housing and the owner has an active interest in its delivery within the plan period;
- 3.41 Choice of housing type, size and tenure meets the requirements of a range of different households within local communities, including the provision of an appropriate level of affordable housing based on defined local needs Any development would comply with Authority's affordable housing policies and any requirements for a mix of types and tenures;
- 3.42 Encourage, where appropriate, brownfield development and use of existing buildings, including long term vacant housing is a priority The site is an entirely suitable brownfield site that is well suited to use for housing;

Natural and Built Environment

3.43 Safeguarding habitats, species, landscapes, townscapes, archaeology, historic buildings and monuments, allowing development that doesn't adversely impact or preferably enhances these assets - The site is well placed to preserve the countryside and landscape as it is screened any contained from them and would be seen as being within the existing built form of the settlement Similarly its brownfield status and the limited amount of vegetation within the site would ensure that it would have a limited impact upon the environment, and any development could provide opportunities for enhancement of the value of the site. Any scheme would also respect the built and cultural character of the locality;

3.44 Safeguarding mineral deposits - The site is not set within a mineral safeguarding area, and as such it would not impact upon this objective;

Welsh Language and Culture

- 3.45 Promote prosperous and sustainable communities that support local services including the provision of additional housing and related development proportionate to local requirement The use of the site for housing would assist in meeting this objective;
- **3.46** Support an advanced, thriving and diverse local economy Any housing allocation will have a neutral impact upon this criterion as it will involve housing only;

Climate Change and Sustainable Development

- 3.47 Ensure high resource efficiency and low/zero carbon energy generation technologies are incorporated within development Any development would be designed to reduce resource usage and renewable & low carbon energy production could be accommodated in any development;
- 3.48 Embrace sustainable quality design and construction in new development Any development would be designed to a sustainable quality design and would be constructed to an appropriate standard;
- 3.49 Avoid, mitigate or adapt to the causes of climate change The site is not subject to risks from climate change, and any development would be designed to respond to potential future impacts;

Creating Quality Places

- **3.50** *Promote high quality new development* Any development on the site would be designed to a high standard;
- 3.51 Protect and enhance important cultural, historic and landscape features The site is well placed to preserve the countryside and landscape as it is screened any contained from them and would be seen as being within the existing built form of the settlement. Any scheme would also respect the built and cultural character of the locality;
- 3.52 Safeguard, promote and expand green networks and habitats The brownfield status of the site and the limited amount of vegetation on the site, together with its location close to centre of the settlement, would ensure that it would not impact upon green corridors or habitats (in contrast to allocation T46). There would also be the potential to improve its value through measures in any scheme on the site;

- 3.53 Integrate new development into existing community infrastructure The site is well placed in relation to existing community infrastructure and so would integrate well with it. Again the site is better placed in this respect than allocation T46.
- 3.54 The site would also comply with the plans spatial strategy as it would be a suitable addition to an identified local service centre, and would be of an appropriate size to meet the need for housing identified and planned for Llanrug by the JPPU in the Deposit Plan. It would also represent an efficient and appropriate use of land that is well related to the built form of the settlement, and indeed would be an improvement from site T46 in that respect as it is a brownfield site that is contained by existing development on all sides. As such it is submitted that site T46 should not be allocated for housing development, as its existing permission is set to expire and this site is a preferable location.

ASSESSMENT OF SITE BY JPPU

3.55 The site does not appear to have been assessed during consideration of potential sites for allocation, and as such there is no existing assessment to respond to.

CANDIDATE SITE ASSESSMENT METHODOLOGY - TOPIC PAPER 1 AND 1A

3.56 The following section sets out an assessment of the site against the criteria provided within Topic Paper 1 - Candidate Site Assessment Update. The reference to Topic Paper 1A - Assessing the Candidate Sites within the LPA's Alternative Sites Guidance is noted, however it does not set out any specific criteria for assessment of sites, and as such there are no criteria within it against which this site can be assessed.

Initial filtering of candidate sites

3.57 Site details

Site Name - Land opposite Hafod Garage, Llanrug;

Proposed use - Housing;

Total area - Brownfield - 0.306ha Greenfield - 0ha;

Planning History - C08A/0384/23/AM - build 8 affordable housing units (exception site) - Decision Date: 04/09/2008 - Refused

C08A/0697/23/AM - outline application to erect 11 affordable dwellings (exception site) - 06/03/2009 - Refused

Subsequent appeal - APP/Q6810/A/09/2110764 - 18/01/2010 - Dismissed (solely on grounds that information on housing need did not support the scale/number of houses proposed)

C11/1118/23/AM - Erection of 6 affordable dwellings (exception site) and new access - 19/03/2012 - Refused;

Compatibility with preferred strategy - see preceding section.

- **3.58 Site location** The site is set immediately adjacent to the existing development boundary of Llanrug (defined as a local service centre within the plan and therefore a settlement where allocations can be made) and is contained by development on all sides. As such it is well located in relation to Llanrug and plan's settlement strategy.
- 3.59 Site area There appears to be some confusion within the Topic Paper as to whether site areas must exceed 0.2 or 0.3 hectares, as Para. 3.2 states that sites below a 0.2 hectare minimum size threshold will be discarded and with Table 6 (Appendix 2) showing sites as being discarded as they fall below 0.2ha in size, but with the Candidate Site Officer Assessment form in Appendix 3 setting a 0.3ha or more threshold. In any event the area of this site is 0.306ha, and it is submitted would reflect the size of the allocation that it is proposed it would replace in terms of its ability to accommodate 6-10 units (which would reflect the number put forward for site T46).
- **3.60** Flood Risk The site is not set within a C2 (or indeed any) identified flood risk area.
- 3.61 *Constraints* The site does not fall within or adjacent to a SAC, SPA, SSSI, NNR, or a Mineral and Coal safeguarded site. It is also separate from any such site in the wider locality by existing development.
- 3.62 As such it is considered that the site passes the initial filtering criteria and should therefore be assessed against the detailed site assessment criteria set out in Candidate Sites Process and Methodology section of Topic Paper 1.

Candidate Sites Process and Methodology - Detailed Assessment

3.63 The following table is taken from the relevant section of Topic Paper 1, and has been filled out as per the Assessment Guidance Notes Appendix 4):-

Issue	Details/Comments	Sui	tabi	lity o	fsite	2		Relevant SA Objective
Environmental Capital			_		_	_	_	
1 - Is there a risk of flooding?	The site is not at risk of flooding but is within the neural category as it is not set close to a watercourse			Х				3, 11
2 - Would development of the site lead to a loss of best and most versatile agricultural land (Grades 1,2 and 3a)?	(indeed it is brownfield)		-	Х				9
3 - Is the site (or parts of the site) protected by landscape, ecological, geological, historical or cultural designations?	It is not within designation and it not close to such an area.			Х				1, 5, 8
4 - Would development of the site lead to the loss of an important habitat, priority species, trees and hedgerows or lead to fragmentation of green corridor?	No loss of habitat or impacts upon a green corridor as the site does include features that would have such a value.			Х				1
5 - Is the site within a groundwater or surface water protection area?	No			Х				11
6 - Does the site constitute Brownfield land?	Yes, it has previously been used as a vehicle sale/display and parking area in connection with the vehicle garage on land opposite. It also has a hard surface reflecting that use.	X						9
7 - Does the site have any value as an open space or recreational importance?	No such value			Х				2, 8
8 - Does the current/previous use of the site suggest that there is a potential risk of contaminated land?	No, land was used for display/parking of vehicles only and had a hard surface.			Х				2,9
9 - Would development of the site present an opportunity to remove an eyesore?	Yes as the site is currently showing signs of degradation due to the period of non-use.		Х					5, 8
10 - LANDMAP Evaluation:	Relevant categories checked based on							1, 5, 8
Visual and Sensory:	LANDMAP search. These would reflect those for	Χ						
Geological:	both allocated sites.		ļ.,			Х		
Landscape Habitats:			Χ					
Historical:					X		V/	
Cultural:	<u> </u>						Χ	

						OWEI	Devenport Lta.
Accessibility and Ease of Movement							
11 - Is the site located within walking distance of a	150/160m level and unobstructed access	X					10
public transport terminal/ bus stop? (Please specify							
distance and whether it is steep/obstructed route)							
12 - How far is the site from an existing recreational	The nearest route is close enough to be		Х				10
walking/cycling route?	considered adjacent (as approximately 100m to						
	the nearest footpath via a level and						
	unobstructed pavement).						
13 - Is the site accessible from a public highway and is	A main highway is set adjacent to the boundary	X					10
the nearby highway system (including junctions) of	of the site, and is of adequate/sufficient						
sufficient quality to deal with potential development	quality/capacity to accommodate its						
on the site?	development.						
14 - Is the nearby highway system (including junctions)	A main highway is set adjacent to the boundary		X				6, 7, 10
of sufficient quality to deal with potential	of the site, and is of adequate/sufficient						
development on the site?	quality/capacity to accommodate its						
	development.						
	The site performs as well at site T45 and better						
community service/facility:	than T46 for many of these criteria due to its						
	location close to the centre of the village.				Ш		
Post Office			Х				
Convenience Store			Х		Li		
Primary or Secondary School	Under 400m to both primary and secondary	X					
	schools						
Supermarket	Approx. 5km to site in Caernarfon	ļ.,			X		
Surgery		X	_				
Pharmacy	Approx. 5km to site in Caernarfon	_	_	L	X		
Dentist	Approx. 5km to site in Caernarfon	ļ.,	<u> </u>		Х		
Play Area		Χ	-				
Other (please state)		-	├				
17 - Please state the distance to the nearest utility							
connection:			_		\vdash		
Electricity		X	-				
Water	AD	X	-				
Gas	All present in highway	X	-				
Sewerage		X	-				
Telecommunications		Χ					
Site Context and Character	Lavel with as well shatmenting	LV	-				
17 - Do the topographical characteristics of the site	Level with no rock obstructions	Χ					

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present an obstacle to development?								
18 - Would development on the site have an adverse	No impact as it is set adjacent to the centre of		Χ					
impact upon important views/vistas?	the village and is enclosed by surrounding							
	development.							
19 - Would development of the site have a detrimental	No impact as it is set adjacent to the centre of		Х					
impact on the character of the settlement?	the village and its use for residential				1 1			
	development would reflect surrounding				1 1			
	development.							_
20 - Would there be any adverse impact arising from	Its use for residential development would		X					
potentially conflicting land uses?	reflect surrounding uses.							
Relationship with Existing Settlements					1			
21 - Is the site located within the built form of a	The site immediately adjoins the existing	X				-		
settlement or does it constitute a minor extension to a	identified development boundary of the							
settlement?	settlement within the UDP, and would							
	constitute infill between surrounding							
	development							
Conclusion						All and the		
22 - Additional Comments and Recommendations	The site complies with Detailed site assessment							
	performs better than allocation T46 is several re-	spects, t	heref	ore is r	nore s	uitable for	allocatio	<u>n.</u>

SUSTAINABILITY APPRAISAL METHODOLOGY

3.64 This section provides an assessment of the proposed Alternative Site against the Sustainability Objectives provided in the Sustainability Appraisal for the Deposit Plan (as set out in Table 2.6) - as required by the Alternative Sites Guidance document provided by the LPAs.

SA Objective	Assessment	Summary
1. Maintain and enhance biodiversity	+	Development will not lead to the loss of an
interests and connectivity		important habitat, priority species, hedgerows, or
(SEA Topics: biodiversity, fauna, flora,		lead to fragmentation of green corridor. There are
soil)		some trees on the site but these are some
		small/immature trees and bushes within the site
		but these are likely to be limited value. There is
		limited potential for enhancement through
		additional planting within or around the site.
2. Promote community viability,	+	Community Facilities/Services - The site is meets
cohesion, health and well being		the distance thresholds for the majority of
(SEA Topics: human health,		community services and facilities (see preceding
population)		table)
	+	Human Health - As per the assessment methodology
		the site would have no harmful impacts and is likely
		to have long-term positive impacts through the
		provision of housing to meet the needs of the plan
		area.
3. Manage and reduce the impacts of	0/7	The impact on traffic is likely to be neutral to
climate change by promoting and		minor negative, but it is likely that any minor
supporting mitigation and adaptation		impacts can be addressed through suitable design &
measures		mitigation. This reflects the stance taken on the
(SEA Topics: climatic factors, air)		allocations put forward within the AGJLDP. The site would have neutral effect as it would
4. Conserve, promote and enhance the	0	contribute to meeting the housing needs of the
Welsh language (SEA Topic: cultural heritage)		area. This reflects the stance taken within the
(SEA TOPIC. Cuttural Heritage)		Sustainability Appraisal Report for the sites put
		forward for allocation.
5. Conserve, promote and enhance	0/?	The site is considered to have neutral impact due
cultural resources and historic heritage	973	to its setting within the settlement and it
assets		brownfield state. Any potential impacts would be
(SEA Topic: cultural heritage)		limited and minor, and could be addressed through
(carrier carrier and carrier a		mitigation. This rating also reflects the stance
		taken on the allocations put forward within the
		AGJLDP.
6. Support economic growth and	0	The site is being put forward for residential
facilitate a vibrant, diversified		development and as such would have a neutral
economy providing local employment		impact.
opportunities		
(SEA Topic: Population)		
7. Provide good quality housing,	+4	The site is being put forward for residential
including affordable housing that		development and as such would have a strong
meets local needs		positive impact by assisting in resolving an
(SEA Topic: population, human health)		identified need for housing development.
8. Value, conserve and enhance the	+/3	The development of the site would have a positive
plan area's rural landscapes and urban		impact by redeveloping a vacant brownfield site
townscapes		that is currently having minor negative impact upon

(SEA Topics: landscape)		the streetscape.
9. Use land and mineral assets	- 4	The site is entirely brownfield land and therefore
efficiently and promote mechanisms		would have a major positive effect against this
for waste minimisation, re-use and		objective (as indicated by the criteria set within
recycling		the Sustainability appraisal report).
(SEA Topic: material assets, soil)		(It should be noted that this contrasts to the
		greenfield status of site T46)
10. Promote and enhance good	+	The site meets the majority of thresholds for
transport links to support the		distance to sustainable modes of transport, and is
community and the economy		of a distance from main service centres and areas
(SEA Topic: population, human health)		of employment that development is likely to reduce
		the need to travel.
11. Safeguard water quality, manage	0	The site is not within a flood risk area and not
water resources sustainability and		within a groundwater or surface water protection
minimise flood risk		area.
(SEA Topic: water, biodiversity)		

3.65 Overall it is clear that the site meets the requirements to be considered sustainable when assessed against the Sustainability Appraisal, and performs better than site T46 that is currently proposed for allocation in Llanrug (and as well as site T45).

OTHER ASSESSMENTS

Welsh language impact Assessment

3.66 It is considered that the site would not have harmful impact upon the Welsh Language, and indeed is likely to have positive impacts by providing housing that would assist in meeting local needs. It should also be noted that the site has been put forward as alternative site to replace allocation T46 within the Deposit Plan, and as such (if accepted) would have the same (acceptable) impact as the current allocation.

Habitat Regulations Appraisal

- 3.67 It is noted from the Alternative Sites Guidance provided by the Joint Planning Policy Unit that it is for the Authority to provide a HRA of alternative sites. It is considered that sufficient information is provided within this document to allow such an assessment. It is also submitted that if allocated the site would not have a harmful impact due to its brownfield status, limited vegetation coverage, and location away from identified sites of nature conservation importance.
- 3.68 Overall the proposal complies with the various objectives and criteria set within the plan, and as such is an entirely suitable site for inclusion within the plan as a housing allocation.

4.0 CONCLUSIONS

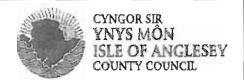
- 4.1 To conclude, the site should be included within the development boundary of the settlement, and would form an entirely acceptable housing allocation within the area, which would be: accessible; form a logical component of the village and complement the existing built form of the settlement; would not harm any interests of acknowledged importance; and which is fully supported by all relevant policy.
- 4.2 The site also performs well against the various criteria set out for Sustainability Appraisal of sites within the plan, and against the Candidate Site Assessment Criteria and the Plan's Vision, Objectives and Preferred Strategy.
- 4.3 As such, it is entirely suited to allocation within the plan, as it would provide an appropriate site for a small-scale housing development (approx. 6 units). The site does not suffer from any physical or environmental constraints, and any potential minor impacts upon the immediate locality can be addressed through a suitably designed scheme (as is the case for any allocated site).
- 4.4 It would also be a considerable improvement from the proposed allocation of T46 within the Deposit LDP as it is a brownfield site that is set in a more accessible position, which would have a lower impact upon habitats and biodiversity, and would is set contained and separated from the countryside and would therefore have a lower visual and landscape impact.
- 4.5 As such the site complies with the aim of improving the sustainability of development, and the area as a whole, and as such its allocation would respect and achieve high standards of sustainability, and would result in the plan being more sound than the current deposit version.

	May 2015
Owen Devenport Ltd.	

Chartered Town Planners & Chartered Surveyors

2755-1295-LLANRUG-ASD2-MAP24





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.gwynedd.gov.uk/ldp or www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/idp 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.awynedd.gov.uk/ldp or www.awynedd.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	MR IAN TREVOR.	MR BERMYN OWEN
Address		ONEN DEVEN PORT LTD
Postcode		
Telephone Number		
Email address		

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

Policy number (please specify)	TAI 15	
Paragraph number (please specify)		
Proposals/ Inset Map (please specify ref no.)	24	
Constraints Map	-	
Appendices (please specify)	_	

2b. Are you objecting or	supporting the Deposit P	lan?		
Objecting	₩	Supporting	T	

2c. Please provide details of your representation on the Depo

PROPOSED ALTERNATIVE SITE IN LLANRUG INPLACE OF SITE 146.
INCLUSION OF SITE WITHIN DEVELOPMENT BOUNDARY
SEE ATTACHED STATEMENT FOR GREATER DETAIL.

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

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At this stage of the Joint LDP process, you can only representations'). However, the Inspector may call speak to the Inspector at a 'hearing session' during your written comments on this form will be given the at a hearing session.	on those who want to chang the Public Examination. You	ge the Plan to appear and I should bear in mind that
3a. Do you want your comments to be considered b	y 'written representations' (or do you want to speak
at a hearing session of the Public Examination? (Plea	ase 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.	r	
	. I ·	
3b. If you wish to speak, please confirm which part of Inspector about and why you consider it to be necessary.		
3c. Would you like to be informed about the followi		
Submission of documents and evidence to the exami	nation	17
Publish Inspector's report		
Plan's adoption		
If additional documents have been provided to supp	oort your representations, p	lease list below:
	-	

Signed: Dated: 81/03/2015

THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN

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

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

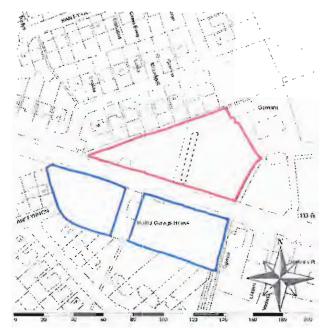
Part 3: What Happens Next?

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

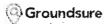
BY POST – By sending to: Joint Planning Policy Unit, 1st Floor, Bangor City Council Offices, Ffordd Gwynedd, Bangor, Gwynedd LL57 1DT

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





Scale: 1:2500 | Area 4Ha | Grid Reference: 253718.363378 | Paper Size: A4



REPRESENTATIONS ON ANGLESEY AND GWYNEDD JOINT LOCAL DEVELOPMENT PLAN - DEPOSIT PLAN (2015) & SUSTAINABILITY APPRAISAL

Proposed Housing Allocation & Inclusion within Development Boundary of
Llanrug
of
Land opposite Former Hafod Garage, Llanrug

Prepared on behalf of Mr. Ian Trevor

Agents Ref: - 819/03/13



Chartered Town Planning Consultants Chartered Surveyors



REPRESENTATIONS ON ANGLESEY AND GWYNEDD JOINT LOCAL DEVELOPMENT PLAN - DEPOSIT PLAN (2015) & SUSTAINABILITY APPRAISAL

LAND OPPOSITE FORMER HAFOD GARAGE, LLANRUG: PROPOSED HOUSING ALLOCATION & INCLUSION WITHIN DEVELOPMENT BOUNDARY OF LLANRUG

SUMMARY

- Proposed site is a sustainable development proposal.
- The suggested site is an appropriate addition to the settlement, and would perform better against the LDP's criteria than site T46.

1.0 INTRODUCTION

- 1.1 The purpose of this statement is to examine the Land opposite the Former Hafod Garage, Llanrug, to demonstrate that the site is in fact entirely suitable for inclusion within the development boundary of Llanrug, and should also be included as an allocated housing development site within the Anglesey and Gwynedd Joint (Deposit) Local Development Plan (AGJLDP).
- 1.2 The site was not examined at candidate sites stage and as such has not been subject to an assessment by the Authority as to its suitability for inclusion within the plan as an allocation, or to a Sustainability Appraisal as part of that process.
- 1.3 As such this report will provide an assessment of the general merits of this site and a comparison against other sites put forward for allocation within the plan in order to demonstrate the merits of this site. It will also provide a Sustainability Appraisal of this site against the criteria set out within Topic Paper 1 and Topic Paper 1A, and an assessment of the site against the AGJLDP's Vision, Objectives and Preferred Strategy.

2.0 SITE ASSESSMENT

- 2.1 This section examines and assesses the merits of the site, demonstrating that the site is in fact worthy of inclusion within the development boundary of Llanrug, and as a housing allocation within the AGJLDP.
- 2.2 A full Sustainability Appraisal against the criteria set within the relevant documents accompanying the LDP is provided in the following section.

SITE MERITS

- 2.3 The site is roughly triangular in shape and is a level site with a good road frontage. The site is vacant previously developed/Brownfield land as it is covered with concrete hard standings and has previously been used as a used car storage and display lot for over 30 years. As such its use to accommodate development reflects National and Local Policy objectives for the use of such sites in preference to greenfield locations.
- 2.4 It is bounded on both sites by existing development, with further development lying to the East and effectively enclosing and separating the site from the open countryside beyond (as shown by the location plan of the site provided with these submissions).
- 2.5 As such the site is entirely acceptable for inclusion within the development boundary of Llanrug, as it is distinct in character from the countryside to the East, and it would not extend the developed area of the settlement to an unacceptable degree. Indeed the adjoining development results in the site being physically and visually separate from the open countryside to the East, and as such it would appear as a logical form of infilling amongst development forming part of the settlement.
- 2.6 Notwithstanding this, the site is also suited to inclusion within the plan as a housing allocation as its development would provide a modest number of dwellings (with 6-10 units put forward as an appropriate allocation size for the site) and would be entirely acceptable in its context.
- 2.7 The appeal site lies in the centre of the village, and its location is within 300 metres of the village school and some 500-600 metres from the village shops, and within easy reach of regular bus services to Caernarfon and Bangor and other local settlements. As such the site has the potential to encourage the adoption of non-car modes of transport.
- 2.8 A reasonable range of shops and services are available to the site: with a good range available within Llanrug; and easy access to the broader range of shops and services available in Caernarfon and Bangor, via public transport or via bicycle in the former case.
- 2.9 In addition the site is also within easy reach of main employment sites in Bangor and Caernarfon.
- 2.10 As such the site is ideally located in relation to: existing built development; nearby settlements; and transport links, and should therefore be included as a housing allocation within the AGJLDP.
- **2.11** The site could also be developed without compromising the amenities enjoyed by the occupiers of adjacent dwellings, as sufficient separation

- distances could be achieved to prevent any overlooking or other harm to amenities.
- 2.12 The site, if allocated, would assist in meeting an identified need for market and affordable housing within the area, which would aid in ensuring the future economic and social sustainability of the village.
- 2.13 The site could easily be provided with an acceptable access onto the highway, as a good standard of visibility is available onto the A4086 which runs directly across the front of the site. The highway is also of entirely sufficient capacity to accommodate the small number of additional vehicle movements generated by the proposal.
- 2.14 In conclusion, the site would form an appropriate and logical addition to the settlement, which would be suited to its context and setting and would utilise a previous developed site. The site is accessible via non-car modes of transport, and is situated within easy reach of the goods, services and employers available within Llanrug and the areas' other main settlements. Its development would not harm any acknowledged interests, and it complies with the requirements for inclusion as a housing allocation within the plan. As such it should be allocated in order to meet the housing needs of Llanrug and the County as a whole.

COMPARISON AGAINST ALLOCATION T46

- 2.15 It is submitted that the site subject of this representation should be allocated in favour of the site included as allocation T46 (Land adjacent Tan Tan Rhyhallt SP931), as this site performs better on a number of criteria than T46.
- 2.16 Site T46 appears to have been considered for allocation on the basis that it has permission for the development of 6 dwellings (under outline permission C09A/0361/23/AM and reserved matters approval C13/0732/23/MG issued on the 03/09/2013). This permission was granted as the site as the site forms part of a larger allocation for 12 dwellings in the Unitary Development Plan. An application for erection of 2 dwellings (rather than the allocated 6) of the southern half of the site is currently under consideration (C13/0710/23/LL).
- 2.17 The slow take up of the site after its allocation within the UDP is suggestive of a lack of interest in the development of the site, as is the fact that the numbers of dwellings brought forward in applications do not reflect the levels allocated on the site (8 rather than the 12 units set within the UDP).
- 2.18 In any event it is considered that it is necessary to assess the allocated site against this suggested alternative site, as the alternative site benefits from several features that mean that it more closely reflects the AGJLDP strategy.
- 2.19 A key consideration in the comparison of the two sites is that site T46 is a Greenfield site, which also has the potential for impacts upon mature trees, hedgerows, and other habitat that would form part of the network of green corridors in the area.
- 2.20 The land opposite the Former Hafod Garage is on the other hand a brownfield site and therefore there is a higher preference for its use over

greenfield sites. As such it would comply with National Policy as set out in Para. 4.7, section 4.9, and Chapter 9 (in particular para's 9.1.1, 9.2.6, 9.2.8-10) of Planning Policy Wales which prioritise the development of previously developed land over greenfield sites, and the plans preferred strategy which also sets a preference for the use of brownfield sites for housing development. It would also be more sustainable when measured against Candidate Site Assessment Criteria 2, 6, 9 and Sustainability Appraisal Criteria 9.

- 2.21 It also has limited biodiversity value. It also has the potential for smaller impacts upon green corridors in the area due to its location on the edge of the centre of the village.
- 2.22 As such it would comply with the requirements of Chapter 5 of PPW, and Strategic Objective SO16, and with the preferences within the preferred strategy to protect the natural & built environment and green networks & habitats. It would also be more sustainable when measured against Candidate Site Assessment Criteria 4 and Sustainability Appraisal Criteria 1.
- 2.23 Site T46 is also set on the edge of the village and in a more open location, and would appear as an addition at the end of existing development. In comparison the proposed alternative site is set within the built form of the village and would adjoin existing development on its eastern and northern/north western sides, and on-going new build development to the south. As a result it is contained and separated from the countryside to the east and would appear as an addition within the existing built form of the settlement. It would therefore have a lower visual and landscape impact than site T46. As such it would comply with Chapter 5 of PPW and the requirements of Strategic Objective SO16, and preferences within the preferred strategy to protect the natural and built environment. It would also be more sustainable when measured against Candidate Site Assessment Criteria 18 and Sustainability Appraisal Criteria 5 and 8.
- 2.24 The proposed alternative site is also set close to the centre of the village and to key services that it provides (such as the primary and secondary schools, post office and village shop, playgrounds/recreation areas). As such it would be more accessible on foot and by bicycle and therefore would be better placed to foster the use of these non-car modes of transport by residents than site T46. As such it would comply with para. 4.7.4 and Chapter 8 (in particular para. 8.1.4) of PPW and the requirements of Strategic Objective SO5, and preferences within the preferred strategy to promote sustainable development & accessibility and to integrate development with existing community infrastructure. It would also be more sustainable when measured against Candidate Site Assessment Criteria 15 and Sustainability Appraisal Criteria 2.
- 2.25 It is also noted that the assessment of site T46 in Topic Paper 1A (SP931) states that Dŵr Cymru highlighted that the site is set approximately 40 metres from the sewer, and that as such an off-site connection would be required. This could present barrier to the development of the site as it would require that this issue is resolved. In contrast a mains sewer connection is available to the proposed site within the highway, and as a result it would not suffer from the potential barrier to development that is present at site T46. As such it would score more highly against criteria 7 of the Candidate Site Assessment methodology.

- 2.26 As such it is clear that the proposed alternative site would be better suited to allocation than site T46 as it performs better on a number of key criteria than that site. It allocation would therefore result in the AGJLDP being more sound than if site T46 was allocated.
- 2.27 It is noted that site T46 does have an extant permission, and that this might be considered a reason for allocation of the site in order to reflect that permission. However, this is set to expire on the 03/09/2015 (based on the approval of reserved matters on the 03/09/2013) which would be before the LDP could be adopted, and it is submitted that bearing in mind the advantages of the proposed alternative site over site T46 there is no reason why site T46 should be allocated in the AGJLDP.

3.0 SUSTAINABILITY APPRAISAL

3.1 The following section assesses the proposed alternative site against the plan's strategy, the Candidate Site Assessment Methodology, and the Sustainability Appraisal requirements set out within the Deposit Plan and its accompanying documents.

COMPATABILITY WITH PLAN STRATEGY

3.2 The following section assesses the proposal against a summary of the AGJLDP vision, objectives, and preferred strategy:-

Vision

- 3.3 Strengthen communities in Gwynedd and Anglesey The site would contribute to this strategy by providing dwellings that would assist in meeting an identified need for housing in the locality.
- 3.4 By 2026, Anglesey and Gwynedd will be recognized for their vibrant and lively communities that celebrate their unique culture, heritage and environment and for being places where people choose to live, work and visit The site would make a positive contribution to this objective as it would be an appropriate addition to the settlement that would assist in promoting a lively community and would retain the area's unique culture, heritage and environment, and would assist in providing an area in which people will choose to live.

That the JLDP plan area will be one:-

- 3.5 Which adapts and responds positively to the challenges of climate change Any dwellings delivered on the site would be designed to respond to climate change, and would not be at risk from climate change effects.
- 3.6 Where the Welsh language is an integral part of communities The provision of dwellings within the village would assist in meeting the needs of local people for housing, and thus will help to cement the role of the Welsh Language as an integral part of the community.
- **3.7** Which boasts an appropriately skilled workforce Any housing allocation will have a neutral to small beneficial impact upon this criterion as it will provide housing that will help to accommodate the local workforce.
- 3.8 Where its residents and businesses are able to grasp new transformational economic opportunities in order to thrive and prosper Any housing allocation will have a neutral impact upon this criterion as it will involve housing only.
- 3.9 Which promotes economic activity amongst young people Any housing allocation will have a neutral impact upon this criterion as it will involve housing only.
- 3.10 Which has a varied, well connected, sustainable and broad economic base that makes the best use of local strengths and opportunities, and where the benefits deriving from the varied economic base are kept local Any housing allocation will have a neutral impact upon this criterion as it will involve housing only.

- 3.11 Which is recognized as a leading location for a variety of renewable and low carbon energy sectors and knowledge based industries, which will have contributed to transforming the local economy Any housing allocation will have a neutral impact upon this criterion as it will involve housing only, however there is the potential for use of renewable/low carbon energy sources in any housing built on the site.
- 3.12 Where the housing needs of local communities in the area are better addressed in terms of supply, type, quality, energy efficiency, location and affordability The provision of dwellings within the village would assist in meeting the needs of local people for housing, any dwellings would be energy efficient, its location close to the centre of the village would mean that it is well located, and any development would comply with Authority's affordable housing policies.
- 3.13 That is home to vibrant networks of inclusive communities where residents enjoy good health and well-being Any housing allocation will have a neutral to small beneficial impact upon this criterion as it will provided housing that will help to accommodate the existing community and contribute to its vibrancy.
- 3.14 Where the unique character of its built and cultural heritage, its countryside and landscape, and its environment is valued, protected and enhanced The site is well placed to preserve the countryside and landscape as it is screened and contained from them and would be seen as being within the existing built form of the settlement. Similarly its brownfield status would ensure that it would have no or a very limited impact upon the environment (with only a limited amount of vegetation on the site), and any development could provide opportunities for enhancement of the value of the site. Any scheme would also respect the built and cultural character of the locality.
- 3.15 A place where the transport infrastructure, particularly Holyhead port and the A487 and A5025 have been developed in order to support and grow businesses locally Any allocation or development on the site would have no impact upon the future development of local transport infrastructure.
- 3.16 The rural areas around the Sub-regional Centre and the Urban Service Centres will be a network of flourishing, sustainable communities. The Local Service Centres will have good links with the Urban Service Centres or the Sub-regional Centre. They will provide a range of local services and facilities for the rural communities around them. They will have received an appropriate level of additional housing units and employment opportunities to assist in maintaining community services and facilities. The allocation of this site would accord with this objective for Llanrug as a local service centre, as it would provide an appropriate site that would contribute to meeting the additional housing needs identified for the settlement, and would therefore assist in maintaining the role and functions of the settlement.

Strategic Objectives

3.17 SO1 Safeguard and strengthen the Welsh language and culture and promote its use as an essential part of community life - The provision of

- dwellings within the village would assist in meeting the needs of local people for housing, and thus will help to cement the role of the Welsh Language as an integral part of the community.
- 3.18 SO2 Ensure that the appropriate physical or community infrastructure is in place e.g. water supply, health facilities, schools, community facilities or that it can be provided (e.g. by means of developer contributions) to cope with every kind of development If allocated the site would not impact upon existing or potential future provision of community infrastructure within the community;
- 3.19 SO3 Improve and maintain safe, efficient, high quality, modern and integrated transport networks to employment, services and education/ training facilities particularly by foot, bicycle and public transport, thus reducing where possible the number of journeys in private cars Similarly there would be no harmful impact upon the existing transport network in the area, and the site would be accessible via range of modes of transport and would be well placed to foster use of non-car modes. Indeed it would be an improvement from site T46 in this respect;
- 3.20 SO4 Maximise the opportunities of Holyhead as a major international gateway and the A55, E22 Trans European network route and the A5025, A487, A470 as key transportation corridors This objective is not relevant to this site due to its location;
- 3.21 SO5 Ensuring that development in the Plan area supports the principles of sustainable development and creates sustainable communities whilst respecting the varied role and character of the centres, villages and countryside The allocation of this brownfield site close to the centre of the village and local facilities would accord with sustainable development principles, and would accord with the role and character of the settlement;
- 3.22 SO6 Minimize, adapt and mitigate the impacts of climate change (specific criteria excluded for the sake of brevity) This site is well suited to meeting this objective (and its criterion as:- it is not at risk of flooding; any development would be designed to reduce resource usage; renewable and low carbon energy production could be accommodated in any development; it is a previously developed site (in contrast to site T46); there would be no impact upon the water environment, and any development would include measures to reduce water usage);
- 3.23 SO7 Ensure that all new development meets high standards in terms of quality of design, energy efficiency, safety, security (persons and property) and accessibility, relates well to existing development, enhances public realm and develops locally distinctive quality places. Any development on the site would be designed to accord with the criteria set out in this objective, and the site is well related to existing development and the use of the site would enhance the public realm by making use of a brownfield site;
- 3.24 SO8 Ensure that settlements are sustainable, accessible and meet all the needs of their communities in accordance with their role in the settlement hierarchy The settlement is sustainable and accessible, as is the site, and the site is well placed to meet the identified need for housing within Llanrug;

- 3.25 SO9 Ensure that a network of employment sites and premises of a size and quality is safeguarded and allocated in sustainable locations that best meet the needs of existing businesses and are able to support the growing sectors of the local economy, attracting investment, and retaining and increasing the number of indigenous jobs Any housing allocation will have a neutral impact upon this criterion as it will involve housing only;
- 3.26 SO10 Secure opportunities to improve the workforce's skills and education Any housing allocation will have a neutral impact upon this criterion as it will involve housing only;
- 3.27 SO11 Diversify the Plan area's rural economy, building on opportunities, offering local employment opportunities with good quality jobs that are suitable for the local community and respects environmental interests Any housing allocation will have a neutral impact upon this criterion as it will involve housing only;
- 3.28 SO12 Promote vital and vibrant town centres in Amlwch, Bangor, Blaenau Ffestiniog, Holyhead, Caernarfon, Llangefni, Porthmadog and Pwllheli, that have either maintained or rediscovered their purpose as centres for work and services, and that are vibrant and attractive places for residents and visitors This objective is not relevant as the site is not set within any of the listed settlements;
- 3.29 SO13 Manage the area as an alternative and sustainable destination for tourists by providing facilities of a high standard that meet modern day needs and offer benefits throughout the year Any housing allocation will have a neutral impact upon this criterion as it will involve housing only;
- 3.30 SO14 To ensure that a sufficient and appropriate range of housing sites are available in sustainable locations in accordance with the settlement hierarchy The site would make a positive contribution to this objective as it would be a suitable housing site in a sustainable location, and would contribute to meeting the identified need for housing within Llanrug;
- 3.31 SO15 To provide a mixture of good quality and affordable housing units, of a range of types and tenures to meet the housing requirements of all sections of the population Any development of the site would comply with Authority's affordable housing policies and any requirements for a mix of types and tenures.
- 3.32 SO16 Protect, enhance and manage the natural and heritage assets of the Plan area, including its natural resources, wildlife habitats, and its landscape character and historic environment The site is well placed to preserve the countryside and landscape as it is screened and contained from them and would be seen as being within the existing built form of the settlement. Similarly its brownfield status and the limited amount of vegetation within the site would ensure that it would have a limited impact upon the environment, and any development could provide opportunities for enhancement of the value of the site. Any scheme would also respect the built and cultural character of the locality;

- 3.33 SO17 Encourage waste management based on the hierarchy of reduce, re-use, recovery and safe disposal Suitable space can be provided within the site to accommodate recycling measures;
- 3.34 SO18 Meet the needs of minerals locally and regionally in a sustainable manner The site is not set within a mineral safeguarding area, and as such it would not impact upon this objective.

Preferred strategy

3.35 The following section examines the relevant sections of the strategy set out in section of the AGJLDP

Sustainable Communities

- 3.36 Match physical and social infrastructure to sustainable development and economic growth needs If allocated the site would not impact upon existing or potential future provision of community infrastructure within the community;
- 3.37 Sustainable movement through consideration of land use and promotion of active and sustainable travel The site is well placed to encourage active and sustainable travel, and indeed is better placed than allocation T46 to do so:
- 3.38 Safeguarding land for future infrastructure provision, including routes If allocated the site would not prevent future infrastructure provision.

Economic Growth and Regeneration

3.39 Criteria listed under this heading are not relevant as a housing allocation is sought. The site would not have a harmful impact upon the objectives set out under this heading is allocated.

Quality Housing

- 3.40 An effective supply of land for housing The site is suited to use for housing and the owner has an active interest in its delivery within the plan period;
- 3.41 Choice of housing type, size and tenure meets the requirements of a range of different households within local communities, including the provision of an appropriate level of affordable housing based on defined local needs Any development would comply with Authority's affordable housing policies and any requirements for a mix of types and tenures;
- 3.42 Encourage, where appropriate, brownfield development and use of existing buildings, including long term vacant housing is a priority - The site is an entirely suitable brownfield site that is well suited to use for housing;

Natural and Built Environment

3.43 Safeguarding habitats, species, landscapes, townscapes, archaeology, historic buildings and monuments, allowing development that doesn't

adversely impact or preferably enhances these assets - The site is well placed to preserve the countryside and landscape as it is screened any contained from them and would be seen as being within the existing built form of the settlement Similarly its brownfield status and the limited amount of vegetation within the site would ensure that it would have a limited impact upon the environment, and any development could provide opportunities for enhancement of the value of the site. Any scheme would also respect the built and cultural character of the locality;

3.44 Safeguarding mineral deposits - The site is not set within a mineral safeguarding area, and as such it would not impact upon this objective;

Welsh Language and Culture

- 3.45 Promote prosperous and sustainable communities that support local services including the provision of additional housing and related development proportionate to local requirement The use of the site for housing would assist in meeting this objective;
- 3.46 Support an advanced, thriving and diverse local economy Any housing allocation will have a neutral impact upon this criterion as it will involve housing only;

Climate Change and Sustainable Development

- 3.47 Ensure high resource efficiency and low/zero carbon energy generation technologies are incorporated within development. Any development would be designed to reduce resource usage and renewable & low carbon energy production could be accommodated in any development;
- 3.48 Embrace sustainable quality design and construction in new development Any development would be designed to a sustainable quality design and would be constructed to an appropriate standard;
- 3.49 Avoid, mitigate or adapt to the causes of climate change The site is not subject to risks from climate change, and any development would be designed to respond to potential future impacts;

Creating Quality Places

- **3.50** *Promote high quality new development* Any development on the site would be designed to a high standard;
- 3.51 Protect and enhance important cultural, historic and landscape features The site is well placed to preserve the countryside and landscape as it is screened any contained from them and would be seen as being within the existing built form of the settlement. Any scheme would also respect the built and cultural character of the locality;
- 3.52 Safeguard, promote and expand green networks and habitats The brownfield status of the site and the limited amount of vegetation on the site, together with its location close to centre of the settlement, would ensure that it would not impact upon green corridors or habitats (in contrast to allocation T46). There would also be the potential to improve its value through measures in any scheme on the site;

- 3.53 Integrate new development into existing community infrastructure The site is well placed in relation to existing community infrastructure and so would integrate well with it. Again the site is better placed in this respect than allocation T46.
- 3.54 The site would also comply with the plans spatial strategy as it would be a suitable addition to an identified local service centre, and would be of an appropriate size to meet the need for housing identified and planned for Llanrug by the JPPU in the Deposit Plan. It would also represent an efficient and appropriate use of land that is well related to the built form of the settlement, and indeed would be an improvement from site T46 in that respect as it is a brownfield site that is contained by existing development on all sides. As such it is submitted that site T46 should not be allocated for housing development, as its existing permission is set to expire and this site is a preferable location.

ASSESSMENT OF SITE BY JPPU

3.55 The site does not appear to have been assessed during consideration of potential sites for allocation, and as such there is no existing assessment to respond to.

CANDIDATE SITE ASSESSMENT METHODOLOGY - TOPIC PAPER 1 AND 1A

3.56 The following section sets out an assessment of the site against the criteria provided within Topic Paper 1 - Candidate Site Assessment Update. The reference to Topic Paper 1A - Assessing the Candidate Sites within the LPA's Alternative Sites Guidance is noted, however it does not set out any specific criteria for assessment of sites, and as such there are no criteria within it against which this site can be assessed.

Initial filtering of candidate sites

3.57 Site details

Site Name - Land opposite Hafod Garage, Llanrug;

Proposed use - Housing;

Total area - Brownfield - 0.306ha Greenfield - 0ha;

Planning History - C08A/0384/23/AM - build 8 affordable housing units (exception site) - Decision Date: 04/09/2008 - Refused

C08A/0697/23/AM - outline application to erect 11 affordable dwellings (exception site) - 06/03/2009 - Refused

Subsequent appeal - APP/Q6810/A/09/2110764 - 18/01/2010 - Dismissed (solely on grounds that information on housing need did not support the scale/number of houses proposed)

C11/1118/23/AM - Erection of 6 affordable dwellings (exception site) and new access - 19/03/2012 - Refused;

Compatibility with preferred strategy - see preceding section.

- **3.58 Site location** The site is set immediately adjacent to the existing development boundary of Llanrug (defined as a local service centre within the plan and therefore a settlement where allocations can be made) and is contained by development on all sides. As such it is well located in relation to Llanrug and plan's settlement strategy.
- 3.59 Site area There appears to be some confusion within the Topic Paper as to whether site areas must exceed 0.2 or 0.3 hectares, as Para. 3.2 states that sites below a 0.2 hectare minimum size threshold will be discarded and with Table 6 (Appendix 2) showing sites as being discarded as they fall below 0.2ha in size, but with the Candidate Site Officer Assessment form in Appendix 3 setting a 0.3ha or more threshold. In any event the area of this site is 0.306ha, and it is submitted would reflect the size of the allocation that it is proposed it would replace in terms of its ability to accommodate 6-10 units (which would reflect the number put forward for site T46).
- **3.60** Flood Risk The site is not set within a C2 (or indeed any) identified flood risk area.
- 3.61 *Constraints* The site does not fall within or adjacent to a SAC, SPA, SSSI, NNR, or a Mineral and Coal safeguarded site. It is also separate from any such site in the wider locality by existing development.
- 3.62 As such it is considered that the site passes the initial filtering criteria and should therefore be assessed against the detailed site assessment criteria set out in Candidate Sites Process and Methodology section of Topic Paper 1.

Candidate Sites Process and Methodology - Detailed Assessment

3.63 The following table is taken from the relevant section of Topic Paper 1, and has been filled out as per the Assessment Guidance Notes Appendix 4):-

Issue	Details/Comments	Sui	Suitability of site					Relevant SA Objective		
								·		
Environmental Capital										
1 - Is there a risk of flooding?	The site is not at risk of flooding but is within the neural category as it is not set close to a watercourse			Х				3, 11		
2 - Would development of the site lead to a loss of best and most versatile agricultural land (Grades 1,2 and 3a)?	The site does not include agricultural land (indeed it is brownfield)							9		
3 - Is the site (or parts of the site) protected by landscape, ecological, geological, historical or cultural designations?				Х				1, 5, 8		
4 - Would development of the site lead to the loss of an important habitat, priority species, trees and hedgerows or lead to fragmentation of green corridor?				X		-		1		
5 - Is the site within a groundwater or surface water protection area?	No			X				11		
6 - Does the site constitute Brownfield land?	Yes, it has previously been used as a vehicle sale/display and parking area in connection with the vehicle garage on land opposite. It also has a hard surface reflecting that use.	X						9		
7 - Does the site have any value as an open space or recreational importance?	No such value			Х				2, 8		
8 - Does the current/previous use of the site suggest that there is a potential risk of contaminated land?	No, land was used for display/parking of vehicles only and had a hard surface.			Х				2,9		
9 - Would development of the site present an opportunity to remove an eyesore?	Yes as the site is currently showing signs of degradation due to the period of non-use.		Χ					5, 8		
10 - LANDMAP Evaluation:	Relevant categories checked based on							1, 5, 8		
 Visual and Sensory: 	LANDMAP search. These would reflect those for	X								
Geological:	both allocated sites.					Χ				
Landscape Habitats:			Х							
Historical:]			-	Х					
Cultural:	1						Х			

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Accessibility and Ease of Movement					
11 - Is the site located within walking distance of a	150/160m level and unobstructed access	X			10
public transport terminal/ bus stop? (Please specify					
distance and whether it is steep/obstructed route)					
12 - How far is the site from an existing recreational	The nearest route is close enough to be		X		10
walking/cycling route?	considered adjacent (as approximately 100m to				
	the nearest footpath via a level and				
	unobstructed pavement).				
13 - Is the site accessible from a public highway and is	A main highway is set adjacent to the boundary	Х			10
the nearby highway system (including junctions) of	of the site, and is of adequate/sufficient				
sufficient quality to deal with potential development	quality/capacity to accommodate its				
on the site?	development.				
14 - Is the nearby highway system (including junctions)	A main highway is set adjacent to the boundary		X		6, 7, 10
of sufficient quality to deal with potential	of the site, and is of adequate/sufficient				
development on the site?	quality/capacity to accommodate its				
	development.				
15 - Please state the distance to the nearest	The site performs as well at site T45 and better				
community service/facility:	than T46 for many of these criteria due to its				
	location close to the centre of the village.				
Post Office			Х		
Convenience Store			Χ		
Primary or Secondary School	Under 400m to both primary and secondary	X			
	schools				
Supermarket	Approx. 5km to site in Caernarfon			X	
Surgery		X			
Pharmacy	Approx. 5km to site in Caernarfon			Х	
Dentist	Approx. 5km to site in Caernarfon	<u> </u>		Х	
Play Area		X			
Other (please state)					
17 - Please state the distance to the nearest utility					
connection:					
Electricity		Χ			
Water		Χ			
Gas	All present in highway	Χ			
Sewerage		X	<u> </u>		
Telecommunications		Χ			
Site Context and Character				 	
17 - Do the topographical characteristics of the site	Level with no rock obstructions	X			

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present an obstacle to development?								
18 - Would development on the site have an adverse	No impact as it is set adjacent to the centre of		X					
impact upon important views/vistas?	the village and is enclosed by surrounding							
	development.							
19 - Would development of the site have a detrimental	No impact as it is set adjacent to the centre of		X					
impact on the character of the settlement?	the village and its use for residential							
	development would reflect surrounding							
	development.							
20 - Would there be any adverse impact arising from	Its use for residential development would		X					
potentially conflicting land uses?	reflect surrounding uses.						_	
Relationship with Existing Settlements								
21 - Is the site located within the built form of a	The site immediately adjoins the existing	X						
settlement or does it constitute a minor extension to a	identified development boundary of the							
settlement?	settlement within the UDP, and would							
	constitute infill between surrounding							
	development							
Conclusion								
22 - Additional Comments and Recommendations	The site complies with Detailed site assessment criteria and as such it suitable for allocation. It also							
	performs better than allocation T46 is several respects, therefore is more suitable for allocation.							

SUSTAINABILITY APPRAISAL METHODOLOGY

3.64 This section provides an assessment of the proposed Alternative Site against the Sustainability Objectives provided in the Sustainability Appraisal for the Deposit Plan (as set out in Table 2.6) - as required by the Alternative Sites Guidance document provided by the LPAs.

SA Objective	Assessment	Summary
1. Maintain and enhance biodiversity	+	Development will not lead to the loss of an
interests and connectivity		important habitat, priority species, hedgerows, or
(SEA Topics: biodiversity, fauna, flora,		lead to fragmentation of green corridor. There are
soil)		some trees on the site but these are some
		small/immature trees and bushes within the site
		but these are likely to be limited value. There is
		limited potential for enhancement through
		additional planting within or around the site.
2. Promote community viability,	+	Community Facilities/Services - The site is meets
cohesion, health and well being		the distance thresholds for the majority of
(SEA Topics: human health,		community services and facilities (see preceding
population)		table)
	+	Human Health - As per the assessment methodology
		the site would have no harmful impacts and is likely
		to have long-term positive impacts through the
		provision of housing to meet the needs of the plan
		area.
3. Manage and reduce the impacts of	0/1	The impact on traffic is likely to be neutral to
climate change by promoting and		minor negative, but it is likely that any minor
supporting mitigation and adaptation		impacts can be addressed through suitable design &
measures		mitigation. This reflects the stance taken on the
(SEA Topics: climatic factors, air)		allocations put forward within the AGJLDP.
4. Conserve, promote and enhance the	0	The site would have neutral effect as it would
Welsh language		contribute to meeting the housing needs of the
(SEA Topic: cultural heritage)		area. This reflects the stance taken within the
		Sustainability Appraisal Report for the sites put
E Conserve and subserve	0.0	forward for allocation.
5. Conserve, promote and enhance	0/7	The site is considered to have neutral impact due
cultural resources and historic heritage		to its setting within the settlement and its
assets		brownfield state. Any potential impacts would be
(SEA Topic: cultural heritage)		limited and minor, and could be addressed through
		mitigation. This rating also reflects the stance
		taken on the allocations put forward within the AGJLDP.
6. Support economic growth and	77	
		The site is being put forward for residential
facilitate a vibrant, diversified economy providing local employment		development and as such would have a neutral impact.
opportunities		mpact.
(SEA Topic: Population)		
7. Provide good quality housing,	Total 1	The site is being put forward for residential
including affordable housing that		development and as such would have a strong
meets local needs		positive impact by assisting in resolving an
(SEA Topic: population, human health)		identified need for housing development.
8. Value, conserve and enhance the	+/?	The development of the site would have a positive
plan area's rural landscapes and urban		impact by redeveloping a vacant brownfield site
townscapes		that is currently having minor negative impact upon
		maring minor negacite impact apoil

(SEA Topics: landscape)		the streetscape.
9. Use land and mineral assets	+4	The site is entirely brownfield land and therefore
efficiently and promote mechanisms		would have a major positive effect against this
for waste minimisation, re-use and		objective (as indicated by the criteria set within
recycling		the Sustainability appraisal report).
(SEA Topic: material assets, soil)		(It should be noted that this contrasts to the
		greenfield status of site T46)
10. Promote and enhance good	+	The site meets the majority of thresholds for
transport links to support the		distance to sustainable modes of transport, and is
community and the economy		of a distance from main service centres and areas
(SEA Topic: population, human health)		of employment that development is likely to reduce
, , , , , , , , , , , , , , , , , , , ,		the need to travel.
11. Safeguard water quality, manage	0	The site is not within a flood risk area and not
water resources sustainability and		within a groundwater or surface water protection
minimise flood risk		area.
(SEA Topic: water, biodiversity)		

3.65 Overall it is clear that the site meets the requirements to be considered sustainable when assessed against the Sustainability Appraisal, and performs better than site T46 that is currently proposed for allocation in Llanrug (and as well as site T45).

OTHER ASSESSMENTS

Welsh language impact Assessment

3.66 It is considered that the site would not have harmful impact upon the Welsh Language, and indeed is likely to have positive impacts by providing housing that would assist in meeting local needs. It should also be noted that the site has been put forward as alternative site to replace allocation T46 within the Deposit Plan, and as such (if accepted) would have the same (acceptable) impact as the current allocation.

Habitat Regulations Appraisal

- 3.67 It is noted from the Alternative Sites Guidance provided by the Joint Planning Policy Unit that it is for the Authority to provide a HRA of alternative sites. It is considered that sufficient information is provided within this document to allow such an assessment. It is also submitted that if allocated the site would not have a harmful impact due to its brownfield status, limited vegetation coverage, and location away from identified sites of nature conservation importance.
- 3.68 Overall the proposal complies with the various objectives and criteria set within the plan, and as such is an entirely suitable site for inclusion within the plan as a housing allocation.

4.0 CONCLUSIONS

- 4.1 To conclude, the site should be included within the development boundary of the settlement, and would form an entirely acceptable housing allocation within the area, which would be: accessible; form a logical component of the village and complement the existing built form of the settlement; would not harm any interests of acknowledged importance; and which is fully supported by all relevant policy.
- 4.2 The site also performs well against the various criteria set out for Sustainability Appraisal of sites within the plan, and against the Candidate Site Assessment Criteria and the Plan's Vision, Objectives and Preferred Strategy.
- 4.3 As such, it is entirely suited to allocation within the plan, as it would provide an appropriate site for a small-scale housing development (approx. 6 units). The site does not suffer from any physical or environmental constraints, and any potential minor impacts upon the immediate locality can be addressed through a suitably designed scheme (as is the case for any allocated site).
- 4.4 It would also be a considerable improvement from the proposed allocation of T46 within the Deposit LDP as it is a brownfield site that is set in a more accessible position, which would have a lower impact upon habitats and biodiversity, and would is set contained and separated from the countryside and would therefore have a lower visual and landscape impact.
- 4.5 As such the site complies with the aim of improving the sustainability of development, and the area as a whole, and as such its allocation would respect and achieve high standards of sustainability, and would result in the plan being more sound than the current deposit version.

	May 2015
Owen Devenport Ltd.	

Chartered Town Planners & Chartered Surveyors



Dyddiad: 26 Chwefror 2015

At Sylw: Nia Davies Rheolwr Cynllunio (Polisi) Cyngor Gwynedd Uned Polisi Cynllunio ar y Cyd Gwynedd & Mon Swyddfeydd Cyngor Dinas Bangor Bangor Gwynedd LL57 IDT

Annwyl Fadam,

Par: Cynllun Adnau - Cyngor Cymuned Llanrug

Mewn cyfarfod diweddar o'r Cyngor Cymuned, fe eglurodd y Cynghorydd Charles Jones y newidiadau i'r Cynllun uchod ac ei fod ef fel Aelod Lleol, yn hapus iawn gyda'r newidiadau. Ategwyd hyn yn unfrydol gan aelodau'r Cyngor Cymuned a gofynnwyd i mi gysylltu a chwi i ddatgan bodlonrwydd y Cyngor Cymuned ar y cynllun, ac i ddiolch i chwi am ystyried pryderon lleol.

Mae'r Cyngor yn bwriadu cysylltu a chwi eţo yn y dyfodol i leisio barn ar pa fath o dai, maent yn awyddus i'w gweld yn cael ei ganiatau yn Llanrug.

Gyda llawer o ddiolch am eich gwaith.

Yn gywir

Meirion Jones Clerc Cyngor Cymuned Llanrug Cc Cyng Charles Jones