#### **APPENDIX A – CHAPTER 7.3 ECONOMY AND REGENERATION**

# **Major Infrastructure Projects**

#### **Context and Introduction**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
866	National Grid (Mrs Rebecca Evans) [2961]	7.3.1	Object	National Grid would expect to see reference to National Policy Statements (NPSs) within the JLDP's policy background on large infrastructure projects, for example paragraphs 7.3.1 to 7.3.17 could contain further information on the role of the NPSs, which is mentioned briefly at the start of Strategic Policy PS8.	Agree – Further information will be included within the background text to emphasise the role of the NSP.  Recommendation  To demonstrate that appropriate regard is made to National Policy and Guidance further information will be included relating to the role of National Policy Statements.  Focussed change: NF40, NF41, NF42, NF45
1139 1156 1140 1141 1142 1143 1144 1145 1146 1147 1148 1149 1150 1151	Nuclear Power (Miss	7.3.1 7.3.2 7.3.3 7.3.4 7.3.5 7.3.6 7.3.7 7.3.9 7.3.10 7.3.11 7.3.12 7.3.13 7.3.14 7.3.15	Object	The clarity of these paragraphs could be improved, particularly what is meant by the distinction between "major infrastructure projects" and nationally significant infrastructure projects as defined by the Planning Act 2008. The chapter varies between being written for general application to "major infrastructure projects"; and being written specifically about the Wylfa Newydd Project. Some explanatory text and policy includes clauses drafted exclusively for deposit version of the Plan and others include clauses for pre-adoption, application and post-construction. This needs to be reviewed and standardised to avoid confusion in interpretation. Additionally, minor errors in the description of the NSIP regime and description of "associated developments"	Partly Agree – It is believed that an adequate emphasis is placed on Wylfa Newydd plans and the economic advantages that would derive from it in the plan.  It is however considered that this section of the Plan could be restructured so as to differentiate between Wylfa Newydd and other National Significant Infrastructure Projects also it is agreed that consistency is required in terms of the terminology used within the Plan.  Recommendation

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
1152 1153		7.3.16 7.3.17			To ensure the internal consistency of the Plan and clarity the policy will be reworded and restructures
1133		7.5.17			(PS8 and PS). The terminology used will also be amended accordingly.
					Focussed change: NF40, NF41, NF42, NF45
				National Grid has some concerns about the description of	Not accepted – Although voluntary community
				planning contributions, particularly community benefits,	benefits may not apply to the National Grid it is
				within paragraphs 7.3.13 to 7.3.17. National Grid will	relevant for other National Significant
				always seek to reduce the negative impacts of its proposed	Infrastructure projects and therefore the criterion shouldn't be removed.
				developments through carefully considered design iterations informed by assessments and consultation;	Shouldh t be removed.
				through the identification of comprehensive mitigation	Recommendation
	National Grid			measures. It is recognised that in some cases planning	Recommendation
867	(Mrs Rebecca	7.3.13	Object	conditions may not adequately secure the inherent design	No robust evidence was received which would
	Evans) [2961]		<b>,</b>	and further mitigation measures and these may therefore	justify amending the Deposit Plan to ensure the
				need to be secured in planning terms through a Section	Plan's soundness.
				106 agreement. In the case of Nationally Significant	
				Infrastructure Projects, EN-1 sets out when planning	No Change
				obligations may be used for energy infrastructure, and	-
				indicates that weight can only be given to obligations	
				which meet all of the tests for their use. Amend criterion 4	
				of PS8 and delete criterion 5.	

## PS8 – Proposals for Large Infrastructure Projects

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
466	Bourne Leisure Ltd [2768]	STRATEGIC POLICY PS8	Support	Bourne Leisure considers that the existing stock of holiday accommodation, including that provided at Greenacres and Hafan-y-Mor may be able to assist in meeting the housing requirement for the 8,500 construction workers that will be on site at peak construction periods. The Deposit Plan states that the workforce will be	Note supporting comment  Recommendation  No Change

ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				accommodated via various means including existing holiday accommodation and purpose built holiday accommodation built by Horizon.	
843	Nathaniel Lichfield & Partners (Mr Arwel Evans) [2767]	STRATEGIC POLICY PS8	Support	Bourne Leisure considers that the existing stock of holiday accommodation, including that provided at Greenacres and Hafan-y-Mor may be able to assist in meeting the housing requirement for the 8,500 construction workers that will be on site at peak construction periods. The Deposit Plan states that the workforce will be accommodated via various means including existing holiday accommodation and purpose built holiday accommodation built by Horizon.	Note supporting comment  Recommendation  No Change
1154	Horizon Nuclear Power (Miss Sarah Fox) [2919]	STRATEGIC POLICY PS8	Object	Horizon's representations seek to clarify that it is PS9 which applies to the Wylfa Newydd Project rather than a mix of PS8 and PS9. Having excluded PS 8 from the policy framework for the Wylfa Newydd Project Horizon does not therefore comment specifically on PS8 except to note that any changes made to PS9 (in accordance with its representations below) may be usefully carried through to PS8 for consistency.	Partly Agree – It is considered necessary to restructure this section of the Plan so that there is greater clarity between the sections which refer to Wylfa Newydd and those which specifically refer to National Significant Infrastructure Projects.  Recommendation  To ensure the internal consistency of the Plan the policy will be reworded and restructured (PS8 and PS9).  Focussed change: NF41

## PS9 – Wylfa Newydd Related Development

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
464	Bourne Leisure Ltd	STRATEGIC	Support	Bourne Leisure considers that the existing stock of holiday accommodation, including that provided at Greenacres	Note supporting comment
	[2768]	POLICY PS9		and Hafan-y-Mor may be able to assist in meeting the	

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				housing requirement for the 8,500 construction workers that will be on site at peak construction periods. The Deposit Plan states that the workforce will be accommodated via various means including existing holiday accommodation and purpose built holiday accommodation built by Horizon.	Recommendation  No Change
844	Nathaniel Lichfield & Partners (Mr Arwel Evans) [2767]	STRATEGIC POLICY PS9	Support	Bourne Leisure considers that the existing stock of holiday accommodation, including that provided at Greenacres and Hafan-y-Mor may be able to assist in meeting the housing requirement for the 8,500 construction workers that will be on site at peak construction periods. The Deposit Plan states that the workforce will be accommodated via various means including existing holiday accommodation and purpose built holiday accommodation built by Horizon.	Note supporting comment  Recommendation  No Change
862	Bangor Civic Society 1 (Don Mathew) [2988]	STRATEGIC POLICY PS9	Object	A 'plan B' is needed in case this project, which is years away from final approval, does not go ahead.	Not accepted – The policy relates specifically to the development of Wylfa Newydd. If Wylfa Newydd doesn't proceed then the policy won't be applied.  Recommendation  No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.  No Change
882	Mr John Tripp [252]	STRATEGIC POLICY PS9	Object	The contractors of Wylfa B to employ 85% + - local people.  Need to secure a big training school.	Not accepted – Current investment is underway to provide adequate training facilities for the training and operational workers. There are relevant Policies within the Plan which will be applied when considering training facilities.  Recommendation

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					No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.
930	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	STRATEGIC POLICY PS9	Support	Some of our assets may require investment to facilitate growth related to Wylfa Newydd. Our AMP investment is regulated both in terms of the amount of funding and the timing o the planned work therefore there may be instances where developers needs do not coincide with the timing of our investment. Where infrastructure improvements would be required prior to planned investment we would look at other mechanisms to fill this funding gap such as developers' contributions through planning obligations. Once the locations of associated development are confirmed we will assess the impact upon our assets and advise accordingly.	No Change  Note supporting comment  Recommendation  No Change
1155	Horizon Nuclear Power (Miss Sarah Fox) [2919]	STRATEGIC POLICY PS9	Object	In order to ensure that the unique opportunity to transform the economy and communities of Anglesey is recognised by the Plan specific Wylfa Newydd Project policies should be developed that along with PS9 should shape the approach to the Wylfa Newydd Project and in particular the proposals for associated development. Recognising the unique status of the development whilst the other policies in the Plan should be properly considered the PS9 and proposed Wylfa Newydd specific policies should take precedence where there is an inconsistency or conflict between them and the other policies. Specific amendments are suggested to criteria 3, 7, 9, 11 & 12.	Not accepted —It is believed that an adequate emphasis is placed on Wylfa Newydd plans and the economic advantages that would derive from it in the plan. There are other policies within the Plan which include planning principles, that would need to be referred to when responding to applications associated with Wylfa Newydd  Further work will be undertaken to ensure consistency between the Plan and the Supplementary Planning Guidance relating to Wylfa Newydd, which is likely to result in a review of the current version of the SPG.  Recommendation  No robust evidence was received which would

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					justify amending the Deposit Plan to ensure the Plan's soundness.
					No Change

# **Providing Opportunities for a Flourishing Economy**

## PS10 – Providing Opportunity for a Flourishing Economy

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
455	Bourne Leisure Ltd [2768]	STRATEGIC POLICY PS10	Object	Specific reference should be added to PS10 to reflect the important role that tourism plays in ensuring a flourishing economy. A 4th bullet point should be added to read:  "4. Supporting new and existing tourism development/redevelopment where appropriate, in order to take full advantage of the economic benefit that tourism development brings to the Local Plan area."	Do not accept – It is considered that other sections of the Plan adequately deal with the economic benefits deriving from tourism initiatives.  Recommendation  No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.
803	Barton Willmore (Mr Mark Roberts) [1645]	STRATEGIC POLICY PS10	Object	Based on the allocated 807 ha of employment land and premises within the Deposit LDP there is over 66 years of employment land and premises supply within the Plan area.  Whilst it is recognised that Wylfa Newydd could have a significant economic impact on the need and demand for employment land and premises, there will not be the need for this level of employment land or premises.  The Plan therefore significantly over allocates and protects employment land premises and particularly sites which are unlikely to deliver employment due to the sites not	Accept - It is accepted that further explanation is required of the need to protect/allocate 807 ha of employment land. It is believed that the fact that the policy protects as well as allocates employment sites creates confusion.  The deposit version of the Plan also allocated new employment land, i.e. green field sites with no infrastructure. Those have also been included in the list in Policy CYF1. PS10, therefore, identifies sites to meet existing and future employment

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				meeting the needs of industry, or subject to significant site constraints.  The Policy therefore does not comply with Test of Soundness C2 as it does not comply with Planning Policy Wales & CE2 as it is not realistic having regard to other alternatives or based upon credible evidence.	needs. The provision has been dispersed across the Plan area and offers choice in terms of location and size. The provision of employment land provides an element of flexibility in terms of the choice available.  Recommendation
				The policy should be amended to only include sufficient available, suitable and deliverable employment land needed for the duration of the Plan Period.	In order to improve clarity, it is proposed that the Strategic Policy is amended to include a further explanation regarding how the figure for employment land has been determined. It is proposed that the policy is amended in order to differentiate between the land allocated and what is being safeguarded.
825	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	STRATEGIC POLICY PS10	Object	PS10 Comment on conclusion of needs for employment land from alternative studies.	Partially accept – In response to comments from other objectors it is proposed to amend the policy to include further information regarding the conclusions of the Employment Land Survey.  Recommendation  To ensure clarity, it is proposed to amend the Plan in order to include further explanation regarding the protected employment land.  Focussed change: NF46
828	Cyngor Cymuned Llanystumdw y (Mr Richard J Roberts)	STRATEGIC POLICY PS10	Object	We are glad that Llanystumdwy Agri Park has been included as Secondary Site but we consider that other sites should be considered, e.g. the old Laundry at Afonwen.	<b>Do not accept – I</b> t is acknowledged that small rural businesses have an important role to play within the local economy and it is believed that Policy CYF5 of the Plan adequately deals with this matter.

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	[1550]			We consider that more should be done to retain industrial sites when they change hands and that the Plan does not do enough to support small businesses, particularly family businesses in the countryside.	Recommendation  No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.  No Change
902	Bourne Leisure Ltd [2768]	STRATEGIC POLICY PS10	Object	PS10 is inconsistent with the remainder of the LDP as it doesn't recognise the significant economic benefit that tourism brings to the local area. Paragraph 4.3 states that tourists/visitors make an important contribution to the local economy. Bourne Leisure therefore maintains that PS10 should reflect the significant contribution that tourism makes to the local economy.  Recognition of the important role of tourism within Strategic Policy PS10 is also necessary to ensure consistency with PPW (para 11.1.1). It would also accord with the Gwynedd Destination Management Plan (2013 - 2020).  Bourne Leisure therefore comments that specific reference should be added to PS10 to reflect the important role that tourism plays in ensuring a flourishing economy.	Do not accept – It is considered that other sections of the Plan adequately deal with the economic benefits deriving from tourism initiatives.  Recommendation  No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.  No change
1046	Welsh Government (Mr Mark Newey) [1561]	STRATEGIC POLICY PS10	Object	Welsh Government supports economic growth however, it is crucial that this economic growth meet the authorities' objectives. The authorities should clarify that oversupplying the market to this extent (approximately by 300ha) will not have negative implications for land values; nor hinder development from coming forward or jeopardise growth aspirations.	Accept - It is accepted that further explanation is required of the need to protect/allocate 807 ha of employment land. It is believed that the fact that the policy protects as well as allocates employment sites creates confusion.  The deposit version of the Plan also allocated new employment land, i.e. green field sites with no infrastructure. Those have also been included in the list in Policy CYF1. PS10, therefore, identifies

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					sites to meet existing and future employment needs. The provision has been dispersed across the Plan area and offers choice in terms of location and size. The provision of employment land provides an element of flexibility in terms of the choice available.
					Recommendation
					In order to improve clarity, it is proposed that the Strategic Policy is amended so as to include a further explanation regarding how the figure for employment land has been determined. It is proposed that the policy is amended in order to differentiate between the land allocated and what is being safeguarded.
					Focussed change: NF45, NF46, NF47
1166	Horizon Nuclear Power (Miss Sarah Fox) [2919]	STRATEGIC POLICY PS10	Object	Concerns about the lack of flexibility in relation to non-employment related development (B1, B2 and B8) on sites covered by the policy, particularly in relation to a change of use for legacy (e.g. to tourism) as this would reduce the overall availability of B1, B2 and B8 sites and therefore run counter to the intention for these to be employment sites. However, rather than seek for specific amendments to policies PS10, CYF1 and CYF2 however, Horizon proposes to rely on the Wylfa Newydd specific policies which will be the relevant policies against which to determine its associated development applications.	Do not accepted - It is acknowledged that it is possible that employment sites could remain unoccupied for a period of time without investment, and therefore, there are possibly grounds to permit alternative use (to employment) on some sites. It is noted, however, that the Employment Land Survey has noted the need to protect and allocate the sites in question (in policy CYF1) for employment use (Use Class B1, B2 or B8 mainly), following an assessment of needs and their real ability to come forward for the use in question. Therefore, the starting-point for employment use is the use favoured on those employment sites identified in Policy CYF1.
					There is an existing policy, Policy CYF4, which

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					provides an element of flexibility on employment sites for alternative uses in exceptional circumstances only, where strong evidence is available to justify doing so. It is in keeping with Planning Policy Wales and TAN23. Appendix 9 of the Deposit Plan identifies a series of supplementary planning guidance which will be prepared to support the Plan. It identifies an intention to prepare one which will provide guidance regarding the evidence required relating to alternative developments.  Recommendation  No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.  No Change
1301	Cyngor Dinas Bangor (Mr Gwyn Hughes) [1523]	STRATEGIC POLICY PS10	Object	The City Council is of the opinion that existing sites in Bangor accommodating such enterprises should be protected from redevelopment. Examples would be the small units at the rear of the upper part of the High Street and Station Road and the site between Sackville Road and Mentec.  More sites should be allocated for such uses in the JLDP so that small business start-ups would be encouraged in the interest of nurturing enterprise in the local economy.	Do not accept – An Employment Land Survey has been carried out, which has sought to identify the need for employment sites – that need has been reflected in the Plan. Therefore, it is not believed that it would be considerate to allocate more land for employment use.  The Plan in its current form permits creating new industrial units where appropriate.  Recommendation  No robust evidence was received which would justify amending the Deposit Plan to ensure the

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1412	NFU Cymru (Dafydd Jarrett) [3285]	STRATEGIC POLICY PS10	Object	NFU Wales would like to make the following general comments about the Development Management Policies included in the draft Plan. We are eager to ensure opportunities that would not prevent the following development:  • Expansion of existing businesses; • Re-use of existing rural buildings appropriate for employment opportunities; • Provide work units by adapting traditional rural buildings; • Diversification of the agricultural economy; • Support social and economic regeneration in rural areas; • Adapting and changing the use of redundant rural buildings outside development boundaries should be permitted to create employment use; • Viable scheme that can adapt to current faming and business demands so that they can prosper in the countryside.	Plan's soundness.  No Change  Do not accept – An Employment Land Survey has been carried out, which has sought to identify the need for employment sites – that need has been reflected in the Plan. Therefore, it is not believed that it would be considerate to allocate more land for employment use.  The Plan in its current form permits creating new industrial units where appropriate, in order to support rural economy and convert rural buildings.  Recommendation  No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.  No Change
1418	NFU Cymru (Dafydd Jarrett) [3285]	STRATEGIC POLICY PS10	Object	NFU Wales would like to make the following general comments about the Development Management Policies included in the draft Plan. We are eager to seek opportunities that would not prevent the following development:  • Initiatives required to satisfy the needs of contemporary farming and forestry. Also infrastructure including green energy, tourism and other initiatives	Comment noted  Recommendation  No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.

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				that would support a sustainable rural economy	No Change
1424	NFU Cymru (Dafydd Jarrett) [3285]	STRATEGIC POLICY PS10	Object	<ul> <li>NFU Wales would like to make the following general comments about the Development Management Policies included in the draft Plan. The Plan should:</li> <li>Make the most effective use of land in the area and there needs to be a specific reference in the Plan to the value of agriculture and local produce.</li> <li>Promote not farming growth and diversification</li> <li>Acknowledge the value of small holdings in Anglesey and Gwynedd as a way that young farmers can start and develop businesses.</li> <li>Acknowledge the value of agriculture and local food businesses to the local economy, employment opportunities and the Welsh language.</li> </ul>	Comment noted  Recommendation  No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.
1608	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	STRATEGIC POLICY PS10	Support	Water mains required for any potential development can be acquired through the water requisition provisions of the Water Industry Act 1991 (am amended). Any proposed site which requires the provision of non-potable water for process use will need further examination to understand how this requirement could be delivered. Sewerage required for any potential development site can be acquired through the sewer requisition provisions of the Water Industry Act 1991 (as amended).	Note the supporting comment.  Recommendation  No Change
1609	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	STRATEGIC POLICY PS10	Support	* Should potential end users of these sites result in the discharge of new or amended trade effluent then the written consent of DCWW is required.	Note the supporting comment.  Recommendation  No Change
1610	Dwr Cymru Welsh Water (Mr Dewi	STRATEGIC POLICY PS10	Support	* The proposed employment allocations represent a substantial area of land for development for which the potential demands are unknown at present. It is essential	Note the supporting comment.

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	Griffiths )			that we understand these demands in order to allow us to	Recommendation
	[2680]			assess the impact on our assets. It may be necessary for	
				water and sewerage modelling assessments to be	No Change
				undertaken to establish how we would provide the water	
				supply and where the proposed development could	
				connect to the public sewerage system. At this moment in	
				time, our response is on the basis of domestic demands	
				based on the area and location of the proposed	
				allocations.	

## CYF1 – Safeguarding and Allocating Land and Units for Employment Use

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
801	Menter laith Bangor (Mrs Branwen Thomas) [2762]	POLICY CYF1	Support	Fair employment is crucial to provide a basis for a stable community in Bangor - ensuring the success of the Welsh language. Welcoming the scheme that proposes to safeguard land and units on the existing employment sites in Bangor. There is a great need for a further development.  Recommend establishing a committee to examine the 21st century needs of the city of Bangor as one entity. There is a need to secure dwellings, infrastructure, employment and education opportunities, a shopping centre, a clean environment and appropriate amenities for the residents and all users of the city.  There is a need for the Committee to include representation of friends of the city.	Note the supporting comment.  Recommendation  No Change
826	Campaign for the Protection of Rural Wales (Mr Noel	POLICY CYF1	Object	CYF1 Comment on difference between safeguarded amount and target take-up rate of employment land.	Accept – It is agreed that there is a need to amend the Policy in order to gain more clarity regarding how the figure for the land to be protected and allocated has been determined.

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	Davey) [1169]				Recommendation
	[233]				For clarity, it is proposed that the Policy is amended to differentiate between employment land allocation and protection, together with further clarity regarding how the lands have been identified.
					Focussed change – NF47
					Do not accept
					Comment noted
883	Mr John Tripp [252]	POLICY CYF1	Object	Aim for Holyhead to develop industry:  * explore Wylfa B  * main port from Ireland	Recommendation  No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.
					No Change
					Do not accept
	Cyngor Cymuned			The Council is concerned that an industrial site is proposed in the Penrhosgarnedd area. The Council doesn't object to creating more employment sites, but it was considered	Comment noted
1010	Pentir (Mr			that this would add to the area's hustle and bustle. It must	Recommendation
1013	Dilwyn Pritchard) [1536]	POLICY CYF1	Object	be remembered that a lot of money has been spent during the last decade to develop Bryn Cegin Estate and the reasonable steps would be to get this site operational. It could also house the new science park being proposed for Gaerwen, Anglesey.	No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.
	NA/ a la la			From the constraint is a second of the district of the distric	No Change
1047	Welsh Government (Mr Mark	POLICY CYF1	Object	Further clarification is required on how the distribution of employment sites relate to the provision for housing. The housing commitments/ allocations are based on a	Accepted – It is agreed that it is appropriate to amend the table which includes the employment land allocations in order to highlight how it

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	Newey) [1561]			hierarchy of settlements and it would be helpful if the employment sites could be presented in a similar manner. It would also be helpful if further information could be provided on how the authorities have considered the interlinkages between the three main strategic employment sites along the A55 corridor, and that these are not in competition with each other and therefore creating problems of deliverability.	addresses the classification strategy.  The growth level in the Plan is based on a high economy in order to address the Plan's vision and objectives. It is a scenario which conveys the Councils' aspirations to maximise job increases within the local economy, especially in the last section of the Plan. The housing growth level reflects this. It is believed that this aspect makes the growth projections for the lifetime of the Plan more powerful than the projections based on trends, which do not reflect the Councils' aspirations (especially IACC) for the area. It is believed that providing a mix and range of high quality employment sites which are able to meet business and employer requirements is fundamental in order to ensure economic success. The significant proposals by the private sector, e.g. Horizon, will attract other employers and add to the skills pool available locally.  Recommendation  For clarity the employment sites table will be amended and split according to the relevant settlement. Further there will be a need to link this section of the Plan with the section which relates to housing growth.  Focused Change: NF45, NF46, NF47, NF48
1048	Welsh Government (Mr Mark Newey)	POLICY CYF1	Object	Further clarification is required to:  1. explain why the plan makes provision for approximately 478ha compared to a need for approximately 180ha of	Accept – It is agreed that it is appropriate to amend the policy in order to justify how much employment land is being allocated / protected.

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	[1561]			employment land as set out in the employment land review.  2. demonstrate that the implications of this over allocation for housing provision and the deliverability of the sites has been considered.  3. demonstrate that the employment assessment is in accordance with Welsh Government's "TAN 23: Economic Development (2014)"  4. explain what the implications would be on types of jobs (skills and salaries) and homes if land take were to exceed the 180ha over the plan period and whether the assessment work, especially the WLIA has taken account of this over-allocation.	There is a current Employment Land Study which has been carried out to assess the employment sites in order to select those most likely to meet today's business requirements as well as those in the future, due to their location and accessibility. This is in keeping with the Plan's sustainable objectives, and also provides a level of flexibility to consider alternative proposals (not within use class B1, B2 or B8 but which create jobs) by using specific criteria (Policy CYF4). This is in keeping with Planning Policy Wales (Section 7.5)  A number of the protected employment sites in Anglesey are protected and allocated to reflect the Island's status as an Enterprise Zone. Enterprise Zone sites receive support from the Welsh Government.  The monitoring framework will review the Plan, and if it is identified that too much employment land is being provided via the Plan, it will be possible to review this.  Recently, the Welsh Government has produced a paper which supports Technical Advice Note 23: Economic Development. This paper provides further guidance on the methodology of carrying out an employment study. The recommended methodology corresponds to the methodology used for our Employment Land Study. It is proposed (together with the Economic Development Departments of both Authorities) to maintain a database which will include current information regarding the employment uses that

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
					exist on the employment sites in question.  Recommendation — For clarity, it is proposed to amend the Policy to explain in more detail how the employment figure has been determined.  Focussed change: NF46, NF47, NF48  Partly accept - It is acknowledged that it is
1167	Horizon Nuclear Power (Miss Sarah Fox) [2919]	POLICY CYF1	Object	Concerns about the lack of flexibility in relation to non-employment related development (B1, B2 and B8) on sites covered by the policy, particularly in relation to a change of use for legacy (e.g. to tourism) as this would reduce the overall availability of B1, B2 and B8 sites and therefore run counter to the intention for these to be employment sites. However, rather than seek for specific amendments to policies PS10, CYF1 and CYF2 however, Horizon proposes to rely on the Wylfa Newydd specific policies which will be the relevant policies against which to determine its associated development applications.	possible that employment sites could remain unoccupied for a period of time without investment, and therefore there are possibly grounds to permit alternative use (to employment) on some sites. It is noted, however, that the Employment Land Survey has noted the need to protect and allocate the sites in question (in policy CYF1) for employment use (Use Class B1, B2 or B8 mainly), following an assessment of needs and their real ability to come forward for the use in question. Therefore, the starting-point for employment use is the use favoured on those employment sites identified in Policy CYF1.  There is an existing policy, Policy CYF4, which provides an element of flexibility on the employment sites for alternative uses in exceptional circumstances only, where strong evidence is available to justify doing so. It is in keeping with Planning Policy Wales and TAN23. Appendix 9 of the Deposit Plan identifies a series of supplementary planning guidance which will be prepared to support the Plan. It identifies an intention to prepare one which will provide guidance regarding the evidence required relating

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
					to alternative developments.
					Recommendation
					It is proposed that new wording is included in the explanation paragraphs to the policy CYF4 which will refer to the Supplementary Planning Guidance it is proposed to prepare in relation to change of use on employment sites.
					Minor Change: NB10
1401	Cyng/Counc Alwyn Gruffydd [381]	POLICY CYF1	Object	The provision of industrial land needs to be extended beyond the main centres to expand growth across the County. This would be a method of safeguarding communities by taking advantage of economic vitality.	Do not accept – A survey of Employment Lands has been carried out, which has identified the needs for employment land during the lifetime of the Plan. It is considered that adequate provision has been proposed, which include sites in y Ffôr.  Recommendation  No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.
					No Change

#### **CYF2** – Ancillary Uses on Employment Sites

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
1168	Horizon Nuclear Power (Miss Sarah Fox)	POLICY CYF2	Object	Concerns about the lack of flexibility in relation to nor- employment related development (B1, B2 and B8) on sites covered by the policy, particularly in relation to a change of use for legacy (e.g. to tourism) as this would reduce the	Partly accept - It is acknowledged that it is possible that employment sites could remain unoccupied for a period of time without investment, and therefore there are possibly grounds to permit

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
	[2919]			overall availability of B1, B2 and B8 sites and therefore run counter to the intention for these to be employment sites. However, rather than seek for specific amendments to policies PS10, CYF1 and CYF2 however, Horizon proposes to rely on the Wylfa Newydd specific policies which will be the relevant policies against which to determine its associated development applications.	alternative use (to employment) on some sites. It is noted, however, that the Employment Land Survey has noted the need to protect and allocate the sites in question (in policy CYF1) for employment use (Use Class B1, B2 or B8 mainly), following an assessment of needs and their real ability to come forward for the use in question. Therefore, the starting-point for employment use is the use favoured on those employment sites identified in Policy CYF1.  There is an existing policy, Policy CYF4, which provides an element of flexibility on the employment sites for alternative uses in exceptional circumstances only, where strong evidence is available to justify doing so. It is in keeping with Planning Policy Wales and TAN23. Appendix 9 of the Deposit Plan identifies a series of supplementary planning guidance which will be prepared to support the Plan. It identifies an intention to develop one which will provide guidance regarding the evidence required relating to alternative developments. It is not considered that robust information has been submitted which would justify amending the wording of the policy.  Recommendation  It is proposed that new wording is included in the explanation paragraphs to the policy CYF4 which will refer to the Supplementary Planning Guidance it is proposed to prepare in relation to change of use on employment sites.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
					Minor Change: NB10

#### CYF3 - No comments

## CYF4 – Alternative Uses of Employment Sites

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
798	First Investments Ltd [3091]	POLICY CYF4	Object	FIL object to the current wording of this policy which, instead of promoting investment and improvements to existing employment space, will result in, at best, retaining the status quo at Peblig Mill Industrial Estate owned which is characterised by old and, in some cases, defunct employment floorspace with a high proportion of vacancies. The policy should instead promote investment in existing employment stock and where necessary, promote alternative uses on the Peblig site that are capable of delivering investment and improvements to the overall quality of employment floorspace. FIL request that the policy be amended to include the following changes;  Create a further independent criterion which deals with poor quality employment sites, e.g. Peblig Industrial Estate, to permit alternative uses and the loss of some employment land where such development could deliver improvements to the remaining floorspace.	Partly accept - It is acknowledged that it is possible that employment sites could remain unoccupied for a period of time without investment, and therefore, there are possibly grounds to permit alternative use (to employment) on some sites. It is noted, however, that the Employment Land Survey has noted the need to protect and allocate the sites in question (in policy CYF1) for employment use (Use Class B1, B2 or B8 mainly), following an assessment of needs and their real ability to come forward for the use in question. Therefore, the starting-point for employment use is the use favoured on those employment sites identified in Policy CYF1.  There is an existing policy, Policy CYF4, which provides an element of flexibility on the employment sites for alternative uses in exceptional circumstances only, where strong evidence is available to justify doing so. It is in keeping with Planning Policy Wales and TAN23. Appendix 9 of the Deposit Plan identifies a series of supplementary planning guidance which will be prepared to support the Plan. It identifies an intention to develop one which will provide

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
					guidance regarding the evidence required relating to alternative developments. It is not considered that robust information has been submitted which would justify amending the wording of the policy.
					Recommendation
					It is proposed that new wording is included in the explanation paragraphs to the policy CYF4 which will refer to the Supplementary Planning Guidance it is proposed to prepare in relation to change of use on employment sites.
					Minor Change: NB10
827	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	POLICY CYF4	Object	CYF4 More flexibility sought in alternate use of sites.	Do not accept - It is acknowledged that it is possible that employment sites could remain unoccupied for a period of time without investment, and therefore there are possibly grounds to permit alternative use (to employment) on some sites. It is noted, however, that the Employment Land Survey has noted the need to protect and allocate the sites in question (in policy CYF1) for employment use (Use Class B1, B2 or B8 mainly), following an assessment of needs and their real ability to come forward for the use in question. Therefore, the starting-point for employment use is the use favoured on those employment sites identified in Policy CYF1.
					There is an existing policy, Policy CYF4, which provides an element of flexibility on the employment sites for alternative uses in exceptional circumstances only, where strong evidence is available to justify doing so. It is in

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
					keeping with Planning Policy Wales and TAN23. Appendix 9 of the Deposit Plan identifies a series of supplementary planning guidance which will be prepared to support the Plan. It identifies an intention to develop one which will provide guidance regarding the evidence required relating to alternative developments. It is not considered that robust information has been submitted which would justify amending the wording of the policy.  Recommendation  No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.  No Change
1169	Horizon Nuclear Power (Miss Sarah Fox) [2919]	POLICY CYF4	Object	It is not clear how the criteria of this policy would need to be met in order for land to be released and what evidence will be acceptable to the Councils in proving conformity to the policy. However, rather than seek for specific amendments to policy CYF4, Horizon proposes to rely on the Wylfa Newydd specific policies proposed below which will be the relevant policies against which to determine its associated development applications. For this reason Horizon is not proposing specific exclusion of its associated development from these policies	Partly accept – It is considered that adequate explanation has been included within the Policy. In due course, it is proposed to prepare a Supplementary Planning Guidance to provide further guidance regarding changing the use of Employment Sites.  Recommendation  It is proposed that new wording is included in the explanation paragraphs to the policy CYF4 which will refer to the Supplementary Planning Guidance it is proposed to prepare in relation to change of use on employment sites.  Minor Change: NB10

## CYF5 – Reuse and Conversion of Rural Buildings, Use of Residential Properties or New Build Units for Business / Industrial Use

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Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
332	Mr Geoff Wood [2916]	Policy CYF5	Object	Generally supportive of the policy. However, there are many existing vernacular rural buildings that are not structurally sound but are still largely intact which have heritage value. Under the policy currently drafted these would be lost. These types of building could however be repaired and viable uses reintroduced which would help to preserve the local character and/or the Welsh culture. The policy should reflect this.	No Change - It is acknowledged that there are traditional buildings that are an important part of the area's historic rural built environment. The clause which notes the need for a building to be structurally sound ensures that the development would not lead to creating new units. It's important for it to be possible to convert buildings without significant structural work, which therefore ensures that important historic characteristics are protected. It is intended to prepare a Supplementary Planning Guidance in due course, which would provide further guidance on what would be considered as a 'structurally sound' building. See Appendix 9 of the Deposit Plan. It is not considered that robust information has been submitted which would justify amending the wording of the policy.  Recommendation  No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.  No Change
884	Mr John Tripp [252]	Policy CYF5	Object	Farming and fishing - important sector, particularly mussels being exported to Holland.	No Change – Comment noted  Recommendation  No robust evidence was received which would

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
					justify amending the Deposit Plan to ensure the Plan's soundness.
					No Change

## CYF6 – Regeneration Sites

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
804	Barton Willmore (Mr Mark Roberts) [1645]	POLICY CYF6	Object	This policy seeks to promote economic growth and contribute to social and environmental objectives by facilitating urban renewal schemes, including for mixed use purposes for housing, employment, retail and leisure etc. However, the policy does not specify any specific regeneration sites despite the references within the Wales Spatial Plan to the mixed-use development of the former Dynamex Friction site in Caernarfon. Clearly, the former Dynamex Friction Site, given our representations to other policies of the Plan, falls within this policy approach.  The former Dynamex Friction site of 20 ha should be identified within this policy for regeneration and redevelopment for mixed use purposes including, employment, housing, and other appropriate uses.  This is necessary as the other policies of the Plan will not enable the redevelopment and regeneration of this vacant, contaminated and previously developed site, which is sustainably located in close proximity to Caernarfon.	Partly accept — The site in question has been identified as a site which will contribute towards the area's employment requirements. Policy CYF4 permits change of use on employment sites provided the proposals comply with a series of criteria.  Recommendation  It is proposed that new wording is included in the explanation paragraphs to the policy CYF4 which will refer to the Supplementary Planning Guidance it is proposed to prepare in relation to change of use on employment sites.  Minor Change: NB10

# **Employment Sites**

## 1) Bangor

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
786	Parc Bryn Cegin Cinema campaign (mrs Tammy Hales) [2745]	POLICY CYF1, C1 - Parc Bryn Cegin, Bangor	Object	We request the planning status of Parc Bryn Cegin, is changed from business planning employment, to include leisure planning permission status A1, A3, C1, D2 & D8. Thus creating;  1) Local employment,  2) Much needed leisure facilities,  3) Creating a tourist attraction and  4) Boosting the local economy.  If the planning status of Parc Bryn Cegin remain unchanged, it is likely the site will remain dormant.  To change the planning status of Parc Bryn Cegin from business planning employment, to include or ideally change to leisure planning permission status A1, A3, C1, D2 & D8.	Partially accept - Policy CYF4 promotes alternative uses on employment sites when justification for this has been accepted. Inevitably, when considering any alternative use, consideration would have to be given to the policies within the plan in its entirety, i.e. the policies that are relevant to the uses in question. It is not believed that robust evidence has been submitted which requires the Plan to be amended.  Recommendation  It is proposed that new wording is included in the explanation paragraphs to the policy CYF4 which will refer to the Supplementary Planning Guidance it is proposed to prepare in relation to change of use on employment sites.  Minor Change: NB10
1611	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C1 - Parc Bryn Cegin, Bangor	Object	The employment area represents a substantial area of land for development for which the potential demands are unknown at present. Once demands are known an assessment can be made of the extent of any off-site water mains that may be required. This site is crossed by a 250mm water main along its northern boundary which will restrict development density for the site. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.	The issues raised will receive further consideration during the planning application stage, through engagement with DCWW.  Recommendation

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
					No change is required to address the issues raised  No Change
1612	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C1 - Parc Bryn Cegin, Bangor	Object	A sewage pumping station (SPS) is located within the site and an assessment may be required to establish whether the flows from this site can be accommodated or whether future improvements to the SPS will be required to allow development to proceed. Should the existing sewerage infrastructure not be sufficient to accommodate the proposed level of growth the provision of sewerage infrastructure can be acquired through the sewer requisition provisions of the Water Industry Act 1991 (as amended).	Comment Noted  The issues raised will receive further consideration during the planning application stage, through engagement with DCWW.  Recommendation  No change is required to address the issues raised.  No Change
1613	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C1 - Parc Bryn Cegin, Bangor	Object	The site would eventually drain to the Bangor Beach Road SPS and an assessment of this SPS may be required to establish whether flows from this site can be accommodated or whether future improvements would be required to the SPS to allow development to proceed. The proposed growth being promoted for this settlement would require improvements at Treborth Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.	Comment Noted  The issues raised will receive further consideration during the planning application stage, through engagement with DCWW.  Recommendation  No change is required to address the issues raised.  No Change
1614	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C2 – Llandygai Industrial estate, Bangor	Object	The local water network located within the existing industrial estate is sufficient to provide the domestic water demands required to serve this development area.  The local sewerage network located within the existing industrial estate can accept the domestic foul flows arising from this development area.  The proposed growth being promoted for this settlement	Comment Noted  The issues raised will receive further consideration during the planning application stage, through engagement with DCWW.  Recommendation

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				would require improvements at Treborth Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.	No change is required to address the issues raised  No Change
1615	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C3 - Parc Britannia, Bangor	Object	Our local water network is sufficient to provide the domestic water demands required to serve this development area.  The public sewerage network can accept the domestic foul flows arising from this development area.  The proposed growth being promoted for this settlement would require improvements at Treborth Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.	The issues raised will receive further consideration during the planning application stage, through engagement with DCWW.  Recommendation  No change is required to address the issues raised.  No Change
1616	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C4 - Parc Menai, Bangor	Object	Our local water network is sufficient to provide the domestic water demands required to serve this development area.  The public sewerage network can accept the domestic foul flows arising from this development area  The proposed growth being promoted for this settlement would require improvements at Treborth Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions	Comment Noted  The issues raised will receive further consideration during the planning application stage, through engagement with DCWW.  Recommendation  No change is required to address the issues raised.  No Change

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
1441	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoria dau Cynllunio) [1521]	POLICY CYF1, C16 - Bae Hirael, Bangor	Object	This site is located directly adjacent to Traeth Lafan Special Protection Area, Y Fenai a Bae Conwy Special Area of Conservation, Traeth Lafan Site of Special Scientific Interest and Traeth Lafan Local Nature Reserve. Any proposal to develop the site will need to demonstrate that it will not have an adverse effect on the site features. The requirements of the 2010 Habitat Regulations apply. Drainage proposals for development will need to take into account the proximity of protected sites and in particular any nearby watercourses that are hydrologically connected to protected sites, ensuring that discharges do not affect water quality within protected sites.	Do not accept  Comment noted – in accordance with the relative policies included within the Local Development Plan along with national policy the necessary consideration will be given to any nearby environmental designation.  Recommendation - No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.  No Change
1634	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C16 - Bae Hirael, Bangor	Object	Our local water network should be sufficient to provide the domestic water demands required to serve this development area.  Off-site sewers would be required to connect to the public sewerage network. These can be provided through the sewer requisition scheme under Sections 98-101 of the Water Industry Act 1991.  The proposed growth being promoted for this settlement would require improvements at Treborth Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.	The issues raised will receive further consideration during the planning application stage, through engagement with DCWW.  Recommendation  No change is required to address the issues raised.  No Change

## 2) Amlwch

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
824	Cyngor Tref	POLICY CYF1,	Object	Council feel there should be an option on the C28 area-	Partially accept - Policy CYF4 promotes alternative

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
	Amlwch (Mrs M Hughes) [1266]	C28 - Former Shell Site, Amlwch		industry and dwellings - starter homes	uses on employment sites when justification for this has been accepted. Inevitably, when considering any alternative use, consideration would have to be given to the policies within the plan in its entirety, i.e. the policies that are relevant to the uses in question. It is not believed that robust evidence has been submitted which requires the Plan to be amended.  Recommendation  It is proposed that new wording is included in the eplanation paragraphs which will refer to the Supplementary Planning Guidance it is proposed to prepare in relation to change of use on employment sites.  Minor Change: NB10
1649	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C28 - Former Shell Site, Amlwch	Support	Our local water network is sufficient to provide the domestic water demands required to serve this development area. The public sewerage network can accept the domestic foul flows arising from this development area. Potential developers need to be aware that the site is crossed by a sewer. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset. Amlwch Wastewater Treatment Works can accommodate the foul flows from the domestic demands arising from this development area	Note supporting comment  Recommendation  No Change
1650	Dwr Cymru Welsh Water (Mr Dewi	POLICY CYF1, C29 - Llwyn Onn Industrial	Support	Our local water network is sufficient to provide the domestic water demands required to serve this development area. Potential developers need to be aware	Note supporting comment

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
	Griffiths ) [2680]	Estate, Amlwch		that this site is crossed by water main and protection measures in the form of easement widths or a diversion of the pipe would be required.	Recommendation  No Change
1651	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C29 - Llwyn Onn Industrial Estate, Amlwch	Support	The public sewerage network can accept the domestic foul flows arising from this development area. Potential developers need to be aware that the site is crossed by a sewer. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.	Note supporting comment  Recommendation  No Change
				Amlwch Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.	

## 3) Holyhead

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
1283	Mon a Gwynedd Friends of the Earth (Mr Richard Mills) [2937]	POLICY CYF1, C11 - Parc Cybi, Holyhead	Object	The Cae Glas area is shown as an employment site but is wildlife rich and prone to flooding. It should be protected from economic/industrial development.	Do not accept – There was no wildlife allocation on the site, and the site is not within a flood zone.  Recommendation - Robust evidence was not received to justify amending the Deposit Plan in order to ensure the soundness of the Plan.  No Change
1626	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C11 - Parc Cybi, Holyhead	Support	This site is crossed by 90mm and 125mm water mains along the western and eastern boundaries which may restrict development density for the site. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times. Protection measures in	Note supporting comment  Recommendation  No Change

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				respect of these assets will be required either in the form	
				of an easement width or a possible diversion of the asset.	
1627	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C11 - Parc Cybi, Holyhead	Support	Holyhead Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.	Note supporting comment  Recommendation  No Change
1686	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C11 - Parc Cybi, Holyhead	Support	The site is crossed by pumped rising sewer main which may restrict development density for the site. Ty Mawr Sewage Pumping Station (SPS) is located within the site and an assessment of the SPS will be required to establish whether all the flows from the proposed allocation can be accommodated or whether future improvements to the SPS will be required to allow all the proposed development to proceed. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.	Note supporting comment  Recommendation  No Change
1628	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C12 – Penrhos Industrial Estate, Caergybi	Support	Our local water network should be sufficient to provide the domestic water demands required to serve this development area.  The public sewerage network can accept the domestic foul flows arising from this development area.  The site is located adjacent to Holyhead WwTW which may give rise to odour, fly and noise nuisance for any development in close proximity to the works. As such your authority may wish to consider providing a buffer zone between the works and any proposed development site.  Holyhead Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands	Note supporting comment  Recommendation  No Change

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				arising from this development area.	
				Our local water network is sufficient to provide the domestic water demands required to serve this development area.	Note supporting comment  Recommendation
1652	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C30 – Anglesey Aluminium, Caergybi	Support	* The public sewerage network can accept the domestic foul flows arising from this development area. Potential developers need to be aware that the site is crossed by a sewer. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.	No Change
1653	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C30 – Anglesey Aluminium, Caergybi	Support	The site is located adjacent to Holyhead WwTW which may give rise to odour, fly and noise nuisance for any development in close proximity to the works. As such your authority may wish to consider providing a buffer zone between the works and any proposed development site.  * Holyhead Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.	Note supporting comment  Recommendation  No Change
1654	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C31 - Former Eaton Electrical, Caergybi	Support	Our local water network is sufficient to provide the domestic water demands required to serve this development area.	Note supporting comment  Recommendation  No Change
1655	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C31 - Former Eaton Electrical, Caergybi	Support	Holyhead Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.	Note supporting comment  Recommendation  No Change
1689	Dwr Cymru Welsh Water	POLICY CYF1, C31 - Former	Object	Potential developers need to be aware that the site is crossed by a sewer. Under the Water Industry Act 1991	Comment Noted

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
	(Mr Dewi Griffiths ) [2680]	Eaton Electrical, Caergybi		Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset. There are isolated incidents of flooding in the public sewerage system that may 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 S106 of the Town & Country Planning Act 1990.	The issues raised will receive further consideration during the planning application stage, through engagement with DCWW.  Recommendation  No change is required to address the issues raised.  No Change
1656	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C32 - Kingsland, Caergybi	Support	Our local water network is sufficient to provide the domestic water demands required to serve this development area. Potential developers need to be aware that this site is crossed by water main and protection measures in the form of easement widths or a diversion of the pipe would be required, which may impact upon the density achievable on site	Note supporting comment  Recommendation  No Change
1657	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C32 - Kingsland, Caergybi	Support	Holyhead Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.	Note supporting comment  Recommendation  No Change
1690	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C32 - Safle Kingsland, Caergybi	Support	Potential developers need to be aware that the site is crossed by a sewer. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset. There are isolated incidents of flooding in the public sewerage system that may 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	Comment Noted  The issues raised will receive further consideration during the planning application stage, through engagement with DCWW.  Recommendation  No change is required to address the issues raised.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				regulator Ofwat, or progress the improvements through the sewerage requisition provisions of the Water Industry Act 1991 or S106 of the Town & Country Planning Act 1990.	No Change
				I am objecting to a Conservation Area containing numerous residential amenities being shown as being land marked for business use.	Do not accept - Holyhead Port is protected as a reserve employment site, specifically as it has been identified as an Enterprise Zone site by the Welsh Government, to contribute towards the Energy Island Programme's objectives. As noted in the Policy, justification would be required of the need
829	Robert Llewelyn Jones [3058]	POLICY CYF1, C35 – Holyhead Port, Caergybi	Object	The area is covered by the SPG for Holyhead Beach and by a lease held by the County Council.	to develop it for employment opportunities within use class B1, B2 or B8. Allocating the land does not prohibit any plans which could be associated with improving the Port.
				To show clearly on the constraints map that this area is not for the extension of the Port facilities and has to be retained as a public open space.	Recommendation - No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.  No Change
1286	Mon a Gwynedd Friends of the Earth (Mr Richard Mills) [2937]	POLICY CYF1, C35 – Holyhead Port, Caergybi	Object	In the area shown as an employment site, Newry Beach should be protected from economic/ industrial development.	Do not accept - Holyhead Port is protected as a reserve employment site, specifically as it has been identified as an Enterprise Zone site by the Welsh Government, to contribute towards the Energy Island Programme's objectives.  Recommendation - Robust evidence was not received to justify amending the Deposit Plan in order to ensure the soundness of the Plan.  No Change
1382	Conygar StenalineLtd [3304]	POLICY CYF1, C35 – Holyhead Port,	Object	The inclusion of the port area as an Energy Island Programme "reserve site" within Policy CYF1 is unnecessarily restrictive and detrimental to the port's long	<b>Do not accept</b> - Holyhead Port is protected as a reserve employment site, specifically as it has been identified as an Enterprise Zone site by the Welsh

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
		Caergybi		This policy is fundamentally flawed and conceived without an understanding of the challenges and opportunities the port faces over the plan period.	Government, to contribute towards the Energy Island Programme's objectives. As noted in the Policy, justification would be required of the need to develop it for employment opportunities within use class B1, B2 or B8. Allocating the land does not prohibit any plans which could be associated with improving the Port.
				Policy CYF1 conflicts with the objectives of Policy CYF7 and the role which the port can play in the regeneration of the town and tourism promotion.	Recommendation - No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.  No Change
				There is sufficient alternative land in Holyhead allocated for employment uses (200+ ha) to support the exclusion of the port from this policy.	
				Proposed amendment to Policy CYF1 to delete any reference to Holyhead Port as a "reserve site" (C35wg) for the purposes of the Anglesey Energy Island Programme.	
1662	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C35 – Holyhead Port, Caergybi	Support	Our local water network should be sufficient to provide the domestic water demands required to serve this development area. The sewerage network in the area is extensive and where sewers cross potential development sites this will restrict development density for the site, and protection measures in respect of these assets will be required. A number of Sewage Pumping Stations (SPS) are located in the area and may need assessment to ascertain their capacity dependant on the location and type of	Note supporting comment  Recommendation  No Change

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				development proposed.	

## 4) Llangefni

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
1629	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C13 - Bryn Cefni Industrial Estate, Llangefni	Support	Our local water network should be sufficient to provide the domestic water demands required to serve this development area.  The sewerage network in the area is extensive and where sewers cross potential development sites this will restrict development density for the site, and protection measures in respect of these assets will be required. Llangefni Main Sewage Pumping Station is located in the area and may need assessment to ascertain its capacity dependant on the location and type of development proposed.  Llangefni Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.	Note supporting comment  Recommendation  No Change
1053	Welsh Government (Mr Mark Newey) [1561]	POLICY CYF1, C14 – Land to the north of Lledwigan Farm	Object	The potential loss of BMV land could result in the permanent loss of approximately 40 hectares. The majority of the land is included in allocations TRA1, C14 and C15 and the plan has limited evidence to demonstrate that paragraph 4.10 has been considered at all in allocating these sites for development.	Do not accept - Best and Most Versatile (BMV) agricultural land was one of many considerations taken into account when assessing sites for employment purposes, in line with para 4.10.1 PPW.  Through the spatial strategy and site deliverability assessment process the Council has exhausted all other potential means to deliver the employment needs in Llangefni.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
					Recommendation - Robust evidence was not received to justify amending the Deposit Plan in order to ensure the soundness of the Plan.  No Change  Do not accept – The Employment Land Survey identifies the need for a main employment site in
1402	Bob Parry & Co Ltd [3342]	POLICY CYF1, C14 – Land to the north of Lledwigan Farm	Object	Include the Dafarn Newydd site as an alternative to the Lledwigan Farm site. The proposed alternative site for employment in Llangefni is a sustainable development proposal. The suggested site at Dafarn Newydd is an appropriate addition to the settlement, and would perform better against the LDP's criteria than site C14 at Lledwigan Farm.	Llangefni. This allocation reflects the allocation included within the Unitary Development Plan (stopped in 2005). Other potential options and locations were assessed, however, it was concluded that the Lledwigan Farm site was more suitable due to its accessibility to the A55. Allocating the site is in keeping with the Plan's classification strategy, as Llangefni is identified as a service Centre. Furthermore, it is noted that the site has been identified as an enterprise zone by the Welsh Government, in an attempt to realise the Energy Island Programme's objectives. The Enterprise Zone allocation is a sign of national and local commitment to develop the site for employment purposes.
					Recommendation - No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.  No Change
1630	Dwr Cymru Welsh Water (Mr Dewi Griffiths )	POLICY CYF1, C14 – Land to the north of Lledwigan	Support	Our local water network should be sufficient to provide the domestic water demands required to serve this development area	Note supporting comment  Recommendation

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
	[2680]	Farm			No Change
1631	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C14 – Land to the north of Lledwigan Farm	Support	Llangefni Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.	Note supporting comment  Recommendation  No Change
1687	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C14 – Land to the north of Lledwigan Farm	Support	The site is crossed by a pumped rising foul main which may restrict development density for the site. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset. The site is adjacent to a pumped rising main and Llangefni Main SPS. An assessment of the SPS may be required to establish whether the flows can be accommodated or whether improvements to the SPS' will be required to allow development to proceed. Off-site sewers would be required to connect to the nearest point of adequacy on the sewerage network.	Note supporting comment  Recommendation  No Change
1054	Welsh Government (Mr Mark Newey) [1561]	POLICY CYF1, C15 – Creamery Land, Llangefni	Object	The potential loss of BMV land could result in the permanent loss of approximately 40 hectares. The majority of the land is included in allocations TRA1, C14 and C15 and the plan has limited evidence to demonstrate that paragraph 4.10 has been considered at all in allocating these sites for development.	Do not accept - Best and Most Versatile (BMV) agricultural land was one of many considerations taken into account when assessing sites for employment purposes, in line with para 4.10.1 PPW.  Through the spatial strategy and site deliverability assessment process the Council has exhausted all other potential means to deliver the employment needs in Llangefni.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
					<b>Recommendation</b> - Robust evidence was not received to justify amending the Deposit Plan in order to ensure the soundness of the Plan.
					No Change
1632	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C15 – Creamery Land, Llangefni	Support	This site is crossed by a 400mm water main which will restrict development density for the site. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset	Note supporting comment  Recommendation  No Change
1633	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C15 – Creamery Land, Llangefni	Support	Llangefni Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.	Note supporting comment  Recommendation  No Change
1688	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C15 – Creamery Land, Llangefni	Support	The site is adjacent to a pumped rising main and Llangefni Main SPS. Off-site sewers would be required to connect to the nearest point of adequacy on the sewerage network. The provision of sewerage for the potential development site can be acquired through the sewer requisition provisions of the Water Industry Act 1991 (as amended). An assessment of the SPS may be required to establish whether the flows can be accommodated or whether improvements to the SPS' will be required to allow development to proceed. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.	Note supporting comment  Recommendation  No Change
999	Watkin Jones (Mr Stuart Hardy) [3159]	Map 4 - Llangefni	Object	Land at Tan y Capel, Llangefni. The above information, which is supplemented by a comprehensive sustainability appraisal of the site, indicates that the site is suitable for employment uses and should be included for allocation	Do not accept - The representation seeks the inclusion of the site for employment purposes. The Employment Land Review which has been carried out has comprehensively assessed the required

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				within the JLDP. The site is accessible, available, deliverable and developable and can help Anglesey/Gwynedd meet its employment land requirements throughout the plan period. The site is therefore considered to be appropriate to be brought forward due to its highly sustainable location in Llangefni, which is recognised within the JLDP as a priority area for development.	need for employment land during the plan period and as a result the Plan provides for there the recognised need. No information was submitted which emphasised that the requirement was beyond that identified. Also no information was submitted to support the suitability of the objection site as opposed to other sites which have been allocated within the Plan.  Recommendation - No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.
					No Change
1002	Owen Devenport Ltd (Mr Berwyn Owen) [2755]	Map 4 - Llangefni	Object	Land at Dafarn Newydd, Llangefni. The proposed alternative site for employment in Llangefni is a sustainable development proposal. The suggested site at Dafarn Newydd is an appropriate addition to the settlement, and would perform better against the LDP's criteria than C14 at Lledwigan Farm.	Do not accept – The Employment Land Survey identifies the need for a main employment site in Llangefni. This allocation reflects the allocation included within the Unitary Development Plan (stopped in 2005). Other potential options and locations were assessed, however, it was concluded that the Lledwigan Farm site was more suitable due to its accessibility to the A55. Allocating the site is in keeping with the Plan's classification strategy, as Llangefni is identified as a service Centre. Furthermore, it is noted that the site has been identified as an enterprise zone by the Welsh Government, in an attempt to realise the Energy Island Programme's objectives. The Enterprise Zone allocation is a sign of national and local commitment to develop the site for employment purposes.
					<b>Recommendation</b> - No robust evidence was received which would justify amending the Deposit

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
					Plan to ensure the Plan's soundness.
					No Change

## 5) Blaenau Ffestiniog

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
1636	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C18 - Safle Tanygrisiau, Blaenau Ffestiniog	Support	Our local water network should be sufficient to provide the domestic water demands required to serve this development area.  The public sewerage network can accept the domestic foul flows arising from this development area.  Blaenau Ffestiniog Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area	Note supporting comment  Recommendation  No Change
433	Ffestiniog Town Council (Mrs Ann Coxon) [2940]	CYF1, C18  TANYGRISIAU  BLAENAU  FFESTINIOG	Support	On the proposals map, Ffestiniog Town Council supports the designation on land surrounding Rehau as a zone to be developed for industry. Space is needed to enable business to expand.	Note the supporting comment  Recommendation  No Change

#### 6) Caernarfon

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
1617	Dwr Cymru Welsh Water	POLICY CYF1, C5 – Cibyn	Object	Our local water network is sufficient to provide the domestic water demands required to serve this	Comment Noted
1617	(Mr Dewi Griffiths )	Industrial Estate,	Object	development area.	The issues raised will receive further consideration during the planning application stage, through

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
	[2680]	Caernarfon		The public sewerage network can accept the domestic foul flows arising from this development area. Part of the site is crossed by a surface water sewer which may restrict development density for the site. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.	engagement with DCWW.  Recommendation  No change is required to address the issues raised.  No Change
1618	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C5 – Cibyn Industrial Estate, Caernarfon	Object	The proposed growth being promoted for this settlement would require improvements at Caernarfon Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.	Comment Noted  The issues raised will receive further consideration during the planning application stage, through engagement with DCWW.  Recommendation  No change is required to address the issues raised.  No Change
799	First Investments Ltd [3091]	POLICY CYF1, C19 - Peblig, Caernarfon	Object	FIL object to the current wording of this policy which, instead of promoting investment and improvements to existing employment space, will result in, at best, retaining the status quo at Peblig Mill Industrial Estate owned which is characterised by old and, in some cases, defunct employment floorspace with a high proportion of vacancies. The policy should instead promote investment in existing employment stock and where necessary, promote alternative uses on the Peblig site that are capable of delivering investment and improvements to the overall quality of employment floorspace.	Partially accept - Policy CYF4 promotes alternative uses on employment sites when justification for this has been accepted. Inevitably, when considering any alternative use, consideration would have to be given to the policies within the plan in its entirety, i.e. the policies that are relevant to the uses in question. It is not believed that robust evidence has been submitted which requires the Plan to be amended.  Recommendation

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				FIL request that the policy be amended to include the following changes;  ② Recognise the viability and vacancy issues in relation to this site and support the redevelopment of existing sites in need of investment;  ② Promote alternative uses where they are able to support such redevelopment/investment at the Peblig site potentially through a link to an amended draft Policy CYF4;  ② Remove hierarchal approach to employment allocations, particularly given the differences in definitions between the Evidence Base and Draft Policy	It is proposed that new wording is included in the explanation paragraphs to the policy CYF4 which will refer to the Supplementary Planning Guidance it is proposed to prepare in relation to change of use on employment sites.  Minor Change: NB10
1637	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C19 - Peblig, Caernarfon	Object	Our local water network should be sufficient to provide the domestic water demands required to serve this development area. This site is crossed by a water main which will restrict development density for the site. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.	Comment Noted  The issues raised will receive further consideration during the planning application stage, through engagement with DCWW.  Recommendation  No change is required to address the issues raised.  No Change
1638	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C19 - Peblig, Caernarfon	Object	Potential developers need to be aware that the site is crossed by a sewer. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or	Comment Noted  The issues raised will receive further consideration during the planning application stage, through

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				a possible diversion of the asset.	engagement with DCWW.
				The proposed growth being promoted for this settlement would require improvements at Caernarfon Wastewater	Recommendation
				Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier	No change is required to address the issues raised.
				through developer contributions.	No Change

# 7) Porthmadog

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
1086	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoria dau Cynllunio) [1521]	POLICY CYF1, C8 – Porthmadog Business Park	Object	The whole site is within flood zone C1. However, flood modelling work suggests that the actual risk to the site is low due to the flood defences within the area. NRW would expect any planning application to be supported by a Flood Consequence Assessment to ensure that development is adequately protected.	Do not accept – The majority of the land protected has already been developed. A Stage 2 Strategic Flood Consequence Assessment has been carried out by Gwynedd Consultancy for Porthmadog Business Park, which shows that there is only a small flood risk in this area.  Recommendation - No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.  No Change
1623	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C8 – Porthmadog Business Park	Support	Our local water network is sufficient to provide the domestic water demands required to serve this development area.  Off-site sewers would be required to connect to the public sewerage network. These can be provided through the sewer requisition scheme under Sections 98-101 of the	Note supporting comment  Recommendation  No Change

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				Water Industry Act 1991	
				Porthmadog Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area	

## 8) Pwllheli

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
105	Cyfoeth Naturiol Cymru (Mr Gareth Thomas) [2757]	POLICY CYF1, C6 - Adwy'r Hafan, Pwllheli	Object	Site C6 is within flood zone C1 of Welsh Government's TAN15: Development Advice Maps. The flood risk has not been assessed. Locating a new employment unit within the site would contradict national policy TAN15. The SFCA, section 9.3 states that none of the allocations fall within zones C1 or C2. There may be risk of flooding due to a breach of the defences (sand dunes) along the eastern boundary, and the potential for flood water to enter the site from over the quay wall to the west of the site.	Do not accept – the majority of the land protected has already been developed.  Employment use, according to TAN15: Development and Flood Risk, is considered as a 'less vulnerable' development. In accordance with TAN15, development applications in C1 and C2 Flood Zones should be considered in cases where it is possible to prove that developments contribute towards key employment objectives, supported by the Local Authority and other partners, in order to sustain a settlement or region. Any potential planning application on the site would have to comply with the requirements outlined in TAN15 and be supported by a comprehensive Flood Consequence Assessment.  Recommendation - No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.  No Change
1082	Cyfoeth Naturiol	POLICY CYF1, C6 - Adwy'r	Object	The land is located within flood zone C1 of the Welsh Government's TAN15: Development Advice Maps.	<b>Do not accept -</b> Comment noted. The points raised will be further considered when a planning

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
	Cymru / Natural Resource Wales (Ymgynhoria dau Cynllunio) [1521]	Hafan, Pwllheli		Developing this land for employment use would contradict national policy guidance contained within TAN15. NRW considers that the flood risk associated with this site has not been adequately assessed.  NRW recommends that either a stage 2 or stage 3 SFCA is prepared and forwarded to NRW for further assessment to demonstrate that developing this site for employment use would comply with the requirements of TAN15 or that development brought forward under this allocation includes no erection of new employment units within the site.	application is submitted, together with any site development briefs which will be prepared.  Recommendation - No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.  No Change
1619	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C6 - Adwy'r Hafan, Pwllheli	Support	Our local water network is sufficient to provide the domestic water demands required to serve this development area.  A sewage pumping station (SPS) is located within the site and an assessment may be required to establish whether the flows from this site can be accommodated or whether future improvements to the SPS will be required to allow development to proceed. Should the existing sewerage infrastructure not be sufficient to accommodate the proposed level of growth the provision of sewerage infrastructure can be acquired through the sewer requisition provisions of the Water Industry Act 1991 (as amended).	Note supporting comment  Recommendation  No Change
1620	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C6 - Adwy'r Hafan, Pwllheli	Support	Pwllheli Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area	Note supporting comment  Recommendation  No Change

## 13) Gaerwen

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
1658	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C33 – Gaerwen Industrial Estate, Gaerwen	Object	Our local water network is sufficient to provide the domestic water demands required to serve this development area. Potential developers need to be aware that this site is crossed by water main and protection measures in the form of easement widths or a diversion of the pipe would be required, which may impact upon the density achievable on site.	Comment Noted  The issues raised will receive further consideration during the planning application stage, through engagement with DCWW.  Recommendation  No change is required to address the issues raised.  No Change
1659	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C33 – Gaerwen Industrial Estate, Gaerwen	Object	The proposed employment allocations in Gaerwen represent a substantial area of land for development for which the potential demands are unknown at present. It is essential that we understand these demands in order to allow us to assess the capacity of Gaerwen Wastewater Treatment Works (WwTW) to accept the domestic demands from this development area.	Comment Noted  The issues raised will receive further consideration during the planning application stage, through engagement with DCWW.  Recommendation  No change is required to address the issues raised.  No Change
1691	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C33 – Gaerwen Industrial Estate, Gaerwen	Object	There are isolated incidents of flooding in the public sewerage system that may 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	Comment Noted  The issues raised will receive further consideration during the planning application stage, through engagement with DCWW.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				of the Water Industry Act 1991 or \$106 of the Town& Country Planning Act 1990. A hydraulic modelling assessment is required to determine an adequate point of connection to the public sewer and potential developers would be expected to fund investigations during preplanning stages. Off-site sewers would be required to connect to the sewerage network from parts of the site, which can be acquired through the sewer requisition provisions of the Water Industry Act 1991 (as amended).	Recommendation  No change is required to address the issues raised.  No Change
1663	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C33 – Gaerwen Industrial Estate, Gaerwen	Object	Off-site water mains may be required to serve the site. These can be provided through a water requisition scheme under Sections 41 - 44 of the Water Industry Act 1991.	The issues raised will receive further consideration during the planning application stage, through engagement with DCWW.  Recommendation  No change is required to address the issues raised.  No Change
1664	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C36 – Extension to Gaerwen Industrial Estate, Gaerwen	Object	The proposed employment allocations in Gaerwen represent a substantial area of land for development for which the potential demands are unknown at present. It is essential that we understand these demands in order to allow us to assess the capacity of Gaerwen Wastewater Treatment Works (WwTW) to accept the domestic demands from this development area.	Comment Noted  The issues raised will receive further consideration during the planning application stage, through engagement with DCWW.  Recommendation  No change is required to address the issues raised.  No Change

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
1692	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C36 – Extension to Gaerwen Industrial Estate, Gaerwen	Object	There are isolated incidents of flooding in the public sewerage system that may 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 S106 of the Town & Country Planning Act 1990. A hydraulic modelling assessment is required to determine an adequate point of connection to the public sewer and potential developers would be expected to fund investigations during preplanning stages. Off-site sewers would be required to connect to the sewerage network from parts of the site, which can be acquired through the sewer requisition provisions of the Water Industry Act 1991 (as amended).	Comment Noted  The issues raised will receive further consideration during the planning application stage, through engagement with DCWW.  Recommendation  No change is required to address the issues raised.  No Change
1180	Llanfihangel Esc Community Council (Alun Foulkes) [3121]	POLICY CYF1, C38 - Parc Gwyddoniaeth Menai	Object	Creating a new employment site (C38) is totally inappropriate for the village for a number of reasons such as the effect of traffic, surface water, sewerage and the visual impact. There is already a large employment allocation already in Gaerwen which is over half the size of the village with a number of empty/vacant land and units.	Do not accept – By now, planning permission has been granted for the site in question, therefore there is a firm intention to develop the site.  Recommendation - No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.  No Change
1287	Mon and Gwynedd Friends of the Earth (Mr Richard Mills) [2937]	POLICY CYF1, C38 - Parc Gwyddoniaeth Menai	Object	This should be continued as a farm, ideally as an educational/demonstration resource.	Do not accept – By now, planning permission has been granted for the site in question, therefore there is a firm intention to develop the site.  Recommendation - No robust evidence was received which would justify amending the Deposit

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
					Plan to ensure the Plan's soundness.  No Change
1666	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C38 - Parc Gwyddoniaeth Menai	Support	Our local water network should be sufficient to provide the domestic water demands required to serve this development area.	Note supporting comment  Recommendation  No Change
1667	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C38 - Parc Gwyddoniaeth Menai	Object	The proposed employment allocations in Gaerwen represent a substantial area of land for development for which the potential demands are unknown at present. It is essential that we understand these demands in order to allow us to assess the capacity of Gaerwen Wastewater Treatment Works (WwTW) to accept the domestic demands from this development area.	The issues raised will receive further consideration during the planning application stage, through engagement with DCWW.  Recommendation  No change is required to address the issues raised.  No Change
1694	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C38 - Parc Gwyddoniaeth Menai	Object	There are isolated incidents of flooding in the public sewerage system that may 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. A hydraulic modelling assessment is required to determine an adequate point of connection to the public sewer and potential developers would be expected to fund investigations during preplanning stages. Off-site sewers would be required to connect to the sewerage network from parts of the site, which can be acquired through the sewer requisition provisions of the Water Industry Act 1991 (as amended).	The issues raised will receive further consideration during the planning application stage, through engagement with DCWW.  Recommendation  No change is required to address the issues raised.  No Change

#### 21) Bethesda

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
1635	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C17 - Felin Fawr, Bethesda	Support	Our local water network should be sufficient to provide the domestic water demands required to serve this development area.  * Potential developers need to be aware that the site is crossed by a sewer. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.	Note supporting comment  Recommendation  No Change
				Tregarth Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area	

## 23) Llanberis

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
1641	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C21 - Glynrhonwy, Llanberis	Support	Our local water network should be sufficient to provide the domestic water demands required to serve this development area.  The public sewerage network can accept the domestic foul flows foul flows arising from this development area. Glan Rhonwy Sewage Pumping Station is located in the area and may need assessment to ascertain its capacity dependant on the type of development proposed.  Llanberis Wastewater Treatment Works (WwTW) can	Note supporting comment  Recommendation  No Change

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				accommodate the foul flows from the domestic demands	
				arising from this development area.	

## 25) Nefyn

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
1645	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C25 – Nefyn Industrial Estate, Nefyn	Support	Our local water network is sufficient to provide the domestic water demands required to serve this development area. There are isolated incidents of flooding in the public sewerage system that may 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.Morfa Nefyn Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.	Note supporting comment  Recommendation  No Change

## 26) Penrhyndeudraeth

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
1621	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C7 - Penrhyndeudr aeth, Business Park	Support	The local water network located within the existing industrial estate is sufficient to provide the domestic water demands required to serve this development area.  A sewage pumping station (SPS) is located within the site and an assessment may be required to establish whether the flows from this site can be accommodated or whether future improvements to the SPS will be required to allow development to proceed. Should the existing sewerage	Note supporting comment  Recommendation  No Change

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				infrastructure not be sufficient to accommodate the proposed level of growth the provision of sewerage infrastructure can be acquired through the sewer requisition provisions of the Water Industry Act 1991	
1622	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C7 - Penrhyndeudr aeth, Business Park	Support	Penrhyndeudraeth Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area	Note supporting comment  Recommendation  No Change
	[2000]			1) Reclassify former hospital from B1 use to C3 & C2 use  2) Correct land area mistake in CYF1 and other tables (1.6ha not 16ha)  Building is former NHS hospital (C2 and Grade 2 listed)	Partially accept - The policy will need to be amended in order to include the correct land area.  The employment land survey has identified the need for the site as an employment site, and therefore, it is proposed to continue with the protection.
1284	Duncan Teed [289]	POLICY CYF1, C22 – Former Ysbyty Bron y Garth, Penrhyndeudr aeth	Object	<ul> <li>- Building is former NHS hospital (C2 and Grade 2 listed)</li> <li>- Deposit Plan changed use class to B1</li> <li>- Have examined B1 usage and buildings not physically suitable for conversion to B1, Grade 2 listed</li> <li>- No demand for additional business units (vacant units in Penrhyndeudraeth and Blaenau Ffestiniog). Change to B1 not commercially viable</li> <li>- Building needs development to stop deterioration - builder advises to convert to apartments.</li> <li>- Good access onto A496 and tarmac car parks</li> <li>- East side (0.8ha) undeveloped and could develop into</li> </ul>	Recommendation – For accuracy the site area on the table in Policy CYF should be amended.  Focus Change: NF47
				- East side (0.8ha) undeveloped and could develop into housing or employment (hotel, garden centre etc)	

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
1442	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoria dau Cynllunio) [1521]	POLICY CYF1, C22 – Former Ysbyty Bron y Garth, Penrhyndeudr aeth	Object	Part of this site is located within Ysbyty Bron y Garth Site of Special Scientific Interest. We would recommend that a design guide is prepared to guide development at the former Bron y Garth Hospital site.	Comment noted - consideration will be given to a Site of Special Scientific Interest when a planning application is submitted.  Recommendation - No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.  No Change
1642	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C22 – Former Ysbyty Bron y Garth, Penrhyndeudr aeth	Support	Our local water network is sufficient to provide the domestic water demands required to serve this development area.  * The public sewerage network can accept the domestic foul flows foul flows arising from this development area. The foul flows would lead to Penrhyndeudraeth Pumping Station (SPS) and an assessment of this SPS may be needed to establish whether the flows can be accommodated or whether improvements to the SPS will be required to allow development to proceed.  * Penrhyndeudraeth Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area	Note supporting comment  Recommendation  No Change
1083	Cyfoeth Naturiol Cymru / Natural Resource Wales	POLICY CYF1, C39 – Griffin Industrial Estate, Penrhyneudra eth	Object	The land is located within flood zone C2 of the Wdsh Government's TAN15: Development Advice Maps. Developing this land for employment use would contradict national policy guidance contained within TAN15.  NRW recommends that either a stage 2 or stage 3 SFCA is	Do not accept – The majority of the land protected has already been developed.  Employment use, according to TAN15: Development and Flood Risk, is considered as a 'less vulnerable' development. In accordance with

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
	(Ymgynhoria dau Cynllunio) [1521]			prepared and forwarded to NRW for further assessment to demonstrate that developing this site for employment use would comply with the requirements of TAN15 or that development brought forward under this allocation includes no erection of new employment units within the site.	TAN, development applications in C1 and C2 Flood Zones should be considered in cases where it is possible to prove that developments contribute towards key employment objectives, supported by the Local Authority and other partners, in order to sustain a settlement or region. Any potential planning application on the site would have to comply with the requirements outlined in TAN15 and be supported by a comprehensive Flood Consequence Assessment.  Recommendation - No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.  No Change
106	Cyfoeth Naturiol Cymru (Mr Gareth Thomas) [2757]	POLICY CYF1, C39 – Griffin Industrial Estate, Penrhyneudra eth	Object	C39: Griffin Industrial Estate, Penrhyndeudraeth - is within flood zone C2 of Welsh Government's TAN15:  Development Advice Maps. Locating a new employment unit within the site would contradict national policy TAN15. The SFCA, section 9.3 states that none of the allocations fall within zones C1 or C2. The flood risk has not been assessed.  Either a stage 2/stage 3 SFCA submitted that demonstrates the site would comply with TAN15 requirement, or that no NEW employment units to be provided within this site.	Do not accept – The majority of the land protected has already been developed.  Employment use, according to TAN15: Development and Flood Risk, is considered as a 'less vulnerable' development. In accordance with TAN, development applications in C1 and C2 Flood Zones should be considered in cases where it is possible to prove that developments contribute towards key employment objectives, supported by the Local Authority and other partners, in order to sustain a settlement or region. Any potential planning application on the site would have to comply with the requirements outlined in TAN15 and be supported by a comprehensive Flood Consequence Assessment.  Recommendation - No robust evidence was

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
					received which would justify amending the Deposit Plan to ensure the Plan's soundness.
					No Change
				Our local water network is sufficient to provide the domestic water demands required to serve this	Note supporting comment
				development area.	Recommendation
1681	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C39 – Griffin Industrial Estate, Penrhyneudra eth	Support	The public sewerage network can accept the domestic foul flows foul flows arising from this development area. The foul flows would lead to Penrhyndeudraeth Pumping Station (SPS) and an assessment of this SPS may be needed to establish whether the flows can be accommodated or whether improvements to the SPS will be required to allow development to proceed.	No Change
				Penrhyndeudraeth Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.	
				The local water network located within the existing	Note supporting comment
				industrial estate is sufficient to provide the domestic water	
				demands required to serve this development area.	Recommendation
1621	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C7 - Penrhyndeudr aeth, Business Park	Support	A sewage pumping station (SPS) is located within the site and an assessment may be required to establish whether the flows from this site can be accommodated or whether future improvements to the SPS will be required to allow development to proceed. Should the existing sewerage infrastructure not be sufficient to accommodate the proposed level of growth the provision of sewerage infrastructure can be acquired through the sewer requisition provisions of the Water Industry Act 1991	No Change
1622	Dwr Cymru Welsh Water	POLICY CYF1, C7 -	Support	Penrhyndeudraeth Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic	Note supporting comment

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
	(Mr Dewi	Penrhyndeudr		demands arising from this development area	Recommendation
	Griffiths )	aeth, Business			
	[2680]	Park			No Change

## 27) Penygroes

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
1643	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C23 – Penygroes Industrial Estate, Penygroes, Gwynedd	Support	Our local water network is sufficient to provide the domestic water demands required to serve this development area. Potential developers need to be aware that the site is crossed by a number of sewers. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.  Penygroes is served by Llanllyfni Wastewater Treatment Works (WwTW) which can accommodate the foul flows from the domestic demands arising from this development area.	Note supporting comment  Recommendation  No Change
926	Mr Robert Jones [3107]	Map 27 - Penygroes, Gwynedd	Object	We wish to object to the development boundary proposed for the Local Service Centre of Penygroes. We wish to propose a site adjacent to the Industrial Estate to be included within the development boundary of Penygroes. The inclusion of the site within the development boundary of Penygroes would therefore be considered as a logical extension to the development boundary to provide a mix of commercial, community and leisure development which could include community services including a petrol filling station and retail shop, together with leisure services including a tourist information centre and tourist related workshops.	Do Not Accept – It is considered that the Plan doesn't prohibit the types of development which are suggested within the objection, provided that the site is appropriate and lies directly adjacent to the development boundary. When considering retail development reference should be made to the considerations as set out in section 10.3 of Planning Policy Wales (Edition 8, 2016).  Further, reference should also be made to Policy ISA2: Community Facilities which highlights the considerations relating to leisure and community

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				We wish to see the development boundary for Penygroes reviewed and altered to include the site adjacent to the Industrial Estate within the development boundary which would form a logical extension to the development boundary to provide a mix of commercial, community and leisure development which could include community services including a petrol filling station and retail shop, together with leisure services including a tourist information centre and tourist related workshops.	uses on appropriate sites adjacent to the development boundary.  Therefore, it isn't considered necessary to amend the boundary in accordance with the objection.  Recommendation - No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.
				, and the second	No Change

## 28) Tywyn

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
1624	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C9 – Pendre Industrial Estate, Tywyn	Support	Our local water network is sufficient to provide the domestic water demands required to serve this development area.  The public sewerage network can accept the domestic foul flows arising from this development area.  Tywyn Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.	Note supporting comment  Recommendation  No Change

## 39) Y Ffôr

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
	Council for	POLICY CYF1,		We support C10 around the garage (Tir Dolwar). While we	Partially accept - Policy CYF4 promotes alternative
1385	the	C10 - Adjacent	Object	note that the 2.8ha C27 employment site (Industrial estate,	uses on employment sites when justification for
	Protection of	to the petrol		partly includedin the GUDP, is still vacant, we suggest that	this has been accepted. Inevitably, when

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
	Rural Wales (Mr Noel Davey) [1169]	station, Y Ffor		C10 should therefore be allocated flexibly, whether to housing or employment, depending on emerging priorities and development proposals.	considering any alternative use, consideration would have to be given to the policies within the plan in its entirety, i.e. the policies that are relevant to the uses in question.  The safeguarded employment site will also be amended to include the previous employment site. However the extent of the allocation won't
					reflect the whole objection site.  Recommendation
					It is proposed that new wording is included in the explanation paragraphs to the policy CYF4 which will refer to the Supplementary Planning Guidance it is proposed to prepare in relation to change of use on employment sites.
					Minor Change: NB10
1625	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C10 - Adjacent to the petrol station, Y Ffor	Object	* Our local water network is sufficient to provide the domestic water demands required to serve this development area.  * The public sewerage network can accept the domestic foul flows arising from this development area.  * The proposed growth being promoted for this settlement would require improvements at Y Ffor Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions	The issues raised will receive further consideration during the planning application stage, through engagement with DCWW.  Recommendation  No change is required to address the issues raised.  No Change
1647	Dwr Cymru Welsh Water	POLICY CYF1, C27 - Y Ffôr	Object	* Our local water network is sufficient to provide the domestic water demands required to serve this	Comment Noted

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
	(Mr Dewi Griffiths ) [2680]	Industrial Estate, Y Ffôr		development area.  * The public sewerage network can accept the foul flows arising from this development area. Potential developers need to be aware that the site is crossed by a sewer. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset	The issues raised will receive further consideration during the planning application stage, through engagement with DCWW.  Recommendation  No change is required to address the issues raised.  No Change
1648	Dwr Cymru Welsh Water (Mr Dewi Griffiths ) [2680]	POLICY CYF1, C27 - Y Ffôr Industrial Estate, Y Ffôr	Object	* The proposed growth being promoted for this settlement would require improvements at Y Ffor Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.	The issues raised will receive further consideration during the planning application stage, through engagement with DCWW.  Recommendation  No change is required to address the issues raised.  No Change

## 53) Llangristiolus

0	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				Land adj Llanfawr Newydd. The above information, which	<b>Do not accept –</b> The respersntation seeks the
	Watkin Jones			is supplemented by a comprehensive sustainability	inclusion of the site for employment purposes. The
1014	(Mr Stuart	Map 53 -	Object	appraisal of the site, indicates that the site holds strategic	Employment Land Review which has been carried
1014	Hardy)	Llangristiolus	Object	importance in Anglesey and should be allocated for a range	out has comprehensivly assessed the required
	[3159]			of uses (light industrial/commercial/mixed uses/leisure)	need for employment land during the plan period
				that can be brought forward during the plan period. In	and as a result the Plan provides for ther the

0	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				summary, the site has excellent access; could be an enabling factor in the initiating of development on the adjacent service station site, would increase the critical mass or gravity pull with investors and would provide synergy between mixed used development and employments.	recognised need. No information was submitted which emphasised tat the requirement was byond that identified. Also no information was submitted to support the suitability of the objection site as opposed to other sites which have been allocated within the Plan.
					Recommendation - No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.  No Change

## II) Ferrodo

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
	Barton	POLICY CYF1,		Only partially identifies the extent of the former Friction Dynamex site as being allocated and subject to a policy support for development. This allocation is therefore artificially and inaccurately defined, and does not reflect the extent of the previously developed land on the site.  The plan needs to provide a more flexible, responsive and	Partially accept - Policy CYF4 promotes alternative uses on employment sites when justification for this has been accepted. Inevitably, when considering any alternative use, consideration would have to be given to the policies within the plan in its entirety, i.e. the policies that are relevant to the uses in question.
1404	Willmore (Mr Mark Roberts) [1645]	C20 - Former Friction Dynamex Site, Caernarfon	Object	pragmatic approach to redeveloping this site. The site whilst potentially appropriate for B2 development is unlikely ever to secure such development as a single occupant. Perpetuating this policy approach will unlikely result in the development of the site for B2 uses.	The safeguarded employment site will also be amended to include the previous employment site. However the extent of the allocation won't reflect the whole objection site.
				The site should be deleted from Policies PS10 and CYF1 and identified as a specific regeneration / mixed use	Recommendation
				development site.	It is proposed that new wording is included in the explanation paragraphs to the policy CYF4 which

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				Reference should be made to the presumption in favour of sustainable development.	will refer to the Supplementary Planning Guidance it is proposed to prepare in relation to change of use on employment sites.  The safeguarded employment site will also be
					amended for clarity.  Focussed change: NF132
	Dwr Cymru	CYF1, C20 -		Our local water network should be sufficient to provide the domestic water demands required to serve this development area.  An extensive distance of off-site sewers would be required	The issues raised will receive further consideration during the planning application stage, through engagement with DCWW.
1639	Welsh Water (Mr Dewi Griffiths ) [2680]	Former Friction Dynamex Site, Caernarfon	Object	to connect to the public sewerage system. Where no public sewerage facilities are available then the provisions of Circular 10/99 Planning Requirement in respect of the 'Use of Non-Mains Sewerage Incorporating Septic Tanks in New Development' apply and consultation with the	Recommendation  No change is required to address the issues raised.
				Environment Agency is required. The provision of sewerage for the potential development site can be acquired through the sewer requisition provisions of the Water Industry Act 1991 (as amended).	No Change
					Comment Noted
1640	Dwr Cymru Welsh Water (Mr Dewi Griffiths )	CYF1, C20 - Former Friction Dynamex Site,	Object	If a connection was made to the public sewerage network, the proposed growth being promoted for this settlement would require improvements at Caernarfon Wastewater Treatment Works (WwTW) which would need to be funded	The issues raised will receive further consideration during the planning application stage, through engagement with DCWW.
	[2680]	Caernarfon		through our Asset Management Plan or potentially earlier through developer contributions.	Recommendation  No change is required to address the issues raised.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
					No Change

# The Visitor Economy

#### **Context and Introduction**

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
294	Cyfeillion Llyn (Mrs Sian Parri) [2871]	7.3.46	Object	It should be clearly noted that there is conflict between promoting tourism in the traditional way and safeguarding the Welsh language.	The plan should not be read in isolation. The Welsh language has been a consideration in formulating the vision, objectives, strategies and policies of the Plan since its inception. The potential effects of the Plan on the Welsh language were considered during the Sustainability Assessment process (including the SEA), which was informed by a Language Impact Assessment. Attention should be given to the various policies of the Plan and topic papers, as well as the SPG for: planning obligations and, maintaining and creating sustainable communities.  Recommendation  No robust evidence was submitted which would justify amending the Deposit Plan to ensure the Plan's soundness.  No Change
191	Kingsbridge Caravan Park	7.3.47	7.3.47 Support	Tourism associated with caravan and camping	Note the Support
171	(Mr Andrew Bate) [2778]	7.5.47	Jupport	parks brings a significant amount of money into	The plan acknowledges the importance of tourism

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				the Anglesey and Gwynedd areas. This is "new"	to the economy of the plan area.
				money which is injected into the local economy. I	
				would like to see a more positive approach, by	Recommendation
				the authorities, toward the development and	
				quality of existing caravan and camping parks.	No change
				Park owners need to gain some reward from	
				their investments.	

#### PS11 – The Visitor Economy

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
184	Ellesmere Sand & Gravel Company Limited [2686]	STRATEGIC POLICY PS11	Object	Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as educational facilities, fishing lakes, water sports centres, mountain biking tracks, quad biking, high wire facilities, rock climbing opportunities, amphitheatre for concerts, hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate. All the abovementioned facilities will create employment and support rural economies and should be supported on previously used land in the rural area.  Allow scope and flexibility in the policy for alternative and viable end uses of mineral sites where appropriate.	Accepted Policies TWR1: Visitor Attractions and Facilities, TWR2: Holiday Accommodation, TWR3: Static Caravan, Chalet Sites and Permanent Alternative Camping Accommodation allow for suitable developments on suitable previously developed land which includes minerals and waste sites (PPW, 2014, figure 4.3)  Recommendation No changes to policy but include the definition of the term, "Previously developed land" in the Glossary of terms to ensure that the policy can be easily interpreted.  Focussed Change NF111
185	Lafarge Tarmac Trading Limited [2735]	STRATEGIC POLICY PS11	Object	Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites	Note the Support Policies TWR1: Visitor Attractions and Facilities,

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				that when restored can provide facilities such as educational facilities, fishing lakes, water sports centres, mountain biking tracks, quad biking, high wire facilities, rock climbing opportunities, amphitheatre for concerts, hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate. All the above mentioned facilities will create employment and support rural economies and should be supported on previously used land in the rural area.  Allow scope and flexibility in the policy for alternative and viable end uses of mineral sites	TWR2: Holiday Accommodation, TWR3: Static Caravan, Chalet Sites and Permanent Alternative Camping Accommodation allow for suitable developments on suitable previously developed land which includes minerals and waste sites (PPW, 2014, figure 4.3)  Recommendation No changes to policy but include the definition of the term, "Previously Developed Land" in the Glossary of terms to ensure that the policy can be easily interpreted.  Focussed Change NF111
				where appropriate	
340	Mr Geoff Wood [2916]	STRATEGIC POLICY PS11	Object	Self-catering accommodation, such as cottages and apartments, has a significant contribution towards the visitor economy and these types of facility are not considered within Strategic Policy PS11 at the moment.	Accepted Agree that the self-catering industry plays an important role in the tourism of the Plan Area.  Recommendation Amend point 3 of policy to include "holiday cottages and apartments" to ensure the internal consistency of the plan.
					Focussed Change NF51
456 &	Bourne Leisure Ltd [2768]	STRATEGIC POLICY PS11	Object	Bourne Leisure endorses PS11 in principle as it supports the development of a year-round local tourism industry. However, Bourne Leisure considers that point 3 should be redrafted to read:	Accepted Agree that PS11 should aim to improve the quality of the existing tourism developments  Recommendation
761				"Managing, and enhancing the provision of high quality un-serviced tourism accommodation in the form of camping, alternative luxury camping,	Amend point 3 to include the word "enhancing" to ensure the internal consistency of the plan  Focussed Change NF51

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
741	Tom Brooks [3034]	STRATEGIC POLICY PS11	Object	static or touring caravan or chalet parks."  Policy PS11 as drafted threatens further development of tourist accommodation through the conversion of existing property to tourist accommodation. Borth-y-Gest already has more than 60% holiday homes or tourist units.  Outside peak summer period Borth-y-Gest is not quite a ghost village but further holiday homes would rapidly make it so.  PS11 should be amended to read "preventing development that would have an unacceptable adverse effect on tourist attractions, including those developments that could have an adverse impact on pretty villages, including the presence of the Welsh culture and developments that could damage all year round life in tourist	Not Accepted  The criteria within policy TWR2: Holiday Accommodation aims to prevent the loss of permanent housing stock, harm the residential character of an area and avoid over concentration of holiday accommodation within areas.  Recommendation The proposed change to the text is not required to ensure the soundness of the plan.  No Change
777	Cyngor Cymuned Botwnnog (Mrs Gwenda Roberts) [1541]	STRATEGIC POLICY PS11	Object	The Plan refers to the visitor economy - if this is to be effective, roads, footpaths and cycle paths should be developed and improved. There is an immediate need for the Council to consider these for the benefit of the local residents as well as tourists. If the facilities leading to this special Peninsula were improved, it might be possible to establish an industry here and therefore reduce the numbers who are unemployed.	Not Accepted The Visitor Economy section should not be read in isolation. The plan should be read as whole. The plan contains a suite of policies and supporting text that explains how development should be managed.  Recommendation This change is not required as it is covered in other parts of the plan and in national policy.  No change
785	Campaign for the Protection of Rural Wales	STRATEGIC POLICY PS11	Object	We acknowledge the important role of caravans in tourism in the JLDP area. Our principal concern	Not Accepted Touring caravan sites are considered more

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
	(Mr Noel Davey) [1169]			is landscape damage from overdevelopment, increasing permanence of tourers and lack of adequate screening of sites. We argue that the moratorium on new static sites should be extended to touring sites, at least in designated areas, while small additions to existing sites should continue to be permitted in exchange for genuine improvements in visual impact. Tackling these issues would contribute to achieving higher quality rather than a larger quantity of caravan tourism accommodation at the expense of the landscape, implicitly in line with point 3 of PS11. Such improvements should be sought more vigorously and implemented more effectively for all exposed sites, including single statics on individual properties (see submission CPRW23). These concerns should be reflected in strategic policies for tourism.	acceptable in land use planning terms as having less impact on the landscape than static caravan sites because, by their very nature, they have transient features which do not impose permanent, year round effects on the local environment. Policy TWR5 aims to reduce the landscape impact of new and extended touring caravan and camping sites. The policy also does not allow for winter storage of caravans and they should be removed from the site when not in use.  Paragraph 7.3.72 states that the councils will require strong evidence for proposals that further units of accommodation on or near the coastline and in the AONBs will not harm the character of the natural resources.  Recommendation The change is not required to ensure the soundness of the plan.  No Change
791	Caravan Club [3039]	STRATEGIC POLICY PS11	Object	In summary the policies relating to tourist accommodation are considered to be overly restrictive and lacking in clarity on the type of development which is acceptable on existing touring caravan sites. The policy should be amended to ensure that the plan does not affect the ability of local tourist businesses from adapting to the changing needs of the visitor economy and does not impact on the future economic viability of these businesses which support local economies, employments and communities.	Not Accepted The Plan acknowledges the importance of tourism and makes plenty of provision for tourism developments. The plan also acknowledges that many of the tourist destinations in the Plan area are in places of high environmental and landscape importance and that any potential development is appropriate in scale and nature to be sympathetic to the character of the area.  Recommendation No robust evidence was submitted which would

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				justify amending the Deposit Plan to ensure the Plan's soundness.
				No Change
				Note the Support
Bangor Civic Society 1 (Don Mathew) [2988]	STRATEGIC POLICY PS11	Support	Policy PS11 is supported.	Recommendation
(2000)				No change
				Comment noted
NFU Cymru (Dafydd Jarrett) [3285]	STRATEGIC POLICY PS11	Object	NFU Wales would like to make the following general comments about the Development Management Policies included in the draft Plan. Opportunities that would not prevent the following development:  * Initiatives linked to appropriate tourism;  * Leisure, but not if they aren't appropriate to a countryside location and another land use in the locality, including agriculture.	The Plan acknowledges the importance of tourism to rural areas and that any potential new developments need to be appropriate in scale and nature to be sympathetic to the character of the area.  Recommendation  No change required to address the representation  No change
				NO Change
	Bangor Civic Society 1 (Don Mathew) [2988]	Bangor Civic Society 1 STRATEGIC (Don Mathew) [2988] POLICY PS11  NFU Cymru (Dafydd STRATEGIC	Bangor Civic Society 1 (Don Mathew) [2988] STRATEGIC POLICY PS11 Support  NFU Cymru (Dafydd STRATEGIC Ohiect	Bangor Civic Society 1 (Don Mathew) [2988]  STRATEGIC POLICY PS11  Support Policy PS11 is supported.  NFU Wales would like to make the following general comments about the Development Management Policies included in the draft Plan. Opportunities that would not prevent the following development:  * Initiatives linked to appropriate tourism; * Leisure, but not if they aren't appropriate to a countryside location and another land use in the

#### TWR1 – Visitor Attractions and Facilities

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
186	Ellesmere Sand & Gravel	POLICY TWR1	Object	Recreation and tourism uses are viable end uses	Accepted

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	Company Limited [2686]			of previously used land at mineral extraction sites that when restored can provide facilities such as educational facilities, fishing lakes, water sports centres, mountain biking tracks, quad biking, high wire facilities, rock climbing opportunities, amphitheatre for concerts, hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate. All the abovementioned facilities will create employment and support rural economies and should be supported on previously used land in the rural area.  Remove reference to development boundary. Allow scope and flexibility in the policy for alternative and viable end uses of mineral sites	Policies TWR1: Visitor Attractions and Facilities, allow for suitable developments on suitable previously developed land which includes minerals and waste sites (PPW, 2014, figure 4.3)  Recommendation  No change to policy but include the definition of the term, "Previously Developed Land" in the Glossary of terms to ensure that the policy can be easily interpreted  Focussed Change NF111
187	Lafarge Tarmac Trading Limited [2735]	POLICY TWR1	Object	where appropriate  Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as educational facilities, fishing lakes, water sports centres, mountain biking tracks, quad biking, high wire facilities, rock climbing opportunities, amphitheatre for concerts, hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate. All the abovementioned facilities will create employment and support rural economies and should be supported on previously used land in the rural area.  Remove reference to development boundary. Allow scope and flexibility in the policy for alternative and viable end uses of mineral sites	Accepted  Policies TWR1: Visitor Attractions and Facilities, allow for suitable developments on suitable previously developed land which includes minerals and waste sites (PPW, 2014, figure 4.3)  Recommendation  No change to policy but include the definition of the term, "Previously Developed Land" in the Glossary of terms to ensure that the policy can be easily interpreted  Focussed Change NF111

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				where appropriate	
					Note the Support
396	Welsh Highland Railway (Mr Graham Farr) [254]	POLICY TWR1	Support	Support.	Recommendation  No change
					-
457 & 744	Bourne Leisure Ltd [2768]	POLICY TWR1	Object	Policy TWR1 should therefore be redrafted to allow for the sensitive development / reconfiguration / expansion of tourist accommodation that fall outside the settlement boundary, providing that commensurate mitigation measures (for example, the inclusion of a buffer zone and appropriate landscaping) can be implemented to mitigate both direct and indirect impacts.	Not Accepted National policy guidance states that development in the open countryside, away from existing settlements must be strictly controlled. Criteria 1—3 provide a degree of flexibility for developments that are not located within or adjacent development boundaries.  Recommendation The change is not required to ensure the soundness of the plan.  No Change
1170	Horizon Nuclear Power (Miss Sarah Fox) [2919]	POLICY TWR1	Object	Clarification is required as to what is meant by "development boundary". Rather than seek for specific amendments to policy TWR1, Horizon proposes to rely on the Wylfa Newydd specific policies proposed below which will be the relevant policies against which to determine its associated development applications. For this reason Horizon is not proposing specific exclusion of its associated development from this policy.	Not Accepted The purpose of development boundaries is to direct most development to sites that are within settlements in order to regulate development and to protect the open countryside from inappropriate development. The Plan recognises that some types of development may require a countryside location.  It is believed that an adequate emphasis is placed on the Wylfa Newydd project and the economic advantages that would derive from it in the plan. There are other policies within the Plan which include planning principles, which would need to

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					be referred to when responding to applications associated with Wylfa Newydd.
					Recommendation  No robust evidence was submitted which would justify amending the Deposit Plan to ensure the Plan's soundness.
					No Change

## TWR2 – Holiday Accommodation

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
190	Ellesmere Sand & Gravel Company Limited [2686]	POLICY TWR2	Support	Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate. This policy is supported as long as mineral extraction sites are considered previously developed sites at point 4.	Policies TWR2: Holiday Accommodation, allow for suitable developments on suitable previously developed land which includes minerals and waste sites (PPW, 2014, figure 4.3)  Recommendation  No change to policy but include the definition of the term, "Previously Developed Land" in the Glossary of terms to ensure that the policy can be easily interpreted  Focussed Change NF111
193	Lafarge Tarmac Trading Limited [2735]	POLICY TWR2	Support	Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as	Note the Support Policies TWR2: Holiday Accommodation, allow for suitable developments on suitable previously

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate. This policy is supported as long as mineral extraction sites are considered previously developed sites at point 4.	developed land which includes minerals and waste sites (PPW, 2014, figure 4.3)  Recommendation  No change to policy but include the definition of the term, "Previously Developed Land" in the Glossary of terms to ensure that the policy can be easily interpreted
					Focussed Change NF111
342	Mr Geoff Wood [2916]	POLICY TWR2	Object	It is difficult to quantify what an over-concentration of holiday accommodation is, which leads to a lack of certainty for applicants.  Delete or amend part 8 "That the development does not lead to an over-concentration of such accommodation within the area."	Accepted Amend the policy's explanation. An SPG will be published to provide more information about the matter.  Recommendation No change to the policy but including new wording in the policy's explanation to ensure the policy can be easily interpreted.
					Focussed Change NF52
344	Mr Geoff Wood [2916]	POLICY TWR2 C	Object	Support the principle of the policy and in particular part 4, however it does not take account of preserving vernacular buildings with heritage value. In some circumstances, these can be viably developed to help preserve local character and / or Welsh heritage.  Amend part 4 to read "In the case of new build accommodation, that the development is located within a development boundary, or makes use of	Not Accepted The Visitor Economy section should not be read in isolation. The plan should be read as whole. The plan contains a suite of policies and supporting text that explains how development should be managed.  Recommendation This change is not required as it is covered in
				a suitable previously developed site or involves the reuse of a heritage asset that helps preserve local character and/or the Welsh culture"	other parts of the plan and in national policy.  No change

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742	Tom Brooks [3034]	POLICY TWR2	Object	Much of the loss of housing units for local families has been created by the conversion of existing buildings into "permanently serviced and self-serviced holiday accommodation". This is a deeply damaging trend for villages such as Borthy-Gest. TWR2 needs amending to protect against any further loss of family accommodation. It currently carries a presumption of granting permission and the caveats are non-specific and undefinable.  TWR2 should be amended to delete point 2 (conversion of exiting buildings). A new policy should be added to permit conversion of existing buildings only in the higher ranked settlements in the settlement strategy.	Point 6, 7 and 8 of the policy aims to reduce the impact of holiday accommodation on permanent homes and residential areas.  Recommendation The change is not required to ensure the soundness of the plan.  No Change
1072	Welsh Government (Mr Mark Newey) [1561]	POLICY TWR2	Object	The policy would be strengthened with an explanation of where the Councils consider 'overconcentration' (Clause 8) of certain accommodation might be a risk.	Accepted Include reasoned justification in the policy's explanation. An SPG will be published to provide more information about the matter.  Recommendation No change to the policy but including new wording in the policy's explanation to ensure the policy can be easily interpreted.  Focussed Change NF52
1171	Horizon Nuclear Power (Miss Sarah Fox) [2919]	7.3.55	Object	This comment applies to paragraphs 7.3.55 - 7.3.80 - Horizon is concerned to ensure that these paragraphs do not impact the construction worker accommodation. Rather than seek for specific amendments to these paragraphs, Horizon proposes to rely on the Wylfa Newydd specific policies proposed above which would be	Not Accepted It is believed that an adequate emphasis is placed in the Plan on the Wylfa Newydd project and the economic advantages that would derive from it. There are other policies within the Plan which include planning principles, which would need to be referred to when responding to applications

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				the relevant policies against which to determine associated development applications.	associated with Wylfa Newydd.
					Recommendation  No robust evidence was submitted which would justify amending the Deposit Plan to ensure the Plan's soundness.
					No Change

# TWR3 – Static Caravan and Chalet Sites and Permanent Alternative Camping Accommodation

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
96	ВН&НРА [2733]	POLICY TWR3	Object	Policy TWR3 should adjudge planning applications for holiday caravan parks located within the AONB and SLA's against a common set of criteria which should apply to all parks. If development proposals can demonstrate significant environmental improvements to the design, layout and appearance of a holiday park then they should be encouraged regardless of where they are located. If the overall impact of an existing site is reduced and/or significant economic benefits would result, then there is no sound reason to preclude against additional pitches. The incentive needs to be there to assist in funding these often expensive development projects.  Amended Policy	Not Accepted Topic Paper 9: Tourism highlighted the high density of Static Caravan and Chalet Parks that exist along on or near the coast, including extensive parts of the AONB.  The Isle of Anglesey, Gwynedd and Snowdonia National Park Landscape Sensitivity and Capacity Study was commissioned to manage development such as static caravan and chalet sites by identifying and protecting sensitive and distinct areas from inappropriate development. The primary objective for designating Areas of Outstanding Natural Beauty is the conservation and enhancement of their natural beauty therefore they must be afforded the highest status of protection from inappropriate

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				1. Delete Point 3 2. Amend Point 4 to allow proposals to improve existing static caravan and chalet sites by allowing minor extension to site area, and/or The relocation of units and/or, A minor increase in the number of units on site subject to detailed criteria. See full submission for detailed text.	developments. The cumulative impacts of static caravan and chalet developments within the Areas of Outstanding Natural Beauty can be obtrusive in the landscape and damaging to the character of the rural area unless strictly controlled. Special Landscape Areas are nonstatutory local designations. Their aim is to ensure that the landscape is not damaged by inappropriate development. The sensitivity and capacity study concluded that within the Area of Outstanding Natural Beauty and Special Landscape Areas (and all areas that contribute to their setting), it is considered that there is typically no capacity for further static caravan/chalet park developments or extensions.  A similar approach taken on static and chalet park has been taken in neighbouring authorities and other Local Planning Authorities in Wales.  Recommendation  No robust evidence was submitted which would justify amending the Deposit Plan to ensure the Plan's soundness.  No Change
197	Kingsbridge Caravan Park (Mr Andrew Bate) [2778]	POLICY TWR3	Object	Whilst I would agree with the proposal to refuse the development of NEW parks within the AONB, consideration should be given to the proposal to restrict the increase in numbers of units in AONB areas. This may lead to increased demand for second homes from visitors. The effects of this are evident in Rhosneigr and Trearddur Bay.	Not Accepted Topic Paper 9: Tourism highlighted the high density of Static Caravan and Chalet Parks that exist along on or near the coast, including extensive parts of the AONB.  The Isle of Anglesey, Gwynedd and Snowdonia National Park Landscape Sensitivity and Capacity

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				I would like to see a degree of flexibility with each case considered on its own merits and perhaps negotiation between planners and park owners.	Study was commissioned to manage development such as static caravan and chalet sites by identifying and protecting sensitive and distinct areas from inappropriate development. The primary objective for designating Areas of Outstanding Natural Beauty is the conservation and enhancement of their natural beauty therefore they must be afforded the highest status of protection from inappropriate developments. The cumulative impacts of static caravan and chalet developments within the Areas of Outstanding Natural Beauty can be obtrusive in the landscape and damaging to the character of the rural area unless strictly controlled. Special Landscape Areas are nonstatutory local designations. Their aim is to ensure that the landscape is not damaged by inappropriate development. The sensitivity and capacity study concluded that within the Area of Outstanding Natural Beauty and Special Landscape Areas (and all areas that contribute to their setting), it is considered that there is typically no capacity for further static caravan/chalet park developments or extensions.  A similar approach taken on static and chalet park has been taken in neighbouring authorities and other Local Planning Authorities in Wales.  Recommendation  No robust evidence was submitted which would justify amending the Deposit Plan to ensure the Plan's soundness.

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					No Change
				Recreation and tourism uses are viable end uses	Note the Support
222	Ellesmere Sand & Gravel	POLICY TWR3	Support	of previously used land at mineral extraction sites that when restored can provide facilities such as	Recommendation
	Company Limited [2686]			hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate.	No change
				Recreation and tourism uses are viable end uses	Note the Support
223	Lafarge Tarmac Trading	POLICY TWR3	Support	of previously used land at mineral extraction sites that when restored can provide facilities such as	Recommendation
	Limited [2735]			hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate.	No change
308	Point Lynas Caravan Park/Pant y Saer Caravan Park (Mr Peter Hoyland) [2886]	POLICY TWR3	Object	Item 3 iii of Policy TW3 is insufficiently flexible to achieve the policy aims. A small increase in the number of static caravan or chalet pitches on the park will be considered if it can be shown that they are a requirement for an improvement scheme to be viable.	Not Accepted Topic Paper 9: Tourism highlighted the high density of Static Caravan and Chalet Parks that exist along on or near the coast, including extensive parts of the AONB.  The Isle of Anglesey, Gwynedd and Snowdonia National Park Landscape Sensitivity and Capacity Study was commissioned to manage development such as static caravan and chalet sites by identifying and protecting sensitive and distinct areas from inappropriate development. The primary objective for designating Areas of Outstanding Natural Beauty is the conservation and enhancement of their natural beauty therefore they must be afforded the highest status of protection from inappropriate developments. The cumulative impacts of static caravan and chalet developments within the Areas of Outstanding Natural Beauty can be obtrusive in the landscape and damaging to the

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					character of the rural area unless strictly controlled. Special Landscape Areas are nonstatutory local designations. Their aim is to ensure that the landscape is not damaged by inappropriate development. The sensitivity and capacity study concluded that within the Area of Outstanding Natural Beauty and Special Landscape Areas (and all areas that contribute to their setting), it is considered that there is typically no capacity for further static caravan/chalet park developments or extensions.  A similar approach taken on static and chalet park has been taken in neighbouring authorities and other Local Planning Authorities in Wales.  Recommendation  No robust evidence was submitted which would justify amending the Deposit Plan to ensure the Plan's soundness.
458	Bourne Leisure Ltd [2768]	POLICY TWR3	Support	Aspects of TWR3 are supported as it facilitates proposals to improve existing static and chalet sites provided they conform to a number of criteria.	No Change  Note the Support  Recommendation  No change
483	Cadnant Planning (Mr Rhys Davies) [1366]	POLICY TWR3	Object	The policy effectively places an embargo on additional static caravans within the AONB and SLA's. This provides no incentive to owners and operators to bring forward improvements to their sites. The effective embargo on additional caravans is contrary to National Planning Policy	Not Accepted Topic Paper 9: Tourism highlighted the high density of Static Caravan and Chalet Parks that exist along on or near the coast, including extensive parts of the AONB.

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				which places an increased emphasis on the economic benefits of tourism.	The Isle of Anglesey, Gwynedd and Snowdonia National Park Landscape Sensitivity and Capacity Study was commissioned to manage development such as static caravan and chalet sites by identifying and protecting sensitive and distinct areas from inappropriate development. The primary objective for designating Areas of Outstanding Natural Beauty is the conservation and enhancement of their natural beauty therefore they must be afforded the highest status of protection from inappropriate developments. The cumulative impacts of static caravan and chalet developments within the Areas of Outstanding Natural Beauty can be obtrusive in the landscape and damaging to the character of the rural area unless strictly controlled. Special Landscape Areas are nonstatutory local designations. Their aim is to ensure that the landscape is not damaged by inappropriate development. The sensitivity and capacity study concluded that within the Area of Outstanding Natural Beauty and Special Landscape Areas (and all areas that contribute to their setting), it is considered that there is typically no capacity for further static caravan/chalet park developments or extensions.  A similar approach taken on static and chalet park has been taken in neighbouring authorities and other Local Planning Authorities in Wales.
					No robust evidence was submitted which would justify amending the Deposit Plan to ensure the

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					Plan's soundness.  No Change
515	Bodafon Caravan Park (Mr Robert Roberts) [180]	POLICY TWR3	Object	Number 1 This paragraph relates to proposals for the development of new Parks and refers to "permanent alternative camping accommodation". There is no definition of "permanent alternative camping accommodation" in the explanation 7.3.60 to 7.3.66 that follows Policy statement TWR3 Does it mean touring caravans, tents or camping, trailer tents, motor homes, pods, yurts, wigwams, and tepees. These have been grouped together and covered in Policy statement TWR5. Policy TWR5 does not differentiate between AONB areas and non-AONB areas. There is therefore possible ambiguity between Policy TWR3 needs to provide a definition of "permanent alternative camping accommodation" in a Citation similar to 1 and 2 on page 114. Changes cannot be suggested without being provided with a definition.	Accepted in Part  Explanation to the types of alternative camping accommodation can be found in the explanation of policy TWR5 but agree to include the definition on the explanation of this policy.  Policy TWR5 covers touring units, while Policy TWR3 covers static/permanent units. Touring caravan and camping sites, are considered more acceptable in land use planning terms as having less of an impact on the landscape that static caravan and chalet sites because, by their very nature, they have transient features which do not impose permanent, year round effects on the local landscape.  Recommendation  No change to the policy but a definition of "permanent alternative camping accommodation" will be included in the policy's explanation to ensure that the policy can be easily interpreted.  Focussed Change NF53
516 & 1052	Bodafon Caravan Park (Mr Robert Roberts) [180]	POLICY TWR3	Object	POLICY TWR3 3 does not allow any increase in numbers of units. Therefore, no incentive to Park Owners to make improvements  Changes to Plan Add:	Not Accepted Topic Paper 9: Tourism highlighted the high density of Static Caravan and Chalet Parks that exist along on or near the coast, including extensive parts of the AONB.

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				3(iii) a very minor increase in the number of units on site.  Explanations:  Minor is defined in para 7.3.66 as "should be no greater than a 10% increase on the number at the time of the original application".  The definition of minor should be amended to "should be no greater than a 15% increase etc. Definition of "very minor"  And "Very minor in relation to site area is not defined except in relation to an increase in the number of units and should be no greater than a 10% increase on the number at the time of the original application"	The Isle of Anglesey, Gwynedd and Snowdonia National Park Landscape Sensitivity and Capacity Study was commissioned to manage development such as static caravan and chalet sites by identifying and protecting sensitive and distinct areas from inappropriate development. The primary objective for designating Areas of Outstanding Natural Beauty is the conservation and enhancement of their natural beauty therefore they must be afforded the highest status of protection from inappropriate developments. The cumulative impacts of static caravan and chalet developments within the Areas of Outstanding Natural Beauty can be obtrusive in the landscape and damaging to the character of the rural area unless strictly controlled. Special Landscape Areas are nonstatutory local designations. Their aim is to ensure that the landscape is not damaged by inappropriate development. The sensitivity and capacity study concluded that within the Area of Outstanding Natural Beauty and Special Landscape Areas (and all areas that contribute to their setting), it is considered that there is typically no capacity for further static caravan/chalet park developments or extensions.  A similar approach taken on static and chalet park has been taken in neighbouring authorities and other Local Planning Authorities in Wales.  Recommendation  No robust evidence was submitted which would justify amending the Deposit Plan to ensure the

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					Plan's soundness.  No Change
517	John Parry [2128]	POLICY TWR3	Object	Explanation 7.3.60 Considers there is a need for further provision of new static caravans and chalets to meet consumer demands. Explanation 7.3.63 considers there is scope for minor static and chalet park extensions as part of a general improvement plan in coastal areas" Explanation 7.3.64 and 7.3.65 Considers that there is no incentive to improve sites if numbers cannot be increased Explanation 7.3.46 Considers that a policy of no extension to existing static parks in AONB contradicts the with the Council's identification of tourism as a key priority	Topic Paper 9: Tourism highlighted the high density of Static Caravan and Chalet Parks that exist along on or near the coast, including extensive parts of the AONB.  The Isle of Anglesey, Gwynedd and Snowdonia National Park Landscape Sensitivity and Capacity Study was commissioned to manage development such as static caravan and chalet sites by identifying and protecting sensitive and distinct areas from inappropriate development. The primary objective for designating Areas of Outstanding Natural Beauty is the conservation and enhancement of their natural beauty therefore they must be afforded the highest status of protection from inappropriate developments. The cumulative impacts of static caravan and chalet developments within the Areas of Outstanding Natural Beauty can be obtrusive in the landscape and damaging to the character of the rural area unless strictly controlled. Special Landscape Areas are nonstatutory local designations. Their aim is to ensure that the landscape is not damaged by inappropriate development. The sensitivity and capacity study concluded that within the Area of Outstanding Natural Beauty and Special Landscape Areas (and all areas that contribute to their setting), it is considered that there is typically no capacity for further static

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					caravan/chalet park developments or extensions  A similar approach taken on static and chalet park has been taken in neighbouring authorities and other Local Planning Authorities in Wales.  Recommendation  No robust evidence was submitted which would justify amending the Deposit Plan to ensure the Plan's soundness.
					No Change
519 & 520	Lambe Planning & Design Ltd (Mr Jeremy Lambe) [1674]	POLICY TWR3	Object	The proposed Policy TWR3 does not allow any minor increase in units within the AONB when considering proposals to improve sites.  Minor increase in the number of units is required to assist with funding of upgrading. Upgrading requires significant investment. Policy D17 of Gwynedd UDP gives an incentive to upgrade.  Minor increase in number of pitches should be allowed to assist in funding relocation of sites within Coastal Change Management Zone.  Delete the reference in point 3 of Policy TWR3 sub paragraph iii -which states "the improvements does not increase the number of static caravan or chalet units on the site and utilise the same wording as Point 4 of Policy TWR3 sub paragraph iii which states "a minor increase in the number of units on site will be permitted providing all of the following criteria can be met".	Accepted Agreed that for existing static and chalet parks that are located within the AONB, SLA and Coastal Change Management Zone that a small increase in units will be allowed when supplemented with a business case to justify the increase.  Recommendation Include following wording to 3iii) Unless, in exceptional circumstances, proposals involve the relocation of existing static and chalet parks that fall within the Coastal Change Management Area.  And include following wording to paragraph 7.3.62 "business case / viability"  Focussed Change NF54
739	Haulfryn Group Ltd [2986]	POLICY TWR3	Object	Where holiday Caravan Parks are located within the Coastal Change Management a minor	Accepted Agreed that for existing static and chalet parks

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				increase in the number of pitches, as part of a proposal that relocates pitches away from the shoreline affected by rising sea levels.  Holiday Park operations contribute significantly to sustainable local communities by providing a market for local goods and services, as well as providing much needed local employment.  A minor increase is necessary to fund the proposal to relocate pitches away from more vulnerable areas to avoid potential loss and fund the investment required to relocate pitches.	that are located within the AONB, SLA and Coastal Change Management Zone that a small increase in units will be allowed when supplemented with a business case to justify the increase.  Recommendation Include following wording to 3iii) Unless, in exceptional circumstances, proposals involve the relocation of existing static and chalet parks that fall within the Coastal Change Management Area.  And include following wording to paragraph 7.3.62 "business case / viability"  Focussed Change NF54
740	Haulfryn Group Ltd [2986]	POLICY TWR3	Object	Policy TWR3 does not allow for a minor increase in pitches within the AONB compared to the existing UDP Policy (D17). To assist with funding the upgrading a site, a minor increase in the number of static holiday caravans/chalets is required.  Delete reference in point 3 of TWR3 which states "the improvements does not increase the number of static or chalet units in the site" and utilize the same wording as point 4 of TWR3 which states "a minor increase in the number of units on site will be permitted providing all of the following criteria can be met".	Not Accepted Topic Paper 9: Tourism highlighted the high density of Static Caravan and Chalet Parks that exist along on or near the coast, including extensive parts of the AONB.  The Isle of Anglesey, Gwynedd and Snowdonia National Park Landscape Sensitivity and Capacity Study was commissioned to manage development such as static caravan and chalet sites by identifying and protecting sensitive and distinct areas from inappropriate development. The primary objective for designating Areas of Outstanding Natural Beauty is the conservation and enhancement of their natural beauty therefore they must be afforded the highest status of protection from inappropriate developments. The cumulative impacts of static

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					caravan and chalet developments within the Areas of Outstanding Natural Beauty can be obtrusive in the landscape and damaging to the character of the rural area unless strictly controlled. Special Landscape Areas are nonstatutory local designations. Their aim is to ensure that the landscape is not damaged by inappropriate development. The sensitivity and capacity study concluded that within the Area of Outstanding Natural Beauty and Special Landscape Areas (and all areas that contribute to their setting), it is considered that there is typically no capacity for further static caravan/chalet park developments or extensions.  A similar approach taken on static and chalet park has been taken in neighbouring authorities and other Local Planning Authorities in Wales.  Recommendation  No robust evidence was submitted which would justify amending the Deposit Plan to ensure the Plan's soundness.  No Change
757	Bourne Leisure Ltd [2768]	POLICY TWR3	Object	Bourne Leisure does not object to point 3 and 4 in policy TWR3 as currently drafted would allow the sensitive redevelopment of caravan parks which is key to maintaining the tourism offer in the plan area which in turn has a significant positive impact on the local economy.  However, Bourne Leisure considers that it would be beneficial for the wording of this policy to be	Not Accepted The Plan acknowledges the importance of tourism to the plan area and allows for sensitive redevelopment of existing parks where that redevelopment does not harm the quality of the surrounding landscape.  Recommendation No robust evidence was received which would

Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
			amended to embody a more positive and flexible approach whereby the constant state of change in tourism facilities is acknowledged, with redevelopment and site rationalisation to meet the needs of the dynamic tourism market.	justify amending the Deposit Plan to ensure the Plan's soundness.  No Change
Cydbwyllgor Ymgynghorol AHNE (Cynghorydd Gruffydd Williams) [3090]	POLICY TWR3	Support	This policy is supported as it is proposed to refuse new sites and extensions within the AONB and the SLA.  We believe that priority should be given to monitoring compliance with planning permissions, planning conditions, landscaping conditions and conditions on occupancy.	Note the Support  Recommendation  No change
Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	POLICY TWR3	Object	We agree with the continued moratorium on new static sites in AONBs and SLAs, but we are concerned about its relaxation elsewhere. We suggest it is maintained in otherwise unprotected buffer areas of the AONBs and within 2 km of the coast where the greatest pressures have been felt, and that only very small new sites are permitted elsewhere. We agree with continuation of a guideline limit of 10% on expansions of existing sites in all areas in return for genuine environmental improvements, but look for strengthening of effective landscaping plans, colouring standards, monitoring and enforcement.	Not Accepted The Isle of Anglesey, Gwynedd and Snowdonia National Park Landscape Sensitivity and Capacity Study was commissioned to manage development such as static caravan and chalet sites by identifying and protecting sensitive and distinct areas from inappropriate development. The study concluded that in some areas outside the Area of Outstanding Natural Beauty and Special Landscape Areas there may be very limited capacity for static caravan/chalet park developments typically comprising of very infrequent, very small scale, well sited, high quality developments.  The supporting text for the policy highlights the importance of sensitive redevelopment to reduce any potential landscape impact.  Recommendation No robust evidence was submitted which would
	Cydbwyllgor Ymgynghorol AHNE (Cynghorydd Gruffydd Williams) [3090] Campaign for the Protection of Rural Wales	Cydbwyllgor Ymgynghorol AHNE (Cynghorydd Gruffydd Williams) [3090]  Campaign for the Protection of Rural Wales  POLICY TWR3	Cydbwyllgor Ymgynghorol AHNE (Cynghorydd Gruffydd Williams) [3090]  Campaign for the Protection of Rural Wales  POLICY TWR3  Support  Object	Ame  Section  Type  Plan  amended to embody a more positive and flexible approach whereby the constant state of change in tourism facilities is acknowledged, with redevelopment and site rationalisation to meet the needs of the dynamic tourism market.  This policy is supported as it is proposed to refuse new sites and extensions within the AONB and the SLA.  Support  We believe that priority should be given to monitoring compliance with planning permissions, planning conditions, landscaping conditions and conditions on occupancy.  We agree with the continued moratorium on new static sites in AONBs and SLAs, but we are concerned about its relaxation elsewhere. We suggest it is maintained in otherwise unprotected buffer areas of the AONBs and within 2 km of the coast where the greatest pressures have been felt, and that only very small new sites are permitted elsewhere. We agree with continuation of a guideline limit of 10% on expansions of existing sites in all areas in return for genuine environmental improvements, but look for strengthening of effective landscaping plans, colouring standards, monitoring and

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					justify amending the Deposit Plan to ensure the Plan's soundness.  No Change
790	Caravan Club [3039]	POLICY TWR3	Object	In summary Policy TWR3 is overly restrictive and lack clarity on the type of development which is acceptable on existing touring caravan sites. The policy should be amended to ensure that the plan does not affect the ability of local tourist businesses from adapting to the changing needs of the visitor economy and does not impact on the future economic viability of these businesses which support local economies, employments and communities.	Not Accepted Topic Paper 9: Tourism highlighted the high density of Static Caravan and Chalet Parks that exist along on or near the coast, including extensive parts of the AONB.  The Isle of Anglesey, Gwynedd and Snowdonia National Park Landscape Sensitivity and Capacity Study was commissioned to manage development such as static caravan and chalet sites by identifying and protecting sensitive and distinct areas from inappropriate development. The primary objective for designating Areas of Outstanding Natural Beauty is the conservation and enhancement of their natural beauty therefore they must be afforded the highest status of protection from inappropriate developments. The cumulative impacts of static caravan and chalet developments within the Areas of Outstanding Natural Beauty can be obtrusive in the landscape and damaging to the character of the rural area unless strictly controlled. Special Landscape Areas are non-statutory local designations. Their aim is to ensure that the landscape is not damaged by inappropriate development. The sensitivity and capacity study concluded that within the Area of Outstanding Natural Beauty and Special Landscape Areas (and all areas that contribute to their setting), it is considered that there is

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
					typically no capacity for further static caravan/chalet park developments or extensions.
					A similar approach taken on static and chalet park has been taken in neighbouring authorities and other Local Planning Authorities in Wales.
					Recommendation  No robust evidence was submitted which would justify amending the Deposit Plan to ensure the Plan's soundness.
					No Change
				In summary the policies relating to tourist	Accepted Explanation to the types of alternative camping accommodation can be found in the explanation of policy TWR5 but agree to include the definition on the explanation of this policy.  Policy TWR5 covers touring units, while Policy TWR3 covers static/permanent units. Touring caravan and camping sites, are considered more
792	Caravan Club [3039]	POLICY TWR3	Object	accommodating are considered to be overly restrictive and lacking in clarity on the type of development which is acceptable on existing touring caravan sites.	acceptable in land use planning terms as having less of an impact on the landscape that static caravan and chalet sites because, by their very nature, they have transient features which do not impose permanent, year round effects on the local landscape.
					Recommendation  No change to the policy but a definition of  "permanent alternative camping  accommodation" will be included in the policy's  explanation to ensure that the policy can be easily

Re	ep D	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
						interpreted.  Focussed Change NF54  Not Accepted
48	ķ	Cadnant Planning (Mr Rhys Davies) [1366]	7.3.63	Object	Para 7.3.63 is inconsistent with Policy TWR3 which allows extensions to sites regardless of the conclusion of the sensitivity and capacity study. Additionally, it is clear that the study has not considered the capacity of the area in such detail as to be able to conclude that there is "no capacity" for further static caravan/chalet park development or extensions"	Topic Paper 9: Tourism highlighted the high density of Static Caravan and Chalet Parks that exist along on or near the coast, including extensive parts of the AONB.  The Isle of Anglesey, Gwynedd and Snowdonia National Park Landscape Sensitivity and Capacity Study was commissioned to manage development such as static caravan and chalet sites by identifying and protecting sensitive and distinct areas from inappropriate development. The primary objective for designating Areas of Outstanding Natural Beauty is the conservation and enhancement of their natural beauty therefore they must be afforded the highest status of protection from inappropriate developments. The cumulative impacts of static caravan and chalet developments within the Areas of Outstanding Natural Beauty can be obtrusive in the landscape and damaging to the character of the rural area unless strictly controlled. Special Landscape Areas are nonstatutory local designations. Their aim is to ensure that the landscape is not damaged by inappropriate development. The sensitivity and capacity study concluded that within the Area of Outstanding Natural Beauty and Special Landscape Areas (and all areas that contribute to their setting), it is considered that there is typically no capacity for further static

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
					Caravan/chalet park developments or extensions  A similar approach taken on static and chalet park has been taken in neighbouring authorities and other Local Planning Authorities in Wales.  Paragraph 7.3.63 states that outside the AONB and SLA a small increase will be allowed.  Recommendation  No robust evidence was submitted which would justify amending the Deposit Plan to ensure the Plan's soundness.
518	Haulfryn Group Ltd [2986]	7.3.64	Object	Paragraph 7.3.64 refers to no increase in caravan or chalet numbers. A minor increase in the number of units should be permitted when the proposal is part of a scheme to improve the range and quality of tourist accommodation and facilities on the site. Without a minor increase to the number of pitches, it may not be possible to fund the significant investment required to pay for upgrading proposals.  Where Holiday Parks are located within the Coastal Change Management Zone (within the AONB), and relocation of pitches are required due to a "rollback" position from the shoreline, a minor increase in the number of pitches should be allowed to assist with funding the re-location of holiday pitches and the significant investment required.  POLICY TWR3 paragraph 7.3.64	Not Accepted Topic Paper 9: Tourism highlighted the high density of Static Caravan and Chalet Parks that exist along on or near the coast, including extensive parts of the AONB.  The Isle of Anglesey, Gwynedd and Snowdonia National Park Landscape Sensitivity and Capacity Study was commissioned to manage development such as static caravan and chalet sites by identifying and protecting sensitive and distinct areas from inappropriate development. The primary objective for designating Areas of Outstanding Natural Beauty is the conservation and enhancement of their natural beauty therefore they must be afforded the highest status of protection from inappropriate developments. The cumulative impacts of static caravan and chalet developments within the

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				change to allow a minor increase in units provided it can be demonstrated that significant site improvements and reduced landscape impact would result	Areas of Outstanding Natural Beauty can be obtrusive in the landscape and damaging to the character of the rural area unless strictly controlled. Special Landscape Areas are nonstatutory local designations. Their aim is to ensure that the landscape is not damaged by inappropriate development. The sensitivity and capacity study concluded that within the Area of Outstanding Natural Beauty and Special Landscape Areas (and all areas that contribute to their setting), it is considered that there is typically no capacity for further static caravan/chalet park developments or extensions.  A similar approach taken on static and chalet park has been taken in neighbouring authorities and other Local Planning Authorities in Wales.  Paragraph 7.3.63 states that outside the AONB and SLA a small increase will be allowed.  Agreed that for existing static and chalet parks that are located within the AONB, SLA and Coastal Change Management Zone that a small increase in units will be allowed when supplemented with a business case to justify the increase.  Recommendation  Include following wording to 3iii) Unless, in exceptional circumstances, proposals involve the relocation of existing static and chalet parks that fall within the Coastal Change Management Area.  And include following wording to paragraph
					And include following wording to paragraph

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
					7.3.62 "business case / viability"  Focussed Change NF54
758	Bourne Leisure Ltd [2768]	7.3.65	Support	Bourne Leisure endorses supporting 7.3.65 as it explains that the purpose of the policy is to promote improvements and upgrade the standard of tourist accommodation alongside reducing the impacts of these sites on the landscape. This approach is in accordance with Bourne Leisure's development aspirations which normally seek to reconfigure/redevelop sites in order to improve the overall quality of the holiday facilities alongside reducing impact on the local environment. This can be done by utilising sensitive landscaping techniques. Endorse the policy aspiration of reducing impact on the landscape as the high quality natural environment is a key attraction for tourists.	Note the Support Recommendation No change
198	Kingsbridge Caravan Park (Mr Andrew Bate) [2778]	7.3.66	Object	Setting a limit of 10% increase in numbers is placing the smaller parks at a disadvantage compared to parks with large numbers of units and gives the large parks an unfair commercial advantage.  I would like to see the limit of 10% increase in numbers deleted and have each case considered on its merits. Small parks have particular problems with limited turnover and need an increase in numbers to recover costs associated with raising quality standards and environmental improvements.	Allowing a small increase on existing site aims to promote improvements and upgrade the standard of visitor accommodation on existing sites, and to reduce the impact of these sites on the landscape. Para 7.3.66 states that because of the considerable variety in the size, nature and location of sites, each application will be assessed on its merit within this general guide.  Recommendation  No robust evidence was submitted which would justify amending the Deposit Plan to ensure the Plan's soundness.

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					No Change
759	Bourne Leisure Ltd [2768]	7.3.66	Support	Bourne Leisure endorses supporting para 7.3.66 as we consider it sensible to not define the size of the area that can be sought as part of redevelopment proposals. This is because some proposals may require a large site area however this area may be used as a buffer for landscaping purposes which has a positive impact on the local environment. Bourne Leisure also considers that it is sensible to assess each site on its own merit within this general guide. This is because of the wide variety of tourist accommodation in Gwynedd.	Note the Support Recommendation No change

# TWR4 – Holiday Occupancy

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
97	BH&HPA [2733]	POLICY TWR4	Support	We would wish to register our support to Policy TWR4 as it complies with the aims and objectives of Planning Policy Wales (PPW) and is in accordance with similar development plan policies in neighbouring Local Planning Authorities which support and encourage extended holiday occupancy periods. The Policy is sound and fulfils all of the required tests of soundness.	Note the Support Recommendation No change
224	Ellesmere Sand & Gravel Company Limited [2686]	POLICY TWR4	Support	Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate.	Note the Support  Recommendation  No change

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
225	Lafarge Tarmac Trading Limited [2735]	POLICY TWR4	Support	Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate.	Note the Support  Recommendation  No change
613 & 614	Menter Môn (Helen Thomas) [1615] Hunaniaith (Debbie A. Williams Jones) [3037]	POLICY TWR4	Object	There is no economic benefit from extending the holiday season to 12 months which would contribute towards securing sustainable communities.  Neither can the Welsh language cope with the negative impact of extending the holiday season. This could mean a substantial increase in the population of some communities, and the little advantage to be had from that is outweighed by the negative effects of such permissions - such as the effect on the linguistic nature of communities, and the pressure on public services.  There is a need to reconsider the policy of opening for 12 months.	Not Accepted National policy guidance supports a year round holiday season. PolicyTWR4 contains robust criteria in order to ensure that the accommodation is being used solely for holiday purposes and does not become the occupant's main or sole place of residence.  The plan should not be read in isolation. The Welsh language has been a consideration in formulating the vision, objectives, strategies and policies of the Plan since its inception. The potential effects of the Plan on the Welsh language were considered during the Sustainability Assessment process (including the SEA), which was informed by a Language Impact Assessment. Attention should be given to the various policies of the Plan and topic documents, as well as the SPG for: planning obligations, and maintaining and creating sustainable communities.  Recommendation  No robust evidence was submitted which would justify amending the Deposit Plan to ensure the Plan's soundness.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
783	Cydbwyllgor Ymgynghorol AHNE (Cynghorydd Gruffydd Williams) [3090]	POLICY TWR4	Object	There was concern about allowing static caravan/chalet sites to remain open for 12 months a year. There are insufficient resources to be able to monitor the situation and people could live permanently in the units - without paying tax.	Not Accepted National policy guidance supports a year round holiday season. PolicyTWR4 contains robust criteria in order to ensure that the accommodation is being used solely for holiday purposes and does not become the occupant's main or sole place of residence.  Recommendation No robust evidence was submitted which would justify amending the Deposit Plan to ensure the
789	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	POLICY TWR4	Object	The goal of extending the tourist season is sensible, but presents problems in the caravan sector. Allowing all-year use of static caravans as opposed to the previously established 10.5 month limit makes no difference to their visual impact and responds to established precedents. However, we share concerns that there is insufficient capacity to monitor and enforce genuine holiday use and prevent permanent residential occupancy, contrary to intended policy. The potential economic benefits of 6 weeks of extra use in the low season seem unlikely to justify these risks. On the other hand, policies to limit holiday use of statics to 28 days at a time or 3 months/year also seem to us arbitrary, impractical and unenforceable.  Scrap limitations on caravan holiday use as these	Plan's soundness.  No Change  Not Accepted  National policy guidance supports a year round holiday season. PolicyTWR4 contains robust criteria in order to ensure that the accommodation is being used solely for holiday purposes and does not become the occupant's main or sole place of residence.  Recommendation  No robust evidence was submitted which would justify amending the Deposit Plan to ensure the Plan's soundness.  No Change

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				are unworkable	
795	Caravan Club [3039]	POLICY TWR4	Object	In summary the policies relating to tourist accommodating are considered to be overly restrictive and lacking in clarity on the type of development which is acceptable on existing touring caravan sites. The policy should be amended to ensure that the plan does not affect the ability of local tourist businesses from adapting to the changing needs of the visitor economy and does not impact on the future economic viability of these businesses which support local economies, employments and communities.	Not Accepted National policy guidance supports a year round holiday season. PolicyTWR4 contains robust criteria in order to ensure that the accommodation is being used solely for holiday purposes and does not become the occupant's main or sole place of residence.  Recommendation No robust evidence was submitted which would justify amending the Deposit Plan to ensure the Plan's soundness.  No Change
1400	Cyng/Counc Alwyn Gruffydd [381]	POLICY TWR4	Object	The view is that extending the holiday season does not contribute substantially to the promotion of sustainable communities, and that the few benefits are outweighed by the negative effects of such permissions, such as the impact on the linguistic nature of communities and the pressure on public services.  Need to further consider the policy of opening for 12 months.	Not Accepted National policy guidance supports a year round holiday season. PolicyTWR4 contains robust criteria in order to ensure that the accommodation is being used solely for holiday purposes and does not become the occupant's main or sole place of residence.  The plan should not be read in isolation. The Welsh language has been a consideration in formulating the vision, objectives, strategies and policies of the Plan since its inception. The potential effects of the Plan on the Welsh language were considered during the Sustainability Assessment process (including the SEA), which was informed by a Language Impact Assessment. Attention should be given to the various policies of the Plan and topic documents, as well as the SPG for: planning obligations, and

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
					maintaining and creating sustainable communities.
					Recommendation  No robust evidence was submitted which would justify amending the Deposit Plan to ensure the Plan's soundness.  No Change

# TWR5 – Touring Caravan, Camping and Temporary Alternative Camping Accommodation

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
98	ВН&НРА [2733]	POLICY TWR5	Object	Whilst draft Policy TWR5 is generally accepted, the imposition of criterion 7 fails to meet the tests of soundness set down for the LDP. There is no planning reason for the imposition of limitation on length of stay and this would unreasonably dictate how a park is operated. The requirement could not be enforced or monitored and is not in accordance with other local planning policies in adjoining areas. It is therefore requested that this element of Policy TWR5 is removed. In order for Policy TWR5 to be 'sound' the accompanying text should be amended. See full submission for detailed changes suggested.	Touring caravan and camping sites, are considered more acceptable in land use planning terms as having less of an impact on the landscape that static caravan and chalet sites because, by their very nature, they have transient features which do not impose permanent, year round effects on the local landscape. By allowing the touring caravans to stay on site all year round it could be argued that they would have the same effect, in terms of land use planning, as a new static caravan site  Recommendation This proposed change is not required to ensure the soundness of the plan.  No Change

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
					Not Accepted
				Touring caravan parks should be allowed to store caravans for customers provided they are located in unobtrusive areas.	Touring caravan and camping sites, are considered more acceptable in land use planning terms as having less of an impact on the
199	Kingsbridge Caravan Park (Mr Andrew Bate) [2778]	POLICY TWR5	Object	This is a key element of the touring park activity and does not appear to be addressed in the policy document. Storage of units has the advantage of reducing disruption on main roads	landscape that static caravan and chalet sites because, by their very nature, they have transient features which do not impose permanent, year round effects on the local landscape.
				and country lanes and above all reduces vehicle emissions by way of improved fuel economy of the vehicle which would otherwise be towing a caravan.	Recommendation This proposed change is not required to ensure the soundness of the plan.
					No Change
226	Ellesmere Sand & Gravel Company Limited [2686]	I POLICY TWRS	Support	Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as	Note the Support  Recommendation
				hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate.	No change
				Recreation and tourism uses are viable end uses	Note the Support
227	Lafarge Tarmac Trading Limited [2735]	POLICY TWR5	Support	of previously used land at mineral extraction sites that when restored can provide facilities such as	Recommendation
	Limiteu [2733]			hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate.	No change
					Not Accepted
				We object to criteria 3 and 7 of policy TWR 5. Criterion 3 could be amended to read:	Touring caravan and camping sites, are considered more acceptable in land use planning
467	Cadnant Planning (Mr Rhys	POLICY TWR5	Object	Criterion 5 could be amended to read.	terms as having less of an impact on the
	Davies) [1366]			capable of being removed off the site if the use has been discontinued.	landscape that static caravan and chalet sites because, by their very nature, they have transient features which do not impose permanent, year

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					round effects on the local landscape.  Recommendation This proposed change is not required to ensure the soundness of the plan.  No Change
784	Cydbwyllgor Ymgynghorol AHNE (Cynghorydd Gruffydd Williams) [3090]	POLICY TWR5	Object	Members had noticed an increase in applications and considerable pressure from this type of development in the Llŷn area. We questioned whether there was a basis for the policy and had an analysis been made of the increase in units/the effect of new developments? We believe the policy should be more restrictive within and near the designated area.  We believe that priority should be given to monitoring compliance with planning permissions, planning conditions, landscaping conditions and conditions on occupancy.	Not Accepted Touring caravan and camping sites, are considered more acceptable in land use planning terms as having less of an impact on the landscape that static caravan and chalet sites because, by their very nature, they have transient features which do not impose permanent, year round effects on the local landscape. The plan recognises that heavily pressured exist in many communities located on or near the coast, including extensive parts of both AONBs. The Councils will require strong evidence that proposals for further units of accommodation in such areas will not add to servicing problems or harm the character or natural resources of these areas.  Recommendation This proposed change is not required to ensure the soundness of the plan.  No Change
788	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	POLICY TWR5	Object	We oppose the continuation of a permissive policy for touring caravan sites in the most sensitive landscape areas, in the absence of evidence regarding its impact. We believe the visual impact of tourers, including cumulative	Not Accepted Touring caravan and camping sites, are considered more acceptable in land use planning terms as having less of an impact on the landscape that static caravan and chalet sites

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				impact, is being underestimated and it isks being as great as that acknowledged for static sites in the past. As a precautionary policy we seek a moratorium on new touring sites within AONBs, SLAs and within 2 km of the coast and some limitation on the size of extensions of existing sites. We support policies for extension of existing sites, provided limits are specified, in exchange for genuine environmental improvements, and provided these are actually monitored and enforced.	because, by their very nature, they have transient features which do not impose permanent, year round effects on the local landscape. The plan recognises that heavily pressured exist in many communities located on or near the coast, including extensive parts of both AONBs. The Councils will require strong evidence that proposals for further units of accommodation in such areas will not add to servicing problems or harm the character or natural resources of these areas.  Recommendation This proposed change is not required to ensure the soundness of the plan.
468	Cadnant Planning (Mr Rhys Davies) [1366]	7.3.74	Object	The words "When not in use and during the winter months all units should be removed from the site" should be deleted as touring caravans, tents and camping pods can stay on the land "when not in use". Additionally, many touring caravan and alternative camping sites are open during some but not all of the "winter months". The text which requires their removal during winter months therefore has the effect of shortening the holiday season contrary to national policy.	Not Accepted Touring caravan sites have been considered acceptable in land use planning terms as having less impact on the landscape than static caravan sites because, by their very nature, they have transient features which do not impose permanent, year round effects on the local environment.  National guidance in Technical Advice Note (TAN) 13: Tourism states Authorities should give sympathetic consideration to applications to extend the opening period allowed under existing permissions. A holiday occupancy condition would seem more appropriate than a seasonal occupancy condition where the need is to reduce pressure on local services. Authorities should

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
					continue to use seasonal occupancy conditions to prevent the permanent residential use of accommodation which, by the character of its construction or design, is unsuitable for continuous occupation especially in the winter months.  Caravan and camping sites should be effectively screened, and planned as to not be visually intrusive. Natural screening is less effective during winter months because there is likely to be less natural green screens such as trees and shrubs.  Recommendation This proposed change is not required to ensure the soundness of the plan.
					No Change
472	Cadnant Planning (Mr Rhys Davies) [1366]	7.3.75	Object	The extent and acceptability of areas of hard standings can be adequately assessed under Policy TWR 5 without the need to have an effective "embargo" as set out within para. 7.3.75	Not Accepted Touring caravan sites have been considered acceptable in land use planning terms as having less impact on the landscape than static caravan sites because, by their very nature, they have transient features which do not impose permanent, year round effects on the local environment.  Recommendation This proposed change is not required to ensure the soundness of the plan.  No Change
470	Cadnant Planning (Mr Rhys Davies) [1366]	7.3.76	Object	The wording of paragraph 7.3.76 contradicts the aims of Policy TWR5 which is to facilitate the	Not Accepted Alternative camping units that have a degree of

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				establishment of high quality touring and camping sites in appropriate locations and recognises the contribution made by high quality touring and camping sites to the range of holiday accommodation available for visitors.	permanence will be dealt with under policy TWR3. Policy TWR5 relates to accommodation that does not impose permanent, year round effects on the local environment.  Recommendation
				The restriction to limit any temporary structures to basic facilities with no drainage or water will inhibit the provision of high quality touring and camping sites. The highest quality alternative camping sites do need to provide water and drainage connections that are now sought by high spend tourists.	This proposed change is not required to ensure the soundness of the plan.  No Change
473	Cadnant Planning (Mr Rhys Davies) [1366]	7.3.77	Object	Touring or alternative camping units do not become classified as "static" caravans of permanent accommodation simply by virtue of the fact that they may be connected to mains water or drainage. Delete 7.3.77	Not Accepted Holiday units that are connected to mains drainage and are not capable of being removed when not in use or relocated to another part of the park are not deemed to be transient units and therefore will be dealt with under policy TWR3 of the Plan.  Recommendation This proposed change is not required to ensure the soundness of the plan.  No Change
475	Cadnant Planning (Mr Rhys Davies) [1366]	7.3.78	Object	This policy is unduly restrictive and contrary to National Planning Policy as the economic benefits of many forms of alternative camping sites can be extended to periods covering almost 12 months.	Not Accepted  Touring caravan sites have been considered acceptable in land use planning terms as having less impact on the landscape than static caravan sites because, by their very nature, they have transient features which do not impose permanent, year round effects on the local environment.

Rep ID	Name	Section	Туре	Summary of Representation / Change(s) to Plan	Comments and Recommendations
					National guidance in Technical Advice Note (TAN) 13: Tourism states Authorities should give sympathetic consideration to applications to extend the opening period allowed under existing permissions. A holiday occupancy condition would seem more appropriate than a seasonal occupancy condition where the need is to reduce pressure on local services. Authorities should continue to use seasonal occupancy conditions to prevent the permanent residential use of accommodation which, by the character of its construction or design, is unsuitable for continuous occupation especially in the winter months.
					Caravan and camping sites should be effectively screened, and planned as to not be visually intrusive. Natural screening is less effective during winter months because there is likely to be less natural green screens such as trees and shrubs.  Recommendation
					This proposed change is not required to ensure the soundness of the plan.  No Change

# **Town Centres and Retail Developments**

#### **Context and Introduction**

Rep Id	Name	Section	Type	Summary of Representation / Change(s) to Plar	Comments and Recommendations

112	CPERA (Cynghorydd Elin Walker Jones) [2760]	7.3.81	Support	The High Street and the city centre should also be used for dwellings, as well as commerce and entertainment. It should not be permitted to build higher than three storeys when building flats or student halls on sites that are offcampus.	Note the supporting comment  The first bullet point in paragraph 7.3.81 refers to Welsh Government Planning Policy. The Plans policies do not prevent residential use in town centres. The Plan contains separate policies referring to design and integration of new development into their surroundings
					Recommendation
					No change

# **PS12 – Town Centre and Retail Developments**

Rep Id	Name	Section	Туре	Summary of Representation / Change(s) to Plar	Comments and Recommendations
432	Cyngor Tref Ffestiniog (Mrs Ann Coxon) [2940]	STRATEGIC POLICY PS12	Support	The map of the Local Plan denotes the town centre incorrectly in our opinion. There are many shops between the station and the Commercial Pub. Many of the town's most important shops are on this part of the High Street, including McColls, one newsagents and one Chinese food shop. These buildings should be kept as shops, in our opinion.	Note the supporting comment  The Blaenau Ffestiniog Map showing the town centre is based on the Retail Study (2013). Policy MAN 3: safeguards shops outside defined town centres unless it can be demonstrated that certain listed criteria can be met.  Recommendation  No change
606	Menter laith Bangor (Mrs Branwen Thomas) [2762]	STRATEGIC POLICY PS12	Support	Menter laith Bangor supports Polisi PS12 Town Centres and Retail and point 1- Encourage a varied mixture of suitable uses (as defined in PPW and TAN 4) in high quality environments which attract a broad range of people at different times of day, that are safe and accessible for everyone. There are too many takeaways in the centre of Bangor and a lack of	Note the supporting comment  Policy MAN7 provides criteria that must be satisfied when considering proposals for hot food take-aways including consideration of over concentration.  Strategic Policy PS1 seeks to promote and support

				hotels and restaurants. The Initiative would welcome native Welsh businesses that would use the Welsh language and provide a Welsh ethos to the main streets, which are lacking any trace of Welsh language and culture at present.	the use of the Welsh language  Recommendation  No change
840	Cyngor Dinas Bangor (Mr Gwyn Hughes) [1523]	STRATEGIC POLICY PS12	Object	Policies safeguarding the vitality and viability of Bangor as a Sub-regional Retail Centre and protecting Bangor by restricting expansion of out-of-town and out-of-centre retailing and leisure developments are welcomed. However, potential redevelopment areas should be identified within or close to the town centre so that a retailing or leisure opportunity is not missed. Several sites appear ripe for redevelopment:  - South eastern side of High Street between Plas Llwyd and Dean Street Junction, including Plas Llwyd car park.  - North western side of the High Street including the Rose and Crown and the White Lion.  - University buildings and car park off James Street, rear of Dean Street, including former Octogon building.	Rather than allocate specific sites to meet the estimated additional new convenience and comparison floor space required over the Plan period, the Councils consider that greater flexibility would be achieved by leaving it to market forces to bring suitable sites forward for development or redevelopment. The redevelopment of the sites suggested in the Retail Study (2013) could be facilitated. in line with the Policy MAN1 & Policy MAN3 and national planning policy and guidance.  Recommendation  No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.  No change
861	Bangor Civic Society 1 (Don Mathew) [2988]	STRATEGIC POLICY PS12	Support	Policy PS12 is supported (noting sub-regional importance of Bangor)	Note the supporting comment  Recommendation  No change
1067	Welsh Government (Mr Mark Newey) [1561]	STRATEGIC POLICY PS12	Object	Different hierarchy to retail and housing - what is the rationale for the difference?	Accepted  Amend text to provide explanation of the reason for using different hierarchies for retail and

					settlements. The retail hierarchy is based on the different retail roles of the centres and information in the Retail Study (2013). The settlement hierarchy is based on a number of factors including the number, type and scale of existing services within each community. It is explained in greater detail in Topic Paper 5 Developing the Settlement Hierarchy  Recommendation  To ensure clarity the text within the policy will be amended to further explain how the retail hierarchy has been determined.  Focussed Change NF: 55
1068	Welsh Government (Mr Mark Newey) [1561]	STRATEGIC POLICY PS12	Object	It is unclear where the provision of retail space will be located.	Rather than allocate specific sites to meet the estimated additional new convenience and comparison floor space required over the Plan period, the JPPU consider that greater flexibility would be achieved by leaving it to market forces to bring suitable sites forward for development or redevelopment.  in line with Policy MAN1 & Policy MAN3 and national planning policy and guidance. Nonetheless it is considered that the Plan's wording should be amended to show the findings of the Retail Study, which set out how the overall requirement for additional floor space should be delivered on a settlement by settlement basis.  Recommendation  Amend Policy and text to state which retail centres

					are expected to provide additional retail space over the Plan period  Focussed Change NF: 56
1172	Horizon Nuclear Power (Miss Sarah Fox) [2919]	STRATEGIC POLICY PS12	Object	Horizon is concerned that Criterion 6 "restricting the expansion of out-of-centre retailing and leisure development" could unduly restrict the development of leisure facilities at temporary worker accommodation sites.  Rather than seek for specific amendments to this policy, Horizon proposes to rely on the Wylfa Newydd specific policies proposed above which would be the relevant policies against which to determine associated development applications. For this reason Horizon is not proposing specific exclusion to its associated development from this policy.	Policy PS12 accords with national retail and town centre policy guidance set out in Planning Policy Wales (Edition 7) 2014 and TAN4 (1996).  It isn't considered necessary to include detailed policies within the plan relating specifically to developments associated with Wylfa Newydd, there are other relevant policies within the Plan which will have to be applied when considering associated development.  Recommendation  No change

# MAN1 – Proposed Town Centre Developments

Rep Id	Name	Section	Туре	Summary of Representation / Change(s) to Plar	Comments and Recommendations
112	CPERA (Cynghorydd Elin Walker Jones) [2760]	7.3.81	Support	The High Street and the city centre should also be used for dwellings, as well as commerce and entertainment. It should not be permitted to build higher than three storeys when building flats or student halls on sites that are off-campus.	The first bullet point in paragraph 7.3.81 refers to Welsh Government Planning Policy. The Plans policies do not prevent residential use in town centres. The Plan contains separate policies referring to design and integration of new development into their surroundings  Recommendation

					No change
432	Cyngor Tref Ffestiniog (Mrs Ann Coxon) [2940]	STRATEGIC POLICY PS12	Support	The map of the Local Plan denotes the town centre incorrectly in our opinion. There are many shops between the station and the Commercial Pub. Many of the town's most important shops are on this part of the High Street, including McColls, one newsagents and one Chinese food shop. These buildings should be kept as shops, in our opinion.	Noted  The Blaenau Ffestiniog Map showing the town centre is based on the Retail Study (2013).  Policy MAN 3: safeguards shops outside defined town centres unless it can be demonstrated that certain listed criteria can be met.  Recommendation  No change
606	Menter laith Bangor (Mrs Branwen Thomas) [2762]	STRATEGIC POLICY PS12	Support	Menter laith Bangor supports Polisi PS12 Town Centres and Retail and point 1- Encourage a varied mixture of suitable uses (as defined in PPW and TAN 4) in high quality environments which attract a broad range of people at different times of day, that are safe and accessible for everyone. There are too many takeaways in the centre of Bangor and a lack of hotels and restaurants. The Initiative would welcome native Welsh businesses that would use the Welsh language and provide a Welsh ethos to the main streets, which are lacking any trace of Welsh language and culture at present.	Noted  Policy MAN7 provides criteria that must be satisfied when considering proposals for hot food take-aways including consideration of over concentration.  Strategic Policy PS1 seeks to promote and support the use of the Welsh language  Recommendation  No change
840	Cyngor Dinas Bangor (Mr Gwyn Hughes) [1523]	STRATEGIC POLICY PS12	Object	Policies safeguarding the vitality and viability of Bangor as a Sub-regional Retail Centre and protecting Bangor by restricting expansion of out-of-town and out-of-centre retailing and leisure developments are welcomed. However, potential redevelopment areas should be identified within or close to the town centre so that a retailing or leisure opportunity is not missed. Several sites appear ripe for redevelopment:  - South eastern side of High Street between Plas	Not accepted  Rather than allocate specific sites to meet the estimated additional new convenience and comparison floor space required over the Plan period, the JPPU consider that greater flexibility would be achieved by leaving it to market forces to bring suitable sites forward for development or redevelopment.

				Llwyd and Dean Street Junction, including Plas Llwyd car park.  - North western side of the High Street including the Rose and Crown and the White Lion.  - University buildings and car park off James Street, rear of Dean Street, including former Octogon building.	in line with Policy MAN1 & Policy MAN3 and national planning policy and guidance.  Recommendation  No change to Plan  Noted
861	Bangor Civic Society 1 (Don Mathew) [2988]	STRATEGIC POLICY PS12	Support	Policy PS12 is supported (noting sub-regional importance of Bangor)	Recommendation  No change to Plan
1067	Welsh Government (Mr Mark Newey) [1561]	STRATEGIC POLICY PS12	Object	Different hierarchy to retail and housing - what is the rationale for the difference?	Amend text to provide explanation of the reason for using different hierarchies for retail and settlements. The retail hierarchy is based on the different retail roles of the centres and information in the Retail Study (2013). The settlement hierarchy is based on a number of factors including the number, type and scale of existing services within each community. It is explained in greater detail in Topic Paper 5 Developing the Settlement Hierarchy
					Amend policy and text in order to provide clarity  Focussed Change NF: 55
1068	Welsh Government (Mr Mark Newey) [1561]	STRATEGIC POLICY PS12	Object	It is unclear where the provision of retail space will be located.	Accepted in part

					Rather than allocate specific sites to meet the estimated additional new convenience and comparison floor space required over the Plan period, the JPPU consider that greater flexibility would be achieved by leaving it to market forces to bring suitable sites forward for development or redevelopment.  in line with Policy MAN1 & Policy MAN3 and national planning policy and guidance.  Recommendation  Focussed change NF:56 and NF57
1172	Horizon Nuclear Power (Miss Sarah Fox) [2919]	STRATEGIC POLICY PS12	Object	Horizon is concerned that Criterion 6 "restricting the expansion of out-of-centre retailing and leisure development" could unduly restrict the development of leisure facilities at temporary worker accommodation sites.  Rather than seek for specific amendments to this policy, Horizon proposes to rely on the Wylfa Newydd specific policies proposed above which would be the relevant policies against which to determine associated development applications. For this reason Horizon is not proposing specific exclusion to its associated development from this policy.	Not accepted  Policy PS12 accords with national retail and town centre policy guidance set out in Planning Policy Wales (Edition 8) 2016 and TAN4 (1996)  Recommendation  No change to Plan

					Not accepted
536	Cyngor Tref Biwmares (Prof TW Ashenden)	POLICY MAN1	Object	The Town Centre of Beaumaris marked on this map does not properly represent the actual town centre area of the town. It is important that these areas are correctly identified in the Deposit Plan	The Town Centre Map of Beaumaris is based on the Retail Study (2013). Policy MAN 3: safeguards shops outside defined town centres unless it can be demonstrated that certain listed criteria can be met.
	[1267]			so that Beaumaris's position as a local service centre and important tourism destination can be secured by the plan.	Recommendation  No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.
					No change

# MAN2 – Primary Retail Areas (Retail Core)

Rep ID	Person/ Organisation	Section	Support / Object	Summary of Representation / Change(s) to Plan	Councils' Response
1392	Cyng/Counc RH Wyn Williams [367]	POLICY MAN2	Object	I would like you to consider the following regarding Abersoch, because the plan is for a period of 10 years or more:-  Request for increase in shopping area boundary, because by now there are many businesses the length of Lôn Engan and therefore there will be need for a small increase in new development in line with demand and the busyness of Abersoch as a local tourist resort over the next 10 years.	The Town Centre Map of Abersoch is based on the Retail Study (2013). Policy MAN 3: safeguards shops outside defined town centres unless it can be demonstrated that certain listed criteria can be met.  Recommendation  No robust evidence was received which would justify amending the Deposit Plan to ensure the

				I would like you to consider the following regarding Abersoch, because the plan is for a period of 10 years or more:-	Plan's soundness.  No change  Not accepted  The Town Centre Map of Abersoch is based on the Retail Study (2013). Policy MAN 3: safeguards shops outside defined town centres unless it can be demonstrated that certain listed criteria can be met.
1393	Cyng/Counc RH Wyn Williams [367]	POLICY MAN2	Object	The bounded area should be identified as a Commercial Area to promote work in the tourism industry and benefit the economy.	Recommendation  No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.  No change

MAN3 - No Comments

MAN4 – No Comments

# MAN5 – New Retailing in Villages

Rep ID	Person/ Organisation	Section	Support / Object	Summary of Representation / Change(s) to Plan	Councils' Response
612	Friends of Borth-y Gest (Tom Brooks) [3036]	POLICY MAN5	Object	Considered that Borth-y- Gest would benefit from a retail outlet since there is no shop in the village. It is considered that Criteria 5 of MAN5 is unnecessary restrictive especially at a time when Gwynedd Council has announced that it is to introduce parking charges on the nearest offstreet parking.	Not accepted  The Polisi is based on the Retail Study (2013).  Policy MAN 3: safeguards shops outside defined town centres unless it can be demonstrated that certain listed criteria can be met.

		Recommendation
	Suggested Change Amend criteria 5 of MAN5 new retailing in village (parking arrangements to permit change of use of existing premises to retail premises without any parking constraints being necessary	, ,

#### MAN6 – Retailing in the Countryside

Rep ID	Person/ Organisation	Section	Support / Object	Summary of Representation / Change(s) to Plan	Councils' Response
1175	Horizon Nuclear Power (Miss Sarah Fox) [2919]	POLICY MAN6	Object	It is not clear whether this policy would apply to any retail development included within temporary worker accommodation sites. Rather than seek for specific amendments to this policy, Horizon proposes to rely on the Wylfa Newydd specific policies proposed above which would be the relevant policies against which to determine associated development applications. For this reason Horizon is not proposing specific exclusion to its associated development from this policy.	Policy MAN6 accords with national retail and town centre policy guidance set out in Planning Policy Wales (Edition 8) 2016 and TAN4 (1996)  Recommendation  It isn't considered necessary to include detailed policies within the plan relating specifically to developments associated with Wylfa Newydd, there are other relevant policies within the Plan which will have to be applied when considering associated development.

		No change to Plan

#### MAN7 – Hot Food Take-Away Uses

Rep ID	Person/ Organisation	Section	Support / Object	Summary of Representation / Change(s) to Plan	Councils' Response
831	Cyngor Dinas Bangor (Mr Gwyn Hughes) [1523]	POLICY MAN7	Object	The Council is of the opinion that  - A 10% limit should be imposed on the provision of hotfood takeaways in the two areas where the saturation point has already been reached- the bottom of Bangor High Street below the Dean Street junction and Holyhead Road in Upper Bangor.  - Hot food takeaways should not be permitted in the designated prime retail area in the town centre as they create litter, refuse and anti-social behaviour problems which could detrimentally affect the character of the centre.	No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.
					Recommendation
					No change to Plan