

APPENDIX A – CHAPTER 7.5 NATURAL AND BUILT ENVIRONMENT

Conserving and Enhancing the Natural Environment

Context and Introduction

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments & Recommendation
319	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	7.5.1	Object	The Plan rightly highlights the importance of the natural environment both for its own intrinsic value but also through the sustainable use of natural resources. This opening section sets a very negative view of the natural environment. We suggest re-wording to reflect the positive approach taken elsewhere in the Plan. Delete the first bullet point and move the (current) fifth point to the beginning	<p>Accepted in part – Rather than delete the first bullet point it is considered that this should be re-worded. It is agreed that the fifth bullet point should be moved to 2nd place with slight modifications to its wording.</p> <p>Recommendation -</p> <p>Re-word first bullet point and move the 5th bullet point to 2nd place in the list in paragraph 7.5.1.</p> <p>Focussed Change - NF 80</p>
320	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	7.5.2	Object	For greater clarity and precision his paragraph should include reference to the habitats also listed in Section 42 of the NERC Act. Add “habitats and . . .” to opening sentence of 7.5.2	<p>Accepted – It is agreed that ‘habitats’ need to be mentioned here, as well as species.</p> <p>Recommendation -</p> <p>Include reference to habitats in the opening sentence of paragraph 7.5.2</p> <p>Focussed Change - NF 89</p>

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324	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	7.5.3	Support	We welcome the recognition given to the importance of green/blue infrastructure networks and suggest that reference is also made to the concept of buffer zones to further protect these features.	<p>Noted.</p> <p>It is considered that PS16 is sufficiently adequate to provide protection without the need to introduce further 'buffer zones'. The impact of development will vary from site to site and will depend on the habitat/species being protected. Rather than imposing a 'buffer zone' it is that such requirements are dealt with on a case by case basis via the planning application process</p> <p>Recommendation</p> <p>No change</p>
53	Oaktree Environmental Ltd (John Williams) [2594]	7.5.4	Object	The proposed designation of the area containing and surrounding Moel Tryfan quarry as a SLA represents a needless, additional layer of designation designed to preserve the landscape where sufficient provision in this regard already exists. Albeit that it combines two existing Landscape Conservation Areas to form proposed SLA area 07, it covers land already afforded sufficient protection by the RHL designation. The addition of another layer of landscape regulation may prove an obstacle to future development at the quarry, thereby potentially undermining the effectiveness of policies relating to economic development, support of the Welsh	<p>Not accepted – Moel Tryfan is a very distinctive landscape. Part of it is designated a geological SSSI and the site includes archaeological and cultural features. SLA's were designated following a detailed review of existing SLA's in Gwynedd and Anglesey. This report was published in 2012 by LUC.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>

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				language and mineral extraction. Look to reduce the area covered by SLA 07 to avoid overlap with designated RHL areas.	

PS16 – Conserving and Enhancing the Natural Environment

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments & Recommendation
165	Rod Dixon [2774]	STRATEGIC POLICY PS16	Object	This is listed as PS19 under 7.5 in the contents table. Change to PS16 in contents table.	Not accepted – It is not clear to which typographical error the objector is referring to since there does not seem to be an error in either the paper copy or the online version of the Plan. Recommendation No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness. No Change
232	Ellesmere Sand & Gravel Company Limited [2686]	STRATEGIC POLICY PS16	Object	This policy lacks clarity as to where it applies e.g. (not all landscapes and biodiversity assets are of the same value). The policy should relate to the local level rather than repeat national policy. If it is considered to apply to mineral extraction sites suggest changes as set out below.	Not accepted – The purpose of PS16 is to outline's the Plan's strategic position respect natural environment and to provide the context for the more detailed policies AMG1-AMG5. Whilst bullet point 2 and 3 of the policy make reference to 'National Policy' it is not considered that this can be construed as repeating PPW. Mineral extraction has the potential of having significant impact

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				Suggest a hierarchy for assessing environmental effects of development proposals notwithstanding other policies in the development plan. There should be a positive emphasis toward existing mineral extraction sites, or extensions to those sites over new sites. Temporary environmental effects should be viewed differently to long term environmental effects.	<p>on natural environment and should be treated no different to other forms of development. It is considered that the present wording adequately covers all the local level issues. Furthermore, minerals matters are covered in specific detail elsewhere.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
233	Lafarge Tarmac Trading Limited [2735]	STRATEGIC POLICY PS16	Object	<p>This policy lacks clarity as to where it applies e.g. (not all landscapes and biodiversity assets are of the same value). The policy should relate to the local level rather than repeat national policy. If it is considered to apply to mineral extraction sites suggest changes as set out below.</p> <p>Suggest a hierarchy for assessing environmental effects of development proposals notwithstanding other policies in the development plan. There should be a positive emphasis toward existing mineral extraction sites, or extensions to those sites over new sites. Temporary environmental effects should be viewed differently to long term environmental</p>	<p>Not accepted – The purpose of PS16 is to outline's the Plan's strategic position respect natural environment and to provide the context for the more detailed policies AMG1-AMG5. Whilst bullet point 2 and 3 of the policy make reference to 'National Policy' it is not considered that this can be construed as repeating PPW. Mineral extraction has the potential of having significant impact on natural environment and should be treated no different to other forms of development. It is considered that the present wording adequately covers all the local level issues. Furthermore, minerals matters are covered in specific detail elsewhere.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify</p>

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				effects.	amending the Deposit Plan to ensure the Plan's soundness. No Change
311	Cyfeillion Llyn (Mrs Sian Parri) [2871]	STRATEGIC POLICY PS16	Object	A specific reference to protecting the AONB should be included in line with the AONB Management Plan in line with the Countryside and Rights of Way Act 2000	Not accepted – Criterion 2 of the policy covers proposed development within AONBs. Additionally, paragraph 2.2.4 of PPW states that “National planning policy set out in Planning Policy Wales should not be repeated as policy in LDPs but plans should explain how it will apply to the local area, critically how national and local policy will work together. Furthermore, paragraph 2.2.5 of PPW notes that “Plans should not duplicate provisions in other legislative regimes.” The existing legislation and national policy and guidance in respect of AONB's is outlined in Table 23 of the LDP Recommendation No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness. No Change
325	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	STRATEGIC POLICY PS16	Object	NB These comments are intended for PS16 but there seems to be an error on the contents link of the online document which links this policy to PS19 We welcome policy PS16 and stress that the distinctive natural environment of	Not accepted – It is considered that PS16 is sufficiently adequate to provide protection without the need to introduce further 'buffer zones'. The impact of development will vary from site to site and will depend on the habitat/species being protected. Rather than imposing a 'buffer zone' it is that such requirements are dealt with on a case by case basis via the planning

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				<p>Gwynedd and Anglesey includes rare, common and a suite of typical habitats and species.</p> <p>We suggest that this policy and associated text also includes reference to buffer zones to further protect green and blue infrastructure (point 5)</p>	<p>application process</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
343	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	STRATEGIC POLICY PS16	Support	<p>We welcome this policy and stress that the distinctive natural environment of Gwynedd and Anglesey includes rare, common and a suite of typical habitats and species. We suggest that this policy and associated text also includes reference to buffer zones to further protect green and blue infrastructure (point 5)</p> <p>NB There seems to be an error on the contents link of the online document which links this policy to PS19</p>	<p>Noted</p> <p>It is considered that PS16 is sufficiently adequate to provide protection without the need to introduce further 'buffer zones'. The impact of development will vary from site to site and will depend on the habitat/species being protected. Rather than imposing a 'buffer zone' it is that such requirements are dealt with on a case by case basis via the planning application process</p> <p>Recommendation</p> <p>No Change</p>
459	Bourne Leisure Ltd [2768]	STRATEGIC POLICY PS16	Support	<p>Bourne Leisure endorses PS16 in principle as it seeks to conserve and enhance the natural environment.</p>	<p>Noted</p> <p>Recommendation</p> <p>No Change</p>
493	Mr Glyn Jones [2971]	STRATEGIC POLICY PS16	Object	<p>Stronger policy for AONB as regards requirement for appropriate level of Landscape and Visual Impact Assessment</p>	<p>Not accepted – Paragraph 2.2.4 of PPW states that "National planning policy set out in Planning Policy Wales should not be repeated as policy in LDPs but plans should</p>

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				for proposed development and requirement to contact relevant landscape / planning officer for the authority to provide guidance on level of LVIA that is required.	<p>explain how it will apply to the local area, critically how national and local policy will work together. Furthermore, paragraph 2.2.5 of PPW notes that "Plans should not duplicate provisions in other legislative regimes." The existing legislation and national policy and guidance in respect of AONB's is outlined in Table 23 of the LDP.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
802	Ty Mawr West Ltd (John Hill) [3062]	STRATEGIC POLICY PS16	Object	My client wishes to repeat his strongly held views that to designate the Nantlle Valley as a Special Landscape Area would be detrimental to the local economy which factor should be borne in mind in the detailed consideration of the possible adverse effects of such designation.	<p>Not accepted - The Nantlle Valley is a dramatic valley with important cultural heritage (slate quarries) and borders the Snowdonia National Park. SLA's have been designated following a detailed review of existing SLA's in Gwynedd and Anglesey. This report was published 2012 by LUC. No evidence has been presented to contradict the reasoning behind the designation of this SLA.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>

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805	Cydbwyllgor Ymgynghorol AHNE (Cynghorydd Gruffydd Williams) [3090]	STRATEGIC POLICY PS16	Object	AONB Management Plan - this is a statutory plan and it is believed that reference should be made to it in the relevant policies.	<p>Accepted – Paragraph 2.2.4 of PPW states that “National planning policy set out in Planning Policy Wales should not be repeated as policy in LDPs but plans should explain how it will apply to the local area, critically how national and local policy will work together. Furthermore, paragraph 2.2.5 of PPW notes that “Plans should not duplicate provisions in other legislative regimes.” The existing legislation and national policy and guidance in respect of AONB’s is outlined in Table 23 of the LDP.</p> <p>Nonetheless, it is considered that the Plan would benefit from amendments that draw attention to the need to consider the relevant AONB Management Plans at a planning application stage.</p> <p>Recommendation</p> <p>Amend paragraph 7.5.13 to refer to the AONB Management Plans. Also include an additional Policy to require consideration of the Management Plans at the planning application stage.</p> <p>Focused Change - NF 82 & NF 85</p>
806	Cydbwyllgor Ymgynghorol AHNE (Cynghorydd Gruffydd Williams) [3090]	STRATEGIC POLICY PS16	Object	AONB - there is no specific policy in terms of maintaining and safeguarding the AONB. Rather, there are general policies and a reference to national legislation and policy. It is believed that a specific policy is required to maintain and retain the AONB, similar to Policy B8 in the	<p>Not accepted – Criterion 2 of the Policy covers proposed development within the AONBs. Additionally, paragraph 2.2.4 of PPW states that “National planning policy set out in Planning Policy Wales should not be repeated as policy in LDPs but plans should explain how it will apply to the local area, critically how national and local policy will work together. Furthermore, paragraph 2.2.5 of PPW notes that “Plans should not duplicate provisions in other</p>

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				current plan.	<p>legislative regimes." The existing legislation and national policy and guidance in respect of AONB's is outlined in Table 23 of the LDP.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
812	Bangor Civic Society 1 (Don Mathew) [2988]	STRATEGIC POLICY PS16	Support	Bangor Civic Society wish to support PS16	<p>Noted</p> <p>Recommendation</p> <p>No Change</p>
891	Friends of Borth-y Gest (Tom Brooks) [3036]	STRATEGIC POLICY PS16	Object	<p>Conserving and enhancing the natural environment is a policy that we strongly support. We are not comfortable that the sites of local importance to Borth-y-Gest, namely the local nature reserves of Parc y Borth and Pen y Banc, and their adjacent ecological continuums are identified appropriately, in accordance with AMG4 local biodiversity conservation.</p> <p>Table 23 is an important schedule of nature conservation designations but it makes no reference to local or non-</p>	<p>Not accepted – Table 23 provides details on the schedule of statutory nature conservation designations and it is important that this table is read in the context of the preceding paragraphs . In accordance with paragraph 5.3.11 of PPW and paragraph 5.5.1 of TAN 5, Nature Conservation and Planning (2009) Local Nature Reserves (LNRs) are regarded as 'non statutory designations/local sites'. Consequently it would not be appropriate to make reference to LNRs under Table 23. Furthermore, it is considered that adequate protection is afforded to LNRs under policy AMG5 of the LDP.</p> <p>Recommendation</p>

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				statutory nature reserves and believe that this omission should be rectified. More over the constraints map is too indistinct to identify features definitively, but it is uncertain that Parc y Borth is clearly identified as a LNR and Pen y Banc is not and would like the omission corrected.	No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness. No Change
898	Bourne Leisure Ltd [2768]	STRATEGIC POLICY PS16	Support	Bourne Leisure endorses PS16 in principle as it seeks to conserve and enhance the natural environment. The exceptional natural environment of Gwynedd, comprises the key visitor attraction of the area and therefore the desire to protect and where possible enhance the natural environment is supported by Bourne Leisure. Indeed the Destination Management Plan 2013-2020 states that 54% of visitors visited Gwynedd because of the scenery/landscape. Greenacres and Hafan y Môr holiday parks are both located in environmentally sensitive locations. Bourne Leisure comments that this should not rule out development at these sites providing that the development is appropriate to the location and that commensurate mitigation measures can be implemented to mitigate both direct and indirect	Noted Recommendation No Change

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				impacts. Bourne Leisure would like to stress that not all development has the potential to negatively impact on key landscape, public views and open spaces.	
900	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	STRATEGIC POLICY PS16	Object	The AONBs are given an inappropriately low emphasis in the JLDP draft in comparison with the GUDP. There should be a much more explicit and positive local commitment to the statutory duties to protect nationally designated landscapes and their settings, in line with SP2, B8 and B14 in the GUDP. Explicit reference should be made to the AONB Management Plans.	<p>Not accepted – Criterion 2 of the Policy covers proposed development within the AONBs. Additionally, paragraph 2.2.4 of PPW states that “National planning policy set out in Planning Policy Wales should not be repeated as policy in LDPs but plans should explain how it will apply to the local area, critically how national and local policy will work together. Furthermore, paragraph 2.2.5 of PPW notes that “Plans should not duplicate provisions in other legislative regimes.” The existing legislation and national policy and guidance in respect of AONB’s is outlined in Table 23 of the LDP.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan’s soundness.</p> <p>No Change</p>
1092	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	STRATEGIC POLICY PS16	Object	With regards to Policy PS16 and AMG4 NRW questions the need for both these policies and if they should be incorporated into a single 'Biodiversity' Policy. A single policy, similar to Policy	<p>Not accepted - PS16 refers to the natural environment and covers a different scale, being more overarching – as indicated by the title ‘Strategic Policy’, whereas AMG4 provides more information relating to the application of this policy in practical terms to the planning case level for</p>

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				NTE/3 in the Conwy LDP, would provide the policy structure for safeguarding species of European, National and local importance as well as referring to the need to achieve the targets of the LBAP. The policy should include a hierarchy that clearly defines the level of protection afforded to sites and species and include reference to species included within Section 42 of the Wildlife and Countryside Act 1991 which the Authority has a duty to protect under the NERC Act (2006).	<p>biodiversity, which is narrower than the 'natural environment'. Therefore it is considered that the two separate policies are justified.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
1182	Horizon Nuclear Power (Miss Sarah Fox) [2919]	STRATEGIC POLICY PS16	Object	<p>There is a typographical error in the introduction: It should be "effect", not "affect".</p> <p>Horizon submits that greater flexibility needs to be included in these policies so that proposals predicted to have an adverse effect will be permissible subject to the identification and implementation of sufficient mitigation measures, supported by an appropriate implementation plan.</p> <p>Rather than seek specific amendments to these policies Horizon proposes to rely on the Wylfa Newydd specific policies proposed above which would be the relevant policies against which to make</p>	<p>Accepted in part – It is accepted that there is a typographical error in the introduction of the English version and that this should be amended accordingly.</p> <p>It is considered that there is sufficient flexibility within the existing policies to accommodate appropriate forms of development. Like any other form of development any planning application/DCO in respect of Wylfa Newydd will be required to take account of all the relevant policies contained within the LDP.</p> <p>Recommendation</p> <p>Correct typographical error in the English version of the JLDP</p> <p>Minor Change: NB 17</p>

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				consultation responses to the DCO application and to determine its associated development applications.	
1423	NFU Cymru (Dafydd Jarrett) [3285]	STRATEGIC POLICY PS16	Object	NFU Wales would like to make the following general comments about the Development Management Policies included in the draft Plan. The Plan should promote a high quality landscape acknowledging that agriculture has to play in it.	<p>Not accepted – Whilst the contribution that agriculture has played in creating the Plan's 'high quality landscape' is acknowledged, it would not be appropriate to make reference to the role of agriculture as suggested by the objector in the context of policy PS16.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
1439	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	STRATEGIC POLICY PS16	Object	The possible impact of development on the favourable conservation status of protected species needs further consideration. Species present in Gwynedd and Ynys Mon include otters, bats and water voles. Relevant policies should ensure that proposed development assessed under the provisions of the Plan and on allocations give proper and full consideration to protected species in order to comply with relevant legislative requirements.	<p>Comment noted - Paragraph 2.2.4 of PPW states that "National planning policy set out in Planning Policy Wales should not be repeated as policy in LDPs but plans should explain how it will apply to the local area, critically how national and local policy will work together. Furthermore, paragraph 2.2.5 of PPW notes that "Plans should not duplicate provisions in other legislative regimes." Chapter 5 of PPW along with TAN 5 provides planning guidance in respect of international and national designations which are protected by legislation.</p> <p>In respect of PS16 bullet point 6 already makes reference to "Safeguarding internationally, nationally and locally protected species". Furthermore policies AMG4 and AMG</p>

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					<p>5 of the LDP provides the local planning context in respect of regional/local species.</p> <p>The Councils will continue to engage with NRW at a planning application stage. When considering any development proposal (including on land allocated for development in the plan) the local planning authorities will consider environmental impact, so as to avoid, wherever possible, adverse effects on the environment.</p> <p>Recommendation</p> <p>No change required to address matters raised in the representation</p> <p>No Change</p>
1443	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	STRATEGIC POLICY PS16	Object	A number of the allocated sites are located within, adjacent or in close proximity to the Llŷn and Ynys Môn AONBs. We remind you of the Authority's duty under Section 85 of the Countryside and Rights of Way Act 2000, which requires public bodies to have regard to the purpose of conserving and enhancing the natural beauty of an AONB. It is considered that where an allocation has the potential to significantly affect the AONB and its associated boundary area, the site would need to be rigorously	<p>Comment noted – Paragraph 2.2.4 of PPW states that “National planning policy set out in Planning Policy Wales should not be repeated as policy in LDPs but plans should explain how it will apply to the local area, critically how national and local policy will work together. Furthermore, paragraph 2.2.5 of PPW notes that “Plans should not duplicate provisions in other legislative regimes.” The existing legislation and national policy and guidance in respect of AONB’s is outlined in Table 23 of the LDP.</p> <p>The Councils will continue to engage with NRW at a planning application stage. When considering any development proposal (including on land allocated for</p>

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				assessed in terms of adverse impact on the amenity and special qualities of the AONB.	development in the plan) the local planning authorities will consider environmental impact, so as to avoid, wherever possible, adverse effects on the environment. Recommendation No change required to address matters raised in the representation No Change
1444	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	STRATEGIC POLICY PS16	Object	Some allocations are located within or adjacent to landscapes that are registered by CADW as Landscapes of Historic Interest. While this isn't a statutory designation, Chapter 6 of Planning Policy Wales identifies that it should be a material planning consideration in the planning process and must be given due regard.	Not accepted – Registered Historic Landscapes are covered by policy PS17 Recommendation No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness. No Change
429	Cyngor Tref Ffestiniog (Mrs Ann Coxon) [2940]	STRATEGIC POLICY PS16	Object	The Plan should include the fact that no planning application should be approved which significantly harms historic woodland, in line with Wales Planning Policy. It should be noted that every opportunity to plant trees in suitable areas should be taken, in order to improve the local environment.	Not accepted – Paragraph 5.2.9 of PPW contains statements of national development management policy in respect of trees and woodlands, including ancient and semi natural woodlands and therefore it is not required to be repeated as local policy in LDPs. Recommendation No robust evidence was received which would justify

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

AMG1 – Special Landscape Areas

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54	Oaktree Environmental Ltd (John Williams) [2594]	POLICY AMG1	Object	The SLAs identified on the Proposals Map overlap other landscape designations which appear to have the same purpose of landscape protection. Where such overlap occurs, consideration should be given to reducing the extent of the SLA in order to avoid duplication of designated areas. In terms of our client's site, which is contained within proposed SLA 07, the landscape is characteristic of the mineral extraction industry in the area and should not be an excessive burden on the future extraction of mineral in the area Look to reduce the area covered by SLA 07 to avoid overlap with designated RHL areas.	Not accepted - SLA's have been designated following a detailed review of existing SLA's in Gwynedd and Anglesey. This report was published 2012 by LUC. No evidence has been presented to contradict the reasoning behind the designation of this SLA and justify the reduction in area covered by it. The mineral extraction industry has the potential to have a significant impact on the landscape and should not be treated any different to other forms of development. Recommendation No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness. No Change
234	Ellesmere Sand & Gravel Company Limited [2686]	POLICY AMG1	Object	There should be a positive emphasis toward existing mineral extraction sites, or extensions to those sites over new	Not accepted - The mineral extraction industry has the potential to have a significant impact on the landscape and should not be treated any different to other forms of

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				<p>sites. Temporary environmental effects should be viewed differently to long term environmental effects.</p> <p>The policy should be amended to include the words "long-term" effects thus allowing for mineral extraction in the interim and refer to restoration proposals being "in accordance" with the "long-term" objectives of the protection of special landscape areas.</p>	<p>development. This policy does not specifically prohibit/restrict mineral extraction within SLA's but ensures that there is adequate information available for the LPA to make informed decisions on planning applications.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
235	Lafarge Tarmac Trading Limited [2735]	POLICY AMG1	Object	<p>There should be a positive emphasis toward existing mineral extraction sites, or extensions to those sites over new sites. Temporary environmental effects should be viewed differently to long term environmental effects.</p> <p>The policy should be amended to include the words "long-term" effects thus allowing for mineral extraction in the interim and refer to restoration proposals being "in accordance" with the "long-term" objectives of the protection of special landscape areas.</p>	<p>Not accepted - The mineral extraction industry has the potential to have a significant impact on the landscape and should not be treated any different to other forms of development. This policy does not specifically prohibit/restrict mineral extraction within SLA's but ensures that there is adequate information available for the LPA to make informed decisions on planning applications.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
291	Mr Myrddin	POLICY AMG1	Object	The officers who are drawing up the new	Not accepted - SLA's have designated following a

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	Roberts [2858]			<p>Joint Local Development Plan have not adequately involved local stakeholders such as community councils, farmers, landowners and residents before designating Special Landscape Areas on the map of Anglesey especially for the SLA named Beaumaris Wooded Slopes and Llangoed Vale. I happen to be the current chairman of Llanddona Community Council, so I know that no officer has attended any of our meetings. We as residents, should have been alerted to this proposed major change in policy. Meaningful dialogue, outlining the implications on businesses, land and homes has not happened.</p> <p>That Policy AMG1 be deleted until such time that all stakeholders have been informed of the proposed introduction of SLA's and discussion and agreement reached by all relevant parties, especially the local community and officers of the Joint Development Plan.</p>	<p>detailed review of existing SLA's in Gwynedd and Anglesey. This report was published 2012 by LUC. On Anglesey the former Special Landscape Area almost covered the whole of Unitary Authority area. The new SLA's replace the former designation and now only relate to specific parts of the Unitary Authority area. Consequently, SLA's should not be regarded as a new designation and will have no greater implications for local businesses and residents than those which exist at present. The formal designation of the SLA's will be undertaken via the LDP consultation process.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
365	Dr Morag McGrath [231]	POLICY AMG1	Object	<p>It is difficult to see how any development can 'add' to the historical, visual, geographical, ecological and cultural features of an SLA.</p> <p>Change the wording to 'maintain,</p>	<p>Accepted – It is considered that this would improve the clarity of the policy and provide consistency with paragraph 7.5.10.</p> <p>Recommendation</p>

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				enhance or restore the recognised character and qualities' as in 7.5.10.	Change the wording of the policy to 'maintain, enhance or restore the recognised character and qualities' Focussed Change - NF 83
375	Welsh Highland Railway (Mr Graham Farr) [254]	POLICY AMG1	Support	The Company supports the Policy as worded. See the Company's separate representation in respect of the area to which it applies.	Noted Recommendation No Change
460	Bourne Leisure Ltd [2768]	POLICY AMG1	Object	Bourne Leisure considers that AMG1 should explicitly set out that due to the need for tourism facilities to be located near the coast there is a high probability that they will also be located in a SLA. Tourist facilities are in a constant state of change, with redevelopment and site rationalisation taking place at all times, to meet the needs of the dynamic tourism market. Bourne Leisure considers that even for sites located in the SLA, appropriate development can come forward providing that commensurate mitigation measures can be implemented to mitigate both direct and indirect impacts.	Not accepted – the tourism industry should not be treated differently to any other form of development. This policy does not inhibit the appropriate development within SLA's but outlines how such proposals will be considered within the local planning context. Recommendation No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness. No Change
609	Mr Paul Madden [3032]	POLICY AMG1	Object	The whole of Anglesey was identified under policy 31 of the Ynys Môn Local Plan as a Special Landscape area (SLA). In the emerging Plan only a few areas are identified as an SLA and the criteria now	Not accepted - SLA's have been designated following a detailed review of existing SLA's in Gwynedd and Anglesey. This report was published 2012 by LUC. The rationale behind designating Global Geoparks is

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				used could apply to the whole island being a SLA. Anglesey could be awarded an enhanced global geopark status which is of equivalent status to a world heritage site. It does not offer sufficient protection against unsuitable development and reverses longstanding policy without adequate justification. Anglesey as a whole should be designated as a SLA.	<p>significantly different to that for SLAs. Geopark status is concerned about acknowledging the high quality of local geological heritage, where greater appreciation and understanding of that geological heritage can benefit local people and businesses through tourism and education initiatives. Geopark status has no legislative basis or land use planning implications.</p> <p>Furthermore, Geoparks are already protected through other LDP policies for example PS17 (second bullet point) and policy AMG5.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
808	Cydbwyllgor Ymgynghorol AHNE (Cynghorydd Gruffydd Williams) [3090]	POLICY AMG1	Object	In some places, this area (Western Llyn SLA) abuts the AONB and protects the setting of the AONB. However, some parts of the AONB are not protected in this way. Therefore, it is believed that reference should be made to safeguarding the setting of the AONB in the relevant policies.	<p>Not accepted – Reference to issue is made in the last sentence in policy AMG2 which states that “Additional consideration will also be given to developments which directly affect the landscape character and setting of the AONBs or the National Park”.</p> <p>However, it is noted that there is an error in the Welsh version and that ‘yn uniongyrchol’ should be included after “effeithio” in the last sentence of policy AMG2 in</p>

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					<p>order to be consistent with the English version</p> <p>Recommendation</p> <p>That the words 'yn uniongyrchol' should be included after "effeithio" in the last sentence of policy AMG2.</p> <p>Minor Change: NB 18</p>
811	Cyngor Cymuned Botwnnog (Mrs Gwenda Roberts) [1541]	POLICY AMG1	Object	The New Coastal Landscape Conservation Area Scheme once more limits the rights of the residents of Pen Llŷn by preventing them building houses in their own area. The countryside will die as a result and depopulation can be expected - if it comes to that the unique culture and traditions of the countryside will be lost forever. Won't the Council regret losing such a valuable resource?	<p>Not accepted – this is considered a general comment and has no specific relevance to policy AMG1. SLA's will have no direct impact on the location housing within the Plan area which will be guided by the relevant housing policies contained within the LDP.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
880	Mr John Tripp [252]	POLICY AMG1	Support	Delighted to see 5 new conservation areas in Anglesey.	<p>Noted</p> <p>Recommendation</p> <p>No Change</p>
892	Barton Willmore (Mr Mark Roberts) [1645]	POLICY AMG1	Object	This policy seeks to ensure that development within SLAs has "no detrimental impact on the landscape"	<p>Accept in part – it is accepted that the phrase 'no detrimental impact' is overly onerous. However, rather than the change suggested by the objector the wording</p>

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				<p>This test and requirement is overly onerous and disproportionate to the SLA status. Also practically impossible in delivering any development not to have an impact of some form on the landscape.</p> <p>Significantly the policy as drafted requires "no detrimental impact on the landscape" and does not embody the presumption in favour of sustainable development, as required by PPW. Reference should be made to the presumption in favour of sustainable development.</p> <p>Reference to "no detrimental impact" should be deleted and replaced with "no significant impact" and a further balance provided in that any impact may be outweighed by the positive effects of the development.</p>	<p>should be amended to 'no significant adverse impact' in order to provide consistency of wording with the rest of the policy.</p> <p>Policy AMG2 is not a 'catch all' policy and needs to be read in the context of the whole LDP.</p> <p>Recommendation</p> <p>Modify the wording of the first sentence of policy AMG to 'no significant adverse impact'</p> <p>Focussed Change - NF 83</p>
899	Bourne Leisure Ltd [2768]	POLICY AMG1	Object	<p>AMG1 allows development to come forward as long as its scale and nature is appropriate and that there is no detrimental impact on the landscape.</p> <p>Policy AMG1 therefore provides a positive policy basis for appropriate development come forward in the SLAs.</p> <p>Bourne Leisure would like to stress that</p>	<p>Not accepted – the tourism industry should not be treated differently to any other form of development. This policy does not inhibit the appropriate development within SLA's but outlines how such proposals will be considered within the local planning context.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's</p>

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				<p>not all development has the potential to negatively impact on key landscape, public views and open spaces.</p> <p>Bourne Leisure considers that AMG1 should explicitly set out that due to the need for tourism facilities to be located near the coast there is a high probability that they will also be located in a SLA. Tourist facilities are in a constant state of change, with redevelopment and site rationalisation taking place at all times, to meet the needs of the dynamic tourism market.</p>	<p>soundness.</p> <p>No Change</p>
901	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	POLICY AMG1	Object	<p>We support the new emphasis on local protection through the SLAs (AMG1). Their role as providing buffers to protect the settings of the AONB should be emphasised and reinforced by extending SLAs close to areas of AONB without that protection. The scope and intentions of AMG2 as distinct from AMG1 need clarification.</p>	<p>Not accepted - Not accepted - SLA's have been designated following a detailed review of existing SLA's in Gwynedd and Anglesey. This report was published 2012 by LUC. It is considered that protecting the settings of the AONB is adequately covered by existing legislation and national planning guidance and need not be repeated at a local level.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
904	Campaign for the	POLICY AMG1	Object	Clarify details of and reasons for	Not accepted - SLA's have been designated following a

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	Protection of Rural Wales (Mr Noel Davey) [1169]			proposed changes in Western Llŷn SLA compared to former Western Llŷn LCA near Abersoch and Pwllheli.	<p>detailed review of existing SLA's in Gwynedd and Anglesey. This report was published 2012 by LUC. A copy of this report is on both Council's website for public viewing.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
905	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	POLICY AMG1	Object	Provide for an SLA as a buffer area to protect the northern part of the Llŷn AONB, comprising (for example) a 2km belt to form the southern backdrop of Yr Eifl and the Clynog Hills.	<p>Not accepted - SLA's have been designated following a detailed review of existing SLA's in Gwynedd and Anglesey. This report was published 2012 by LUC. It is considered that protecting the settings of the AONB is adequately covered by existing legislation and national planning guidance and need not be repeated at a local level.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
906	Campaign for the Protection of Rural Wales (Mr	POLICY AMG1	Object	SLAs 8 and 9 protecting the south Menai Strait shore should be extended to include unprotected areas on the	<p>Not accepted - SLA's have been designated following a detailed review of existing SLA's in Gwynedd and Anglesey. This report was published 2012 by LUC. It is</p>

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	Noel Davey) [1169]			Gwynedd side of the Menai, between Foryd Bay and Felinheli, either side of the World Heritage site in Caernarfon. Apart from protecting a valuable and vulnerable local landscape, reinstating a former Landscape Conservation Area, their key role would be to provide a buffer for the Anglesey AONB on the north side of the Strait.	considered that protecting the settings of the AONB is adequately covered by existing legislation and national planning guidance and need not be repeated at a local level. Recommendation No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness. No Change
55	Oaktree Environmental Ltd (John Williams) [2594]	7.5.9	Object	There should be no need for additional protection if areas of land are already protected by other landscape designations which recognise the quality of the landscape concerned. Our client's site is a working quarry which is located in an area recognised for its historic landscape value and so designated. There should be no need to afford the area additional landscape protection when such already exists. Look to reduce the area covered by SLA 07 to avoid overlap with designated RHL areas.	Not accepted - SLA's have designated following a detailed review of existing SLA's in Gwynedd and Anglesey. This report was published 2012 by LUC. No evidence has been presented to contradict the reasoning behind the designation of this SLA and justify the reduction in area covered by it. The mineral extraction industry has the potential to have a significant impact on the landscape and should not be treated any different to other forms of development. Recommendation No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness. No Change
56	Oaktree	7.5.10	Object	Where landscape protection already	Not accepted - SLA's have designated following a

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	Environmental Ltd (John Williams) [2594]			<p>exists, development proposals should already be required to give consideration to maintaining, enhancing or restoring the recognised character and quality of the areas. Conferring SLA status to such areas is therefore an unnecessary exercise which serves little purpose given the existing level of landscape protection.</p> <p>Look to reduce the area covered by SLA 07 to avoid overlap with designated RHL areas</p>	<p>detailed review of existing SLA's in Gwynedd and Anglesey. This report was published 2012 by LUC. No evidence has been presented to contradict the reasoning behind the designation of this SLA and justify the reduction in area covered by it. The mineral extraction industry has the potential to have a significant impact on the landscape and should not be treated any different to other forms of development.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
426	Cyngor Tref Ffestiniog (Mrs Ann Coxon) [2940]	7.5.10	Object	We support this policy to safeguard Special Landscape Areas. But in our opinion, Cwmorthin should be included amongst these. This area is certainly one which is incredibly striking and beautiful, and deserves to be specifically protected.	<p>Not accepted - SLA's have designated following a detailed review of existing SLA's in Gwynedd and Anglesey. This report was published 2012 by LUC. On Anglesey the former Special Landscape Area almost covered the whole of Unitary Authority area. The new SLA's replace the former designation and now only relate to specific parts of the Unitary Authority area. Consequently, SLA's should not be regarded as a new designation and will have no greater implications for local businesses and residents than those which exist at present. The formal designation of the SLA's will be undertaken via the LDP consultation process.</p>

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					<p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
275	Mr Myrddin Roberts [2858]	7.5.11	Object	No discussions have taken place with the relevant Community Councils and landowners in respect of the new SLA named Beaumaris Wooded Slopes and Llangoed Vale. Surely all interested parties should have been made aware of this new designation and its implications on their businesses, land and homes. This major change and addition to planning policy merits more stakeholder input. It is insufficient to state that this is the time for public comment when we have not had detailed information readily available and had the necessary discussions with members of the Joint Development Plan.	<p>Not accepted - SLA's have designated following a detailed review of existing SLA's in Gwynedd and Anglesey. This report was published 2012 by LUC. On Anglesey the former Special Landscape Area almost covered the whole of Unitary Authority area. The new SLA's replace the former designation and now only relate to specific parts of the Unitary Authority area. Consequently, SLA's should not be regarded as a new designation and will have no greater implications for local businesses and residents than those which exist at present. The formal designation of the SLA's will be undertaken via the LDP consultation process.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>

AMG2 – Protecting and Enhancing Features and Qualities that are Unique to the Local Landscape Character

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments & Recommendation
236	Ellesmere Sand & Gravel Company Limited [2686]	POLICY AMG2	Object	<p>There should be a positive emphasis toward existing mineral extraction sites, or extensions to those sites over new sites. Temporary environmental effects should be viewed differently to long term environmental effects. Suggest duplication with Policy AMG1.</p> <p>The policy should be amended to include the words “long-term” effects thus allowing for mineral extraction in the interim and refer to restoration proposals being “in accordance” with the “long-term” objectives of the protection of special landscape areas. Suggest potential merge with Policy AMG1.</p>	<p>Not accepted - The mineral extraction industry has the potential to have a significant impact on the landscape and should not be treated any different to other forms of development. This policy does not specifically prohibit/restrict mineral extraction within SLA's but ensures that there is adequate information available for the LPA to make informed decisions on planning applications.</p> <p>Policy AMG2 refer to Landscape Character Areas (LCAs) and not to SLAs. LCAs cover the whole area of Anglesey and Gwynedd and are defined in the Landscape Strategy for each authority. Consequently the policy relates to the wider landscape than just those included within SLAs.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
237	Lafarge Tarmac Trading Limited [2735]	POLICY AMG2	Object	<p>There should be a positive emphasis toward existing mineral extraction sites, or extensions to those sites over new sites. Temporary environmental effects should be viewed differently to long term environmental effects. Suggest</p>	<p>Not accepted - The mineral extraction industry has the potential to have a significant impact on the landscape and should not be treated any different to other forms of development. This policy does not specifically prohibit/restrict mineral extraction but ensures that there is adequate information available for the LPA to</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments & Recommendation
				<p>duplication with Policy AMG1.</p> <p>The policy should be amended to include the words "long-term" effects thus allowing for mineral extraction in the interim and refer to restoration proposals being "in accordance" with the "long-term" objectives of the protection of special landscape areas. Suggest potential merge with Policy AMG1.</p>	<p>make informed decisions on planning applications</p> <p>Policy AMG2 refer to Landscape Character Areas (LCAs) and not to SLAs. LCAs cover the whole area of Anglesey and Gwynedd and are defined in the Landscape Strategy for each authority. Consequently the policy relates to the wider landscape than just those included within SLAs.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
330	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	POLICY AMG2	Object	SLA are adequately covered by AMG1, for greater clarity AMG2 should be re-worded to protect the wider landscape and the important characteristic features of the local landscapes of Gwynedd and Anglesey. Remove reference to SLA and ensure policy relates to wider landscape.	<p>Not accepted – Policy AMG2 refer to Landscape Character Areas (LCAs) and not to SLAs. LCAs cover the whole area of Anglesey and Gwynedd and are defined in the Landscape Strategy for each authority. Consequently the policy relates to the wider landscape than just those included within SLAs.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
809	Cydbwyllgor	POLICY AMG2	Object	It is a praiseworthy but slightly	Not accepted – it is considered that the policy is

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	Ymgynghorol AHNE (Cyngorydd Gruffydd Williams) [3090]			complicated policy, and it is believed that it could be difficult to put into operation.	<p>sufficiently clear in meaning and capable of being implemented.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
886	Friends of Borth-y Gest (Tom Brooks) [3036]	POLICY AMG2	Support	<p>Policies AMG2, AMG3 and AMG4 related to features and qualities that are unique to the local landscape, coastal protection and local biodiversity conservation.</p> <p>We support these policies which are in line with the objectives of the Friends of Borth-y-Gest.</p>	<p>Noted</p> <p>Recommendation</p> <p>No Change</p>
893	Barton Willmore (Mr Mark Roberts) [1645]	POLICY AMG2	Object	<p>The policy does not set a qualifying requirement that impacts need to be "significant". It merely requires an adverse impact. This is not appropriate as any development may be deemed to have an adverse impact in some form on the landscape.</p> <p>Furthermore, the policy does not allow the balancing of the economic, social or indeed other environmental benefits of a project (remediation and demolition of a contaminate site and large buildings),</p>	<p>Accepted in part – it is accepted that 'significant' should replace 'adverse' in the first sentence and also included before 'adverse' in the second sentence of policy AMG2.</p> <p>Policy AMG2 is not a 'catch all' policy and needs to be read in the context of the whole LDP including those sections referring to the economy and sustainable development.</p> <p>Recommendation</p> <p>That 'significant' should replace 'adverse' in the first</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments & Recommendation
				<p>compared to the landscape impact arising from a small scale development. Reference should be made to the presumption in favour of sustainable development.</p> <p>The policy should be revised to require landscape impacts to be significant in undesignated areas and for these to significantly and demonstrably outweigh the economic, social or other environmental benefits before an application is refused on the basis of this policy.</p>	<p>sentence and also included before 'adverse in the second sentence of policy AMG2.</p> <p>Focussed Change - NF 84</p>
1445	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	POLICY AMG2	Object	<p>We would recommend that this policy name is changed to protecting and enhancing features and qualities that are 'distinctive or special' to the landscape character rather than 'unique'.</p>	<p>Accepted – It is considered that the 'distinctive' should be used as opposed to 'unique' in the title of AMG2.</p> <p>Recommendation</p> <p>That 'the 'distinctive' should be used as opposed to 'unique' in the title of AMG2.</p> <p>Focussed Change - NF 84</p>
1446	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	POLICY AMG2	Object	<p>Criterion 3 should be amended to read "layout of settlements and boundary types".</p>	<p>Not accepted – It is not considered that the suggested wording would improve the clarity of the criterion. Furthermore, 'boundary types' is covered by 'traditional features'.</p> <p>Recommendation</p>

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					<p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
57	Oaktree Environmental Ltd (John Williams) [2594]	7.5.12	Object	<p>The area containing our client's site is protected by a historic landscape designation considered sufficient to maintain the unique scenery and sense of place. It is ironic that further development at the quarry may be affected by protection of landscape characteristics that would not have existed but for the mineral extraction industry. The Nantlle Valley is renowned for its slate quarrying heritage and, in an area where good quality jobs may be scarce, extraction and processing of slate provides the basis for job creation to retain local populations in an industry that characterises the area in landscape and cultural terms.</p> <p>Look to reduce the area covered by SLA 07 to avoid overlap with designated RHL areas.</p>	<p>Not accepted – paragraph 7.5.12 makes no reference to SLA's. This objection has no relevance to the paragraph in question. A similar observation has already been made by the objector in respect of policy AMG1.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>

AMG3 – Coastal Protection

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments & Recommendation
810	Cydbwyllgor Ymgynghorol AHNE (Cyngorydd Gruffydd Williams) [3090]	POLICY AMG3	Object	The Heritage Coast is a local designation that largely follows the AONB's coastal boundary in Llŷn. It is believed that this policy should reflect the designation in a more positive manner through further conserving the HC.	<p>Not accepted – it is considered that the importance of the Heritage Coast is adequately covered in policy AMG3 and paragraph 7.5.17.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
887	Friends of Borth-y-Gest (Tom Brooks) [3036]	POLICY AMG3	Support	<p>Policies AMG2, AMG3 and AMG4 related to features and qualities that are unique to the local landscape, coastal protection and local biodiversity conservation.</p> <p>We support these policies which are in line with the objectives of the Friends of Borth-y-Gest.</p>	<p>Noted</p> <p>Recommendation</p> <p>No Change</p>

AMG4 – Local Biodiversity Conservation

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments & Recommendation
238	Ellesmere Sand & Gravel Company Limited [2686]	POLICY AMG4	Object	Suggest the policy is repetitive of national policy, unwieldy and requires flexibility in the wording as no definition or hierarchy is set out in regard to mineral extraction	Accepted in part – it is agreed that reference to international and national sites should be deleted from the policy to avoid duplication with national policy. In respect of minerals matters, these are covered in specific

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				<p>sites.</p> <p>Would suggest merge with Policy AMG5 and change in wording to first sentence to read "Proposals should where appropriate protect and enhance biodiversity that has been identified as being important to the local area."</p>	<p>detail elsewhere.</p> <p>Unlike AMG4, AMG5 refers exclusively to local sites which do not enjoy statutory protection in the way SSSIs and SACs do. The level of protection afforded to these local sites is defined in the LDP and it therefore is appropriate to have this as a separate policy.</p> <p>Recommendation</p> <p>That the policy should be re-drafted to improve its clarity, avoid duplication with national policy and to reflect the importance and status of local biodiversity sites.</p> <p>Focussed Change - NF 86</p>
239	Lafarge Tarmac Trading Limited [2735]	POLICY AMG4	Object	<p>Suggest the policy is repetitive of national policy, unwieldy and requires flexibility in the wording as no definition or hierarchy is set out in regard to mineral extraction sites.</p> <p>Would suggest merge with Policy AMG5 and change in wording to first sentence to read "Proposals should where appropriate protect and enhance biodiversity that has been identified as being important to the local area."</p>	<p>Accepted in part – it is agreed that reference to international and national sites should be deleted from the policy to avoid duplication with national policy. In respect of minerals matters, these are covered in specific detail elsewhere.</p> <p>Unlike AMG4, AMG5 refers exclusively to local sites which do not enjoy statutory protection in the way SSSIs and SACs do. The level of protection afforded to these local sites is defined in the LDP and it therefore is appropriate to have this as a separate policy.</p> <p>Recommendation</p> <p>That the policy should be re-drafted to improve its clarity,</p>

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					<p>avoid duplication with national policy and to reflect the importance and status of local biodiversity sites.</p> <p>Focussed Change - NF 86</p>
333	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	POLICY AMG4	Support	We welcome the protection given to local biodiversity through this policy	<p>Noted.</p> <p>Recommendation</p> <p>No Change</p>
462	Bourne Leisure Ltd [2768]	POLICY AMG4	Object	Point 1 should be amended to state that only alternative sites that are reasonably related to the application site should need to be considered to satisfy this policy. Point 2 should be amended to acknowledge that some developments already exist within areas of international, national and local biodiversity importance. Further development at these locations should be permitted as long as biodiversity is protected and enhanced.	<p>Accepted in part – it is considered that the words ‘satisfactory alternative site’ in Criterion 1 is sufficiently adequate to cover the objector’s concerns regarding the need to be ‘reasonably related’ to the application site. However, the word “addas” should be included after “safle amgen arall” in the Welsh version of the amended policy in order to have consistency with the English version of the policy.</p> <p>In respect of Criterion 2 the objector’s comments are accepted and the wording be amended by inserting the words “significant harmful impacts” after “avoiding” in the amended policy.</p> <p>Recommendation</p> <p>That the policy should be re-drafted to improve its clarity, avoid duplication with national policy and to reflect the importance and status of local biodiversity sites.</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments & Recommendation
					Focussed Change - NF 86
888	Friends of Borth-y-Gest (Tom Brooks) [3036]	POLICY AMG4	Support	<p>Policies AMG2, AMG3 and AMG4 related to features and qualities that are unique to the local landscape, coastal protection and local biodiversity conservation.</p> <p>We support these policies which are in line with the objectives of the Friends of Borth-y-Gest.</p>	<p>Noted</p> <p>Recommendation</p> <p>No Change</p>
897	Bourne Leisure Ltd [2768]	POLICY AMG4	Object	<p>AMG4 does not provide a positive basis for appropriate development to come forward and could stifle appropriate development.</p> <p>Point 1 should be amended to state that only alternative sites that are reasonably related to the application site should need to be considered to satisfy this policy. Bourne Leisure considers that it is inappropriate to assess alternative sites that are not reasonably related to the existing site.</p> <p>Point 2 should be amended to acknowledge that some developments already exist within areas of international, national and local biodiversity importance. Further development at these locations should be permitted as long as biodiversity is</p>	<p>Accepted in part – it is considered that the words ‘satisfactory alternative site’ in Criterion 1 is sufficiently adequate to cover the objector’s concerns regarding the need to be ‘reasonably related’ to the application site.</p> <p>In respect of Criterion 2 the objector’s comments are accepted and the wording be amended by inserting the words “significant harmful impacts” after “avoiding” in the amended policy.</p> <p>Recommendation</p> <p>That the policy should be re-drafted to improve its clarity, avoid duplication with national policy and to reflect the importance and status of local biodiversity sites.</p> <p>Focussed Change - NF 86</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments & Recommendation
				<p>protected and enhanced.</p> <p>Bourne Leisure considers it important for Anglesey and Gwynedd to take a balanced, pragmatic approach with regard to development proposals that have the potential to affect biodiversity.</p> <p>Bourne Leisure notes that specific developments also have the potential to generate net gain in biodiversity value through habitat creation.</p>	
1073	Welsh Government (Mr Mark Newey) [1561]	POLICY AMG4	Object	It requires further re-drafting. As drafted the policy seems overly onerous for the consideration of development proposals on local non-statutory nature conservation designations.	<p>Accepted – it is considered that the policy should be re-drafted. The proposed re-wording will not effect on the soundness of the Plan.</p> <p>Recommendation</p> <p>That the policy should be re-drafted to improve its clarity, avoid duplication with national policy and to reflect the importance and status of local biodiversity sites.</p> <p>.</p> <p>Focussed Change - NF 86</p>
1440	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	POLICY AMG4	Object	We have not considered possible effects on all local or regional interests. Therefore, the possibility of adverse effects on such interests should not be ruled out, which would be relevant to your Authority's general duty to have regard to conserving biodiversity as set	<p>Accepted in part – whilst the comments are accepted, it is considered that the issues raised by the objector are already covered in policy AMG4. Furthermore, it is considered that the proposed re-drafted wording of AMG4 should help improve the clarity of this policy.</p> <p>Recommendation</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments & Recommendation
				out in section 40 of the Natural Environment and Rural communities (NERC) Act (2006). This advice includes any consideration of the planned provision of 'linear' and 'stepping stone' habitats as defined in Article 10 of the Habitats Directive.	That the policy should be re-drafted to improve its clarity, avoid duplication with national policy and to reflect the importance and status of local biodiversity sites. Focussed Change - NF 86
1675	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	POLICY AMG4	Object	With regards to Policy PS16 and AMG4 NRW questions the need for both these policies and if they should be incorporated into a single 'Biodiversity' Policy. A single policy, similar to Policy NTE/3 in the Conwy LDP, would provide the policy structure for safeguarding species of European, national and local importance as well as referring to the need to achieve the targets of the LBAP. The policy should include a hierarchy that clearly defines the level of protection afforded to sites and species and include reference to species included within Section 42 of the Wildlife and Countryside Act 1991 which the Authority has a duty to protect under the NERC Act (2006).	Not accepted - PS16 refers to the natural environment and covers a different scale, being more overarching – as indicated by the title 'Strategic Policy', whereas AMG4 provides more information about the application of this policy as it will apply in practical terms to the planning case level for local biodiversity, which is narrower than the 'natural environment'. Therefore it is considered that the two separate policies are justified. Policy guidance on protecting species of international and national importance is outlined in PPW and should not be repeated in the LDP. Consequently AMG4 focuses on wildlife species and habitats of local importance. Recommendation No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness. No Change

AMG5 – Protecting Sites of Regional or Local Significance

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments & Recommendation
164	Rod Dixon [2774]	POLICY AMG5	Object	<p>Anglesey is likely to achieve UNESCO global Geopark status. This should be included as a protected area.</p> <p>Include UNESCO sites and Global Geoparks as protected areas.</p>	<p>Not accepted - Geopark status is concerned about acknowledging the high quality of local geological heritage, where greater appreciation and understanding of that geological heritage can benefit local people and businesses through tourism and education initiatives. Geopark status has no legislative basis or land use planning implications.</p> <p>Whilst the same could also be argued for World Heritage Sites, PPW does provide guidance on how WHS should be protected within the national planning framework.</p> <p>Furthermore, Geoparks are already protected through other LDP policies for example PS17 (second bullet point) and policy AMG5.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
192	Mrs Irene Stott [2780]	POLICY AMG5	Object	<p>Anglesey is likely to achieve UNESCO global Geopark status. This should be included as a protected area. Include UNESCO sites and Global Geoparks as</p>	<p>Not accepted - Geopark status is concerned about acknowledging the high quality of local geological heritage, where greater appreciation and understanding of that geological heritage can benefit local people and</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments & Recommendation
				protected areas.	<p>businesses through tourism and education initiatives. Geopark status has no legislative basis or land use planning implications.</p> <p>Whilst the same could also be argued for World Heritage Sites, PPW does provide guidance on how WHS should be protected within the national planning framework.</p> <p>Furthermore, Geoparks are already protected through other LDP policies for example PS17 (second bullet point) and policy AMG5.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
240	Ellesmere Sand & Gravel Company Limited [2686]	POLICY AMG5	Object	<p>The policy should look more positively toward mineral extraction development and support existing sites and extensions to existing sites over new development.</p> <p>Suggest potential merge with Policy AMG4 to allow for Ecological Assessment to support development of sites.</p>	<p>Not accepted - Mineral extraction can have significant ecological impacts and each case should be considered individually; no ecological justification for giving this industry preferential treatment over other industries.</p> <p>Unlike AMG4, AMG5 refers exclusively to local sites which do not enjoy statutory protection in the way SSSIs and SAC do. The level of protection afforded to these sites is defined in the LDP and it therefore seems appropriate to have this as a separate policy.</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments & Recommendation
					<p>Furthermore, Geoparks are already protected through other LDP policies for example PS17 (second bullet point) and policy AMG5.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
241	Lafarge Tarmac Trading Limited [2735]	POLICY AMG5	Object	<p>The policy should look more positively toward mineral extraction development and support existing sites and extensions to existing sites over new development.</p> <p>Suggest potential merge with Policy AMG4 to allow for Ecological Assessment to support development of sites.</p>	<p>Not accepted - Mineral extraction can have significant ecological impacts and each case should be considered individually; no ecological justification for giving this industry preferential treatment over other industries.</p> <p>Unlike AMG4, AMG5 refers exclusively to local sites which do not enjoy statutory protection in the way SSSIs and SAC do. The level of protection afforded to these sites is defined in the LDP and it therefore seems appropriate to have this as a separate policy.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments & Recommendation
					No Change
338	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	POLICY AMG5	Object	<p>We welcome the support given to sites of regional or local importance.</p> <p>However we suggest that the second paragraph starts with "if" rather than "when".</p>	<p>Not accepted - Disagree to the change in wording from 'when' to 'if' since it is considered that the existing wording is sufficient.</p> <p>Recommendation</p> <p>No Change</p>
889	Friends of Borth-y Gest (Tom Brooks) [3036]	POLICY AMG5	Object	<p>We would wish AMG5, which makes specific reference to local nature reserves, made reference to a table in which such reserves were listed.</p>	<p>Not accepted – Local Nature Reserves are already shown on the Constraints Map.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
890	Barton Willmore (Mr Mark Roberts) [1645]	POLICY AMG5	Object	<p>This policy seeks to protect areas identified in the Plan for their ecological interest.</p> <p>Note that land at the former Dynamex Friction Site, is identified as being within a Wildlife Site (WS) Plas Brereton but is subject to significant levels of contamination requiring remedial works. The policy as drafted does not allow for standard mitigation techniques to be employed to deal with any wildlife or</p>	<p>Not accepted – The second from last sentence of policy AMG5 refers to 'appropriate mitigation measures'. There is nothing in the policy which prohibits the use of standard mitigation techniques to deal with any wildlife or habitats on the site which would be subject to demolition or remediation works.</p> <p>The specific mitigation measures/methodology would have to be agreed with the LPA case by case basis so as not to adversely impact the sites during such works. This could include the amount of short term (temporary) adverse impact that may be unavoidable to achieve long-</p>

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				<p>habitats on the site which would be subject to demolition or remediation works.</p> <p>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.</p> <p>The policy should be re-written to allow on-site mitigation or other techniques to be utilised as is common practice on previously developed sites and non-statutory protected wildlife sites.</p>	<p>term beneficial outcomes.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>

Preserving and Enhancing Heritage Assets

Context and Introduction

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments and Recommendation
487	Gwynedd Archaeological planning Service (Mr Ashley Batten) [2959]	7.5.28	Object	What about locally important buildings (local listing?) and or regionally significant monuments, sites or other assets?	<p>Not accepted - the list of heritage assets in paragraph 7.5.8 is not exhaustive and does not preclude protection to other types of heritage assets. For example Policy AT3 already covers 'Locally or regionally significant non-designated heritage assets' and 'Policy AT4 'Protection of non-designated archaeological sites'</p> <p>Currently there is no duty for local authorities to prepare</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments and Recommendation
					<p>a register of locally important buildings. Neither Gwynedd nor Ynys Môn Council prepare such listings.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
501	Gwynedd Archaeological planning Service (Mr Ashley Batten) [2959]	7.5.30	Object	It is worth specifying that Cadw and the Gwynedd Archaeological Trust will be consulted and are stakeholders / partners in this decision making process	<p>Not accepted - the number of interests which are consulted on a variety of different types of planning applications is considerable. The land use planning system has a statutory duty to consult with specific interests depending on the type of planning application. Consequently, it is felt that there would be no purpose in repeating the stakeholder/partners within the text of the JLDP.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>

PS17 – Preserving and Enhancing Heritage Assets

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments and Recommendation
58	Oaktree Environmental Ltd (John Williams) [2594]	STRATEGIC POLICY PS17	Object	<p>Reference to Candidate World Heritage Sites is unnecessary as no World Heritage status will apply to them. It would rather be more practical to change the text referring to specific world heritage sites (criterion 4) to cover World Heritage Sites in general so that if a candidate site is confirmed, it would automatically be covered by criterion 4. To include a specific criterion for candidate sites serves little purpose, given that they have little if any status. Interestingly, no reference is made in detailed policy AT1 to Candidate World Heritage Sites.</p> <p>Re-draft policy to amend criterion 4 to offer coverage for World Heritage Sites in general as opposed to referring to specific sites and removal of criterion 5 which refers to Candidate World Heritage Sites.</p>	<p>Not accepted – Gwynedd Council and its partners are actively preparing a bid DCMS to nominate the slate industry of North Wales for inclusion by UNESCO as a WHS. In order to take the work forward Gwynedd Council and its partners will need to demonstrate at the outset that there are measures in place to facilitate the protection of attributes that will convey the potential outstanding universal value of the area. It is considered that recognition of the candidate WHS status within the JLDP will meet that requirement.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
242	Ellesmere Sand & Gravel Company Limited [2686]	STRATEGIC POLICY PS17	Object	<p>The reference to “other areas of archaeological importance” at point one is not defined. Again this is considered a catch all policy.</p> <p>Suggest removal of “other areas of archaeological importance” be removed</p>	<p>Not accepted – Criterion 1 of PS17 is cross-referenced to policy AT4 and it is considered that it is reasonable to refer “other areas of archaeological importance” within the context of Policy PS17. Policy PS17 provides the context for detailed policy AT4. PS17 and AT4 reflect the importance attached to non-designated archaeological sites to the cultural heritage of the Plan area.</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments and Recommendation
				from point one given the wide ranging scope and how this might inhibit mineral extraction development.	<p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
243	Lafarge Tarmac Trading Limited [2735]	STRATEGIC POLICY PS17	Object	<p>The reference to "other areas of archaeological importance" at point one is not defined. Again this is considered a catch all policy.</p> <p>Suggest removal of "other areas of archaeological importance" be removed from point one given the wide ranging scope and how this might inhibit mineral extraction development.</p>	<p>Not accepted – Criterion 1 of PS17 is cross-referenced to policy AT4 and it is considered that it is reasonable to refer "other areas of archaeological importance" within the context of Policy PS17. Policy PS17 provides the context for detailed policy AT4. PS17 and AT4 reflect the importance attached to non-designated archaeological sites to the cultural heritage of the Plan area.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
427	Cyngor Tref Ffestiniog (Mrs Ann Coxon) [2940]	STRATEGIC POLICY PS17	Support	Ffestiniog Town Council supports the effort to acknowledge the slate areas as a Heritage Site of the World. This would provide economic and social opportunities for these areas that would greatly benefit as a result. This is an excellent way to make the best of the	<p>Noted</p> <p>Recommendation</p> <p>No Change</p>

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				area's natural resources. This would build on the strengths of the area and the County, giving Wales a special status.	
649	Friends of Borth-y Gest (Tom Brooks) [3036]	STRATEGIC POLICY PS17	Object	<p>Policies PS17 Borth-y-Gest contains a scheduled ancient monument which is indicated on the constraints map. The Seascope Character Area map referred to in the Deposit Draft includes for the Porthmadog Estuary a list of key scheduled ancient monuments which does not include the "Iron Age to Romano-British hut group" in Parc y Borth. Cadw have recently told us "The monument is of particular interest due to its survival in a lowland area where this type of earth constructed site is rare. It is of national importance for its potential to enhance our knowledge of prehistoric settlement practices. It is an important relic of the prehistoric landscape and retains significant archaeological potential. There is a strong probability of the presence of environmental and structural evidence, including preserved internal and external floor levels."</p> <p>The principle document reference for the study of the site is "PARCYBORTH ARCHAEOLOGICAL RECORDING - G1764 - Report number: 484 - Prepared for</p>	<p>Not accepted - The Seascope Character Area Study was produced by the Countryside Council for Wales (now part of Natural Resource Wales) and is outside the scope of the JLDP process. However, the site is indicated on the Constraints Map and the protection afforded to Scheduled Ancient Monuments is outlined in Table 25: Schedule of Historic assets of the JLDP.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments and Recommendation
				Gwynedd Council - MAY2003. We would wish the site to be specifically mentioned as an important heritage site feature.	
692	Bangor Civic Society 1 (Don Mathew) [2988]	STRATEGIC POLICY PS17	Support	Noting very positive support for slate industry World Heritage Site bid.	Noted. Recommendation No Change
695	Robert Llewelyn Jones [3058]	STRATEGIC POLICY PS17	Object	The need to do something to protect and make these Grade II listed buildings given to the public. They are at present closed to any tourist and locals wishing to have a casual look. I wish to include these very special listed buildings into the plan. Strategic Policy PS 16/17 states that the aim of the plan is to safeguard the Plan area's history and landscape. This area does not appear to be part of our local authority's brief. It is not ring fenced or noted on the plan as being of such significance. I am requesting the area to be ring fenced and noted on the map of the area as being listed buildings.	Accepted in part - Planning policy in respect of the protection afforded to listed buildings is outlined in Planning Policy Wales and consequently not duplicated in the JLDP. Neither Policy PS17 nor Legislation would be able to change public access being afforded to all Heritage assets. Strategic Plan Policies PS16 and PS17 cover the whole of the Joint Policy Plan Area so there should be no need for any areas to be selected. However it is noted that listed buildings are not shown on the interactive Constraints Map. Including listed buildings on this map will help raise awareness of their presence to potential developers. Recommendation - No change to the JLDP but include listed buildings on the interactive Constraints Map Minor Change: NF 139

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments and Recommendation
696	Robert Llewelyn Jones [3058]	STRATEGIC POLICY PS17	Object	<p>Asking for the Great Breakwater in Holyhead to be the same status as the two Heritage castles.</p> <p>That the Constraints Map includes the Great Breakwater at Holyhead and that the building is given a higher profile alongside that of Beaumaris Castle and Caernarfon Castle due to its importance even today to the future of this Port of Holyhead - it is a living, working structure and has been since it was built over 150 years ago.</p>	<p>Not accepted - Both Beaumaris and Caernarfon castles are UNESCO designated World Heritage Sites. The historical importance of the Great Breakwater in Holyhead is acknowledged as it is a Grade II* listed buildings/structure.</p> <p>However it is noted that listed buildings are not shown on the interactive Constraints Map. Including listed buildings on this map will help raise awareness of their presence to potential developers.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>Minor Change: NB</p>
1183	Horizon Nuclear Power (Miss Sarah Fox) [2919]	STRATEGIC POLICY PS17	Object	<p>Horizon submits that greater flexibility needs to be included in these policies so that proposals predicted to have an adverse effect will be permissible subject to the identification and implementation of sufficient mitigation measures, supported by an appropriate implementation plan. Rather than seek specific amendments to these policies Horizon proposes to rely on the Wylfa Newydd specific policies proposed above</p>	<p>Not accepted – It is considered that the policy is sufficiently flexible. It is up to developers to demonstrate that their proposals “will preserve and enhance heritage assets, their setting and significant views into and out of the building/area. Like all other developments any proposals arising from the Wylfa Newydd scheme will be required to conform to all relevant policies within the JLDP.</p> <p>Recommendation</p>

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				which would be the relevant policies against which to make consultation responses to the DCO application and to determine its associated development applications.	No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness. No Change

National Development Management Policies

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments and Recommendation
488	Gwynedd Archaeological planning Service (Mr Ashley Batten) [2959]	7.5.31	Object	It is worth noting that the archaeological resource is dynamic (as opposed to static) and is constantly developing. New archaeological sites are discovered all the time and new sites of national importance are added to the Schedule of Ancient Monuments as and when they have been assessed and their importance recognised.	Noted - There is no disagreement with this comment. All statutory designations are shown on the Constraints Map, which will be updated within the Plan period to reflect the most up to date information available. Recommendation No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness. No Change
653	Cyng/Counc R. Ll. Jones [300]	7.5.31	Object	A more explicit explanation to the para. re 'no statutory requirement' and as to how effective the LDP is in protecting our heritage and listed monuments. Clearer explanation of the statement as per page 182 and 'statutory requirement.	Accepted in part – The Courts have now accepted that Section 54A of the 1990 TCPA Act (Section 38(6) of the 2004 Act does not apply to applications for Listed Building (LB) or Conservation Area (CA) consent but that development plans should contain policies relevant to development control, decisions which should be taken into account when determining applications for LB/CA

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					<p>consent</p> <p>Recommendation</p> <p>Amend wording to clarify that this is based on case law.</p> <p>Focussed Change - NF 87</p>
830	Robert Llewelyn Jones [3058]	7.5.31	Object	<p>I am asking for the Constraints Map to show areas of Conservation - SPG plainly. I would not wish to have the same situation happen at Newry Beach again or at any other location on Anglesey. I would say that the Plan is unsound due to the lack of protection for the Conservation Area - Newry/Holyhead Beach.</p> <p>It is very important for the Planning Committee to have easily read planning guidance and not to have to depend on officers to bring them to their notice. The Deposit Plan is not easily understood unless you are willing to spend a lot of time studying it. Make it more 'community friendly' - easily a common reference book for all.</p>	<p>Not accepted – Conservation Areas are already shown in the interactive Constraints Map. Policy AT1, PPW and national guidance and the proposed Heritage Assets SPG will provide the required land use planning policy framework to determine whether a proposal would maintain and enhance conservation areas.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
489	Gwynedd Archaeological Planning Service (Mr Ashley Batten) [2959]	7.5.32	Object	<p>Developers should also take into account the regional HER when formulating proposals if they are to consider the undesignated archaeological resource / historic environment</p>	<p>Not accepted - Paragraph 7.5.32 refers to the National context outlined in 25. Whilst it is not disputed that Historic Environment Records should be taken into account in the preparation of development proposals, it is considered that issue is best dealt with in the SPG on</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments and Recommendation
					<p>Heritage Assets which will prepared within 18 of the Plan's Adoption.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
658	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	7.5.34	Support	<p>We are glad to see the definition of setting as likely to be either limited or wide according to the particular location. This is sensible though it is as aspect of protection which is always going to be difficult to demonstrate. It is well to be prepared for debate.</p> <p>Broad support, but some suggested areas for more detail or emphasis.</p>	<p>Noted</p> <p>Recommendation</p> <p>No Change</p>
59	Oaktree Environmental Ltd (John Williams) [2594]	7.5.35	Object	<p>A 'candidate' site may have little status other than that afforded by whatever current designation such a site may benefit from. Given our client's site is a working slate quarry within the proposed World Heritage Site application boundary, the weight attached to any application for World Heritage status should be commensurate with the stage reached in progressing the application.</p>	<p>Not accepted – Gwynedd Council and its partners are actively preparing a bid DCMS to nominate the slate industry of North Wales for inclusion by UNESCO as a WHS. In order to take the work forward Gwynedd Council and its partners will need to demonstrate at the outset that there are measures in place to facilitate the protection of attributes that will convey the potential outstanding universal value of the area. It is considered that recognition of the candidate WHS status within the JLDP will meet that requirement.</p>

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				Clarify what weight will be given to candidate site status when considering development proposals and whether that weight will increase as the World Heritage Site application progresses.	<p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>

AT1 – Conservation Areas, World Heritage Sites and Registered Historic Landscapes, Parks and Gardens

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments and Recommendation
673	Campaign for the Protection of Rural Wales (Mr Noel Davey) [1169]	7.5.37	Object	<p>The content of the Assessment is not indicated in any detail. The possible impact on underlying remains and archaeological information should be remembered, alongside matters of style and materials.</p> <p>Broad support, but some suggested areas for more detail or emphasis.</p>	<p>Not accepted –It is considered that the contents/format of Heritage Impact Assessment should be covered within the proposed SPG as opposed to the JLDP itself. An indication of the issues that will need to be covered is set out in paragraph 7.5.39 of the JLDP.</p> <p>Recommendation -</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>

AT3 – Locally or Regionally Significant Non-Designated Heritage Assets

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments and Recommendation
362	Mr Geoff Wood [2916]	POLICY AT3	Object	<p>In some circumstances, it may be appropriate to protect a heritage asset and / or preserve Welsh culture by bringing a building back into active use where the building is in a poor state of repair or is in a derelict state but still standing.</p> <p>Amend part 1 to state "The sympathetic re-use and repair of redundant, derelict and under-used historic buildings and areas which are consistent with their conservation;"</p>	<p>Noted – Policy AT3 already facilitates the re-use of a heritage asset provided this is undertaken in a sympathetic manner. A range of policies in the Plan will provide the relevant framework relating to the proposed use e.g. TAI19, which requires a ‘structurally sound building’.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan’s soundness.</p> <p>No change</p>
495	Gwynedd Archaeological planning Service (Mr Ashley Batten) [2959]	POLICY AT3	Object	<p>Interpretation, management, access, public engagement and other educational benefits should also be considered alongside reuse of historic buildings, archaeological sites, monuments and other historic assets</p>	<p>Accepted – Agree that management and drawing the public and owner’s attention to the value of local heritage assets are important. The Councils will engage with the Gwynedd Archaeological Trust to develop the Heritage Assets SPG accordingly.</p> <p>Recommendation</p> <p>No change to the Plan but to consult with the Gwynedd Archaeological Trust to develop the Heritage Assets SPG.</p> <p>No change</p>
675	Campaign for the	POLICY AT3	Object	The explanation to this policy is sensible	Accepted - it is agreed that the wording could be

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments and Recommendation
	Protection of Rural Wales (Mr Noel Davey) [1169]			and clear but the policy itself is poorly phrased and consequently not easy to understand. There is a bit too much about 'enhancement' which might result in the loss of true historic character if it was not made more clear that this is a conservation policy. Broad support, but some suggested areas for more detail or emphasis.	amended in order to clarify the scope of the policy. However, it is considered important to ensure that any changes to the policy does not weaken the 'positive approach' to the protection of non-designated heritage assets which the JLDP aims to promote. Recommendation Amend the wording of the policy. Focussed Change - NF 88
499	Gwynedd Archaeological planning Service (Mr Ashley Batten) [2959]	7.5.43	Support	The archaeological resource is dynamic with new discoveries being made and reported regularly (over 2000 new records are added to the regional Historic Environment Record annually).	Noted Recommendation No Change

AT4 – Protection or Non-Designated Archaeological Sites

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments and Recommendation
244	Ellesmere Sand & Gravel Company Limited [2686]	POLICY AT4	Object	Mineral extraction sites by their very nature may have some effect on non-designated archaeological sites. The policy is considered too unwieldy, the words "may" and "potential" are not definitive.	Not accepted – Mineral extraction should not be treated differently to any other form of development. This policy is consistent with paragraph 6.4.2 which states that "Not all nationally important remains meriting preservation will necessarily be scheduled. Such remains and, in appropriate circumstances, other unscheduled archaeological remains of more local importance, and

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments and Recommendation
				Would suggest the policy is deleted and is covered by pre-application decision and the local list to requires and archaeological assessment where defined archaeological interest are located and/or cover by planning condition.	<p>their settings, may also be identified in development plans as particularly worthy of preservation.”</p> <p>This policy provides clear guidance of what is expected in relation to potentially significant non-designated archaeological sites.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
245	Lafarge Tarmac Trading Limited [2735]	POLICY AT4	Object	<p>Mineral extraction sites by their very nature may have some effect on non-designated archaeological sites. The policy is considered too unwieldy, the words “may” and “potential” are not definitive.</p> <p>Would suggest the policy is deleted and is covered by pre-application decision and the local list to require an archaeological assessment where defined archaeological interest are located and/or cover by planning condition.</p>	<p>Not accepted – Mineral extraction should not be treated differently to any other form of development. This policy is consistent with paragraph 6.4.2 of PPW which states that “Not all nationally important remains meriting preservation will necessarily be scheduled. Such remains and, in appropriate circumstances, other unscheduled archaeological remains of more local importance, and their settings, may also be identified in development plans as particularly worthy of preservation.”</p> <p>This policy provides clear guidance of what is expected in relation to potentially significant non-designated archaeological sites.</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments and Recommendation
					<p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
494	Gwynedd Archaeological Planning Service (Mr Ashley Batten) [2959]	POLICY AT4	Object	Where the remains are not considered to be of national importance and their protection ('preservation in situ') is not considered appropriate (by the LPA and their archaeological advisors) then alternative mitigation ('preservation by record') will be the appropriate course of action in accordance with circular 60/96. Post-excavation, publication and dissemination of results must be ensured with an emphasis on public benefit, particularly educational benefits to the local community. All work should be in accordance with the standards set by the Chartered Institute for Archaeologists	<p>Accepted - It is considered that this issue is covered in the last sentence of policy AT4 and paragraph 7.5.46 However to explain the requirement of the policy its considered that appropriate wording on the lines suggested by the Objector should be included at the end of paragraph 7.5.6 and further detail included in the SPG on Heritage Assets which will be prepared within 18 months of the Plan's Adoption.</p> <p>Recommendation</p> <p>Include appropriate wording on the lines suggested by the Objector at the end of paragraph 7.5.46.</p> <p>Focussed Change - NF 89</p>
496	Gwynedd Archaeological Planning Service (Mr Ashley Batten) [2959]	7.5.45	Object	Archaeological potential needs to be considered. Archaeological potential can often be inferred rather than just reacting to known archaeological sites. For example larger scale developments have the potential to reveal new archaeological information across landscapes where the current knowledge	<p>Not accepted – Whilst the comment is accepted policy AT4 already refers to 'sites of potential national importance'. Consequently it is felt that those types of archaeological sites referred by the objector can be adequately covered by policy AT4.</p> <p>Recommendation</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Officer's Comments and Recommendation
				base might be limited. In these circumstances, even where there is limited existing evidence, archaeological evaluation may be required to establish an evidence baseline. Also, the archaeological resource is dynamic and the number, location, distribution of archaeological sites increases all the time.	No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness. No Change

Waste Management

PS18 – Waste Management

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
444	Mon a Gwynedd Friends of the Earth (Mr Richard Mills) [2937]	STRATEGIC POLICY PS18	Object	Strategic Policy PS18, and the associated policies, should make reference to waste minimisation and reduction strategies, reflecting targets in The Waste Prevention Programme for Wales. The JLDP should encourage or compel developers to avoid waste, and to re-use and recycle waste generated during the demolition and/or construction phase.	Not accepted - Issue has been adequately addressed in Policy PS5: Sustainable Development Recommendation No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
					No Change
807	Ty Mawr West Ltd (John Hill) [3062]	STRATEGIC POLICY PS18	Object	PS18 Waste Management. The waste hierarchy should include a provision for the appropriate use of suitable inert waste arising to be employed in the prudent restoration of previously disturbed land.	Not accepted - Issue of inert materials used in recovery as opposed to waste disposal operations already addressed in Paragraph 4.23 of TAN 21: Waste (Welsh Assembly Government). National Policy shouldn't be reiterated within the Local Development Plan. Recommendation No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness. No Change
987	Welsh Slate Ltd [3147]	STRATEGIC POLICY PS18	Object	Whilst the Company supports the general strategy it is of the opinion that clear reference should be made to the use of suitable inert wastes in the restoration of previously disturbed land from whatever previous user.	Not accepted - Issue of inert materials used in recovery as opposed to waste disposal operations already addressed in Paragraph 4.23 of TAN 21: Waste (Welsh Assembly Government). National Policy shouldn't be reiterated within the Local Development Plan.

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
					<p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>

GWA1 – Provision of Waste Management and Recycling Infrastructure

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
374	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	POLICY GWA1	Object	The Penygroes site includes land designated as a local WS, this should be removed from the development boundary. This would also provide a buffer between the waste site and adjacent river	<p>Do not accept - Wildlife Sites are places that are considered to be of local importance for their biodiversity value. They are non-statutory sites that are not designated under any specific law but a suite of policies and legislation.</p> <p>It is recognised that there are local biodiversity value to the most easterly part of the site which has been allocated. It is considered that there are sufficient policies within the Plan which will give due consideration to the biodiversity value of</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
					<p>the site during the planning application process.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No change</p>
492	Mon a Gwynedd Friends of the Earth (Mr Richard Mills) [2937]	POLICY GWA1	Object	The list of sites for waste management and recycling infrastructure should be reformulated to take account for the scope to embed within communities smart closed-loop waste management facilities, recognising the importance attributed to these facilities in "Towards Zero Waste" and the Municipal Sector Plan.	<p>Not accepted - Issue has been adequately addressed in Policy PS5: Sustainable Development</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
1447	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio)	POLICY GWA1	Support	NRW welcomes that this Policy allows for waste management facilities on some employment allocations.	<p>Note supporting comment</p> <p>Recommendation</p> <p>No Change</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
	[1521]				

GWA2 – Waste Management Outside Development Boundaries and Allocated Sites

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
1448	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	POLICY GWA2	Object	GWA2, does not set out how the 7 year and 5 year trigger points in relation to the supply of landfill will be monitored and how the LPA will work with other Authorities to meet this need, if required. It is acknowledged that landfill has a diminishing role but the Plan should acknowledge the need for regional collaboration to meet the need for landfill across North Wales and how it will work with other authorities to meet this need. This should be set out in the policy to accord with TAN21.	<p>Accept – Further clarification should be included which will emphasise the need for collaboration and monitoring. Include a new paragraph after 7.5.55.</p> <p>Recommendation</p> <p>To ensure the accuracy of the Plan.</p> <p>Focussed Change – NF90</p>

GWA3 – Low and Very Low Level Radioactive Waste Treatment and Storage

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
615	Cyng/Counc R.	POLICY	Object	This policy is leaving the residents of Anglesey and Gwynedd in danger of becoming the	Accept in Part - There are current producers of low and very low radioactive waste within the Plan area, which include

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
	Ll. Jones [300]	GWA3		<p>dumping ground for radioactive waste, treatment and storage. The statement that low level radiation generated in existing businesses is made. Does this rule out the new nuclear plant that is being proposed or is it only our present Wylfa A that this applies to? Our County Council have not voted to store radioactive material on site and this should be made clear in the Policy GWA3.</p> <p>Changes to Plan Clarification on the storage of nuclear waste and how the policies refer to the proposed Wylfa Newydd</p>	<p>the current Nuclear Power Station at Wylfa. Most disposal of LLW requires a permit under the radioactive waste regulations to be held by both the waste producer and the operator of the waste facility that receives it – the treatment of the Low and Very Low Radioactive Waste is therefore tightly managed and regulated.</p> <p>Recommendation</p> <p>To ensure clarity it is recommended that a definition of what is meant by Low and Very Low Level Radioactive waste is included.</p> <p>Focussed Change – NF91</p>
796	Mr Rob Booth [3033]	POLICY GWA3	Object	<p>Page 191 GWA3 is a policy for radioactive waste treatment and storage. This highlights one of the main problems of having a nuclear power station. The waste is extremely hazardous and difficult dangerous and had to store. The radioactive waste cannot be neutralized, when the half-life of Plutonium is 24,000 years.</p> <p>Change to Plan</p>	<p>Accepted – Radioactive waste is a conserving issue and including further clarification with regard to what is meant by the term low and very low radioactive waste would be beneficial.</p> <p>Recommendation</p> <p>To ensure clarity it is recommended that a definition of what is meant by Low and</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				There is a need for the definition of low level and very low level radioactive waste; what type of radioactive waste? I suggest that if this policy is retained it must lists which radioactive isotopes e.g. plutonium 239. If a radioactive waste is required to be stored it should be stored at the power station.	Very Low Level Radioactive waste is included. Focussed Change – NF91

Minerals

PS19 – Minerals

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
246	Ellesmere Sand & Gravel Company Limited [2686]	STRATEGIC POLICY PS19	Object	Suggest hierarchy to support existing mineral extraction sites, then extensions to existing sites before new sites are considered. It is considered however the Council should maintain a MINIMUM 7 year land bank for Sand and Gravel at all times. Alternative restoration plans should be considered outside the traditional return to greenfield sites. Dormant and long inactive sites should be considered a potential valuable source of mineral that can be called upon when demand is high and a land bank is not fully available.	Not accepted - Point 9 reflects the requirements of Welsh Government Minerals Planning Policy, the relevant guidance in MTAN 1: Aggregates & The Regional Technical Statement on Aggregates (First Review 2014). Suggestion of a hierarchy not sustainable as each site is assessed on it's own merit in accordance with all of the policies included

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				<p>Promotion of existing mineral extraction sites and extensions to these sites should be promoted above any new sites. It is considered the Council should maintain a MINIMUM 7 year land bank for Sand and Gravel at all times and there should be a positive presumption toward mineral extraction particularly at existing sites. Actively encourage alternative after uses for mineral extractions sites over the return to greenfield where appropriate. Remove point 9.</p>	<p>within the Plan as well as national policies</p> <p>It is considered that landbank issues are sufficiently addressed in the policy.</p> <p>Alternative restoration plans may include for amenity & biodiversity interests but the comment is vague with respect to any proposed uses. Any afteruse proposals must comply with the policies and objectives of the Local Development Plan.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
247	Lafarge Tarmac Trading Limited [2735]	STRATEGIC POLICY PS19	Object	<p>Suggest hierarchy to support existing mineral extraction sites, then extensions to existing sites before new sites are considered. It is considered however the Council should maintain a MINIMUM 10 year land bank of crushed rock at all times. Alternative restoration plans should be considered outside the traditional return to</p>	<p>Not accepted - Point 9 reflects the requirements of Welsh Government Minerals Planning Policy, the relevant guidance in MTAN 1: Aggregates & The Regional Technical Statement on Aggregates (First Review 2014).</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				greenfield sites.	<p>Suggestion of a hierarchy not sustainable as each site is assessed on it's own merit in accordance with all of the policies included within the Plan as well as national policies.</p> <p>It is considered that landbank issues are sufficiently addressed in the policy.</p> <p>Alternative restoration plans may include for amenity & biodiversity interests but the comment is vague with respect to any proposed uses. Any afteruse proposals must comply with the policies and objectives of the local development plan.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
502	Gwynedd Archaeological Planning Service (Mr Ashley	STRATEGIC POLICY PS19	Support	restoration and aftercare needs to be considered in the context of the historically important quarries and historically significant slate tips for	<p>Note supporting comment</p> <p>Recommendation</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
	Batten) [2959]			example	No Change
594	The Coal Authority (Mr James Smith) [2998]	STRATEGIC POLICY PS19	Object	<p>Policy PS19 fails to make reference to potential proposals for hydrocarbons and unconventional hydrocarbons</p> <p>Suggested Changes Reference should be made in Policy PS19 to the need for any proposals which come forward for conventional and unconventional hydrocarbons to be considered in accordance with national policies and guidance.</p>	<p>Not accepted - Energy policies are specifically included in section 7.2 of the document, Living Sustainably where paragraph 7.2.1 sets out the context of addressing sustainable development and climate change.</p> <p>Also WG position on 'hydraulic fracking' set out in the Notification Direction Feb 2015, (<i>The Town and Country Planning (Notification) (Unconventional Oil and Gas) (Wales) Direction 2015</i>).</p> <p>Not considered that there is sufficient evidence or justification to provide a special case for hydrocarbons and unconventional hydrocarbons under the policy framework to cover potential proposals for Shale GAS and/or Coalbed Methane extraction in the plan area.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
					ensure the Plan's soundness. No Change
619	Mineral Products Association (Mr Malcolm Ratcliff) [1647]	STRATEGIC POLICY PS19	Object	<p>STRATEGIC POLICY PS19 MINERALS</p> <p>this policy is in danger of confusing separate objectives of mineral planning by putting them under the general heading of supply and is thus unsound</p> <p>We suggest the reordering of the policy as follows,</p> <p>The Councils will contribute to regional and local demand for a continuous, secure and sustainable supply of minerals by:</p> <ol style="list-style-type: none"> 1. Maintaining a minimum 7 year land bank of Sand and Gravel and minimum 10 year land bank of crushed rock aggregate reserves throughout the plan period in line with national guidance. 2. Making provision for the production of dimension stone. 3. Making provision for the production of 	<p>Partly accept - It is not considered that the reference to 'supply' makes the policy unsound or incoherent and does not preclude minerals development for the extraction of dimension stone or industrial minerals. However, Mineral Planning Authorities have a statutory obligation through the RAWPS and in accordance with MPPW and the provisions of the North Wales Regional Technical Statement to maintain a landbank of aggregate reserves and this is the reason for its inclusion in the policy criterion.</p> <p>The policy specifically refers to the, 'sustainable supply of minerals' as opposed to aggregates. The supporting text makes it clear that building stone and industrial minerals are also important. There is no need therefore to include the insertion, '<i>making provision for the production of dimension stone/industrial minerals</i>' as a</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				<p>industrial minerals.</p> <p>4. Maximising the use of secondary and recycled materials and mineral wastes for which appropriate provision will be made in land allocations</p> <p>5. Acknowledging that where the principles of sustainable development can be achieved, the extension of existing quarries and/or new quarries is likely to be appropriate.</p> <p>6. Requiring that where there is a need for new capacity of minerals, these should come from locations of low environmental constraint and take into account transport implications.</p> <p>7. Minimising potential conflict between mineral and non-mineral land uses.</p> <p>The Councils will safeguarding known / potential mineral resources from permanent development that would sterilize them or hinder extraction and protect maritime wharf and railhead facilities as a means of encouraging sustainable transport of</p>	<p>separate category.</p> <p>It is considered that Strategic Policy PS19 reflects the requirements of paragraph 10 of MPPW, under the heading of; 'Key Objectives/principles of sustainable mineral development', where amongst other requirements, the following key principles are listed;</p> <ul style="list-style-type: none"> • Provide mineral resources to meet society's needs and to safeguard resources from sterilisation, • Achieve high standard restoration and beneficial afteruse. <p>Recommendation</p> <p>For clarity the wording of the policy could be slightly amended.</p> <p>Focussed Change – NF92</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				<p>aggregates.</p> <p>The Councils will ensure good restoration and aftercare.</p> <p>All Dormant and long-inactive minerals sites identified on the proposals map will be reviewed to assess their potential to contribute to the land bank and the likelihood of their re-opening. Where appropriate, Prohibition Orders will be served.</p>	
659	Ty Mawr West Ltd (John Hill) [3062]	STRATEGIC POLICY PS19	Object	<p>PS19 Minerals -Slate Waste</p> <p>The summary relating to the rail connection at Blaenau Ffestiniog does not portray the total facts of the matter. Yes there is a passenger rail connection but the rail infrastructure itself is unsuitable for the passage of heavy goods wagons which remedial works would require major expenditure</p>	<p>Not accepted: Rail transport of aggregates reflects the principles of sustainable development and provides viable alternatives to road haulage.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>

MWYN1 – Safeguarding Mineral Resources

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
248	Ellesmere Sand & Gravel Company Limited [2686]	POLICY MWYN1	Object	<p>The policy is supported to ensure a steady and continued supply of aggregates. In order to comply with Mineral Planning Policy Wales the Council should maintain a MINIMUM 7 year landbank of sand and gravel at all times.</p> <p>It is considered the Council should maintain a MINIMUM 7 year land bank for Sand and Gravel at all times and there should be a positive presumption toward mineral extraction particularly at existing sites.</p>	<p>Not accepted - Policy Mwyn 1 reflects the requirements of Welsh Government Minerals Planning Policy, the relevant guidance in MTAN 1: Aggregates & The Regional Technical Statement on Aggregates (First Review 2014).</p> <p>Landbank is sufficiently addressed in Policy PS19</p> <p>Recommendation</p> <p>No Change</p>
249	Lafarge Tarmac Trading Limited [2735]	POLICY MWYN1	Object	<p>The policy is supported to ensure a steady and continued supply of aggregates. In order to comply with Mineral Planning Policy Wales the Council should maintain a MINIMUM 10 year landbank of crushed rock at all times. This would obviously be beneficial from existing quarries.</p> <p>The Council should maintain a MINIMUM 10 year land bank of crushed rock at all times and there should be a positive presumption toward mineral</p>	<p>Not accepted – Policy Mwyn 1 reflects the requirements of Welsh Government Minerals Planning Policy, the relevant guidance in TAN 1: Aggregates & The Regional Technical Statement on Aggregates (First Review 2014).</p> <p>Landbank is sufficiently addressed in Policy</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				extraction particularly at existing sites. Request that existing Sandstone and Dolerite Category 1 be included within the Safeguarding Area.	<p>PS19</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
600	The Coal Authority (Mr James Smith) [2998]	POLICY MWYN1	Object	<p>The Coal Authority considers that insufficient evidence has been provided to justify the omission of a Mineral Safeguarding Area covering the Caernarfon coalfield which does not appear to be located within an area covered by any International or National designations.</p> <p>Change requested A Mineral Safeguarding Area covering the Caernarfon coalfield should be included on the Proposals Map.</p>	<p>Not accepted - Given both historic and recent geotechnical information it remains that very little is known about the coal resource only that it would appear to be overlain with a substantial layer of very hard granites on the northern extent which is consistent with the information contained on the 2010 BGS publication, 'Minerals Resource Map of Wales. It appears that the entire coal resource lies underneath; <i>'other igneous rocks including basalts, felsites, gabbros, tuffs and granites'</i>, and the potential for any coal extraction is constrained by the overlying geology and commercial exploitation therefore appears to be low. On balance, it</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
					<p>is not considered that the coal resource north-east of Caernarfon should be safeguarded on the LDP Proposals or Constraints maps.</p> <p>An enquiry was submitted to Welsh Government Transport Department in respect of any geotechnical surveys prepared in advance of the proposed Bontnewydd bypass. In response, it was confirmed that a series of boreholes had been carried out in the vicinity of the coal resource where it is intersected by the line of the protected route, but at the time of writing this response, the borehole logs have not been published for inspection.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
620	Mineral Products	POLICY	Object	Could not find any reference to Mineral Safeguarding Areas on either the Proposals Map	Partly accept - The MSAs are actually included on the constraints map and the

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
	Association (Mr Malcolm Ratcliff) [1647]	MWYN1		<p>or its Key. Consider the proposed criteria for assessing non-mineral development are incoherent. The deficiencies of the policy are that it does not specify a minerals report which should provide information on the quantity and quality of mineral potentially sterilised; it does not distinguish between forms of permanent development that pose a real risk to mineral sterilisation and those like minor applications, that do not; and it does not require that a statement of relative need between the mineral and the proposed development is submitted for the mpa to make a judgement of the planning balance.</p> <p>Detailed replacement policy provided (see attachment)</p>	<p>wording of the policy should be amended accordingly to refer to the '<i>constraints</i>', as opposed to the '<i>proposals</i>' map.</p> <p>In terms of how development should be managed in MSAs, most of the mineral resources are located outside of urban areas and potential allocations in the LDP, and there is therefore very limited scope for conflicting development in such areas.</p> <p>Recommendation</p> <p>To ensure clarity the wording of the policy should refer to 'Constraint Map' as opposed to 'Proposal Map'.</p> <p>Minor Change: NB20</p>

MWYN2 – Sustainable Supply of Mineral Resources

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
250	Ellesmere Sand & Gravel	POLICY	Object	There should be a positive policy presumption in favour of pursuing extensions to existing and new	Not accepted - It is considered that the issue has been adequately addressed in the

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
	Company Limited [2686]	MWYN2		<p>sites.</p> <p>The policy should encourage sites to come forward with extensions to existing sites preferred over new sites.</p>	<p>response to Policy PS19 & Mwyn 1.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
251	Lafarge Tarmac Trading Limited [2735]	POLICY MWYN2	Object	<p>There should be a positive policy presumption in favour of pursuing extensions to existing sites.</p> <p>The policy should encourage sites to come forward with extensions to existing sites preferred over new sites.</p>	<p>Not accepted - It is considered that the issue has been adequately addressed in the response to Policy PS19 & Mwyn 1.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
621	Mineral Products Association (Mr Malcolm Ratcliff) [1647]	POLICY MWYN2	Object	<p>In view of the fact that the size of the landbank to be secured by policy is indicated in sufficient detail in policy PS19 we question whether this policy is necessary and is not a duplication. It thus fails soundness test CE1.</p>	<p>Accepted – It is agreed that Policy MWYN2 is a duplication of strategic policy PS19 and that it should be deleted.</p> <p>Recommendation</p> <p>To remove undue repetition Policy MWYN2</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				We suggest it is deleted.	will be deleted and the explanation paragraph will be included within the introduction to the Minerals section of the plan (after para 7.5.61). Minor Change: NB19
321	Lafarge Tarmac Trading Limited [2735]	7.5.66	Object	The landbank requirement needs to be expressed as a minimum of 7 years for sand and gravel and a minimum of 10 years for crushed rock at all times through the plan and at the end of the plan. There is inference that no additional reserves in addition to the minimum landbanks would be consented.	Not accepted – The explanation paragraph reflects the requirements of Welsh Government Minerals Planning Policy, the relevant guidance in MTAN 1: Aggregates & The Regional Technical Statement on Aggregates (First Review 2014). Recommendation No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan’s soundness. No Change
378	Ellesmere Sand & Gravel Company Limited [2686]	7.5.66	Object	The landbank requirement needs to be expressed as a minimum of 7 years for sand and gravel and a minimum of 10 years for crushed rock at all times through the plan and at the end of the plan. There is inference that no additional reserves in addition	Not accepted – The explanation paragraph reflects the requirements of Welsh Government Minerals Planning Policy, the relevant guidance in MTAN 1: Aggregates & The Regional Technical Statement on

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				to the minimum landbanks would be consented. The paragraph text should be amended to express landbank as a minimum of 7 years for sand and gravel and a minimum of 10 years for crushed rock at all times.	Aggregates (First Review 2014). Recommendation No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness. No Change

MWYN3 – Preferred Areas of Search

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
252	Ellesmere Sand & Gravel Company Limited [2686]	POLICY MWYN3	Object	The preferred area of search at Bodychain, Llanllyfni is identified in the written policy but not on the proposals map. It should be shown on the proposals map. There is significant commercial potential for the resource and planning might reasonably be anticipated. It should therefore be a Preferred Area to be worked as an extension to Cefn Graiainog. This would potentially overcome the significant shortfall. The precise working area would be informed by EIA. The resource block at	Accepted – There is a mapping error which needs to be corrected and the Preferred Areas need to be shown on the proposal map. Recommendation To ensure accuracy Bodychain Farm, Llanllyfni, Derwyn fawr, Garndolbenmaen and Llecheiddior Uchaf, Garndolbenmaen will need to be shown on the proposal

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				Llanllyfni and Cae Efa Lwyd, Penygroes is supported as an Area of Search.	map as Preferred Areas. Focus Change: NF136
348	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	POLICY MWYN3	Object	The preferred area of search to the north and north-west of Rhuddlan Bach quarry includes land within our ownership. We object to its inclusion with the AoS and note that the land is currently managed by us as part of and a buffer to the adjacent Cors Goch Ramsar site/SAC/SSSI/NNR. We would under no circumstances permit quarrying on our land.	Not Accepted – The designation recognises the mineral resource only, it doesn't necessarily mean that the site will ever be developed. Recommendation No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness. No Change
622	Mineral Products Association (Mr Malcolm Ratcliff) [1647]	POLICY MWYN3	Object	This policy is deficient in confusing terminology mentioned in national policy. The objection is not to the sites listed but to the way they are referred to. The policy uses the term 'preferred areas of search'. This confuses two completely different and distinct types of mineral provision in Local Plans which it is important to maintain. Suggested Changes At present we suggest the dropping of the word	Accepted – The current terminology which is used is confusing as the policy appears to merge two completely different and distinct types of mineral provision as 'Preferred Areas of Search'. The identification of 'preferred areas of search' should be reviewed in accordance with the best available information and the following criteria;

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				'preferred' from areas of search to align more closely with national policy. However, whilst we ask for further clarification about the mineral site strategy we are unable to make any suggestions for changes at this time.	<p>Preferred Areas (<i>“areas of known resources with some commercial potential, and where planning permission might reasonably be anticipated”</i>), within which operators should be encouraged to bring forward more specific proposals.</p> <p>Areas of Search (<i>“...broad areas that are believed to contain mineral resources of commercial significance but whose extent is uncertain...”</i>).</p> <p>Recommendation</p> <p>To ensure accuracy the and to demonstrate that appropriate regard is made to national Policy and guidance the term ‘Preferred Areas of search’ will be amended to read ‘Preferred Areas’.</p> <p>Minor Change: NB21</p>
1812	Gwasanaeth Cynllunio Mwynau &	POLICY MWYN3	Object	The mineral safeguarding areas (Policy MWYN1) do not appear on the proposal map on Gwynedd Council's website nor do the sand and gravel	Accepted – There is a mapping error which needs to be corrected and the Preferred Areas need to be shown on the

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
	Gwastraff Gogledd Cymru (Dafydd Gareth Jones) [2578]			<p>preferred areas of search referred to in policy MWYN 3.</p> <p>Inconsistency with the preferred areas of search for sand and grain in Policy MWYN3 and Proposals Map 1.</p> <p>Need to update the safeguarding mineral areas identified on Proposals Map 1.</p> <p>Notation for some of the constraints maps is hard to interpret, e.g. safeguarding sand and gravel where the area crosses other denotations such as 'special landscape areas'.</p> <p>Proposed Changes Need to include all preferred areas of search that have been identified for sand and gravel in Policy MWYN3 on Proposals Map 1, i.e. ensure that the following areas are marked on the proposals map as well as those that have already been included, namely; Bodychain Farm, Llanllyfni, Derwyn Fawr, Gandolbenmaen, Llecheiddior Uchaf, Gandolbenmaen.</p>	<p>proposal map.</p> <p>Recommendation</p> <p>To ensure accuracy Bodychain Farm, Llanllyfni, Derwyn fawr, Gandolbenmaen and Llecheiddior Uchaf, Gandolbenmaen will need to be shown on the proposal map as Preferred Areas.</p> <p>Nanhoron and Nant Gwrtheyrn should also be shown on the proposal maps as mineral working sites.</p> <p>Focus Change: NF136, NF137</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				<p>Update the mineral sites identified on Proposals Map 1 to include Nanhoron Quarry and Nant Gwrtheyrn working mineral deposits. The situation also needs to be reviewed to include new back-up quarries (if approved), but also the practicality of including small sites such as Nant Gwrtheyrn and the submission of Prohibition Orders to recommence mining on any 'dormant' mineral site, e.g. Dorothea Quarry.</p> <p>The mineral safeguarding areas (Policy MWYN1) need to be included on the interactive map as well as all the sand and gravel preferred areas of search referred to in policy MWYN3.</p>	
314	Lafarge Tarmac Trading Limited [2735]	7.5.67	Object	<p>There is a reasonable likelihood of the LDP failing to achieve a minimum 10 year landbank for crushed rock in Gwynedd. The recessionary 10 years upon which demand has been calculated is likely to be an underestimate. It does not reflect the major infrastructure projects identified in the RTS. The landbank calculation is flawed by combining slate with primary aggregates. Slate accounts for between 11.7% and 14.8% aggregates usage. The calculated landbank has a higher and disproportionate contribution from slate. The</p>	<p>Not accepted - High specification aggregates are safeguarded on the proposal map.</p> <p>Policy reflects regional apportionment as recommended in the RTS.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p>

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				<p>constraints on using slate as highlighted in the RTS have not been properly considered. Strategically important high Specification Aggregates require recognition.</p> <p>Changes to Plan</p> <p>See suggested revised policy in attachment</p>	No Change
372	Ellesmere Sand & Gravel Company Limited [2686]	7.5.68	Object	<p>There may not be sufficient information to support allocations for Specific Sites. There is though sufficient information on Bodychain, Llanllyfni for it to be promoted as a Preferred Area.</p>	<p>Accepted – There is a mapping error which needs to be corrected and the Preferred Areas need to be shown on the proposal map.</p> <p>Recommendation</p> <p>To ensure accuracy Bodychain Farm, Llanllyfni, Derwyn fawr, Garndolbenmaen and Llecheiddior Uchaf, Garndolbenmaen will need to be shown on the proposal map as Preferred Areas.</p> <p>Focus Change: NF136</p>

MWYN4 – Mineral Developments

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
254	Ellesmere Sand & Gravel Company Limited [2686]	POLICY MWYN4	Object	Policy is overly prescriptive rather than supportive of mineral winning e.g. not all landscapes, biodiversity and other assets are of the same value. It applies a blanket protection of all assets. There is no consideration in the policy of the benefits of mineral extraction to local economy, employment or the restored environment.	<p>Accepted in part – The Policy reflects current criteria-based assessments considered with all mineral developments.</p> <p>It is however accepted that the policy could make reference to the economic and environmental benefits which may occur from mineral workings.</p> <p>Recommendation</p> <p>To ensure clarity reference will be made within the explanation to the policy to the economic and environmental benefit which arise from mineral workings.</p> <p>Focus Change: NF95</p>
255	Lafarge Tarmac Trading Limited [2735]	POLICY MWYN4	Object	Policy is overly prescriptive rather than supportive of mineral winning e.g. not all landscapes, biodiversity and other assets are of the same value. It applies a blanket protection of all assets. There is	<p>Accepted in part – The Policy reflects current criteria-based assessments considered with all mineral</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				no consideration in the policy of the benefits of mineral extraction to local economy, employment or the restored environment.	<p>developments.</p> <p>It is however accepted that the policy could make reference to the economic and environmental benefits which may occur from mineral workings.</p> <p>Recommendation</p> <p>To ensure clarity reference will be made within the explanation to the policy to the economic and environmental benefit which arise from mineral workings.</p> <p>Focus Change: NF95</p>
503	Gwynedd Archaeological Planning Service (Mr Ashley Batten) [2959]	POLICY MWYN4	Object	Screening and landscaping only where appropriate. Needs to be some recognition that quarry tips themselves are often of historic importance	<p>Not accepted - Policy reflects current criteria-based assessments considered with all mineral developments. Slate tips form an integral component of the Register of Historic Landscapes which fall within the scope of the policy criteria.</p> <p>Recommendation</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
					No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness. No Change
505	Gwynedd Archaeological planning Service (Mr Ashley Batten) [2959]	POLICY MWYN4	Object	What is meant by 'environmental capacity'?	Partly accepted - Environmental capacity under criterion 7 is a concept of strategic mineral planning and possibly beyond the remit of local planning policy. Recommendation To ensure accuracy reference to 'environmental capacity' will be deleted as it is beyond the remit of the Local Planning Authority. Focus Change: NF94
623	Mineral Products Association (Mr Malcolm Ratcliff) [1647]	POLICY MWYN4	Object	POLICY MWYN4: MINERAL DEVELOPMENTS This policy is unsound because it fails soundness test CE1. The following criteria are the subject of objection, 1. We question whether the inclusion of odour in the list of amenity effects relates to minerals at all.	Accepted – The reference to 'odour' within the Policy should be deleted as it isn't a relevant issue with regard to mineral working. Environmental capacity under criterion 7

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				<p>Surely, this is limited to the deposit of waste? 7. We object to the inclusion of this criterion because we believe it is not needed since all aspects of the environment are already covered by other criteria in the policy and it thus serves no useful purpose because an overall assessment of all environmental effects would be carried out in the determination process. It is moreover, notoriously difficult to define environmental capacity for all types of effects for which the concept is unsuited.</p> <p>Changes to Plan See suggested revised policy in attachment</p>	<p>is a concept of strategic mineral planning and possibly beyond the remit of local planning policy.</p> <p>Recommendation</p> <p>To ensure accuracy reference to 'odour' in criterion 1 will be deleted and criterion 7 will be deleted.</p> <p>Focus Change: NF94</p>
875	Mr John Tripp [252]	POLICY MWYN4	Object	<p>Criterion 2 - Safeguarding mineral assets. Use of slate waste. Restoration - legal and financial restraints (cite South Wales - open cast)</p>	<p>Not accepted – Comment as opposed to objection.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
317	Lafarge Tarmac Trading Limited	7.5.71	Object	<p>There is no recognition of the economic, social, employment benefits that can arise from mineral</p>	<p>Accepted - It is accepted that the policy could make reference to the economic</p>

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	[2735]			working. Or that minerals development can and often does result in a net benefit to biodiversity and other local assets. Acknowledgment is required that minerals working often makes a positive contribution to the local economy, habitats and the environment.	and environmental benefits which may occur from mineral workings. Recommendation To ensure clarity reference will be made within the explanation to the policy to the economic and environmental benefit which arise from mineral workings. Focus Change: NF95
380	Ellesmere Sand & Gravel Company Limited [2686]	7.5.71	Object	There is no recognition of the economic, social, employment benefits that can arise from mineral working. Or that minerals development can and often does result in a net benefit to biodiversity and other local assets.	Accepted - It is accepted that the policy could make reference to the economic and environmental benefits which may occur from mineral workings. Recommendation To ensure clarity reference will be made within the explanation to the policy to the economic and environmental benefit which arise from mineral workings. Focus Change: NF95

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
507	Gwynedd Archaeological Planning Service (Mr Ashley Batten) [2959]	7.5.71	Object	The setting of Snowdonia National Park should also be considered in relation to proposals adjacent to the park.	<p>Accepted – The explanation text to the policy should make reference to the setting of Snowdonia National Park.</p> <p>Recommendation</p> <p>To ensure accuracy the explanation text will be amended to include reference to the Snowdonia National Park Authority.</p> <p>Minor Change: NB22</p>

MWYN5 – Local Building Stone

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
624	Mineral Products Association (Mr Malcolm Ratcliff) [1647]	POLICY MWYN5	Object	we very much doubt that any building stone quarry operated to modern professional and sustainable standards can meet the requirements of the policy The policy as drafted does not in our opinion provide a realistic prospect to encourage new dimension stone operations, although it may allow continuation of existing ones. An application for more than a small operation (undefined) proposing to serve a wider market not limited to the heritage market by building a sustainable local business would	Not accepted - It is considered that these comments have taken Policy Mwyn 5 out of context. The objectives of policy Mwyn 5 recognises the importance of traditional building materials in local heritage with the temporary working or re-opening of small-scale mineral operations in the interests of building conservation, where it can be demonstrated that the

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				<p>undoubtedly fail. As would an application that produced material already available even if in tiny quantities from another site. There is no reason adduced that would justify such draconian and punitive conditions.</p> <p>Changes to Plan We suggest the following changes to the policy The working or reopening of mineral operations to provide traditional building materials will be granted provided that: It is compatible with other Plan policies</p>	<p>need for such materials cannot be met from existing reserves/resources.</p> <p>As stated previously, Policy PS19 specifically refers to the, 'sustainable supply of minerals' as opposed to aggregates and does not preclude minerals development for the extraction of dimension stone.</p> <p>There is sufficient provision therefore to consider large-scale and long-term mineral working for dimension stone under policy PS19 & policy Mwyn 4 under the general heading of 'Mineral Developments'</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>

MWYN6 – Buffer Zones Around Mineral Sites

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
258	Ellesmere Sand & Gravel Company Limited [2686]	POLICY MWYN6	Object	Buffer zone guidance is set out in Mineral Planning Policy Wales (2000) and the Aggregates Technical Advice Note (2004). Although for sand and gravel quarries 100m is the defined standoff from sensitive development this is defined as any building occupied by people on a regular basis and includes housing areas, hostels, meeting places, schools and hospitals where an acceptable standard of amenity should be expected. Where there is very limited impact from the mineral extraction site the 100m buffer zone may be reduced.	<p>Partly agree – Reference within the policy could be made to circumstances where there is an element of flexibility when considering the buffer zones in accordance with MTAN1.</p> <p>Recommendation</p> <p>To ensure clarity the policy will be amended to refer to circumstances where there may be a justifiable reason for reducing the distance.</p> <p>Focused Change: NF96</p>
259	Lafarge Tarmac Trading Limited [2735]	POLICY MWYN6	Object	Buffer zone guidance is set out in Mineral Planning Policy Wales (2000) and the Aggregates Technical Advice Note (2004). Although for hard rock quarries 200m is the defined standoff from sensitive development this is defined as any building occupied by people on a regular basis and includes housing areas, hostels, meeting places, schools and hospitals where an acceptable standard of amenity should be expected. Where there is very limited impact from the mineral extraction site the 200m buffer zone	<p>Partly agree – Reference within the policy could be made to circumstances where there is an element of flexibility when considering the buffer zones in accordance with MTAN1.</p> <p>Recommendation</p> <p>To ensure clarity the policy will be amended to refer to circumstances where there may be a justifiable reason</p>

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				may be reduced.	for reducing the distance. Focused Change: NF96
318	Jones Bros Ruthin [2911]	POLICY MWYN6	Object	<p>The policy and justification should be simplified and revised, allowing for:</p> <p>1 Where applied, Buffer zones to be set as the minimum necessary distances, on a case-by-case basis, given other related legislative control measures.</p> <p>2 100 m buffer zones should also apply to extraction from hard rock mineral working deposits where no blasting is permitted, as MTAN1.</p> <p>3 Extensions to mineral working operations, including working of mineral-working deposits, within defined buffer zones may be permitted in exceptional cases where it is shown that there would be no unacceptable impact on existing sensitive development.</p> <p>4 Review and clarify the LDP map annotation.</p> <p>Detailed replacement policies provided (see attachment)</p>	<p>Partly agree – Reference within the policy could be made to circumstances where there is an element of flexibility when considering the buffer zones in accordance with MTAN1.</p> <p>Recommendation</p> <p>To ensure clarity the policy will be amended to refer to circumstances where there may be a justifiable reason for reducing the distance.</p> <p>Focused Change: NF96</p>
602	The Coal	POLICY	Object	The final paragraph of Policy MWYN6 appears to	Not accepted – The representation

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	Authority (Mr James Smith) [2998]	MWYN6		<p>attempt to combine the issues of land instability arising from the legacy of coal mining and the potential for prior extraction of coal to avoid resource sterilisation with buffer zones around mineral sites. These are two distinct planning issues. The Coal Authority does not consider that the reference to land instability should be included within a policy relating to buffer zones around mineral sites.</p> <p>Suggested Change The Coal Authority recommends that the last paragraph of Policy MWYN6 should be moved into a new policy</p>	<p>seems to confuse buffer zones for mineral workings and the requirement for minerals safeguarding. The explanation of policy Mwyn 6 makes it clear that the purpose of a buffer zone is to protect both mineral reserves (<i>resources with planning permission</i>) and mineral resources from development that may sterilise them, but also to ensure the environmental effects of quarrying do not adversely affect sensitive development.</p> <p>Buffer zone policies do not include for prior extraction. The issue is specifically addressed in paragraph 13 of MPPW, 'safeguarding', where it states; "...<i>areas to be safeguarded should be identified on the proposals maps (constraints map for Mon & Gwynedd LDP) and policies should protect potential mineral resources from other types of permanent development which would either sterilise them or hinder extraction the potential for extraction of</i></p>

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					<p><i>mineral resources prior to undertaking other forms of development must be considered".</i></p> <p>The term 'development' in Policy Mwyn 6 does not refer to coal extraction in areas where working would otherwise be unacceptable, rather the policy identifies other forms of development (as per policy 13 of MPPW) that would normally be undertaken within settlement boundaries.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
1813	Gwasanaeth Cynllunio Mwynau & Gwastraff Gogledd Cymru (Dafydd Gareth	POLICY MWYN6	Object	The mineral safeguarding areas (Policy MWYN1) do not appear on the proposal map on Gwynedd Council's website nor do the sand and gravel preferred areas of search referred to in policy MWYN 3.	Accepted – There is a mapping error which needs to be corrected and the Preferred Areas need to be shown on the proposal map.

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	Jones) [2578]			<p>Inconsistency with the preferred areas of search for sand and gravel in in Policy MWYN3 and Proposals Map 1.</p> <p>Need to update the safeguarding mineral areas identified on Proposals Map 1.</p> <p>Notation for some of the constraints maps is hard to interpret, e.g. safeguarding sand and gravel where the area crosses other denotations such as 'special landscape areas'.</p> <p>Proposed Changes Need to include all preferred areas of search that have been identified for sand and gravel in Policy MWYN3 on Proposals Map 1, i.e. ensure that the following areas are marked on the proposals map as well as those that have already been included, namely; Bodychain Farm, Llanllyfni, Derwyn Fawr, Gandolbenmaen, Llecheiddior Uchaf, Gandolbenmaen. Update the mineral sites identified on Proposals Map 1 to include Nanhoron Quarry and Nant Gwrtheyrn working mineral deposits. The situation</p>	<p>Recommendation</p> <p>To ensure accuracy Bodychain Farm, Llanllyfni, Derwyn fawr, Garndolbenmaen and Llecheiddior Uchaf, Garndolbenmaen will need to be shown on the proposal map as Preferred Areas.</p> <p>For clarity the Proposal Maps should also include the mineral working at Nanhoron and Nant Gwrtheyrn.</p> <p>Focused Change: NF136, NF137</p>

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				<p>also needs to be reviewed to include new back-up quarries (if approved), but also the practicality of including small sites such as Nant Gwrtheyrn and the submission of Prohibition Orders to recommence mining on any 'dormant' mineral site, e.g. Dorothea Quarry.</p> <p>The mineral safeguarding areas (Policy MWYN1) need to be included on the interactive map as well as all the sand and gravel preferred areas of search referred to in policy MWYN3.</p>	

MWYN7 – Railhead and Wharf Facilities

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
260	Ellesmere Sand & Gravel Company Limited [2686]	POLICY MWYN7	Object	<p>The policy should include all rail and wharf facilities related to the minerals industry (rather than just those identified on the Proposals Map) as sustainable modes of transport. Where it is justified that these facilities no longer have a commercially viable future alternative site uses will be supported.</p>	<p>Not accepted – Designating the rail and wharf facility doesn't exclude other means of sustainable transport of minerals.</p> <p>If alternative are sought they should comply with the policies and objectives of the local development plan.</p>

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					<p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
435	Cyngor Tref Ffestiniog (Mrs Ann Coxon) [2940]	POLICY MWYN7	Support	Ffestiniog Town Council also supports safeguarding the land at Rhiw for railway developments. If there was a way to develop a Conwy Valley railway line, there would be an opportunity to move waste slate from Blaenau Ffestiniog to be used as an aggregate, therefore avoiding the need to create new quarries and making these slates a new source of work and income for the town.	<p>Note supporting comment</p> <p>Recommendation</p> <p>No Change</p>

MWYN8 – Exploration Works

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
261	Ellesmere Sand & Gravel Company Limited [2686]	POLICY MWYN8	Object	As the reasoned justification states mineral exploration works are considered permitted development under the Town and Country Planning (General Permitted Development Order) 1995.	Not accepted - Part 22, Class B to Schedule 2 of the GPDO allows for mineral exploration outside the 28 day period specified in Class A, subject to

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				Delete policy.	<p>the agreement of the mineral planning authority and a set of development criteria. Petroleum exploration and excavations in excess of 10m in depth and 12 square metres in surface area do not fall within the scope of permitted development and require planning permission. Therefore the policy should remain within the Plan.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
262	Lafarge Tarmac Trading Limited [2735]	POLICY MWYN8	Object	<p>As the reasoned justification states mineral exploration works are considered permitted development under the Town and Country Planning (General Permitted Development Order) 1995.</p> <p>Delete policy.</p>	<p>Not accepted - Part 22, Class B to Schedule 2 of the GPDO allows for mineral exploration outside the 28 day period specified in Class A, subject to the agreement of the mineral planning authority and a set of development criteria. Petroleum exploration and excavations in excess of 10m in depth</p>

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					<p>and 12 square metres in surface area do not fall within the scope of permitted development and require planning permission. Therefore the policy should remain within the Plan.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
1449	Cyfoeth Naturiol Cymru / Natural Resource Wales (Ymgynhoriadau Cynllunio) [1521]	POLICY MWYN8	Object	It would be useful to know if unconventional fracturing is within scope of this policy. If yes then some flexibility built in to this policy would be welcome such as the policy will be reviewed in light of any new evidence on the potential impacts of these types of development on the environment.	<p>Not accepted - Part 22, Class B to Schedule 2 of the GPDO allows for mineral exploration outside the 28 day period specified in Class A, subject to the agreement of the mineral planning authority and a set of development criteria. Petroleum exploration and excavations in excess of 10m in depth and 12 square metres in surface area do not fall within the scope of permitted development and require planning permission. Therefore the policy should</p>

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
					<p>remain within the Plan.</p> <p>Unconventional fracking may be considered in the same context as petroleum exploration.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
508	Gwynedd Archaeological Planning Service (Mr Ashley Batten) [2959]	7.5.80	Object	There is potential for such works to have an archaeological / historic environment impact which should also be considered.	<p>Not accepted - No specific provision for archaeological recording under permitted development rights under Part 22 of the GPDO other than what could be loosely interpreted as details submitted in accordance with a notification submitted to the mineral planning authority under Class B.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan</p>

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

MWYN9 – Borrow Pits

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
263	Ellesmere Sand & Gravel Company Limited [2686]	POLICY MWYN9	Object	<p>Existing and proposed borrow pits can be a viable source of mineral that should be supported to ensure the sterilisation of mineral does not occur.</p> <p>Environmental benefits is a wide ranging statement and requires defining.</p> <p>Support the use of existing and proposed borrow pits where commercially viable given the temporary nature of development. Definition of the scope and extent environmental benefits.</p>	<p>Partly accept - Further clarification is required in the explanation to the policy, regarding why environmental impacts may derive from borrow pits.</p> <p>Recommendation</p> <p>To ensure clarity the policy will be amended to refer to circumstances where environmental impacts may derive from borrow pits.</p> <p>Focused change: NF97</p>
1184	Horizon Nuclear Power (Miss Sarah	POLICY MWYN9	Object	Horizon supports a policy on borrow pits.	Not Accepted - Ancillary development associated with the Wylfa Newydd

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
	Fox) [2919]			However, rather than seek for specific amendments to policy MWYN9, 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.	<p>project should not be exempt from the scope of relevant policies and objectives of the LDP. Other policies within the Plan can be appropriately used to assess developments associated with Wylfa Newydd.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>

MWYN10 – Restoration and After Care

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
i	Ellesmere Sand & Gravel Company Limited [2686]	POLICY MWYN10	Object	Restoration should explore different uses of the site alongside traditional restoration plans of returning the site to greenfield status particularly where the landform has changed significantly from its original	Do not accept - Alternative restoration plans may include for amenity & biodiversity interests but the comment is vague with respect to any proposed

Rep ID	Name	Section	Type	Summary of Representation / Change(s) to Plan	Comments and Recommendations
				form.	<p>uses. Any afteruse proposals must comply with the policies and objectives of the local development plan.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
265	Lafarge Tarmac Trading Limited [2735]	POLICY MWYN10	Object	Restoration should explore different uses of the site alongside traditional restoration plans of returning the site to greenfield status particularly where the landform has changed significantly from its original form. Allow scope and flexibility in the policy for alternative and viable end uses of mineral sites where appropriate.	<p>Not Accepted - Alternative restoration plans may include for amenity & biodiversity interests but the comment is vague with respect to any proposed uses. Any afteruse proposals must comply with the policies and objectives of the local development plan.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>

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315	Lafarge Tarmac Trading Limited [2735]	POLICY MWYN10	Object	<p>There should be encouragement for secondary or restoration uses of mineral working sites. Restoration offers significant opportunities for recreational, economic and employment uses that can bring long lasting local benefits after restoration.</p> <p>The policy wording and the accompanying text requires to be adjusted to encourage alternative uses to be promoted.</p>	<p>Not Accepted - Alternative restoration plans may include for amenity & biodiversity interests but the comment is vague with respect to any proposed uses. Any afteruse proposals must comply with the policies and objectives of the local development plan.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
352	North Wales Wildlife Trust (Mr Chris Wynne) [2626]	POLICY MWYN10	Object	<p>As a way of facilitating the implementation of other policies e.g. PS16 (point 5) and AMG 5, greater emphasis and priority should be given to the potential for natural recolonisation and enhancing or providing wildlife habitats</p>	<p>Not Accepted – It is believed that criterion 8 of Policy MWYN10 sufficiently deals with the potential for natural recolonisation and enhancing or providing wildlife habitats</p> <p>Recommendation</p> <p>No robust evidence was received which</p>

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					would justify amending the Deposit Plan to ensure the Plan's soundness. No Change
509	Gwynedd Archaeological Planning Service (Mr Ashley Batten) [2959]	POLICY MWYN10	Object	There needs to be some recognition that quarry tips themselves are often of historic importance and restoration may not be appropriate or may at least need to be considered in this context.	Not Accepted – The Plan should be read as a whole, other policies within the Plan, include those which refer to landscapes of historic importance will have to be taken into consideration. Recommendation No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness. No Change
592	The Coal Authority (Mr James Smith) [2998]	POLICY MWYN10	Support	The policy places a strong emphasis in achieving high standards of restoration and aftercare which the Coal Authority strongly supports. This will ensure that sites can be put to appropriate beneficial after use without future public safety issues arising from legacy.	Note supporting comment Recommendation No Change
381	Ellesmere Sand &	7.5.82	Object	There should be encouragement for secondary or	Partly accept - Any afteruse proposals

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	Gravel Company Limited [2686]			restoration uses of mineral working sites. Restoration offers significant opportunities for recreational, economic and employment uses that can bring long lasting local benefits after restoration.	<p>must comply with the policies and objectives of the local development plan.</p> <p>However it is accepted that greater emphasis should be included within the Plan to, economic, recreational and environmental benefits which may arise from the development.</p> <p>Recommendation</p> <p>To ensure clarity the policy will be amended to refer to economic, recreational and environmental benefits which may arise from the development.</p> <p>Focused Change: NF98</p>