

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

2a. Which part of the Deposit Plan are you commenting on?	
	CPRW 5 Sustainable Development
Policy number (please specify)	Ch 7.2 Sustainable Development esp. PCYFF1-3
Paragraph number (please specify)	Mainly 7.2.1-7.2.13
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	

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

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

5. Sustainable Development

5.1 Context. We appreciate that emerging national policy sees ‘sustainable development’ as the main purpose of the land use planning system and requires the LDP to place these principles at the heart of its local strategy. We have no quarrel with the broad aims and aspirations of sustainable development. However, we question whether the proposed sustainable development policies can be applied effectively at the more local scale in the planning system. Permitted development rights are recognised for the least intrusive proposals, but the great majority of proposals where planning permission is required are for relatively small developments where it will be difficult to demonstrate sustainable development principles in any meaningful way.

5.2 We have a major concern that so much weight is to be placed on three generalised policies related to sustainable development (PCYFF1-3). We understand the intention to reduce duplication, but we think that the testing of all proposals against these overarching principles could readily become a bland ritual without much meaning in every Design and Access Statement, while at the same time planning decisions could become more arbitrary and less objective when tested against these generalised statements. The emphasis gained from explicit criteria attached to individual policies for each type of proposal will be lost. In many cases there will be no explicit policy, but only a requirement to refer to the broad sustainable development policies. ‘The baby may be thrown out with the bathwater’. The net effect risks being a less effective planning framework and poorer planning decisions.

5.3 Para 7.2.2 *'Sustainable development means making sure that people can satisfy their basic needs in the present, while ensuring that future generations can also look forward to the same quality of life'* - Should there not be an aspiration also to improve the quality of life of future generations? Add **'at least'** the same quality of life?

5.4 The interlocking and equivalent character of the three 'interconnected pillars' of sustainable development should be shown and expressed graphically as a more triangular relationship, illustrating more clearly how they inter-relate and need to be considered together.

5.5 PS5 All development proposals are required to fulfil nine objectives. We fully agree with the objectives in principle but do not see how all proposals, such as small extension to houses, could demonstrate in practice how they would contribute to all of them, especially #6 *'preserve and enhance' the quality of .. assets'* and #7 *protect and improve' the quality of the natural environment*. There is probably a need to add some qualifier e.g. *'wherever possible'*. It is noted that the introduction of objectives #10-14 does include the words *'proposals should also where appropriate:'*

5.6 PS5 #4 *'Promote greater self-containment of Centres and Villages by contributing to balanced communities that are supported by sufficient services; cultural, arts, sporting and entertainment activities; a varied range of employment opportunities; physical and social infrastructure; and a choice of modes of travel;'* This approach will clash with pressure for 'economies of scale' e.g. the current arguments about concentration of services in N Wales NHS.

5.7 PS5 #13 Improve sense by inserting 'car' and deleting 'means of' : *'Reduce the need to travel **by car** and encourage the opportunities for all users to travel when required as often as possible by ~~means of~~ alternative modes'.*

5.8 PS6 #1 We fully support the proposed energy hierarchy.

5.9 PCYFF 1-3 The Welsh words or other source for the derivation of the policy code letters are not clear. 'PCYFF' is a mouthful as a mnemonic for these policies and difficult to recall, unlike other policies which have useful and memorable abbreviation codes where the derivation is evident. (Perhaps PCY1-3?).

5.10 PCYFF1 #4 Housing density. While agreeing that dense settlement can be efficient in terms of land use etc. the impression on the landscape of dense estates of detached houses is alien to the traditional landscape in North Wales where settlement has not been significantly concentrated, except in 19th century quarrying areas. (See PCYFF2) If density is to be encouraged it should be through the building of terraces, rather than 'little boxes'. The terrace or even semi-detached units produce much better proportioned building blocks. The social (and economic) value of gardens should not be forgotten.

5.11 PCYFF2 #1 How practical is it to prove it *'enhances'* as well as complements? When will it be judged 'relevant'?

5.12 PCYFF2 # 5,9,11,12 Use of design jargon – ‘Secured by design.. inclusive design.. be legible.. active frontage’ – meanings may not be intelligible to the lay reader; re-word, provide explanatory text or glossary.

5.13 PCYFF2# 7.ii must surely mean NOT precluding the reasonable use of neighbouring land...

5.14 Para 7.2.9. We agree that proximity of poor development should not justify poor quality new development.

5.15 Para 7.2.10. This implies some proposals will not require a Design and Access Statement - clarify which ones and what is required instead.

5.16 PCYFF3 Design and Landscaping. We agree with the aims, but have concern about the ability to monitor and enforce landscaping plans and conditions in practice.

5.17 PCYFF#1. We have been unable to locate online detailed Seascape Character Area Assessments.

5.18 PCYFF4 We support the proposed broad approach to carbon management including the priority to be given to improving energy efficiency (#1,2) and subject to the useful general conditions regarding siting and design in #3,4.

5.19 PCYFF4 #4. We would like to add ‘...carbon measures must not **(iii) ‘damage the landscape’** (giving more emphasis to the weaker statement in #3(ii) ‘be sympathetic to the character and appearance of the landscape’.

5.20 ARNA1 Coastal Change Management Areas

ARNA1 #8 significance of ‘(outside the indicative policy epoch up to 2025)’ ? – clarify under what circumstances these non-residential developments (beach huts, shops, camp sites, etc.) will be permitted.

5.21 ARNA1. We have been unable to locate online the CCMA maps. The maps in the Shoreline Management Plan show the location of coastal sections, but not the width of the affected management areas extending back from the coast.

5.22 ARNA1 # 3. ‘Either cleared **or** made safe’ (rather than ‘and’)

2ch. If your response to 2c above exceeds 100 words, please provide a summary (no more than 100 words).

5.23 Summary Sustainable Development: We have a number of points of detail; but our principle concern is doubt that generalised sustainable development principles can be applied effectively to local planning developments of smaller scale. We fear that the weight to be given to testing all proposals against a few generalised policies, accompanied by a loss in emphasis or omission of policies for specific types of development, will result in a less effective planning framework and more arbitrary planning decisions.

2d. Please detail the changes you wish to see made to the Deposit Plan.

2dd. Is the Deposit Plan sound?

Yes No NO

2e. If you think that the Deposit Plan is unsound which test of soundness do you think that it fails? (Please tick below). *More details are provided at the back of this form.*

Procedural				Consistency				Coherence & Effectiveness											
P1	<input type="checkbox"/>	P2	<input type="checkbox"/>	C1	<input type="checkbox"/>	C2	<input type="checkbox"/>	C3	<input type="checkbox"/>	C4	<input type="checkbox"/>	CE 1	<input type="checkbox"/>	CE 2	<input checked="" type="checkbox"/>	CE 3	<input type="checkbox"/>	CE 4	<input type="checkbox"/>

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **175**

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

Rhan: **POLISI PCYFF3**

Section: **POLICY PCYFF3**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Mae'n debygol y caiff y polisi cyffredinol ei anelu at ddatblygu trefol ond nid yw'n mynd i fanylion e.e. (nid pob tirwedd sydd â'r un gwerth). Os ystyrir ei fod yn berthnasol i safleoedd cloddio mwynau, awgrymu'r newidiadau a nodir isod.

Representation Summary:

General policy likely to be aimed at urban development but does not specify e.g. (not all landscapes are of the same value). If considered to apply to mineral extraction sites suggest changes set out below.

Sylw Llawn / Full Representation:

General policy likely to be aimed at urban development but does not specify e.g. (not all landscapes are of the same value). If considered to apply to mineral extraction sites suggest changes set out below.

Newid(iadau) i'r Cynllun

Mineral extraction sites should be excluded from this policy suggest change of wording to start policy "

Change(s) to the Plan

Mineral extraction sites should be excluded from this policy suggest change of wording to start policy "Where possible and in accordance with other policies set out in this plan ..."

Profion Cadernid / Soundness Tests: x, viii, ix

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **176**

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

Rhan: **POLISI PCYFF3**

Section: **POLICY PCYFF3**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Mae'r polisi cyffredinol yn debygol o fod wedi'i anelu at ddatblygu trefol ond nid yw'n mynd i fanylion e.e. (nid pob tirwedd sydd â'r un gwerth). Os ystyrir ei fod yn berthnasol i safleoedd cloddio mwynau, awgrymu'r newidiadau a nodir isod. Fe ddylid eithrio safleoedd echdynu mwynau o'r polisi yma gan awgrymu newid i ddechrau'r polisi "Lle'n bosib ac yn unol a pholisiau eraill yn y cynllun yma....."

Representation Summary:

General policy likely to be aimed at urban development but does not specify e.g. (not all landscapes are of the same value). If considered to apply to mineral extraction sites suggest changes set out below.

Mineral extraction sites should be excluded from this policy suggest change of wording to start policy "Where possible and in accordance with other policies set out in this plan ..."

Sylw Llawn / Full Representation:

General policy likely to be aimed at urban development but does not specify e.g. (not all landscapes are of the same value). If considered to apply to mineral extraction sites suggest changes set out below.

Newid(iadau) i'r Cynllun

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Change(s) to the Plan

Mineral extraction sites should be excluded from this policy suggest change of wording to start policy "Where possible and in accordance with other policies set out in this plan ..."

Profion Cadernid / Soundness Tests: x, viii, ix