

adnewyddadwy? Gellid defnyddio'r asesiad ynni i wella geiriad polisïau PS6 a PCYFF4, gan eu bod fel y maen nhw, yn aneglur. Gallai'r asesiad ynni ei gwneud hi'n glir beth yn union a ddisgwylir ac ar gyfer pa fath/faint o ddatblygiad y mae'r polisïau yn ymwneud â nhw.

Mae Polisi ADN2 yn ceisio cadw technolegau ynni anadnewyddadwy o fewn ffiniau datblygu. Mae hyn yn cyfyngu gormod ac yn groes i bolisi cynllunio cenedlaethol. Dylai'r asesiad ynni roi'r dystiolaeth sydd ei hangen i allu cynllunio'n bositif ar gyfer pob math o ddatblygiad adnewyddadwy ac ynni isel.

C. Mewn perthynas â'r profion cadernid CE2, CE3, CE4: Er na thybir eu bod yn faterion o bwysigrwydd sylfaenol i gadernid yr CDLI, rydym o'r farn bod diffyg sicrwydd neu eglurder yngl n â'r materion canlynol, y tybiwn y byddai'n fuddiol tynnu eich sylw atynt, i'ch galluogi i ystyried amgenach ffyrdd o'u dangos:

I. Y gallu i gyflawni

Mae'r awdurdod wedi ystyried y gallu i gyflawni i raddau, ac mae Papur Testun 13, Seilwaith Cymunedol yn rhoi cyd-destun defnyddiol gan ddangos y mathau o seilwaith sydd eu hangen yn yr ardal. Fodd bynnag, nid yw hyn wedi'i drosi ar gyfer yr asesiadau fesul safle unigol. Rhaid i'r awdurdodau egluro pa seilwaith sy'n angenrheidiol er mwyn cyflawni'r safleoedd a ddynodwyd, a dangos sut a phryd y bydd hyn yn cael ei gyflawni yn ystod cyfnod y cynllun, ac ystyried p'un oes angen datblygu graddol. Ni ddylai gyfyngu ar newid o fewn y cynllun, ond dylai sicrhau bod y strategaeth yn cael ei chyflawni. Dylai'r awdurdodau gadarnhau pa seilwaith sy'n angenrheidiol a sut y bydd hyn yn cael ei roi ar waith o fewn y cyfyngiadau (fel y nodwyd yn y cynllun) sy'n dod i rym ar gytundebau Adran 106 ym mis Ebrill 2015, yn arbennig o ran y cyfyngiadau ar gronni adnoddau a nodir yn y rheoliadau.

Gall anawsterau godi os nad oes systemau yn eu lle i gydio yn y manteision ariannol a ddaw drwy ddatblygu, er mwyn eu defnyddio i helpu i ddarparu'r seilwaith priodol. Nid yw'n glir a yw Polisi ISA1 yn blaenoriaethu'r seilwaith gofynnol neu ai rhestr yn unig yw hon. Mae'r gwaith ar hyfywedd safle mewn perthynas â'r gallu i gyflawni hefyd yn wan.

Yr awdurdodau ddylai ddangos beth fydd, a beth na fydd yn cael eu cwmpasu gan gyfraniadau/rhwymedigaethau cynllunio eraill, sut mae hyn yn berthnasol i Reoliad 122 o Reoliadau'r Ardoll Seilwaith Cymunedol 2010, megis mesurau lliniaru uniongyrchol ar gyfer datblygiad, sut y gellir cyflawni rhwymedigaethau eraill y mae Cylchlythyr 13/97 yn eu ceisio, newidiadau hysbys i ddeddfwriaeth, megis Rhan L a systemau chwistrellu, a chostau seilwaith. Dylai'r awdurdod hefyd fedru dangos rhestr flaenoriaeth gyffredinol ynghylch y rhwymedigaethau y bydd yn eu ceisio gan ddatblygiad a baich ariannol rhwymedigaethau o'r fath ynghyd ag effaith hyfywedd.

Os nad oes Ardoll Seilwaith Cymunedol mewn lle, mae perygl bydd bwlch yn y polisi ac yng ngallu'r cynllun i gasglu arian i helpu gyda'r datblygiadau. Ni ddylid gadael hyn nes adolygiad cynnar o'r cynllun. Nid yw bwlch o'r fath yn fuddiol i'r cynllun. Mae angen esboniad pellach i ddangos nad yw hyn yn broblem neu, os yw'n broblem, sut y gellir ei ddatrys. Dylid egluro'r berthynas rhwng darparu seilwaith ar gyfer tai a chyflogaeth yn nhermau datblygiad graddol.

II. Darpariaeth tai

Rheoli datblygiadau tai mewn pentrefi

Ymddengys fod cyfanswm y safleoedd a ddynodwyd a'r safleoedd ar hap yn llai na'r ffigur sy'n cael ei nodi yn nhabl 17 y cynllun (1,502 - tudalen 151). Mae angen i'r awdurdod sicrhau fod cyfanswm y safleoedd a ddynodwyd a'r safleoedd ar hap mewn pentrefi yn cyfateb i'r ffigur yn y cynllun. Hefyd rhaid sicrhau bod y ffigur hwn yn cael ei gyflawni, ac nad oes modd datblygu nifer fawr o dai mewn pentref unigol neu lond dwrn o bentrefi bach, yn unol â'r strategaeth dai yn y cynllun.

Cyflenwad 5 Mlynedd o Dir

Mae angen eglurhad pellach i ddangos sut y bydd targedau penodol yn cael eu defnyddio i gynnal cyflenwad 5 mlynedd o dir ar gyfer tai. Dylai'r Awdurdodau Cynllunio Lleol ddangos bod modd iddynt ddarparu cyflenwad 5 mlynedd o dir ar gyfer tai wrth fabwysiadu'r cynllun, yn unol â Pholisi Cynllunio Cymru, paragraff 9.2.3.

Darparu tai

Nid yw'n eglur sut y pennwyd y datblygiad graddol o dai sy'n cael ei gynnig, a sut y bydd yn cael ei gyflawni dros gyfnod y cynllun. Rydym yn nodi bod y cynllun wedi cysylltu'r camau datblygu gyda datblygiad Wylfa B. Fodd bynnag mae angen eglurhad pellach mewn perthynas â safleoedd penodol a'r gallu i gyflawni ar y safleoedd hynny. Bydd angen i awdurdodau reoli a monitro'r ddarpariaeth o dai er mwyn sicrhau eu bod yn llwyddo i gyflawni'r cyfraddau adeiladu a'r gofynion tai cyffredinol sy'n cael eu cynnig (gweler hefyd y fframwaith monitro)

III. Fframwaith Monitro

Rhaid i'r fframwaith monitro fod yn briodol, gan fesur cynnydd y broses o roi'r Cynllun ar waith, rhybuddio'n gynnar os oes perygl o fethu cyflawni, a darparu sail ar gyfer ystyried adolygiad. Nid yw'n glir pam fod yr awdurdod wedi penderfynu cael dwy fframwaith monitro ar wahân (paragraff 8.5).

Dylid rhoi ystyriaeth bellach i'r meysydd canlynol o'r fframwaith:

Datblygu safleoedd yn raddol, eu cyflawni, unrhyw sbardun perthnasol a chymau gweithredu cysylltiedig. Byddai hyn yn berthnasol er enghraifft i feysydd tai, swyddi, Sipsiwn a Theithwyr, ynni adnewyddadwy, tai fforddiadwy.

Dylid cynnwys targedau a sbardunau er mwyn sicrhau bod y prif elfennau'n cael eu cyflawni, ee rhwymedigaethau cynllunio; bydd hyn yn tynnu sylw'r awdurdodau at unrhyw ddiffyg.

Mae'r siart wedi'i threfnu yn y fath fodd fel nad yw dangosyddion allbwn craidd Llywodraeth Cymru bob tro yn gysylltiedig â'r dangosydd allbwn lleol, ac o ganlyniad y targedau/sbardunau/polisiâu sydd yn yr un rhes. Byddai hefyd yn well, lle'n briodol, diwygio dangosyddion craidd i adlewyrchu'r amgylchiadau lleol.

[http://wales.gov.uk/topics/planning/policy/dear-cpo-](http://wales.gov.uk/topics/planning/policy/dear-cpo-letters/strategic-monitoring-framework/?lang=en)

[letters/strategic-monitoring-framework/?lang=en](http://wales.gov.uk/topics/planning/policy/dear-cpo-letters/strategic-monitoring-framework/?lang=en) Yng nghyd-destun

canllawiau'r llawlyfr ar Gynlluniau Datblygu Lleol (adran 9.5), dylid ystyried goblygiadau'r Dangosyddion Datblygu Cynaliadwy a gyhoeddwyd yn ddiweddar i'w casglu o fis Ebrill 2013 ymlaen a'r gwaith parhaus ar fireinio'r broses o lunio Cynlluniau Datblygu Lleol; gweler y dolenni canlynol: dangosyddion Datblygu

Cynaliadwy newydd: <http://llyw.cymru/topics/planning/policy/dear-cpo-letters/strategic-monitoring-framework/?skip=1&lang=cy>

a'r

Adroddiad Mireinio:

<http://wales.gov.uk/topics/planning/policy/guidanceandleaflets/ldp-process-refinement-report/?lang=en>

<http://llyw.cymru/topics/planning/policy/guidanceandleaflets/ldp-process-refinement-report/?skip=1&lang=cy>

D. Materion yngl n ag eglurder y cynllun yn gyffredinol, y tybiwn y gallent fod o gymorth i'ch awdurdod ac i'r Arolygydd wrth ystyried newidiadau priodol.

Materion technegol penodol:

Tabl 13 – Mae dau o'r meini prawf atodol yn debyg iawn 'mawr/ yn fawr iawn', mae angen egluro'r gwahaniaeth rhwng y ddau.

Gwahanol hierarchaeth i fanwerthu a thai – beth yw'r rhesymeg dros y gwahaniaeth?

Polisi PS12 – nid yw'n glir ble fydd y ddarpariaeth o ofod manwerthu'n cael ei leoli.

Methodoleg Asesu Safleoedd - Er mwyn i'r asesiad hwn fod yn effeithiol, bydd angen i'r awdurdodau egluro faint yn union o'r safle sydd ar dir a ddynodwyd fel Tir Gorau a Mwyaf Amlbwrpas, a sut mae hyn wedi effeithio ar benderfyniadau ynghylch defnydd o dir o'r fath.

Paragraff 7.2.34 - Er bod Llywodraeth Cymru'n cefnogi'r egwyddor o sicrhau manteision cymunedol cynaliadwy drwy drefniadau gwirfoddol, rhaid iddynt beidio ag amharu ar y broses benderfynu ac ni ddylid eu trin fel ystyriaeth berthnasol oni bai eu bod yn bodloni'r profion a nodir yng Nghylchlythyr 13/97.

ARNA 1 - Cefnogir y Polisi mewn egwyddor ond byddai'n fuddiol ei fân olygu i sicrhau eglurder. Cymal 1 - awgrymir cynnwys "y rhagwelir y bydd dan fygythiad" yn lle "sydd dan fygythiad", er mwyn sicrhau cysylltiad â'r SMP. Cymal 2 - egluro a oes rhaid i'r cynigion fodloni'r ddau is-gymal, (i) a (ii), neu ddim ond un neu'r llall. Cymal 6 - nid yw'n glir pam fod y gofyniad am ganiatâd Cyfoeth Naturiol Cymru yn benodol ac yn unigryw i'r cymal hwn. Cymal 8 - Mae'r testun o fewn y cromfachau'n aneglur, ymddengys fel petai'n awgrymu y byddai rhai datblygiadau penodol yn dderbyniol ar ôl y cyfnod polisi cychwynnol (2025). Nid yw'n glir sut mae hynny'n cyfateb i bolisi sy'n dod i ben yn 2026.

Polisi TRA2 - Dylid nodi bod Polisi Cynllunio Cymru'n datgan y dylai awdurdodau lleol sicrhau bod datblygiadau newydd yn darparu lefelau is o ofod parcio na'r hyn a wnaed yn y gorffennol. Mae TAN 18 yn datgan y dylid defnyddio uchafswm safonau parcio ceir fel ffordd o reoli'r galw.

'gormodedd' neu 'orddarpariaeth' - Nid yw'n glir sut y bydd Cynghorau'n dangos bod gorddarpariaeth o ofod agored, fel sy'n cael ei ddisgrifio yng nghymal 1 a pharagraff 7.1.21.

Polisi TWR2 – Llety Gwyliau- Byddai'r polisi'n gryfach pe bai'n cynnwys esboniad o'r hyn y byddai Cynghorau'n ei ystyried fel perygl o 'ormodedd' (Cymal 8) o lety penodol.

Polisi AMG 4 (Cadwraeth Bioamrywiaeth Leol) - angen ailddrafftio pellach. Mae'r polisi drafft ar hyn o bryd yn ymddangos yn rhy feichus ar gyfer ystyried cynigion datblygu ar dir dynodedig lle mae materion cadwraeth natur lleol anstatudol.

Materion technegol ynghylch gwybodaeth am Sipsiwn a Theithwyr

Paragraff 7.4.97 - mae angen eglurhad pellach ynghylch cam 4 (mewn perthynas â'r 'asesiad manwl o safleoedd') ac fe ddylai'r polisi hefyd adlewyrchu'r ffaith bod y broses

yn ymwneud â dod o hyd i safleoedd cyhoeddus ar gyfer Sipsiwn a Theithwyr, yn hytrach na safleoedd preifat.

Paragraff 7.4.99 - mae cynnwys 'ni chant aros am fwy na 5 diwrnod' yn cyfyngu Awdurdodau Lleol yn y dyfodol os byddant yn gweld y terfyn amser hwn yn wrthgynhyrchiol. Hefyd, nodir bod angen safle tramwy/aros allai gymryd hyd at 15 o leiniau er mwyn rhoi lle i 15 carafán. Fodd bynnag, mae canllawiau Dylunio Safleoedd Sipsiwn a Theithwyr Llywodraeth Cymru'n datgan y dylai pob llain dramwy fedru rhoi lle i ddwy garafán deithiol. Felly dylai safle 8 llain fod yn ddigonol.

Polisi TAI11 - mewn perthynas â diogelu safleoedd presennol, dylid ehangu'r cymal i: "diogelu fel safleoedd preswyl parhaol i'w defnyddio gan Sipsiwn a Theithwyr yn unig".

Polisi TAI13 - dyma'r polisi ar sail meini prawf ar gyfer safleoedd Sipsiwn a Theithwyr yn y dyfodol, mae'r meini prawf hyn yn ymwneud yn benodol â safleoedd preswyl ac nid ydynt yn caniatáu ar gyfer anghenion safleoedd tramwy yn y dyfodol. Nid yw maen prawf 2 yn ei gwneud yn glir nad oes trafndiaeth gyhoeddus ar gael bob tro, yn arbennig pan fo safleoedd yn cael eu dynodi yn unol â pharagraff 7.4.102. Mae maen prawf 4 yn hyblyg iawn yn sgil defnyddio'r cymal "yn cynnwys". Dylai'r awdurdodau ystyried cyfyngu'r ffactorau hyn i'r rhai a nodwyd eisoes, ac ychwanegu "oni bai bod mesurau lliniaru yn bosibl ac yn gymesur". Mae maen prawf 6 yn afresymol gan fod canllawiau Dylunio Safleoedd Sipsiwn a Theithwyr Llywodraeth Cymru'n ymwneud â safleoedd Awdurdodau Lleol ac nid safleoedd preifat. Gallai'r Awdurdod Lleol egluro y dylai'r safleoedd cyhoeddus ystyried y canllawiau hynny, tra byddai safleoedd preifat yn cael eu rheoleiddio dan Ddeddf Cartrefi Symudol (Cymru) 2013. Mae maen prawf 9 eisoes yn dod o dan bolisi TAI11.

Gallai paragraff 7.4.104 fod yn rhesymol mewn perthynas â safleoedd preswyl parhaol ond nid mewn perthynas â defnyddwyr tramwy.

Dylai paragraff 7.4.105 egluro nad oes gofyn i ddatblygwyr safleoedd preifat fyw yn yr ardal cyn cyflwyno cais cynllunio ar gyfer safle, gan y gallai hyn gyfyngu ar ryddid symudiad. Mae cylchlythyr cynllunio 30/2007 Llywodraeth Cymru yn ei gwneud yn glir y byddai gofyniad o'r fath yn annerbyniol ac yn mynd yn groes i bolisi cenedlaethol.

Mae paragraff 2.11 yn datgan y bydd pob safle sy'n dod o dan restr o feini prawf yn cael eu diystyru. Fodd bynnag, ni ddylid diystyru dynodiad ardal llifogydd C1 yn awtomatig. Dylid profi'r cyfiawnhad dros safleoedd o'r fath yn hytrach na chyfyngu opsiynau addas posibl ymhellach.

Cyfeiriadau at ganllawiau presennol:

Paragraff 7.2.23 - yn cyfeirio at Ddatganiad Polisi Ynni Llywodraeth Cymru (2010). Mae bellach wedi'i ddisodli gan Ynni Cymru: Newid Carbon Isel (2012).

Tabl 5 - yn cyfeirio at flaenoriaethau'r Cynlluniau Trafnidiaeth Rhanbarthol Taith a TraCC. Bydd y Cynlluniau hyn yn cael eu disodli gan Gynllun Trafnidiaeth Lleol ar y Cyd Gogledd Cymru a Chynllun Trafnidiaeth Lleol ar y Cyd Canolbarth Cymru. Dylai'r cynllun gyfeirio at unrhyw welliannau priffordd yr ymrwymwyd iddynt pan fo'n briodol.

Amgylchedd a Datblygu Cynaliadwy
Environment and Sustainable Development



Llywodraeth Cymru
Welsh Government

Nia Davies
Yr Uned Polisi Cynllunio ar y Cyd
Gwynedd a Môn
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31 March 2015

Dear Nia,

Welsh Government response to Gwynedd and Ynys Mon's joint Local Development Plan 2011 – 2026 – Deposit Version

Thank you for your recent correspondence of 16th February, including copies of the Deposit Local Development Plan (LDP) and accompanying documentation.

We are pleased to see progress being made in preparing a joint development plan for the area and we acknowledge the amount of work undertaken by the two Local Planning Authorities and the Joint Planning Policy Unit to reach this stage, particularly the collaborative working which we commend. We also recognise the amount of evidence the authorities have collected to support their conclusions in seeking to find solutions within the land-use planning system to housing and cultural issues of significant concern to communities.

Under the LDP system responsibility rests with the local planning authority to ensure that a submitted LDP is sound in procedural terms, and enshrines the principles of early community engagement, transparency, consistency, coherence and compatibility to neighbouring authorities. If these principles have not been addressed adequately at the earliest stages of preparation, then the deposit LDP may be considered unsound and unfit for examination.

The matter of whether a plan is considered 'sound' will be for the appointed Planning Inspector to determine. We have considered the Deposit LDP in accordance with the consistency/coherence and effectiveness tests, and principally in accordance with whether satisfactory regard has been given to national planning policy (test C2). Our representations are separated into **4 categories** which are supported with more detail in the **attached annex**.



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A. Objection under soundness tests C2, CE2: Fundamental issues that we consider present a significant degree of risk for the authority if not addressed prior to submission stage, and may have implications for the plan's strategy:

No Issues

B. Objections under soundness tests C2, CE1, CE2: Matters where it appears that the deposit plan has not satisfactorily translated national policy down to the local level and there may be tensions within the plan, namely:

Creating sustainable communities – this heading covers 4 aspects:

1. Provision for Gypsies and Travellers;
2. Housing provision including deliverability of Affordable housing;
3. Provision for Employment sites; and
4. Renewable Energy

C. In relation to soundness tests CE2, CE3, CE4: whilst not considered to be fundamental to the soundness of the LDP, we consider there to be a lack of certainty or clarity on the following matters which we consider we can usefully draw to your attention to enable you to consider how they might be better demonstrated:

- I. Deliverability of sites;
- II. Control of housing developments in villages;
- III. Monitoring and implementation; and

D. Matters relating to clarity of the plan generally which we consider may be of assistance to your authority and to the Inspector in considering suitable changes.

- Specific technical issues

We have raised some of these issues with you on previous occasions and we will be contacting you soon to arrange a meeting to discuss any matters arising from our formal response to your deposit LDP.

Yours sincerely

Mark Newey
Head of Plans Branch
Planning Division
Welsh Government
Annex

Annex to WG letter (31 March 2015) in response to the Gwynedd and Mon Joint deposit LDP

- A. Objection under soundness tests C2, CE2: Fundamental issues that we consider present a significant degree of risk for the authority if not addressed prior to submission stage, and may have implications for the plan's strategy:**

No Issues

- B. Objections under soundness tests C2, CE1, and CE2: Matters where it appears that the deposit plan has not satisfactorily translated national policy down to the local level and there may be tensions within the plan, namely:**

Creating Sustainable communities:

1. Gypsies and Travellers

The evidence doesn't quantify the need for either permanent or transit sites and when, within the plan period they are needed (7.4.90 – 11 residential pitches to replace the existing one near Pentraeth, 10 residential pitches in Gwynedd, 28 transit pitches required across North Wales). The plan has allocated 5 pitches, and clarification is required on how and when the additional 16 will be delivered (permanent pitches) and what the authorities' need are in relation to the 28 transit pitches, and when these are required. The Welsh Government considers that the plan has not made sufficient provision to meet the level of identified need. Para 17 of Welsh Government Circular 30/2007 'Planning for Gypsies & Travellers' states that "where there is an assessment of unmet need for Gypsy and Traveller accommodation in the area, local planning authorities should allocate sufficient sites in LDPs to ensure that the identified pitch requirements for residential and transit use can be met. Section 103 of Housing (Wales) Act 2014, when commenced (anticipated March 2016), will make the provision to meet the need a statutory duty.

The authorities have acknowledged that not every group of Gypsies and Travellers can be accommodated on the same site, and the authorities need to clarify whether this has been taken into consideration when making provisions for Gypsies and Travellers (under the broader definition included in the Housing (Wales) Act).

(For technical points relating to Gypsies and Travellers please see category D.)

2. Housing provision

Clusters

Further justification is required to explain the number of villages included within this policy. Some of these clusters have scored very low in the sustainability matrix included in topic paper 5 (Developing the Settlement Hierarchy). The lower scores suggest that these are less sustainable, isolated developments, and not well connected to services

and facilities, hence the need to explain why these have been identified. The Welsh Government objects to the identification of so many 'clusters' which lack justification.

Policy PS15 – Settlement strategy

The strategy of the plan is not questioned; however the growth limitation created by policy wording for the main centres has not been justified. It would seem logical to create growth limitations for the lower tiers rather than for the most sustainable areas.

Issues not in accordance with Planning Policy Wales

The authorities have set out evidence in 'Topic Paper 17: Local Market Housing' which demonstrates the issues facing local communities. Paragraph 9.2.4 of Planning Policy Wales (PPW) makes it clear that market housing to meet specific local housing needs would normally have no occupancy condition. Such a departure from national policies need to be justified with robust evidence. Therefore, the evidence should go further and detail why the affordable housing policies, and the provision of intermediate affordable housing, could not assist in meeting the identified need.

Furthermore, paragraph 7.4.39 states that local market housing, allowed under Policy TAI5, will be restricted to those who are eligible by S106 legal agreements. Therefore, it does not comply with PPW, i.e. that the obligation is "necessary to make the development acceptable in planning terms" (PPW 3.7.6).

Development on exception sites - Policy TAI10 states that in exceptional circumstances open market housing may be included to make a proposal viable. However, sites that include a mix of market and affordable housing cannot be classed as 'exception sites' under national policy – TAN 2 explicitly states that such sites are not appropriate for market housing (para. 10.14).

Affordable housing

Supporting evidence

Planning Policy Wales (PPW, paragraph 9.1.4) states the importance of local authorities understanding their whole housing system so they can develop evidence-based market and affordable housing policies. A key component of this evidence base will be a Local Housing Market Assessment (LHMA). Paragraph 9.2.16 (PPW) also states that LDPs should include an authority-wide delivery target for affordable housing, based on an LHMA. The LDP should express the total affordable housing need (including any backlog) over the whole plan period in the reasoned justification to the affordable housing policy.

Deliverability of affordable housing

The plan and supporting documents have identified the need for affordable housing over the first 5 years of the plan (including backlog), and the delivery of the affordable housing is obviously a priority for both authorities. The authorities need to explain the relationship between the target within the LHMA and the level of affordable/ market housing proposed in the plan. It is necessary for the authorities to demonstrate that they are maximising provision through the LDP given the high level of need.

Further clarification is required to explain what delivery rates are expected from current commitments and how allocations will contribute to the affordable housing need target. It remains unclear how 1,400 affordable housing will be delivered and whether the

authorities have explored all options to maximise provision through the LDP given the very high level of needs identified for the first 5 years of the plan alone i.e. relationship to market housing.

Viability of affordable housing

It is noted that an update of the viability work has been prepared. It is important that the viability evidence supporting the plan is up-to-date and takes into account known costs, including the impact of affordable housing and 'other' contributions. When preparing a plan the authorities should have a reasonable understanding of the costs associated with development.

The viability work has clearly taken on board and recent changes to national policy and has provided further clarification in relation to costs. However, further clarification is required to explain what costs, related to the obligations/ contributions have been taken on board. The viability work does include this aspect but the specific costs are unclear. It is for the authorities to demonstrate what other planning obligations/contributions will, or will not cover (see also comments in relation to deliverability). Challenging targets need to be grounded in evidence and applicable to the majority of applications, whilst allowing site specific negotiations to occur, if/ where necessary (on a limited number of sites). All components of the viability evidence need to be justified.

In order to maximise affordable housing delivery and meet the key objective, the viability work has identified hotspots related to specific geographical areas within the plan area. The authorities should consider whether the wording of TAI9 is strong enough to negotiate much higher percentages of contributions from these specific hotspots.

National planning policy

Para 9.2.15 of PPW states that it is desirable that new housing development incorporates a reasonable range and mix and balance of house types and sizes so as to cater for a range of housing needs and contribute to the development of sustainable communities. Furthermore, para 8.1 of TAN 2: "Local Housing Market Assessments and the Development Plan", states that it is important that a LPA has an appreciation of the demand for the different dwelling sizes and types of housing (i.e. intermediate and social rented) in relation to the supply so that the LPA can negotiate the appropriate mix on new sites.

LDP affordable housing policies should not include the range/type/mix of housing as matters could change over the lifespan of the plan and potentially inhibit the delivery. However, LDPs should include reference to the latest information within the reasoned justification to enable effective negotiation. Dependent on the mix, which may have financial implications, the delivery of affordable housing (percentage sought on site) could also be impacted. The LMHA does assess the full range of housing requirements, but this is not referenced specifically in the LDP. The plan would benefit from including such information which could be factored into the viability calculations to demonstrate consistency with the evidence and no adverse implications.

3. Employment

Welsh Government supports economic growth however, it is crucial that this economic growth meet the authorities' objectives. The authorities should clarify that oversupplying the market to this extent (approximately by 300ha) will not have negative implications for

land values; nor hinder development from coming forward or jeopardise growth aspirations.

Spatial distribution of employment land

Further clarification is required on how the distribution of employment sites relate to the provision for housing. The housing commitments/ allocations are based on a hierarchy of settlements and it would be helpful if the employment sites could be presented in a similar manner. It would also be helpful if further information could be provided on how the authorities have considered the inter-linkages between the three main strategic employment sites along the A55 corridor, and that these are not in competition with each other and therefore creating problems of deliverability.

Employment provision

Further clarification is required on how the level of employment provision inter-relates with the strategic approach on the housing provision.

Policy CYF1 “Safeguarding and Allocating Land and Units for Employment Use” - Further clarification is required to explain why it is considered that over 800ha (excluding Wylfa) of land is required to be safeguarded for the plan period. Paragraph 7.3.23, states that the employment land review estimated a need of approximately 12 ha for the authorities over the plan period. This would equate to a need of approximately 180ha of employment land over the whole plan period. It is therefore unclear why the plan makes provision for approximately 478has (the proposed and existing undeveloped allocations of the identified need). How has the plan considered the implications of this over-allocation with the housing provision and the deliverability of the sites? The authorities also need to clarify whether the employment assessment (carried out in accordance with DCLG guidance 2004) is in accordance with Welsh Government’s “TAN 23: Economic Development (2014)”.

The authority should clarify what the implications would be on types of jobs (skills and salaries) and homes if landtake were to exceed the 180hqa over the plan period. Further clarification is necessary to explain how the supporting assessment work, especially the Welsh Language Impact Assessment (WLIA) has taken account of this over-allocation. Some background information has been included on upskilling residents in both authorities (especially in relation to the new Wylfa proposed development) but what kind of jobs are the authorities expecting for these allocated sites? Are the required skills available locally, or would this encourage job migration into the area and increase pressure on housing/ Welsh language?

Best and Most Versatile Agricultural land

The potential loss of BMV land could result in the permanent loss of approximately 40 hectares. The majority of the land is included in allocations TRA1, C14 and C15 and the plan has limited evidence to demonstrate that paragraph 4.10 has been considered at all in allocating these sites for development.

4. Renewable Energy

A Renewable Energy Assessment has been undertaken for both areas, however the Deposit Plan fails to take the opportunity to take into account the contribution the area can make towards developing and facilitating renewable and low carbon energy and plan positively for appropriate development. Further consideration needs to be given to how to translate the evidence base into a set of policies which guide appropriate development. For example, could the assessment work provide evidence to provide

opportunities for higher sustainable building standards on strategic sites or can the co-location of developments optimise opportunities for renewable energy? The energy assessment could also be used to improve the policy wording for PS6 and PCYFF4, as these stand they lack clarity. The energy assessment could make it clear what is expected and to what scale/ type of development the policies apply.

Policy ADN2 seeks to constrain non-renewable energy technologies to within development boundaries. This is overly restrictive and contrary to national planning policy. The energy assessment should provide the evidence to plan positively for all forms of renewable and low energy development.

C. In relation to soundness tests CE2, CE3, CE4: whilst not considered to be fundamental to the soundness of the LDP, we consider there to be a lack of certainty or clarity on the following matters which we consider we can usefully draw to your attention to enable you to consider how they might be better demonstrated:

I. Deliverability

Whilst the authority has considered deliverability to some degree, Topic paper 13, 'Community Infrastructure' provides a helpful context illustrating the types of infrastructure requirements in the area. However, this has not been transposed to a site by site assessment. The authorities need to clarify what infrastructure is required to deliver the allocated sites and how and when this will be delivered within the plan period, and whether any phasing of development will be required. It should not limit change within the plan but it should ensure the strategy is delivered. The authorities should secure the infrastructure required and how this will be implemented within the limitations (as identified in the plan) coming into force on Section 106 agreements in April 2015, particularly having regard to the pooling limitations as set out in the regulations.

If there is no mechanism in place to capture the financial benefits arising from development which can be used to assist the provision of appropriate infrastructure, this could cause difficulties. It is not clear whether Policy ISA1 prioritises the infrastructure requirement or whether this is merely a list. The viability work relating to the site deliverability is also weak.

It is for the authorities to demonstrate what other planning obligations/contributions will, or will not cover, how this relates to Regulation 122 of the Community Infrastructure Levy (CIL) Regulations 2010, i.e. direct mitigation for development, how other obligations sought by Circular 13/97 can be achieved, known changes to legislation, i.e. Part L & sprinklers, as well as infrastructure costs. The authority should also be able to indicate a priority list, in the generality, of what obligations it will seek from development and the financial magnitude of such obligations and the impact of viability.

If a CIL is not in place, there could be a policy vacuum in the plans ability to capture financial receipts to support development. This should not be left to an early review of the plan. It is not in the interest of the plan to create a policy void. Further explanation is required to demonstrate how this is not an issue or, if it is, how it is to be resolved. The

implications of infrastructure delivery on the housing provision and employment allocations in terms of phasing should be clarified.

II. Housing provision

Control of housing developments in villages

The total of allocations and windfalls appear to fall short of the figure included in the plan at table 17 (1,502 – page 153). The authority needs to ensure the total of allocation and windfall in villages tally to the figure in the plan and ensure this is delivered and that a large number of housing will not be able to be developed in one or a few small villages, as set out in the plan's housing strategy.

5 year-land supply

Further clarity is required to illustrate how the identified targets will be used to maintain a 5 year land supply of housing land. The LPAs should demonstrate that they can provide a 5 year housing supply from the plans adoption, in accordance with Planning Policy Wales, paragraph 9.2.3.

Delivery of housing

It is unclear how the proposed phasing of housing development has been derived and how it will be delivered over the plan period. It is noted that the plan has linked its phasing to the development of Wylfa B, however further clarification in relation to specific sites, and deliverability of those sites is required. The authorities will need to control and monitor the housing provision to ensure they achieve the proposed build rates and overall housing requirements (see also monitoring framework)

III. Monitoring Framework

The monitoring framework (MF) needs to be appropriate in enabling progress of the Plan's implementation to be measured, early alert to avoid non-delivery and providing the basis for consideration of review. It is unclear why the authority has decided to have two separate monitoring frameworks (para 8.5).

Further consideration should be given to the following areas of the framework:

The phasing of the development sites, their delivery, relevant triggers and associated action points. This would apply for example to housing, employment, Gypsy and Travellers, renewable energy, affordable housing.

Targets and triggers should be included to ensure that key factors are delivered e.g. planning obligations; this will identify the shortfalls for the authorities.

The arrangement of the chart is such that the WG core output indicators don't always relate to the local output indicator and therefore the related targets/trigger/policies contained in the same row. It would also be preferable, where appropriate, to amend core indicators to reflect local circumstances.

In the context of LDP manual guidance (section 9.5) the implications of the recently published Sustainable Development Indicators to be collected from April 2013 onwards and the ongoing LDP Process Refinement Exercise should be considered in finalising the MF; see at following links: new SD indicators link:

<http://gov.wales/topics/planning/policy/dear-cpo-letters/strategic-monitoring-framework/?skip=1&lang=en>;

and

PRE Report link:

<http://gov.wales/topics/planning/policy/guidanceandleaflets/ldp-process-refinement-report/?lang=en>

D. Matters relating to clarity of the plan generally which we consider may be of assistance to your authority and to the Inspector in considering suitable changes.

Specific technical issues:

Table 13 – Two of the supplementary criteria are very similar ‘large/ very large’, clarity required on the difference between these two.

Different hierarchy to retail and housing – what is the rational for the difference?

Policy PS12 – it is unclear where the provision of retail space will be located.

SA Methodology - For this assessment to be effective, the authorities will need to clarify exactly how much of the site is BMV and how it has influenced decisions regarding uses on such lands.

Paragraph 7.2.34 - While the Welsh Government supports the principle of securing sustainable community benefits for communities through voluntary arrangements, they must not impact on the decision making process and should not be treated as a material consideration unless it meets the tests set out in Circular 13/97.

ARNA 1 - The Policy is supported in principle but would benefit from minor editing to ensure clarity. Clause 1 - suggest insertion of "predicted to be" immediately before "threatened", to ensure link to SMP. Clause 2 - clarify whether proposals must meet both sub-clauses (i) and (ii), or either one of the sub-clauses. Clause 6 - it is not clear why the requirement for NRW consent is specific and unique to this clause. Clause 8 - The text within brackets is unclear, as it appears to suggest that after the first policy epoch (2025) certain developments would be acceptable. It is not clear how that fits with a plan with an end date of 2026.

Policy TRA2 - It should be noted that PPW sets out that local authorities should ensure that new developments provide lower levels of parking than have generally been achieved in the past. TAN 18 states that maximum car parking standards should be used as a form of demand management.

'surplus provision' or 'over provision' - It is not clear how the Councils will demonstrate surplus/ over provision of open space, as described at clause 1 and in Para 7.1.21.

Policy TWR2 – Holiday Accommodation - The policy would be strengthened with an explanation of where the Councils consider 'over-concentration' (Clause 8) of certain accommodation might be a risk.

Policy AMG 4 (Local Biodiversity Conservation) requires further re-drafting. As drafted the policy seems overly onerous for the consideration of development proposals on local non-statutory nature conservation designations.

Technical issues relating to information on Gypsies and Travellers

Paragraph 7.4.97 - further clarification is required in relation to step 4 (relating to the 'detailed site assessment') and policy should also reflect that the process is in relation to finding public Gypsy and Traveller sites, as opposed to private sites.

Paragraph 7.4.99 -by including 'up to 5 days at a time' restricts the Local Authorities in future if they found this time limit was counter-productive. It also states that a transit site of 15 pitches could be required to accommodate 15 caravans.). However, the Welsh Government's Designing Gypsy and Traveller Sites guidance states each transit pitch should be capable of accommodating two tourer caravans. Therefore, a site of 8 pitches should suffice.

Policy TAI11 - relates to the safeguarding of existing sites, the phrase should be widened to: "safeguarded as a permanent residential site to be solely used by Gypsies and Travellers".

Policy TAI13 - constitutes the criteria-based policy for future Gypsy and Traveller sites, these criteria relate specifically to residential sites and does not allow for future transit site needs. Criterion 2 is not clear that public transport links are not always available, particularly where sites are allocated in accordance with paragraph 7.4.102. Criterion 4 is extremely flexible due to the use of the word "including." The authorities should consider limiting these factors to those already mentioned and add "unless mitigation is possible and proportionate." Criterion 6 is unreasonable as the Welsh Government Designing Gypsy and Traveller Sites guidance applies to Local Authority sites and not private sites. The Local Authority could clarify that public sites should have regard to that guidance whilst private sites would be regulated under the Mobile Homes (Wales) Act 2013. Criterion 9 is already covered by policy TAI11.

Paragraph 7.4.104 could be reasonable in relation to permanent residential sites but not in relation to transit occupants.

Paragraph 7.4.105 should clarify that private site developers should not be required to live in the area before submitting a site planning application as this could otherwise have the effect of limiting freedom of movement. Welsh Government planning circular 30/2007 makes clear that such a requirement would be unacceptable and contrary to national policy.

Paragraph 2.11 states that all sites included within a range of listed criteria will be discarded. However, the designation of C1 flood zone should not be automatically discarded. Such sites should be subject to a justification test instead of further limiting potentially suitable options.

References to current guidance:

Paragraph 7.2.23 - refers to the Welsh Government's Energy Policy Statement (2010). This has been superseded by Energy Wales: A Low Carbon Transition (2012).

Table 5 - refers to priorities of the Taith and TraCC Regional Transport Plans. These Plans are to be replaced by the North Wales Joint Local Transport Plan and the Mid Wales Joint Local Transport Plan. The plans should make reference to any committed highway improvements wher relevant

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **81**

Enw / Name: **Adran Cynllunio a Thai, Cyngor Sir Ddinbych (Angela Lo**

Rhan: **POLISI PCYFF4**

Section: **POLICY PCYFF4**

Math / Type: **Cefnogi / Support**

Crynodeb o'r Sylw:

Cefnogi'r polisi manwl a phosib hwn.

Representation Summary:

Support this detailed and workable policy.

Sylw Llawn / Full Representation:

Support this detailed and workable policy.

Newid(iadau) i'r Cynllun

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Change(s) to the Plan

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Profion Cadernid / Soundness Tests: None

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **453**

Enw / Name: **Bourne Leisure Ltd [2768]**

Rhan: **POLISI PCYFF4**

Section: **POLICY PCYFF4**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Mae Bourne Leisure yn nodi y dylia cael dyluniad ac adeiladu cynaliadwy yn bennaf trwy Reolaeth Adeiladu. Serch hynny, mae'r cwmni hefyd yn nodi y dylia dyluniad cynnar adeilad yn y cyfnod cynllunio ystyried y gallu i gyrraedd gofynion Rheolaeth Adeiladu yn y dyfodol. Dylia'r pwynt yma gael ei osod yn y CDLI i sicrhau na fydd yna unrhyw gamddealltwriaeth. Felly, nid oes angen i CDLI wneud cyfeiriad i nodweddion a mesurau effeithlonrwydd ynni.

Representation Summary:

Bourne Leisure comments however that sustainable design and construction should be primarily sought via Building Regulations. However, the Company also notes that the initial design of a building in the planning process will need to consider the ability to meet Building Regulations' requirements in the future. This point of principle should be set out in the LDP, to ensure that no confusion arises. It is therefore unnecessary for the LDP to make reference to energy efficiency features and measures.

Sylw Llawn / Full Representation:

Bourne Leisure supports sustainable development in its buildings, venues and accommodation units. All new buildings and refurbishments of existing venues incorporate the use of LED lighting, efficient heating and cooling solutions, occupancy sensors, the use of heat pump technology and are designed to benefit from the maximum use of natural ventilation and natural daylight. The Company's hire fleet holiday homes have been developed in recent years to include increased levels of insulation, efficient boilers to provide heating and hot water, LED lighting both internally and externally, occupancy sensors to limit energy use in periods of non-occupancy and insulative double glazing.

Bourne Leisure comments however that sustainable design and construction should be primarily sought via Building Regulations. However, the Company also notes that the initial design of a building in the planning process will need to consider the ability to meet Building Regulations' requirements in the future. This point of principle should be set out in the LDP, to ensure that no confusion arises. TAN22 (Sustainable Buildings) was cancelled on 31 July 2014 to coincide with changes to Part L (relating to energy efficiency) of the Building Regulations. It is therefore unnecessary for the LDP to make reference to energy efficiency features and measures.

Newid(iadau) i'r Cynllun

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Change(s) to the Plan

Bourne Leisure comments however that sustainable design and construction should be primarily sought via Building Regulations. However, the Company also notes that the initial design of a building in the planning process will need to consider the ability to meet Building Regulations' requirements in the future. This point of principle should be set out in the LDP, to ensure that no confusion arises. TAN22 (Sustainable Buildings) was cancelled on 31 July 2014 to coincide with changes to Part L (relating to energy efficiency) of the Building Regulations. It is therefore unnecessary for the LDP to make reference to energy efficiency features and measures.

HORIZON

NUCLEAR POWER

**Joint Local Development Plan Anglesey & Gwynedd
(2011-2026) Deposit Plan (2015)**

Horizon Nuclear Power – Table of Representations

DCRM Ref Number: HNP-S5-PAC-REP-00036

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
			<p>understood and applied effectively by a developer.</p> <p>More broadly, it is not clear how "acceptability" and "unacceptability" is to be assessed in the Plan.</p>	<p>pollution, or other forms of pollution or nuisance;</p> <p>12. The quality of ground or surface water;</p> <p>13. The best and most versatile agricultural land;</p> <p>14. Land safeguarded for other uses, or impairs the development and use of adjoining land.</p>
23.	Chapter 7 Managing growth and Development – Sustainable Living	Policy PCYFF4	<p>It is not clear what requirement this policy imposes on developers in relation to the "Potential Options". For example, do all options need to be considered and at least one implemented or is it permissible for no options to be implemented if evidence is presented showing that none of the options is feasible? It would be beneficial to reword this policy so that the particular obligation(s) are identified more clearly.</p>	
24.	Chapter 7 Managing growth and Development – Sustainable Living	Policy ARNA1	<p>Rather than seek for specific amendments to policy ARNA1 which seek to exclude application of this policy from the marine located associated development, Horizon proposes to rely on the Wylfa Newydd specific policies proposed below which would be the relevant policies against which to determine associated development applications. For this</p>	

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **385**

Enw / Name: **Mon a Gwynedd Friends of the Earth (Mr Richard Mills)**

Rhan: **POLISI PCYFF4**

Section: **POLICY PCYFF4**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Mae'n ymddangos bod yna fethiant i adnabod unrhyw safleoedd strategol lle dylai mesurau effeithlonrwydd ynni ragori ar safonau adeiladu safonol. Mae Polisi Cynllunio Cymru, cyfrol 5, para 6.6 a 6.7 yn berthnasol yn hyn o beth, yn ogystal a llythyr gan Carl Sargeant, dyddiedig 5 Mehefin 2014, sy'n dweud y dylai ACLI wrth baratoi Cynlluniau Datblygu Lleol gario 'mlaen i asesu eu safleoedd strategol i adnabod cyfleoedd i gael safonau uwch na beth sydd eu hangen o dan reoliadau (adeiladu cynaliadwy). Rydym felly yn ystyried nad yw'r CDLI ar y Cyd Adnau yn cyd fynd a phroffion cadernid C2 a CE2 o ran tai/ effeithlonrwydd ynni.

Representation Summary:

There appears to have been a failure to identify any strategic sites where energy efficiency measures should exceed the regulatory building standard. Planning Policy Wales, edn. 5, paras. 6.6 and 6.7 is relevant in this respect, as is the letter from Carl Sargeant, dated 5 June 2014, which states that "In formulating their Local Development Plans, LPAs should continue to assess their strategic sites to identify opportunities to require higher than regulatory (sustainable building) standards". We therefore consider that, with regard to housing/energy efficiency, the Deposit JLDP fails consistency test C2 and coherence and effectiveness test CE2.

Sylw Llawn / Full Representation:

Please note: The following comments are cross-cutting and relate not only to POLICY PCYFF4 but also to Strategic Objective 6, POLICY PCYFF2 and the various housing policies, e.g. Policy TAI1:

Strategic Objective 6 of the Plan is to "Minimize, adapt and mitigate the impacts of climate change." One measure to achieve this is recognised to be, "reduce the need for energy and other resources in developments". When the JLDP Objectives were evaluated in the Sustainability Appraisal Assessment, one of the suggested amendments related to the need to favour "appropriately designed and located buildings that are energy efficient". This has been transposed into Strategic Objective 6, to "reduce the need for energy and other resources in developments". We consider, however, that this Strategic Objective has been given insufficient weight in the policies relating to housing that are presented in this Deposit JLDP.

Potentially relevant policies and explanations are:

STRATEGIC OBJECTIVE 6:

"Ensure that all new development meets high standards in terms of quality of design, energy efficiency, safety, security (persons and property) and accessibility, relates well to existing development, enhances public realm and develops locally distinctive quality places."

POLICY PCYFF2. DESIGN AND PLACE SHAPING:

"All proposals will be expected to demonstrate high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places. Innovative and energy efficient design will be particularly encouraged."

Para 7.2.9 of Explanation for Policy PCYFF2:

"7.2.19 Carbon management measures, comprising of both energy efficiency and renewable technologies, are essential in helping to reduce the carbon footprint of the plan area and are strongly encouraged in both new build construction and the retrofitting of existing buildings."

POLICY PCYFF4 CARBON MANAGEMENT:

Sylwadau Dros y We / Representations via the Internet

"Developers should carefully consider the most appropriate carbon management measure, or group of measures, at the conception of a development scheme. This may be an individual measure or a combination of both energy efficiency and renewable energy measures."

"Potential Options for Energy Efficiency:

1. New build construction:

i. The energy efficiency of building fabric (including the whole building envelope which includes the ceiling, walls, windows, floors, roofs, foundations and doors);

ii.

Passive design (including natural lighting, passive cooling and passive solar heating).

2. Existing buildings

i. The upgrading of existing building elements such as doors, floors, roofs, walls and windows.

Potential Options for Renewable Energy: Biomass, heat-pumps (air, ground and water), solar photovoltaic, solar thermal, marine, waste, water and wind, including micro- γ -generation and free- γ -standing apparatus."

Para 7.2.16 of Explanation for Policy PCYFF4:

"It is important that new development responds to the challenges posed by climate change. Part of this response should involve the consideration of carbon management in new build applications, including energy efficiency and renewable energy measures."

Para 7.2.19 of Explanation for Policy PCYFF4:

"Carbon management measures, comprising of both energy efficiency and renewable technologies, are essential in helping to reduce the carbon footprint of the plan area and are strongly encouraged in both new build construction and the retrofitting of existing buildings. Schemes including carbon management measures will be supported, provided that they are of the highest standard in terms of both design and energy performance."

Comments

Despite the lip service to the significance of energy efficiency, the references to "encouragement" for energy-efficient design and the need for developers of "carefully consider" carbon management measures reflect the lack of concrete content of the Deposit JLDP with regard to energy efficiency in housing.

For example:

1. Paragraph 7.4.10 states, "The following Strategic Policy aims to address housing issues around the number of housing units, affordable housing, type, mix of new homes and as well as ensuring that the needs and requirements of specific groups, such as the elderly are met." There is no reference to energy efficiency.

2. Policy TAI1: Appropriate Housing Mix states: "The Councils will work with partners to promote sustainable mixed communities by ensuring that all new residential development contributes to improving the balance of housing and meets the identified needs of the whole community. Proposals should contribute to creating sustainable mixed communities by:" In the seven listed items following this quote, there is reference only to high standards of design.

In a letter to local authority Chief Executives and Chief Planning Officers dated 5 June 2014, Carl Sargeant, Minister for Housing and Regeneration, wrote, "In formulating their Local Development Plans, LPAs should continue to assess their strategic sites to identify opportunities to require higher than regulatory (sustainable building) standards to be achieved. Evidence that this assessment has been undertaken and that higher standards would not impact on the overall viability of a scheme will need to be prepared."

In a similar light, the revised Technical Advice Note 12 (July 2014) states:

- 6.6 Planning authorities should apply the national planning policy to their local circumstances and explore opportunities to promote the underlying objectives of the policy in moving towards more sustainable and zero carbon buildings in Wales.

- 6.7 PPW sets out guidance on the selection of sites in order to deliver sustainability. The potential for strategic sites to contribute to the delivery of sustainable buildings (including zero carbon) should form part of this assessment. New development can be located so as to maximise opportunities for delivering higher sustainable building standards.

- 6.12 Local requirements for sustainable building standards on strategic sites should;

Sylwadau Dros y We / Representations via the Internet

* be set out in the LDP, so as to ensure examination by an independent inspector. This is so that standards and requirements are properly consulted on and tested to ensure their ambition reflects local potential and are deliverable;

* relate to a strategic site as identified by the local planning authority in the LDP;

* be specified in terms of achievement of a nationally described sustainable buildings standard

Evidence base

6.13 In preparing policies in an LDP which seek higher sustainable building standards, local authorities will need to establish:

* what is proposed is evidence-based and viable, having regard to the overall costs of bringing sites to the market (including the costs of any necessary supporting infrastructure) and the need to avoid any adverse impact on the development needs of communities; * the need for higher sustainable building standards on that site above the minimum required by Building Regulations; * what site specific opportunities are provided by the site to allow a building/development to achieve a higher sustainable building standard; * the costs and benefits of delivering higher sustainable building standards.

The Deposit JLDP, however, fails to identify any such strategic sites where energy efficiency measures should exceed the regulatory standard, and we have found no evidence that an appropriate assessment to identify such sites has been undertaken. For this reason we consider that, with regard to housing, the Deposit JLDP is not sound and in particular fails consistency test C2 and coherence and effectiveness test CE2.

We would also mention in this respect that the Deposit JLDP appears to fail to take into account the conclusion of the Sustainability Appraisal for the Deposit Plan that the Planning and Energy Act 2008 implies that the JLDP should set targets for energy efficiency standards.

Newid(iadau) i'r Cynllun

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Change(s) to the Plan

The objection calls for assessment and identification of strategic sites where higher than regulatory (sustainable building) standards should be achieved. This would impact on a number of paragraphs and policies.

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **438**

Enw / Name: **Cyngor Tref Ffestiniog (Mrs Ann Coxon) [2940]**

Rhan: **POLISI PCYFF4**

Section: **POLICY PCYFF4**

Math / Type: **Cefnogi / Support**

Crynodeb o'r Sylw:

Mae Cyngor Tref Ffestiniog yn cefnogi'r polisi pwysig yma am reoli carbon. Dylid cefnogi cynlluniau cyffrous i greu tai a chyfleusterau sydd yn ateb anghenion y dyfodol.

Representation Summary:

Ffestiniog Town Council supports this important policy to control carbon. Exciting plans to build housing and facilities that address the needs of the future should be supported.

Sylw Llawn / Full Representation:

Mae Cyngor Tref Ffestiniog yn cefnogi'r polisi pwysig yma am reoli carbon. Dylid cefnogi cynlluniau cyffrous i greu tai a chyfleusterau sydd yn ateb anghenion y dyfodol.

Newid(iadau) i'r Cynllun

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Change(s) to the Plan

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Profion Cadernid / Soundness Tests: None