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CYNGOR SIR  
YNYS MÔN  
ISLE OF ANGLESEY  
COUNTY COUNCIL

*For office use only:*

*Representor No.*

*Date received:*

*Date acknowledged:*

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

**PART 1: Contact details**

	<b>Your details/ Your client's details</b>	<b>Agent's details (if relevant)</b>
<b>Name</b>	Noel Davey	
<b>Address</b>	CPRW/Campaign for Protection of Rural Wales, [REDACTED]	
<b>Postcode</b>	[REDACTED]	
<b>Telephone Number</b>	[REDACTED]	
<b>Email address</b>	[REDACTED]	

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

<b>2a. Which part of the Deposit Plan are you commenting on?</b>	
	<b>CPRW 35 Employment Sites</b>
Policy number (please specify)	PS10/CYF1/CYF4
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	

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

**35. Employment Sites**

35.1 Para 7.3.1. The first 2 bullet points seem not to be relevant to major infrastructure.

35.2 **PS10.** We agree with Gwynedd Council’s aim to safeguard adequate employment land and ensure a geographical spread of employment opportunities. Two land availability studies are quoted, one of which (7.3.23) revealed an ‘*excess of existing employment land that is **unlikely** to meet the requirements of modern business*’, while another (7.3.24) concludes ‘*that there is sufficient employment land across the area which is evenly distributed*’. Some comment is needed on the conclusion the Plan draws from these alternative views.

35.3 **CYF1. Safeguarded Employment Land.** It is noted that PS10 requires 807ha of employment land to be safeguarded throughout the Plan area, of which CYF1 suggests some 472 ha are registered as vacant including reserve areas, enough for 40-50ha/year over a 10 year plan period, leaving aside any windfall sites. At the same time para 7.3.27 notes there has been a traditional rate of take-up of employment land within the Plan area of 4 ha per annum, while the Plan provides for a precautionary rate of 6 ha per annum. Some comment is required on the difference between the safeguarded amount and the target take-up rate.

35.4 **CYF4** provides for release of safeguarded sites for **alternative use** only in **special circumstances**. We think this policy should be more flexible in allowing, for example, alternative use of safeguarded employment sites for housing if suitable opportunities arise. Some sites originally proposed in the GUDP for employment have now been either deleted or switched to housing which implies a degree of flexibility. 7.3.35 notes that some traditional employment sites have been dormant: an example is the Afon Wen old laundry site where a housing proposal was recently refused (see CPRW 32).

**34.4 Inappropriate Uses.** There is also concern about a proliferation of sheds close to settlements which may cause adverse visual residential amenity impact and/or be used in practice for general storage purposes with little connection to farming, even though being presented as 'agricultural' buildings. Policies should specifically address this issue to ensure closer scrutiny of genuine need in planning applications.

**34.5 Explicit Policy Needed.** We appreciate that agricultural buildings might be covered in principle by policies PCYFF2 and 3, but as we comment elsewhere, these are highly broad and generalised policies which we fear will fail to focus attention on particular impact concerns. In contrast, there are explicit policies in the case of some other developments with a potential risk for high visual impact, such as wind turbines and caravan sites.

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

**34.6 Agricultural Sheds Summary.** An explicit policy is required regarding agricultural sheds comparable to GUDP D9. Farmers needs these, but they are large structures being built in increasing numbers in rural areas. Presently planning scrutiny of shed applications appears weak and more attention needs to be given to the siting, colouring and type of materials used.

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

**2dd. Is the Deposit Plan sound?**

Yes  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 type="checkbox"/>	CE 3	<input type="checkbox"/>	CE 4	<input type="checkbox"/>

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

PS10 Comment on conclusion of needs for employment land from alternative studies.

CYF1 Comment on difference between safeguarded amount and target take-up rate of employment land.

CYF4 More flexibility sought in alternate use of sites.

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

**2dd. Is the Deposit Plan sound?**

Yes  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	P2	C1	C2	C3	C4	CE 1	CE 2	CE 3	CE 4
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

<b>2a. Which part of the Deposit Plan are you commenting on?</b>			
<b>CPRW 36 Waste Management</b>			
Policy number (please specify)			
Paragraph number (please specify)		7.5	
Proposals/ Inset Map (please specify ref no.)			
Constraints Map			
Appendices (please specify)			
<b>2b. Are you objecting or supporting the Deposit Plan?</b>			
Objecting	<input type="checkbox"/>	Supporting	<input type="checkbox"/> <b>SUPPORT</b>

### 36. Waste Management

36.11 This is a sensible discussion of the issues, taking account of the north Wales wide plans and therefore concentrating on transport of waste and the position of local facilities for locally produced (hopefully reused waste). There is special discussion of concentrating construction waste (rubble etc) with an eye to re-use etc. There is no mention of any contact with the research on these matters in Bangor University, nor is there any mention of plastics and their end use. Presumably these aspects don't impact on planning issues. There is also a special section on Low level nuclear waste (as distinct from medium level which will be produced during the decommissioning of Wylfa).

36.2 We note Bryncir quarry is one of several potential sites proposed for waste management. We understand it is to be used as a holding area for materials produced from consented quarry operations at Llecheiddior west of the main road. We would be concerned by any proposed use for organic or soft waste since the quarry is subject to drainage issues.

<b>2ch. If your response to 2c above exceeds 100 words, please provide a summary (no more than 100 words).</b>																							
<b>2d. Please detail the changes you wish to see made to the Deposit Plan.</b>																							
<b>2dd. Is the Deposit Plan sound?</b>																							
Yes						<input type="checkbox"/>						No						<input type="checkbox"/>					
<b>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.</b>																							
<b>Procedural</b>				<b>Consistency</b>								<b>Coherence &amp; Effectiveness</b>											
<b>P1</b>	<input type="checkbox"/>	<b>P2</b>	<input type="checkbox"/>	<b>C1</b>	<input type="checkbox"/>	<b>C2</b>	<input type="checkbox"/>	<b>C3</b>	<input type="checkbox"/>	<b>C4</b>	<input type="checkbox"/>	<b>CE 1</b>	<input type="checkbox"/>	<b>CE 2</b>	<input type="checkbox"/>	<b>CE 3</b>	<input type="checkbox"/>	<b>CE 4</b>	<input type="checkbox"/>				



31 March 2015

Annwyl Nia

**REPRESENTATIONS BY BANGOR CITY COUNCIL ON ANGLESEY AND GWYNEDD  
JOINT LOCAL DEVELOPMENT PLAN - DEPOSIT PLAN (2015)**

Bangor City Council at its meeting held on the 23 March 2015 resolved to submit the following comments on the JLDP:

**Housing**

**Policy TAI14: Residential Allocation**

**Site Reference No. T5 - Land opposite Crematorium:**

The City Council are of the opinion that:

- The site is located in a prominent and attractive rural location, divorced from the built up area of the City of Bangor and the shopping, community facilities and services that it provides. It would therefore not be sustainable development as it would encourage the use of motor cars in order to take advantage of these facilities.
- It would extend a ribbon of development into an attractive rural landscape to the detriment of the character and visual amenities of the area.
- The site occupies a prominent location when viewed from the adjoining highway and buildings erected thereon would dominate the skyline and cause serious injury to the visual amenities of the area.
- The residential allocation of the site should be re-considered and the development boundary re-drawn to exclude the site.

**Policy TAI 12: Sub-division of Existing Properties into Self-contained Flats and Houses in Multiple Occupation:**

The City Council welcomes the curbs and safeguards included in the JLDP regarding this type of accommodation in Bangor and also welcomes the limit imposed on the density of such accommodation in the various Wards as set out in the document. However, it is of the opinion that the definition of this type of accommodation need to be made clear and unambiguous in the Plan. The Topic Paper 16 "Student Accommodation" is welcomed as is the commitment to update the data in the Topic Paper on an annual basis.

**Policy TAI 16: Purpose Built Student Accommodation:**

The Council welcomes the criteria set out in this policy relating to the siting of such developments and also welcomes the inclusion of the Preferred Search Zone on the Proposals Map.

## Economy and Regeneration

### Living Above the Shop Proposals

The Council is of the opinion that the JLDP should include policies to encourage “Living Above the Shop” in Bangor’s High Street. This would:

- Provide much-needed residential accommodation in a sustainable location.
- Give vacant upper floors of High Street shop buildings an economic use which would result in an incentive for landlords to invest in these buildings.
- Bring security and vitality back into the town centre.
- Help to regenerate the High Street.

### Policy MAN7: Hot Food Takeaway Uses

The Council is of the opinion that:

- A10% limit should be imposed on the provision of hot food takeaways in the two areas where the saturation point has already been reached - the bottom of Bangor High Street below the Dean Street junction and Holyhead Road in Upper Bangor.
- Hot food takeaways should not be permitted in the designated prime retail area in the town centre as they create litter, refuse and anti-social behaviour problems which would detrimentally affect the character of the centre.

### Strategic Policy PS12: Town Centre and Retail Developments

Policies to safeguard the vitality and viability of Bangor as a Sub-regional Retail Centre are welcomed as are the policies to protect Bangor by restricting the expansion of out of town and out of centre retailing and leisure developments. However the Council is of the opinion that areas of potential redevelopment should be identified within or close to the town centre so that a retailing or leisure opportunity for this area is not missed. Several sites appear ripe for re-development:

- The buildings on the south eastern side of the High Street from Plas Llwyd down to the Dean Street junction, including the Plas Llwyd car park at the rear.
- The buildings on the north western side of the High Street including the Rose and Crown and the White Lion.
- The University buildings and car park off James Street at the back of Dean Street, including the former Octagon building.

**Employment Sites/Buildings for Small Starter/Incubator Units and Small Businesses.**

The City Council is of the opinion that existing sites in Bangor accommodating such enterprises should be protected from redevelopment. Examples would be the small units at the rear of the upper part of the High Street and Station Road and the site between Sackville Road and Mentec.

More sites should be allocated for such uses in the JLDP so that small business start-ups would be encouraged in the interest of nurturing enterprise in the local economy.

**Open Spaces.**

The open spaces and parkland area of Pen y Bryn Park and the site of Penrhyn Arms on the south eastern end of Beach Road have been omitted from the Proposals Map.

I trust that you will take note of the above comments and amend the JLDP as suggested.

Yn gywir

Gwyn Hughes  
Town Clerk



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

**2a. Ar ba ran o'r Cynllun Adnau yr ydych chi'n gwneud sylwadau?**

Polisi rhif (nodwch)	PS10
Paragraff rhif (nodwch)	
Cynigion/ Map Mewnsood (nodwch y rhif cyfeirnod)	
Map Cyfyngiadau	
Atodiadau (nodwch)	

**2b. A ydych yn gwrthwynebu neu gefnogi?**

Gwrthwynebu	<input checked="" type="checkbox"/>	Cefnogi	<input checked="" type="checkbox"/>
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**2c. Rhowch fanylion eich sylwadau ar y Cynllun Adnau.**

Rydym yn falch fod Parc Amaeth Llanystumdwy wedi'i gynnwys o dan y Safleoedd Hilaiod ond teimlwn fod safleoedd eraill y gellid eu hystyried e.e. hen Olddy Hwauwen.

Credwn y dylid gwneud mwy i gadw safleoedd diwydiannol pan maent yn newid dnylo ac nad oes digon yn y Cynllun i gefnogi busnesau bychain, yn enwedig busnesau teulol cefn gwlad.

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

2ch. Os yw eich sylw yn 2c yn fwy na 100 o eiriau, darparwch grynodedb os gwelwch yn dda (dim mwy na 100 o eiriau).

2d Rhowch fanylion y newidiadau yr hoffech eu gweld i'r Cynllun Adnau

Gweler ail baragraff 2c

2dd. Ydi'r Cynllun yn gadarn?

Ydi	<input type="checkbox"/>	Nac ydi	<input checked="" type="checkbox"/>
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2e. Os ydych chi'n meddwl nad yw'r Cynllun Adnau yn gadarn, pa brawf cadernid ydych chi'n meddwl y mae'n ei fethu? (Ticiwch isod os gwelwch yn dda) Rhoddir mwy o fanylion am y profion cadernid ar gefn y ffurflen hon

Gweithdrefnol				Cysondeb				Cydlynad ac Effeithiolrwydd											
P1	<input type="checkbox"/>	P2	<input type="checkbox"/>	C1	<input type="checkbox"/>	C2	<input type="checkbox"/>	C3	<input type="checkbox"/>	C4	<input checked="" type="checkbox"/>	CE 1	<input type="checkbox"/>	CE 2	<input type="checkbox"/>	CE 3	<input type="checkbox"/>	CE 4	<input checked="" type="checkbox"/>

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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**

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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

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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 478ha (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 180ha 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

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yw'r awdurdodau wedi ystyried pob opsiwn i ddarparu cymaint o dai â phosibl trwy'r CDLI o gofio maint yr angen a glustnodir ym 5 mlynedd y cynllun yn unig h.y. y berthynas â thai ar gyfer y farchnad agored.

### **Hyfywdra tai fforddiadwy**

Nodir bod yr asesiad o hyfywdra wedi'i ddiweddarau. Mae'n bwysig bod y dystiolaeth o hyfywdra sy'n ategu'r cynllun yn gyfoes a'i bod yn ystyried y costau hysbys, gan gynnwys effaith tai fforddiadwy a chyfraniadau 'eraill'. Wrth baratoi cynllun, dylai fod gan yr awdurdodau ddealltwriaeth resymol o'r costau sy'n gysylltiedig â'r datblygiad.

Mae'n amlwg bod yr asesiad o hyfywdra wedi cymryd i ystyriaeth y newidiadau diweddar i'r polisi cenedlaethol a'i fod yn esbonio costau'n fanylach. Fodd bynnag, mae angen mwy o eglurhad i esbonio pa gostau y rhoddwyd ystyriaeth iddynt sy'n gysylltiedig ag ymrwymadau/cyfraniadau. Mae'r asesiad o hyfywdra yn ymdrin â hyn ond mae'r costau penodol yn aneglur. Mater i'r awdurdodau yw dangos beth y bydd ymrwymadau/cyfraniadau cynllunio eraill yn ymdrin â nhw a ddim yn ymdrin â nhw (gweler hefyd y sylwadau ynghylch y gallu i gyflawni). Bydd angen seilio targedau heriol ar dystiolaeth a bydd gofyn medru eu cymhwyso i'r rhan fwyaf o sefyllfaoedd ond gan ganiatáu i'r negodi ynghylch safleoedd penodol fynd rhagddynt, os/lle gwelir bod angen (ar nifer gyfyngedig o safleoedd). Rhaid gallu cyfiawnhau pob elfen o'r dystiolaeth o hyfywdra.

Er mwyn darparu cymaint o dai fforddiadwy â phosibl a chyflawni'r prif amcan, mae'r asesiad o hyfywdra wedi adnabod ardaloedd lle ceir y prisiau uchaf o fewn ardal y cynllun. Dylai'r awdurdodau ystyried a yw geiriad TAI9 yn ddigon cryf i negodi canran uwch o gyfraniad yn yr ardaloedd penodol hyn.

### **Polisi cynllunio cenedlaethol**

Dywed paragraff 9.2.15 PCC y byddai'n ddymunol i ddatblygiad tai newydd ymgorffori ystod, cymysgedd a chydbwysedd rhesymol o dai o ran eu math a'u maint er mwyn diwallu'r angen am ystod o dai a chyfrannu at ddatblygu cymunedau cynaliadwy. At hynny, dywed para 8.1 "Asesiadau'r Farchnad Dai Leol a'r Cynllun Datblygu" ei bod yn bwysig bod yr ACLI yn deall maint y galw am anheddau o wahanol faint a math (h.y. canolraddol a rhent cymdeithasol) o'i gymharu â'r cyflenwad fel y gall yr ACLI negodi'r gymysgedd briodol ar safleoedd newydd.

Ni ddylai polisiâu'r CDLI ar dai fforddiadwy nodi'r ystod/math/cymysgedd o dai, oherwydd gallai'r sefyllfa newid dros oes y cynllun gan ei rwystro o bosibl rhag medru gwneud y ddarpariaeth. Fe ddylai CDLlïau gyfeirio er hynny at yr wybodaeth ddiweddaraf yn y cyfiawnhad rhesymegol i'w galluogi i negodi'n effeithiol. Gan ddibynnu ar y gymysgedd, a allai fod ag iddi oblygiadau ariannol, gallai effeithio hefyd ar y gallu i ddarparu tai fforddiadwy (y ganran y gofynnir amdani ar y safle). Mae'r LMHA yn asesu'r ystod lawn o ofynion tai, ond nid yw'r CDLI yn cyfeirio'n benodol at hyn. Byddai'r cynllun ar ei ennill o gynnwys gwybodaeth o'r fath a'i hystyried wrth asesu hyfywdra'r cynllun er mwyn dangos ei fod yn gyson â'r dystiolaeth ac na chât ganlyniadau andwyol.

### **3. Cyflogaeth**

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Mae Llywodraeth Cymru yn cefnogi twf economaidd, ond mae'n hanfodol bod y twf economaidd hwn yn gwireddu amcanion yr awdurdodau. Dylai'r awdurdodau esbonio



sut na fydd gorgyflenwi'r farchnad fel hyn (tua 300ha) yn cael effaith negyddol ar werthoedd tir; na rhwystro datblygiad rhag dod i fod na pheryglu dyheadau am dwf.

### **Dosbarthiad tir cyflogaeth ar draws yr ardal**

Mae angen mwy o eglurhad ynghylch sut mae'r berthynas rhwng dosbarthiad safleoedd cyflogaeth yn effeithio ar y ddarpariaeth dai. Mae'r ymrwymadau/dyraniadau tai yn seiliedig ar hierarchiaeth o aneddeleoedd a byddai'n dda o beth pe bai modd cyflwyno'r safleoedd cyflogaeth hefyd yn yr un modd. Byddai'n fuddiol hefyd pe bai modd darparu mwy o wybodaeth ynghylch sut y mae'r awdurdodau wedi ystyried y gyd-berthynas rhwng y tair brif safle cyflogaeth strategol ar hyd coridor yr A55 ac nad ydynt yn cystadlu â'i gilydd gan, drwy hynny, greu problemau o ran eu cyflawni.

### **Darparu cyflogaeth**

Mae angen mwy o esboniad ynghylch y berthynas rhwng lefel y goflogaeth a ddarperir ag ymagwedd strategol i ddarparu tai.

Polisi CYF1 "Gwarchod a Dynodi Tir ac Unedau ar gyfer Defnydd Cyflogaeth" – Mae angen mwy o eglurhad i esbonio pam mae angen diogelu dros 800ha o dir (heb gynnwys Wylfa) dros gyfnod y cynllun. Yn ôl paragraff 7.3.23, amcangyfrifwyd ynyr adolygiad o dir cyflogaeth fod angen tua 12 ha ar yr awdurdodau dros gyfnod y cynllun. Byddai hynny'n cyfateb i oddeutu 180ha o dir cyflogaeth dros gyfnod y cynllun llawn. Nid yw'n amlwg felly pam mae'r cynllun yn neilltuo tua 478ha (tir heb ei ddatblygu sydd wedi'i ddynodi neu wedi'i gynnig ar gyfer ei ddynodi i ddiwallu'r angen a nodwyd). Sut mae'r cynllun wedi ystyried goblygiadau'r gorddyranid hwn, a'r ddarpariaeth dai a pha mor ymarferol fyddai darparu'r safleoedd hyn? Mae angen i'r awdurdodau esbonio hefyd a yw'r asesiad o gyflogaeth (a gynhaliwyd yn unol â chanllaw CDLG 2004) yn gyson â "TAN 23: Datblygu Economaidd (2014)" Llywodraeth Cymru.

Dylai'r awdurdod egluro beth fyddai'r effaith ar y mathau o swyddi (sgiliau a chyflogau) a chartrefi pe cymerid mwy na'r 180ha dros gyfnod y cynllun. Mae angen mwy o eglurhad hefyd i esbonio sut mae gwaith asesu ategol, yn enwedig yr Asesiad o'r Effaith ar y Gymraeg wedi cymryd y gorddyranid i ystyriaeth. Mae ychydig o wybodaeth gefndir wedi'i chynnwys ynghylch gwella sgiliau trigolion y ddau awdurdod (yn enwedig mewn perthynas â'r cynnig i ddatblygu Wylfa Newydd) ond pa fath o swyddi y mae'r awdurdodau'n eu disgwyl ar gyfer y safleoedd dyranedig hyn? Ydy'r sgiliau sydd eu hangen ar gael yn yr ardal neu a fyddai'n annog mewnffudo i'r ardal a chynyddu'r pwysau ar dai/y Gymraeg?

### **Y Tir Amaethyddol Gorau a Mwyaf Amlbwrpas**

Gallai'r dyraniadau tir olygu colli tua 40 hectar o'r Tir Gorau a Mwyaf Hyblyg am byth. Mae mwyafrif y tir wedi'i gynnwys yn nyraniadau TRA1, C14 a C15 a phrin yw'r dystiolaeth yn y cynllun i ddangos bod paragraff 4.10 wedi cael ei ystyried o gwbl wrth ddyrannu'r safleoedd hyn ar gyfer datblygu.

## **4. Ynni Adnewyddadwy**

Mae Asesiad Effaith Ynni Adnewyddadwy wedi'i gynnal yn y ddwy ardal. Er hynny, nid yw'r Cynllun Adnau yn manteisio ar y cyfle i ystyried y cyfraniad y gallai'r ardal ei wneud at ddatblygu a hwyluso ynni adnewyddadwy a charbon isel ac i gynllunio'n bositif ar gyfer datblygiad addas. Mae angen ystyried yn fanylach sut i droi'r dystiolaeth yn set o bolisiau sy'n llywio datblygu addas. Er enghraifft, a allai'r asesiadau roi tystiolaeth i ddarparu cyfleoedd ar gyfer cynnal safonau adeilad cynaliadwy uwch ar safleoedd strategol neu a allai lleoli datblygiadau yn yr un lle wella'r cyfleoedd ar gyfer ynni



CYNGOR SIR  
YNYS MÔN  
ISLE OF ANGLESEY  
COUNTY COUNCIL

For office use only:

Representor No.

Date received: 31/3/15  
ebw

Date acknowledged:

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

**Data Protection**

How your representation and the information that you give us will be used. All information submitted will be seen in full by the Joint Planning Policy Unit staff dealing with the Joint Local Development Plan (Joint LDP). Your name and comments as set out in your representation form will be published together with the Councils' response. This helps to show that the consultation was carried out properly. Please note that this form may also be made available to any Public Examination on the Joint LDP.

We would prefer that you submit your representations directly online. Alternatively, an electronic version of this form can be completed online at [www.gwynedd.gov.uk/ldp](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp) Separate forms should be completed for each comment that you wish to make.

Additional representation forms can be obtained from the Joint Planning Policy Unit on 01286 685003 or may be downloaded from the Council's web site at: [www.gwynedd.gov.uk/ldp](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp) or you may photocopy this form. When making comments please use additional sheets as required clearly numbering each consecutive sheet.

**PART 1: Contact details**

	Your details/ Your client's details	Agent's details (if relevant)
Name		Mark Roberts
Address		
Postcode		
Telephone Number		
Email address		



### Guidance Note.

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

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

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

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

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

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

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

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

**Where a group shares a common view on how it wishes the Deposit Plan to be changed, the Councils will accept a signed petition.** In submitting a representation form on behalf of a group, the representation form should include the contact details of a lead individual at Section 1 and the comments should be clearly set out on the representation form. The signed petition should state clearly how many people are being represented and how the representation has been authorised. Signing a petition does not prevent the submission of individual forms.

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

<b>2a. Which part of the Deposit Plan are you commenting on?</b>	
Policy number (please specify)	Policy PS10 providing opportunity for a flourishing economy
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	

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

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

**Policy PS10 providing opportunity for a flourishing economy**

This policy states that it will:

**“facilitate economic growth by safeguarding 807ha of land and units for employment and business purposes for B1, B2, B8 and some sui-generis uses... which have been allocated on the proposals maps.”**

Notably however the Employment Land Review of 2011, identifies that there has been a take up rate of circa 6ha of employment land and buildings, within each authority area, i.e. 12ha per annum and there is an excess of employment land that is unlikely to meet modern requirements.

Based on the allocated 807 ha of employment land and premises within the Deposit LDP there is over 66 years of employment land and premises supply within the Plan area.

Whilst it is recognised that Wylfa Newydd could have a significant economic impact on the need and demand for employment land and premises, there will not be the need for this level of employment land or premises.

Significantly, TAN23 identifies at paragraph 4.5.2 that:

**“Land provision targets may be higher than anticipated demand, to allow for the chance that the assessments are too low and to ensure that no opportunities are missed. They should also allow for flexibility, competition and choice.”**

Clearly provision of 807 ha of employment land and buildings a supply of 66 years is well beyond any needs for flexibility. The Market Analysis of 2008 undertaken by King Sturge confirms a substantial over supply of employment land in the area which is not acknowledged or addressed by the Council pursuant to the former Dynamex Friction site in Caernarfon.

The Plan therefore significantly over allocates and protects employment land premises and particularly sites which are unlikely to deliver employment due to the sites not meeting the needs of industry, or subject to significant site constraints.

The Policy therefore does not comply with Test of Soundness C2 as it does not comply with Planning Policy Wales & CE2 as it is not realistic having regard to other alternatives or based upon credible evidence.

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



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

Empty response box for question 2ch.

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

The policy should be amended to only include sufficient available, suitable and deliverable employment land needed for the duration of the Plan Period.

**2dd. Is the Deposit Plan sound?**

Yes  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	x	C3	<input type="checkbox"/>	C4	<input type="checkbox"/>	CE 1	<input type="checkbox"/>	CE 2	x	CE 3	<input type="checkbox"/>	CE 4	<input type="checkbox"/>

**Part 3: What Happens Next?**

At this stage of the Joint LDP process, you can only make comments in writing (these are called 'written representations'). However, the Inspector may call on those who want to change the Plan to appear and speak to the Inspector at a 'hearing session' during the Public Examination. You should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session.

**3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick one of the following)**

I do not want to speak at a hearing session and am happy for my written comments to be considered by the Inspector.

I want to speak at a hearing session.

**3b. If you wish to speak, please confirm which part of your representation you wish to speak to the Inspector about and why you consider it to be necessary to speak at the Hearing.**

**3c. Would you like to be informed about the following (Please tick the relevant boxes)**

Submission of documents and evidence to the examination

x

Publish Inspector's report

x

Plan's adoption

x

**If additional documents have been provided to support your representations, please list below:**

Signed



Dated: 31/03/2015

**THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN**

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

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

**ONLINE** – By completing the electronic form at [www.gwynedd.gov.uk/ldp](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp)

**BY EMAIL** – [planningpolicy@gwynedd.gov.uk](mailto:planningpolicy@gwynedd.gov.uk)

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

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

## Test of Soundness

Test	Procedural Tests
P1	It has not been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme.
P2	The plan and its policies have not been subjected to Sustainability Appraisal including Strategic Environmental Assessment.
	Consistency Tests
C1	It is a land use plan which does not have regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
C2	It does not have regard to national policy.
C3	It does not have regard to the Wales Spatial Plan.
C4	It does not have regard to the relevant community strategy.
	Coherence and Effectiveness Tests
CE1	The plan does not set out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is not compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are not realistic and appropriate having considered the relevant alternatives and/or are not founded on a robust and credible evidence base.
CE3	There are no clear mechanisms for implementation and monitoring.
CE4	It is not reasonably flexible to enable it to deal with changing circumstances.

The Planning and Compulsory Purchase Act 2004 states that the purpose of the examination of a Local Development Plan (the Plan) is to consider whether it is “sound”. This means that anyone who wants to comment on or object to the Deposit Plan should seek to say how it is unsound and what is needed to make it sound. Sound may be considered in this context within its ordinary meaning of “*showing good judgement*” and “*able to be trusted*”. To assess the Deposit Plan we use 10 tests as set out above. The Deposit Plan will be examined by an independent Inspector appointed by the Welsh Government and it will be the Inspector’s job to consider whether the Plan is sound.

Where you propose a change to the Deposit Plan you should therefore make clear which test(s) of soundness you believe the Deposit Plan fails. The tests are in 3 groups - ‘Procedural’ (2 tests); ‘Conformity’ (4 tests); and ‘Coherence and Effectiveness’ (4 tests). If you wish to comment on the way in which the Councils have prepared the Deposit Plan, it is likely that your comments or objections would fall under one of the procedural tests. If you wish to comment on or object to the content of the Deposit Plan, it may help to look at the ‘consistency’ and the ‘coherence and effectiveness’ tests.

# Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **455**

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

Rhan: **POLISI STRATEGAETH PS10**

Section: **STRATEGIC POLICY PS10**

Math / Type: **Gwrthwynebu / Object**

## Crynodeb o'r Sylw:

Dylid ychwanegu cyfeiriad penodol i PS10 i adlewyrchu pwysigrwydd rol twristiaeth i sicrhau economi sy'n ffynnu. Dylid ychwanegu 4ydd pwynt bwled i ddarllen: "4 Cefnogi datblygiad twristiaeth newydd neu ailddatblygiad rhai presennol lle'n briodol, er mwyn cymryd mantais llawn y budd economaidd mai datblygiad twristiaeth yn dod i ardal y Cynllun Lleol."

## Representation Summary:

Specific reference should be added to PS10 to reflect the important role that tourism plays in ensuring a flourishing economy. A 4th bullet point should be added to read:

"4. Supporting new and existing tourism development/redevelopment where appropriate, in order to take full advantage of the economic benefit that tourism development brings to the Local Plan area."

## Sylw Llawn / Full Representation:

Bourne Leisure objects to Strategic Policy PS10. PS10 is inconsistent with the remainder of the LDP as it doesn't recognise the significant economic benefit that tourism brings to the local area. Paragraph 4.3 states that tourists/visitors make an important contribution to the local economy. Bourne Leisure therefore maintains that PS10 should reflect the significant contribution that tourism makes to the local economy.

Recognition of the important role of tourism within Strategic Policy PS10 is also necessary to ensure consistency with PPW (para 11.1.1) which states:

"Tourism is vital to economic prosperity and job creation in many parts of Wales. It is a significant and growing source of employment and investment, based on the country's cultural and environmental diversity"

It would also accord with the Gwynedd Destination Management Plan (2013 - 2020) which states:

"Tourism's contribution to the economy and communities of Gwynedd is of significant importance and ensuring the growth of this sector, in addition to the growth of the local economy is imperative to ensure the sustainability of our communities in Gwynedd."

The Management Plan goes further and states:

"According to Gwynedd Council figures, in 2011, tourism was estimated to be worth some £917 million to the county's economy, supporting almost 16,000 jobs, 80% of which were direct employment in tourism. Over 7 million people visit Gwynedd every year, with over 21 million tourist days, including almost 18 million overnight stays (source: Gwynedd Destination Management and Marketing Audit Data Review 2012)."

Bourne Leisure therefore comments that specific reference should be added to PS10 to reflect the important role that tourism plays in ensuring a flourishing economy. A 4th bullet point should be added to read:

"4. Supporting new and existing tourism development/redevelopment where appropriate, in order to take full advantage of the economic benefit that tourism development brings to the Local Plan area."

## Newid(iadau) i'r Cynllun

.

## Change(s) to the Plan

Bourne Leisure therefore comments that specific reference should be added to PS10 to reflect the

## Sylwadau Dros y We / Representations via the Internet

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important role that tourism plays in ensuring a flourishing economy. A 4th bullet point should be added to read:

"4. Supporting new and existing tourism development/redevelopment where appropriate, in order to take full advantage of the economic benefit that tourism development brings to the Local Plan area."

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**Profion Cadernid / Soundness Tests:** iv, viii



2766/2767/902

Bourne Leisure 31/3/15  
(ebook)

PS10

A ✓  
C ✓



### Strategic Policy PS10: Providing Opportunity for a Flourishing Economy

Bourne Leisure objects to Strategic Policy PS10. PS10 is inconsistent with the remainder of the LDP as it doesn't recognise the significant economic benefit that tourism brings to the local area. Paragraph 4.3 states that tourists/visitors make an important contribution to the local economy. Bourne Leisure therefore maintains that PS10 should reflect the significant contribution that tourism makes to the local economy.

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*"4. Supporting new and existing tourism development/redevelopment where appropriate, in order to take full advantage of the economic benefit that tourism development brings to the Local Plan area."*

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
				<p><u>Newydd Project or are measures to provide mitigation to potentially adverse effects; and</u></p> <ul style="list-style-type: none"> <li>• <u>if the Wylfa Newydd Project does not come forward, the sites can be restored or reinstated or will provide a beneficial legacy</u></li> </ul>
32.	Chapter 7 Managing growth and Development – Economy and regeneration	<p>1166</p> <p>Strategic Policy PS10, CYF1 and CYF2</p>	<p>Horizon has concerns about the lack of flexibility for the sites in these policies regarding the sites to be uses for non-employment related development (B1, B2 and B8), particularly in relation to a change of use for legacy (e.g. to tourism) as this would reduce the overall availability of B1, B2 and B8 sites and therefore run counter to the intention for these to be employment sites.</p> <p>However, rather than seek for specific amendments to policies PS10, CYF1 and CYF2 however, 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>	
33.	Chapter 7	Policy CYF4	Horizon considers it is not clear how	

Dafydd.Jarrett@nfu.org.uk

## Cynllun Datblygu Lleol Gwynedd a Môn

*Hoffai NFU Cymru wneud y sylwadau cyffredinol canlynol ar y Polisiâu Rheoli Datblygu sydd wedi ei gynnwys yn y Cynllun drafft*

### **Cyfleoedd na fyddai'n rhwystro'r datblygiadau canlynol:-**

1. Ehangu busnesau priodol
2. Ailddefnyddio adeiladau gwledig sy'n addas ar gyfer creu cyflogaeth
3. Darparu unedau gwaith trwy addasu adeiladau gwledig traddodiadol
4. Arallgyfeirio yn yr economi amaethyddol
5. Mentrau sy'n gysylltiedig â thwristiaeth briodol
6. Hamdden ond dim ond pan fyddant yn briodol i leoliad cefn gwlad a defnydd arall o dir yn yr ardal yn cynnwys amaethu
7. Caniatáu datblygiadau technolegol i hwyluso datblygiad cyflogaeth mewn ardaloedd gwledig
8. Mentrau yn angenrheidiol i gwrdd ag anghenion ffermio a choedwigaeth gyfoes. Hefyd isadeiledd yn cynnwys egni gwyrdd, twristiaeth a mentrau eraill a fydd yn helpu i gefnogi'r economi gwledig cynaliadwy.
9. Byddai'n darparu cyfleusterau cymunedol sy'n diwallu angen lleol
10. Mewn amgylchiadau, lle y byddai'n helpu i fodloni angen lleol am dai, gan gynnwys cynlluniau sy'n gyson â'r Polisi Tai Fforddiadwy.
11. Byddai'n gwneud darpariaeth ar gyfer cynhyrchu ynni adnewyddadwy, sy'n briodol o raddfa a dyluniad i'w leoliad
12. Byddai'n cefnogi adfywiad cymdeithasol ac economaidd ardaloedd gwledig
13. Adeiladau amaethyddol newydd sy'n addas ar gyfer amaethu cyfoes wedi ystyried eu graddfa, lleoliad, dyluniad a'r deunyddiau lleihau'r effaith weledol ar y dirwedd
14. Lle mae'n bosib dylai adeiladau newydd yn cael eu grwpio gydag unrhyw adeiladau presennol er mwyn lleihau eu heffaith weledol ar y dirwedd. Fodd bynnag, dylai adeiladau ynysig cael eu caniatáu lle mae eu lleoliad yn hanfodol i'r gweithgaredd amaethyddol sy'n cael ei wneud lle nad ydynt yn cael eu lleoli mewn man amlwg.

15. Dylai'r addasu neu newid defnydd adeiladau gwledig segur y tu allan i unrhyw ffin datblygu tai yn cael eu caniatáu ar gyfer defnydd cyflogaeth.

### **Dylai'r Cynllun hefyd**

1. Wneud defnydd mwyaf effeithiol o dir yr ardal ac mae angen cyfeiriad penodol yn y Cynllun o werth amaethyddiaeth a chynnyrch lleol.
2. Annog nid gwrthod twf ffermio ac arallgyfeirio
3. Caniatáu cymysgedd o dai gan gynnwys yr hawl i ddatblygu hen adfeilion nid yn unig i ymwelwyr ond i'r boblogaeth gynhenid gael byw ynddynt.
4. Hyrwyddo tirwedd o safon uchel a chydabyddiaeth mae amaethyddiaeth yn ei chwarae yn hyn
5. Gydabod gwerth manddaliadau Môn a Gwynedd fel modd i ffermwyr ifanc gychwyn a datblygu ei busnesau
6. Cydnabyddiaeth o werth amaeth a'r diwydiannau bwyd lleol i'r economi wledig, cyfleon, cyflogaeth a'r iaith Gymraeg.
7. Gefnogi gweithio o gartref a mesurau a fydd yn gwella'r band eang a chyfathrebu yn yr ardaloedd anghysbell yn arbennig
8. Cynllun hyfyw sydd a gallu i addasu i ofynion cyfredol ffermio a busnesau i ffynnu yng nghefn gwlad.

## Cynllun Datblygu Lleol Gwynedd a Môn

*Hoffai NFU Cymru wneud y sylwadau cyffredinol canlynol ar y Polisiâu Rheoli Datblygu sydd wedi ei gynnwys yn y Cynllun drafft*

### **Cyfleoedd na fyddai'n rhwystro'r datblygiadau canlynol:-**

1. Ehangu busnesau priodol
2. Ailddefnyddio adeiladau gwledig sy'n addas ar gyfer creu cyflogaeth
3. Darparu unedau gwaith trwy addasu adeiladau gwledig traddodiadol
4. Arallgyfeirio yn yr economi amaethyddol
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8. Mentrau yn angenrheidiol i gwrdd ag anghenion ffermio a choedwigaeth gyfoes. Hefyd isadeiledd yn cynnwys egni gwyrdd, twristiaeth a mentrau eraill a fydd yn helpu i gefnogi'r economi gwledig cynaliadwy.
9. Byddai'n darparu cyfleusterau cymunedol sy'n diwallu angen lleol
10. Mewn amgylchiadau, lle y byddai'n helpu i fodloni angen lleol am dai, gan gynnwys cynlluniau sy'n gyson â'r Polisi Tai Fforddiadwy.
11. Byddai'n gwneud darpariaeth ar gyfer cynhyrchu ynni adnewyddadwy, sy'n briodol o raddfa a dyluniad i'w leoliad
12. Byddai'n cefnogi adfywiad cymdeithasol ac economaidd ardaloedd gwledig
13. Adeiladau amaethyddol newydd sy'n addas ar gyfer amaethu cyfoes wedi ystyried eu graddfa, lleoliad, dyluniad a'r deunyddiau lleihau'r effaith weledol ar y dirwedd
14. Lle mae'n bosib dylai adeiladau newydd yn cael eu grwpio gydag unrhyw adeiladau presennol er mwyn lleihau eu heffaith weledol ar y dirwedd. Fodd bynnag, dylai adeiladau ynysig cael eu caniatáu lle mae eu lleoliad yn hanfodol i'r gweithgaredd amaethyddol sy'n cael ei wneud lle nad ydynt yn cael eu lleoli mewn man amlwg.

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15. Dylai'r addasu neu newid defnydd adeiladau gwledig segur y tu allan i unrhyw ffin datblygu tai yn cael eu caniatáu ar gyfer defnydd cyflogaeth.

### **Dylai'r Cynllun hefyd**

1. Wneud defnydd mwyaf effeithiol o dir yr ardal ac mae angen cyfeiriad penodol yn y Cynllun o werth amaethyddiaeth a chynnyrch lleol.
2. Annog nid gwrthod twf ffermio ac arallgyfeirio
3. Caniatáu cymysgedd o dai gan gynnwys yr hawl i ddatblygu hen adfeilion nid yn unig i ymwelwyr ond i'r boblogaeth gynhenid gael byw ynddynt.
4. Hyrwyddo tirwedd o safon uchel a chydabyddiaeth mae amaethyddiaeth yn ei chwarae yn hyn
5. Gydabod gwerth manddaliadau Môn a Gwynedd fel modd i ffermwyr ifanc gychwyn a datblygu ei busnesau
6. Cydnabyddiaeth o werth amaeth a'r diwydiannau bwyd lleol i'r economi wledig, cyfleon, cyflogaeth a'r iaith Gymraeg.
7. Gefnogi gweithio o gartref a mesurau a fydd yn gwella'r band eang a chyfathrebu yn yr ardaloedd anghysbell yn arbennig
8. Cynllun hyfyw sydd a gallu i addasu i ofynion cyfredol ffermio a busnesau i ffynnu yng nghefn gwlad.

## Cynllun Datblygu Lleol Gwynedd a Môn

*Hoffai NFU Cymru wneud y sylwadau cyffredinol canlynol ar y Polisiâu Rheoli Datblygu sydd wedi ei gynnwys yn y Cynllun drafft*

### **Cyfleoedd na fyddai'n rhwystro'r datblygiadau canlynol:-**

1. Ehangu busnesau priodol
2. Ailddefnyddio adeiladau gwledig sy'n addas ar gyfer creu cyflogaeth
3. Darparu unedau gwaith trwy addasu adeiladau gwledig traddodiadol
4. Arallgyfeirio yn yr economi amaethyddol
5. Mentrau sy'n gysylltiedig â thwristiaeth briodol
6. Hamdden ond dim ond pan fyddant yn briodol i leoliad cefn gwlad a defnydd arall o dir yn yr ardal yn cynnwys amaethu
7. Caniatáu datblygiadau technolegol i hwyluso datblygiad cyflogaeth mewn ardaloedd gwledig
8. Mentrau yn angenrheidiol i gwrdd ag anghenion ffermio a choedwigaeth gyfoes. Hefyd isadeiledd yn cynnwys egni gwyrdd, twristiaeth a mentrau eraill a fydd yn helpu i gefnogi'r economi gwledig cynaliadwy.
9. Byddai'n darparu cyfleusterau cymunedol sy'n diwallu angen lleol
10. Mewn amgylchiadau, lle y byddai'n helpu i fodloni angen lleol am dai, gan gynnwys cynlluniau sy'n gyson â'r Polisi Tai Fforddiadwy.
11. Byddai'n gwneud darpariaeth ar gyfer cynhyrchu ynni adnewyddadwy, sy'n briodol o raddfa a dyluniad i'w leoliad
12. Byddai'n cefnogi adfywiad cymdeithasol ac economaidd ardaloedd gwledig
13. Adeiladau amaethyddol newydd sy'n addas ar gyfer amaethu cyfoes wedi ystyried eu graddfa, lleoliad, dyluniad a'r deunyddiau lleihau'r effaith weledol ar y dirwedd
14. Lle mae'n bosib dylai adeiladau newydd yn cael eu grwpio gydag unrhyw adeiladau presennol er mwyn lleihau eu heffaith weledol ar y dirwedd. Fodd bynnag, dylai adeiladau ynysig cael eu caniatáu lle mae eu lleoliad yn hanfodol i'r gweithgaredd amaethyddol sy'n cael ei wneud lle nad ydynt yn cael eu lleoli mewn man amlwg.

15. Dylai'r addasu neu newid defnydd adeiladau gwledig segur y tu allan i unrhyw ffin datblygu tai yn cael eu caniatáu ar gyfer defnydd cyflogaeth.

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### **Dylai'r Cynllun hefyd**

1. Wneud defnydd mwyaf effeithiol o dir yr ardal ac mae angen cyfeiriad penodol yn y Cynllun o werth amaethyddiaeth a chynnyrch lleol.
2. Annog nid gwrthod twf ffermio ac arallgyfeirio
3. Caniatáu cymysgedd o dai gan gynnwys yr hawl i ddatblygu hen adfeilion nid yn unig i ymwelwyr ond i'r boblogaeth gynhenid gael byw ynddynt.
4. Hyrwyddo tirwedd o safon uchel a chydabyddiaeth mae amaethyddiaeth yn ei chwarae yn hyn
5. Gydabod gwerth manddaliadau Môn a Gwynedd fel modd i ffermwyr ifanc gychwyn a datblygu ei busnesau
6. Cydnabyddiaeth o werth amaeth a'r diwydiannau bwyd lleol i'r economi wledig, cyfleon, cyflogaeth a'r iaith Gymraeg.
7. Gefnogi gweithio o gartref a mesurau a fydd yn gwella'r band eang a chyfathrebu yn yr ardaloedd anghysbell yn arbennig
8. Cynllun hyfyw sydd a gallu i addasu i ofynion cyfredol ffermio a busnesau i ffynnu yng nghefn gwlad.