

Amgylchedd a Datblygu Cynaliadwy  
Environment and Sustainable Development



Llywodraeth Cymru  
Welsh Government

Nia Davies  
Yr Uned Polisi Cynllunio ar y Cyd  
Gwynedd a Môn  
Neuadd y Dref  
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31 Mawrth 2015

Annwyl Nia,

**Ymateb Llywodraeth Cymru i Gynllun Datblygu Lleol ar y Cyd Gwynedd a Môn  
2011 – 2026 – Fersiwn wedi'i hadneuo**

Diolch yn fawr ichi am eich gohebiaeth ddiweddar dyddiedig 16 Chwefror, gan gynnwys copïau o'r Cynllun Datblygu Lleol (CDLI) Adnau a'r dogfennau cysylltiedig.

Rydym yn falch o weld y cynnydd sydd wedi'i wneud o ran paratoi cynllun datblygu ar y cyd ar gyfer yr ardal ac rydym yn cydnabod y gwaith y mae'r ddau Awdurdod Cynllunio Lleol a'r Uned Polisi Cynllunio ar y Cyd wedi'i wneud i gyrraedd y cam hwn, gan gynnwys y cydweithredu rhyngddynt sydd i'w ganmol. Yr ydym hefyd yn cydnabod swm y dystiolaeth y mae'r awdurdodau wedi'i chasglu i gefnogi'u casgliadau, yn eu hymgais i gael hyd i atebion o fewn y system cynllunio defnydd tir i gwestiynau ym maes tai a diwylliant sy'n destun gofid arwyddocaol i'r gymuned.

O dan system y CDLI, cyfrifoldeb yr awdurdod cynllunio lleol yw sicrhau bod y CDLI sy'n cael ei gyflwyno yn gadarn o safbwynt gweithdrefnol a'i fod yn ymgorffori egwyddorion ymgysylltu â'r gymuned, tryloywder, cysondeb, cydlynid a chydawnsedd ag awdurdodau cyffiniol. O beidio â mynd i'r afael yn ddigonol â'r egwyddorion hyn ar ddechrau'r camau paratoi, yna mae posibilrwydd na châi'r CDLI ei ystyried yn gadarn nac yn addas ar gyfer ei archwilio.

Mater ar gyfer yr Arolygydd Cynllunio a benodir yw penderfynu a ystyrir cynllun yn 'gadarn' ai peidio. Rydym wedi ystyried y CDLI Adnau yn unol â'r profion cysondeb/cydlynid ac effeithiolrwydd, ac yn bennaf pa un a roddwyd sylw boddhaol ai peidio i'r polisi cynllunio cenedlaethol (prawf C2). Mae ein sylwadau wedi eu rhannu'n **4 categori**, ac y mae'r **atodiad sydd ynghlwm** wrth y llythyr hwn yn rhoi rhagor o fanylion.



- A.** Gwrthwynebiadau o dan y profion cadernid C2, CE2: Materion sylfaenol sydd, yn ein tyb ni, yn cynrychioli risg sylweddol i'r awdurdod os na roddir sylw iddynt cyn y cam cyflwyno, ac y gallent amharu ar strategaeth y cynllun:

**Dim materion**

- B.** Gwrthwynebiadau o dan y profion cadernid C2, CE1, CE2: Materion lle nad yw'n ymddangos bod y cynllun a adnewwyd wedi trosi'r polisi cenedlaethol yn foddhaol i'r lefel leol, ac bod tensiynau posibl o fewn y cynllun, sef;

**Creu cymunedau cynaliadwy** – mae'r pennawd hwn yn cwmpasu 4 agwedd:

1. Y ddarpariaeth ar gyfer Sipsiwn a Theithwyr;
2. Y ddarpariaeth dai gan gynnwys darparu tai fforddiadwy;
3. Y ddarpariaeth ar gyfer safleoedd cyflogaeth; ac
4. Renewable Energy

- 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 ddangos bod:

- I. Y gallu i gyflawni;
- II. Rheoli datblygiadau tai mewn pentrefi;
- III. Monitro a gweithredu; a

- 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

Yr ydym eisoes wedi codi rhai o'r materion gyda chi ar adegau yn y gorffennol a byddwn yn cysylltu â chi yn y man i drefnu cyfarfod i drafod unrhyw faterion a godir yn ein hymateb ffurfiol i'ch CDLI Adnau.

Yn gywir

**Mark Newey**

Pennaeth y Gangen Gynlluniau  
Yr Is-adran Gynllunio  
Llywodraeth Cymru

**Atodiad**

## Atodiad i lythyr ymateb Llywodraeth Cymru (31 Mawrth 2015) i Gynllun Datblygu Lleol Gwynedd a Môn wedi'i adneuo

- A. Gwrthwynebiadau o dan y profion cadernid C2, CE2: Materion sylfaenol sydd, yn ein tyb ni, yn cynrychioli risg sylweddol i'r awdurdod os na roddir sylw iddynt cyn y cam cyflwyno, ac y gallent amharu ar strategaeth y cynllun:

Dim materion yn codi

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- B. Gwrthwynebiadau o dan y profion cadernid C2, CE1, CE2: Materion lle nad yw'n ymddangos bod y cynllun a adneuwyd wedi trosi'r polisi cenedlaethol yn foddhaol i'r lefel leol, ac bod tensiynau posibl o fewn y cynllun, sef;

### Creu cymunedau cynaliadwy:

#### 1. Sipsiwn a Theithwyr

Nid yw'r dystiolaeth yn mesur faint yw'r angen am naill ai safleoedd parhaol neu dros dro na phryd o fewn cyfnod y cynllun y bydd eu hangen (7.4.90 – 11 o leiniau preswyl i gymryd lle'r un presennol ger Pentraeth, 10 llain preswyl yng Ngwynedd, 28 llain dros dro sydd eu hangen ledled y Gogledd). Mae'r cynllun wedi neilltuo 5 llain, ac mae angen eglurhad sut a phryd y caiff yr 16 llain ychwanegol (lleiniau parhaol) eu darparu a beth yw anghenion yr awdurdodau o safbwynt y 28 o leiniau dros dro, a phryd y bydd eu hangen arnynt. Mae Llywodraeth Cymru'n credu nad yw'r cynllun yn neilltuo digon i ddiwallu lefel yr angen a nodwyd. Dywed Para 17 Cylchlythyr 30/2007 Llywodraeth Cymru 'Cynllunio ar gyfer Sipsiwn a Theithwyr', "Mewn achosion lle ceir asesiad o angen sydd heb ei ddiwallu am lety Sipsiwn a Theithwyr yn yr ardal, dylai awdurdodau cynllunio lleol glustnodi digon o safleoedd mewn CDLlau i sicrhau bod modd diwallu'r gofynion llain dynodedig at ddefnydd preswyl a dros dro." Bydd darpariaeth yn Adran 103 Deddf Tai (Cymru) 2014, pan y cychwynnir (rhagwelir mis Mawrth 2016) i wneud diwallu'r angen yn ddyletswydd statudol.

Mae'r awdurdodau wedi cydnabod na fydd modd lletya pob grŵp o Sipsiwn a Theithwyr gyda'i gilydd ar yr un safle a bydd angen i awdurdodau esbonio a ydynt wedi cymryd hyn i ystyriaeth wrth ddarparu ar gyfer Sipsiwn a Theithwyr (o dan y diffiniad ehangach a gynhwysir yn Neddf Tai (Cymru).

(Am bwyntiau technegol sy'n ymwneud â Sipsiwn a Theithwyr, gweler categori D).

#### 2. Y ddarpariaeth dai

##### **Clystyrau**

Mae angen mwy o gyfiawnhad i esbonio nifer y pentrefi rydych wedi'u cynnwys yn y polisi hwn. Mae rhai o'r clystyrau hyn wedi cael sgôr isel iawn yn y matrices cynaliadwyedd a welwch ym mhapur testun 5 (Datblygu'r Strategaeth Aneddleoedd). Mae'r sgoriau is yn awgrymu eu bod yn ddatblygiadau diarffordd llai cynaliadwy, heb gysylltiad da â gwasanaethau a chyfleusterau - ac felly angen egluro pam eu bod wedi'u

henwi. Mae Llywodraeth Cymru'n gwrthwynebu bod cymaint o 'glystyrau' wedi'u henwi heb ddigon o gyfiawnhad.

### **Polisi PS15 – Strategaeth aneddeoedd**

Nid ydym yn cwestiynu strategaeth y cynllun; fodd bynnag, nid ydych wedi cyfiawnhau'r cyfyngiad twf a grëir gan eiriad y polisi ar gyfer y prif ganolfannau. Byddai'n fwy rhesymegol creu cyfyngiadau twf ar gyfer yr haenau is yn hytrach nag ar gyfer yr ardaloedd mwyaf cynaliadwy.

### **Materion nad ydynt yn cydymffurfio â Pholisi Cynllunio Cymru**

Mae'r awdurdodau wedi gosod tystiolaeth ym 'Mhapur Testun 17: Tai Marchnad Angen Lleol' sy'n dangos y materion sy'n wynebu cymunedau lleol. Mae Paragraff 9.2.4 Polisi Cynllunio Cymru (PCC) yn gwneud yn glir na fyddai amod meddiannaeth fel arfer ar gyfer tai marchnad ar gyfer anghenion lleol penodol. Byddai'n rhaid wrth dystiolaeth gref i gyfiawnhau gwyro o'r polisi cenedlaethol yn hyn o beth. Felly, dylai'r dystiolaeth fynd ymhellach ac esbonio'n fanwl pam na allai'r polisiâu tai fforddiadwy a darparu tai fforddiadwy canolraddol, helpu i ddiwallu'r angen a nodwyd

At hynny, dywed paragraff 7.4.39 y cyfyngir tai'r farchnad leol a ganiateir o dan Bolisi TA15 i'r rheini sy'n gymwys trwy gytundebau Adran 106 lleol. Nid yw felly yn cydymffurfio â PCC h.y. bod yr ymrwymiad yn angenrheidiol i "wneud y datblygiad yn dderbyniol o safbwynt cynllunio" (PCC 3.7.6).

Yn ôl Polisi TAI10, Datblygu ar safleoedd eithrio, o dan amgylchiadau eithriadol gellid cynnwys tai marchnad i wneud cynnig yn hyfyw. Er hynny, ni ellir dosbarthu safleoedd sy'n gymysgedd o dai fforddiadwy a thai marchnad yn 'safleoedd eithrio' o dan bolisi cenedlaethol – dywed TAN 2 yn benodol nad yw safleoedd o'r fath yn briodol ar gyfer tai marchnad (para. 10.14).

### **Tai fforddiadwy**

#### **Tystiolaeth ategol**

Dywed Polisi Cynllunio Cymru (PCC, paragraff 9.1.4) ei bod yn bwysig bod awdurdodau lleol yn deall eu system dai yn ei chyfanrwydd er mwyn iddynt allu datblygu polisiâu tai marchnad a fforddiadwy sy'n seiliedig ar dystiolaeth. Elfen allweddol o'r dystiolaeth hon fydd yr Asesiad o'r Farchnad Dai Leol (LHMA). Dywed paragraff 9.2.16 (PCC) hefyd y dylai'r CDLI gynnwys targed cyflawni tai fforddiadwy ar gyfer yr awdurdod lleol, yn seiliedig ar yr LHMA. Dylai'r CDLI fynegi cyfanswm yr angen am dai fforddiadwy (gan gynnwys unrhyw ôlgroniad) dros gyfnod cyfan y cynllun, yng nghyfiawnhad rhesymegol y polisi tai fforddiadwy.

#### **Darparu tai fforddiadwy**

Mae'r cynllun a'r dogfennau ategol wedi nodi faint yr angen am dai fforddiadwy dros 5 mlynedd cyntaf y cynllun (gan gynnwys yr ôlgroniad) ac mae darparu tai fforddiadwy wrth reswm yn flaenoriaeth i'r ddau awdurdod. Bydd angen i'r awdurdodau esbonio'r berthynas rhwng y targed o fewn yr LHMA a lefel y tai fforddiadwy/marchnad a gynigir yn y cynllun. Bydd gofyn i'r awdurdodau ddangos eu bod yn darparu cymaint ag y gallent trwy'r CDLI gan fod yr angen mor fawr.

Mae angen mwy o eglurhad i esbonio'r cyfraddau darparu a ddisgwylir trwy'r ymrwymadau cyfredol a sut y bydd y dyraniadau'n cyfrannu at gyflawni'r targed am dai fforddiadwy. Pery'n aneglur sut y disgwylir darparu 1,400 o dai fforddiadwy a ph'un a

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 CDLiau 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**

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 ymrwymiadau/dyraniadau tai yn seiliedig ar hierarchiaeth o aneddleoedd 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 gorddyrianiad 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 gorddyrianiad 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 mewnfudo 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 nyriadau 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 bolisiâu 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

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.

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**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 chatau 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>

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## 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  
Neuadd y Dref  
Bangor  
Gwynedd  
LL57 1DT

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 16<sup>th</sup> 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**.



**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**

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- 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.

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**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>

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**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: **190**

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

Rhan: **POLISI TWR2**

Section: **POLICY TWR2**

Math / Type: **Cefnogi / Support**

### Crynodeb o'r Sylw:

Mae defnyddiau hamdden a thwristiaeth yn ddefnyddiau hyfyw o dir sydd eisoes wedi'i ddefnyddio ar safleoedd cloddio mwynau y mae modd iddynt, unwaith y byddant wedi'u hadfer, ddarparu cyfleusterau megis cyfleoedd llety, gweryllfeydd, cabanau coed a meysydd carafanau lle bo'n briodol. Caiff y polisi hwn ei gefnogi cyhyd ag y caiff safleoedd cloddio mwynau eu hystyried yn safleoedd sydd eisoes wedi'u datblygu ym mhwynt 4.

### Representation Summary:

Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate. This policy is supported as long as mineral extraction sites are considered previously developed sites at point 4.

### Sylw Llawn / Full Representation:

Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate. This policy is supported as long as mineral extraction sites are considered previously developed sites at point 4.

### Newid(iadau) i'r Cynllun

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### Change(s) to the Plan

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

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## Sylwadau Dros y We / Representations via the Internet

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Rhif Sylw / Rep Id: **193**

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

Rhan: **POLISI TWR2**

Section: **POLICY TWR2**

Math / Type: **Cefnogi / Support**

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### Crynodeb o'r Sylw:

Mae defnyddiau hamdden a thwristiaeth yn ddefnyddiau hyfyw o dir sydd eisoes wedi'i ddefnyddio ar safleoedd cloddio mwynau y mae modd iddynt, unwaith y byddant wedi'u hadfer, ddarparu cyfleusterau megis, cyfleoedd llety, gweryllfeydd, cabanau coed a meysydd carafanau lle bo'n briodol. Caiff y polisi hwn ei gefnogi cyhyd ag y caiff safleoedd cloddio mwynau eu hystyried yn safleoedd sydd eisoes wedi'u datblygu ym mhwynt 4.

### Representation Summary:

Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate. This policy is supported as long as mineral extraction sites are considered previously developed sites at point 4.

### Sylw Llawn / Full Representation:

Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate. This policy is supported as long as mineral extraction sites are considered previously developed sites at point 4.

### Newid(iadau) i'r Cynllun

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### Change(s) to the Plan

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Profion Cadernid / Soundness Tests: None

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## Sylwadau Dros y We / Representations via the Internet

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Rhif Sylw / Rep Id: **342**

Enw / Name: **Mr Geoff Wood [2916]**

Rhan: **POLISI TWR2**

Section: **POLICY TWR2**

Math / Type: **Gwrthwynebu / Object**

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### **Crynodeb o'r Sylw:**

Mae'n anodd meintoli beth yw gorgrynhoad o lety gwyliau, ac mae'n arwain at ansicrwydd i ymgeiswyr.

### **Representation Summary:**

It is difficult to quantify what an over-concentration of holiday accommodation is, which leads to a lack of certainty for applicants.

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### **Sylw Llawn / Full Representation:**

It is difficult to quantify what an over-concentration of holiday accommodation is, which leads to a lack of certainty for applicants.

### **Newid(iadau) i'r Cynllun**

Delete or amend part 8 "That the development does not lead to an over-concentration of such accommodati

### **Change(s) to the Plan**

Delete or amend part 8 "That the development does not lead to an over-concentration of such accommodation within the area."

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**Profion Cadernid / Soundness Tests:** ix

## Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **344**

Enw / Name: **Mr Geoff Wood [2916]**

Rhan: **POLISI TWR2**

Section: **POLICY TWR2**

Math / Type: **Gwrthwynebu / Object**

### Crynodeb o'r Sylw:

Cefnogi egwyddor y polisi ac, yn enwedig felly ran 4. Fodd bynnag, nid yw'n cadw mewn cof ddiogelu adeiladau gwerinol sydd â gwerth treftadaeth. Dan rai amgylchiadau, mae modd datblygu'r rhain yn hyfyw er mwyn diogelu cymeriad lleol a/neu dreftadaeth Cymreig.

### Representation Summary:

Support the principle of the policy and in particular part 4, however it does not take account of preserving vernacular buildings with heritage value. In some circumstances, these can be viably developed to help preserve local character and / or Welsh heritage.

### Sylw Llawn / Full Representation:

Support the principle of the policy and in particular part 4, however it does not take account of preserving vernacular buildings with heritage value. In some circumstances, these can be viably developed to help preserve local character and / or Welsh heritage.

### Newid(iadau) i'r Cynllun

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### Change(s) to the Plan

Amend part 4 to read "In the case of new build accommodation, that the development is located within a development boundary, or makes use of a suitable previously developed site or involves the reuse of a heritage asset that helps preserve local character and/or the Welsh culture"

Profion Cadernid / Soundness Tests: x



	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p>For office use only:</p> <p>Representor No. 3034/742</p> <p>Date received: 27/3/15 eba</p> <p>Date acknowledged:</p>
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**Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026  
Representation Form**

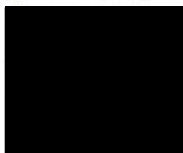



**Data Protection**

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	Tom Brooks	
Address		
Postcode		
Telephone Number		
Email address		

Tom Brooks

**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)	PS11 and TWR2
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"/>	<input checked="" type="checkbox"/>	Supporting
			<input type="checkbox"/>

<b>2c. Please provide details of your representation on the Deposit Plan.</b>
<p>Policy PS11 – The visitor economy – as drafted, threatens further development of tourist accommodation through the conversion of existing property to tourist accommodation. In Borth-y-Gest, the coastal village already has more than 60% holiday homes or tourist units.</p> <p>Outside of the peak summer period, Borth-y-Gest is not quite a ‘ghost’ village but further holiday homes would rapidly make it so.</p> <p>Much of the loss of housing units for local families has been created by the conversion of existing buildings into “permanently serviced and self-services holiday accommodation”. This is a deeply damaging trend for villages such a Borth-y-Gest. TWR2 needs amending to protect against any further such loss of family accommodation. It currently carries a presumption of granting permission and the caveats are non specific and undefinable.</p> <p>The explanation paragraphs in 7.3.55 are challenged in failing to be evidence based and to err in their conclusions.</p> <p style="text-align: right;"><i>Please use additional sheet if necessary. Please state how many additional sheets have been used.....</i></p>

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

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

PS11 No 5 should be amended to read, “ preventing development that would have an unacceptable adverse effect on tourist attractions, including those developments that could have an adverse impact on pretty villages, including the presence of Welsh culture and any developments that could damage all year round life in tourist appealing villages”.

TWR2 should be amended to delete point 2 “The conversion of existing buildings into such accommodation”. A new TWR policy should be added to the plan to permit conversion of existing buildings in “Sub-Regional Centre, Urban Service Centre, Local Services Centres and local villages”. However, in “coastal/ rural villages” and “clusters” conversion of existing buildings should be specifically excluded.

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

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	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
			policies.	
35.	Chapter 7 Managing growth and Development – Economy and regeneration	7.3.55 – 7.3.80	Horizon is concerned to ensure that these paragraphs do not impact the construction worker accommodation.  Rather than seek for specific amendments to these paragraphs, Horizon proposes to rely on the Wylfa Newydd specific policies proposed above which would be the relevant policies against which to determine associated development applications. For this reason Horizon is not proposing specific exclusion to its associated development from these paragraphs.	
36.	Chapter 7 Managing growth and Development – Economy and regeneration	Strategic Policy PS12	Horizon is concerned that Criterion 6 "restricting the expansion of out-of-centre retailing and leisure development" could unduly restrict the development of leisure facilities at temporary worker accommodation sites.  Rather than seek for specific amendments to this policy, Horizon proposes to rely on the Wylfa Newydd specific policies proposed above which would be the relevant policies against which to determine associated	