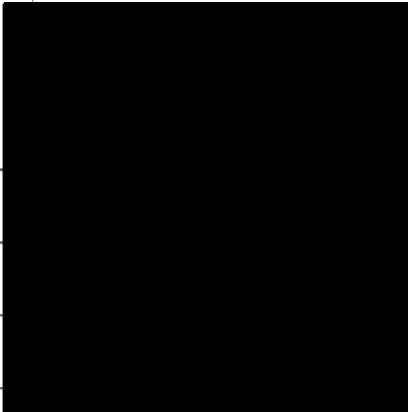
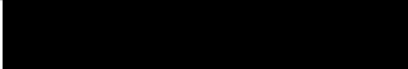
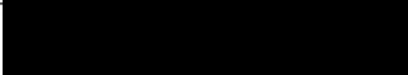
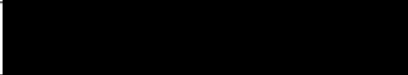


	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p><i>For office use only:</i></p> <p>Representor No. 1169/900</p> <p>Date received: 30/3/15 <i>ew</i></p> <p>Date acknowledged:</p>
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**Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026
Representation Form**

PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	Noel Davey	
Address	CPRW/Campaign for Protection of Rural Wales, Caernarfonshire Branch c/o 	
Postcode		
Telephone Number		
Email address		

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

2a. Which part of the Deposit Plan are you commenting on?	
	CPRW 13 AONBs
Policy number (please specify)	PS16
Paragraph number (please specify)	7.5.1-7.5.6
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	

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

13 AONBs

13.1 Para 7.5.1-7.5.6 Context/Introduction. A section on ‘Conserving and Enhancing the Natural Environment’ is included towards the end of the JLDP document whereas in the GUDP ‘Effective Protection of the Environment’ was the first priority. Landscape and biodiversity are bracketed together within the general heading of the Natural Environment even though they raise different issues where impact is concerned. This gives a general impression that landscape protection in particular is being accorded relatively low priority in the JLDP.

13.2 PS16/AONBs. The Llŷn and Anglesey Areas of Outstanding Natural Beauty (AONBs) are given an inappropriately low emphasis in the draft JLDP even though these are areas designated nationally for their landscape qualities which should be accorded the highest level of protection. There are 28 references to (the two) AONBs in the JLDP text compared with 61 to (the single) AONB in the GUDP. Strategic Policy PS16 simply states in #3 that ‘When considering permitting applications the Planning Authorities will ensure that they are... having regard to the relative significance of the designations in considering the weight to be attached to acknowledged interests in line with National Policy’. This appears a quite lukewarm statement, giving at best grudging acknowledgement of the Authorities’ statutory duty, but hardly embracing the value of the landscapes which are the jewels of the Plan area’s natural assets. We would expect to see an explicit strategic objective to protect and enhance the landscape comparable to GUDP Strategic Policy 2 (*‘The area’s natural environment and its landscape character, and views in and out of the Snowdonia National Park and the Anglesey and Llŷn AONBs, will be safeguarded, maintained or improved by refusing development proposals that will significantly harm them’*).

13.3 PS16/Review of Designated Landscapes. The proposal in 13.2 (above) would be in line with recommendation 6 of the Stage 1 Report of the Review of Designated Landscapes in Wales (Jan 30th 2015) which states: *'We recommend a new single Statutory Duty that removes the weak 'have regard to' prefixes in the current duties on relevant public bodies and replaces them with a single and clear duty: 'To contribute to the delivery of the three Purposes of the National Designated Landscapes'.*

13.4 Explicit AONB Policy. There should be a policy comparable to GUDP B8 explicitly dealing with the AONBs. There is a passing reference in para 7.5.4 to the AONBs, but otherwise they are simply listed in a schedule of 'nature conservation designations' accompanied by brief notes on 'obligations'. AMG1-4 deal only with local protection policies.

13.5 AONB Management Plan. There should be an explicit reference to the AONB Management Plans which have an important bearing on appropriate land use and development policies within the AONBs.

13.6 AONB Buffer Areas. There is little explicit reference to the importance of protecting the setting of the AONBs, i.e. the views in and out. However, we fully support (see below) the strengthening of policy relating to the locally designated Special Landscape Areas, most of which provide in effect visual buffer areas around the AONBs or the National Park. Nevertheless, this does not justify a weakening of policy in respect of the AONBs. AONBs and National Parks have the same level of statutory designation in respect of landscape protection. This should be as well reflected in the Joint Plan of the authorities responsible for AONBs as it is in the case of the National Park Authority's Plan. AMG1-3 relate to landscape protection issues of a non-statutory character or designation, but there is no equivalent policy spelt out for the designated areas.

13.7 Why emphasise the AONB? The reason for this change of approach compared with the GUDP is not given. The argument may be that it is not considered to be the role of the local plan to explain the protections required for national statutory designated areas, but the GUDP did so and it is important for local developers and the public to be fully aware of and understand the reasons for the need to safeguard the values of the AONBs. The Plan should demonstrate a firm local commitment to fulfil statutory obligations to protect the AONB.

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

13.8 Summary PS16 and AONBs. The AONBs are given an inappropriately low emphasis in the JLDP draft in comparison with the GUDP. There should be a much more explicit and positive local commitment to the statutory duties to protect nationally designated landscapes and their settings, in line with SP2, B8 and B14 in the GUDP. Explicit reference should be made to the AONB Management Plans.

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

13.9 PS16 Change sought : include a point (as GUDP SP2) expanding on or in part replacing points 2 and 3: *'The area's natural environment and its landscape character, and views in and out of the Snowdonia National Park and the Anglesey and Llŷn AONBs, will be safeguarded, maintained or improved by refusing development proposals that will significantly harm them in accordance with the obligations of National Policy'*.

13.10 Add a new AMG policy (comparable to GUDP B8 and B14) explicitly dealing with local duties to protect the landscapes of the AONBs and National Parks. Include an explicit reference *'Detailed consideration will be given to the recommendations and policies of the AONB Management Plans'*

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 checked="" 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)

2a. Which part of the Deposit Plan are you commenting on?	
	CPRW 14 Special Landscape Areas
Policy number (please specify)	AMG1
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	

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

14. Special Landscape Areas

14.1 AMG1 Special Landscape Areas. We support the concept of Special Landscape Areas (SLAs) which replace the former Landscape Conservation Areas (LCAs). We welcome the proposed new emphasis on these areas and their increased significance in planning decisions. Of the 10 SLAs specified for Gwynedd most serve as valuable visual buffers for the AONBs or National Park, while also protecting local landscapes of high merit. This buffering role is not mentioned but should be. The Western Llŷn SLA is particularly valuable in this respect, in that it is almost entirely surrounded by the Llŷn AONB on the coast and inland hills. We are concerned that the north-eastern section of the Llŷn AONB is not similarly protected by a buffer SLA south of Yr Eifl and the Clynnog Hills. Consideration should be given to creating an additional SLA here (see CPRW submission 17). The Menai shore on the Gwynedd side is partly protected by proposed SLAS 8,9,10 of which 8 (Foryd Bay) is new. We welcome this. However, sections of the Menai coastal belt, especially west of Caernarfon are still left without any local protection. We argued in a Candidate Sites submission (SP361) that the entire Menai shore should be covered by an SLA, to protect both the local landscape and provide a buffer to protect the Anglesey AONB on the opposite shore. (See more detailed comments under CPRW submission 15).

14.2 AMG2: Protecting and Enhancing Features and Qualities that are Unique to the Local Landscape Character. We support this policy, but its scope and intentions as distinct from AMG 1 need to be clarified. The SLAs and Landscape Character Areas both derive in large part from analysis of the LANDMAP data as reflected in the Gwynedd Landscape Strategy. This policy presumably has intentions similar to those for AMG1, but is directed more at areas outside the SLAs. We are glad to note reference is made here to the character and settings of the AONBs and National Park.



1521-1092-PS16

Protecting Biodiversity

- 1.9 With regards to Policy PS16 AND AMG4 NRW questions the need for both these policies and if they should be incorporated into a single 'Biodiversity' Policy.
- 1.10 We suggest that you refer to Conwy County Council's adopted Local Development Plan and in particular to policy NTE/3 – Biodiversity and its explanatory text.
- 1.11 This single policy provides the policy structure for safeguarding species of European, national and local importance as well as referring to the need to achieve the targets of the Local Biodiversity Action Plan.
- 1.12 Conwy's adopted policy in particular identifies that new development should aim to conserve and where possible enhance biodiversity through;
- *Sensitive siting of development*
 - *Sensitive layout and design which avoids impacts or mitigates through an agreed programme*
 - *Creating, enhancing and managing wildlife habitats and natural landscapes including connectivity*
 - *Integrating biodiversity measures into the built environment*
 - *Providing for a management agreement with the Local Planning Authority to secure the retention and long term future of biodiversity interests where applicable*
- 1.13 It is considered that providing a more comprehensive Biodiversity policy will help ensure that development proposals are presented with sensitive layout and designs which avoid impacts or mitigate for any identified adverse impact on biodiversity and also ensure that the developer is aware through the policy inclusion of the need to enter into a long term management agreement with the LPA to secure retention and long term future of biodiversity interests where applicable.
- 1.14 In addition, the policy should include a hierarchy that clearly defines the level of protection afforded to sites and species and include reference to species included within Section 42 of the Wildlife and Countryside Act 1991 which the Authority has a duty to protect under the Natural Environment and Rural Communities (NERC) Act (2006).

PTO



- 1.15 It is considered that amending policy PS16 as recommended would help to meet test of soundness C2.

Proposed Employment and Housing Site Allocations

- 1.16 NRW is satisfied with the strategy's aim to disperse development proportionately around the plan area. The focus being on locating development within those locations that provide the best opportunity for achieving sustainable development i.e. developing the Sub regional, urban and local service centres, and an appropriate amount of development in villages with a focus on service villages and then some development in Clusters.
- 1.17 NRW welcomes that housing within the rural clusters will be 100% affordable housing.
- 1.18 It is acknowledged that the Plan does not propose any housing allocations in Porthmadog due to large parts of the settlement being categorised as being within Zone C1 and with no alternative sites identified as being available beyond the flood risk areas. Criccieth and Penrhyndeudraeth have therefore been identified as being appropriate to meet the housing requirement of Porthmadog.
- 1.19 NRW has reviewed the allocations included under the following policies;
- CYF1: Safeguarding and Allocating Land and Units for Employment Use,
TAI14: Housing in Sub-Regional Centre and Urban Service Centres,
TAI15: Housing in Local Service Centre
TAI16: Housing in Service Villages and;
TAI17 Housing in Local, Rural and Coastal Villages.*
- 1.20 In addition to the sites referred to in our covering letter we also provide the following advice with regards to the allocations proposed under the above listed policies.

Protected Species

- 1.21 The possible impact of development on the favourable conservation status of protected species needs further consideration. Species present in Gwynedd and Ynys Mon include otters, bats and water voles.
- 1.22 It is assumed that none of the proposed allocations have been subject to ecological assessments.



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Protected Species

- 1439
- 1.21 The possible impact of development on the favourable conservation status of protected species needs further consideration. Species present in Gwynedd and Ynys Mon include otters, bats and water voles.
- 1.22 It is assumed that none of the proposed allocations have been subject to ecological assessments.



- 1.23 Regulations 9(1) and 9(5) of the Conservation of Habitats and Species Regulations 2010 (as amended) requires public bodies in exercise of their functions, to have regard to and to secure compliance with the provisions of the 1992 'Habitats' Directive (92/43/EEC) and the 2009 'Birds' Directive ([2009/147/EC](#)) so far that they might be affected by those functions.
- 1.24 When assessing allocations, the other requirements of the Habitats Directive should also be considered where appropriate. This includes provision and management of stepping stone and linear features; prevention of incidental capture/killing of European Species; protection of European protected species including consideration of deterioration and ensuring compliance of Article 16 in respect of whether the proposal satisfies a listed derogation criterion; and if the two mandatory tests are satisfied.
- 1.25 We consider that land use planning and proposed land use change within Anglesey and Gwynedd needs to adequately consider and audit the relevant provisions of the Birds Directive (as set out in Regulation 9(A) of the 2012 amendments to The Conservation of Habitats and Species Regulations 2010). In the context of the wider countryside, this specifically relates to the upkeep, management and creation of habitat for wild birds. The LPA is reminded of NRW's duty to report on the implementation of this legislation (Regulation 9(B)).
- 1.26 Where a European Protected Species is present, a development may only proceed provided that derogation provisions of Article 16 of the Habitats Directive are satisfied.

Natural Environment and Rural Communities (NERC) Act (2006)

- 1.27 Please note that we have not considered possible effects on all local or regional interests. Therefore, you should not rule out the possibility of adverse effects on such interests, which would be relevant to your Authority's general duty to have regard to conserving biodiversity, as set out in section 40 of the Natural Environment and Rural Communities (NERC) Act (2006). This advice includes any consideration of the planned provision of "linear" and "stepping stone" habitats as defined in Article 10 of the Habitats Directive.
- 1.28 To comply with your authority's duty under section 40 of the NERC Act, to have regard to conserving biodiversity, your decision should take account of possible adverse effects on such interests. We recommend that you seek further advice from your authority's internal ecological adviser and/or third sector nature conservation organisations such as the local wildlife trust, RSPB, etc. The Wales Biodiversity Partnership's web site has guidance for assessing proposals that have implications for section 42 habitats and species (www.biodiversitywales.org.uk).



Annex 1 Habitat and Wildlife Sites

- 1.29 We advise that you consult your internal ecologist and Cofnod in respect of the potential presence of any Annex 1 habitats within the boundaries of any of the proposed allocations.

Protected Sites

- 1.30 Proposed allocation C16 – Bae Hiraef, Bangor is located directly adjacent Traeth Lafan Special Protection Area (SPA), Y Fenai a Bae Conwy Special Area of Conservation (SAC), Traeth Lafan Site of Special Scientific Interest (SSSI) and Traeth Lafan Local Nature Reserve. Any proposal to develop this site will need to demonstrate that it will not have an adverse effects on the site features.
- 1.31 We remind you that, as a competent authority for the purposes of the 2010 Regulations, your authority must not normally agree to include any of the proposed allocations and the plan unless you are sure beyond reasonable scientific doubt that any of the proposed allocations will not adversely affect the integrity of a SAC, SPA or Ramsar site.
- 1.32 We advise that drainage proposals for developments will need to take into account the proximity of protected sites and in particular any nearby watercourses are hydrologically connected to protected sites. Where a hydrological connection exists, there is a need to ensure that any proposed discharges do not affect water quality within the protected site.
- 1.33 In addition, part of proposed allocation C22 – Former Bron y Garth Hospital Site, Penrhydeudraeth is located within Ysbyty Bron y Garth Site of Special Scientific Interest (SSSI).
- 1.34 We would recommend that a design guide is prepared to guide development at the former Bron y Garth Hospital Site.

Protected Landscapes

- 1443 {
- 1.35 A number of the allocated land are located within, adjacent or in close proximity to the Llyn Area of Outstanding Natural Beauty (AONB) and Ynys Mon Area of Outstanding Natural Beauty (AONB).
- 1.36 We remind you of your Authority's duty under Section 85 of the Countryside and Rights of Way Act 2000 which required public bodies to have regard to the purposes of conserving and enhancing the natural beauty of the AONB. The



statutory purposes of Areas of Outstanding Natural Beauty are conservation and enhancement of their natural beauty.

1443
1.37 NRW consider that where an allocation has the potential to significantly affect the AONB and its associated boundary area, the site would need to be rigorously assessed in terms of adverse impact on the amenity and special qualities of the AONB.

1.38 Also some of the allocation are located within or adjacent to landscapes that are Registered by CADW as Landscapes of Historic Interest including the Llyn ac Ynys Enlli Registered Landscape of Historic Interest. While this is not a statutory designation, Chapter 6 of PPW identifies that it should be a material consideration in the planning process and must be given due regard.

1.39 With regards to POLICY AMG2 we would recommend that this policy name is changed to protecting and enhancing features and qualities that are 'distinctive or special' to the landscape character rather than 'unique'.

1.40 With regards to criteria 3 set out under Policy AMG2 NRW recommends that the reference to 'layout of settlements' is amended to 'layout of settlements and boundary types'.

Waste Management

1.41 NRW welcome that Policy GWA1 – Provisional of waste management and recycling infrastructure allows for waste management facilities on some employment allocations. However GWA2, does not set out how the 7 year and 5 year trigger points in relation to the supply of landfill will be monitored and how the LPA will work with other Authorities to meet this need, if required. It is acknowledged that landfill has a diminishing role but the Plan should acknowledge the need for regional collaboration to meet the need for landfill across North Wales and how it will work with other authorities to meet this need. This should be set out in the policy to accord with TAN21.

1.42 With regards to Policy MWYN8 – Exploration Works, it would be useful to know if unconventional fracturing is within scope of this policy. If yes then some flexibility built in to this policy would be welcome such as the policy will be reviewed in light of any new evidence on the potential impacts of these types of development on the environment.



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1182

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
42.	Chapter 7 Managing growth and Development – Natural and Built Environment	Policy PS16 – Conserving and Enhancing the Natural Environment and Policies AMG1-5	<p>There is a typographical error in the introduction: It should be "effect", not "affect".</p> <p>Horizon submits that greater flexibility needs to be included in these policies so that proposals predicted to have an adverse effect will be permissible subject to the identification and implementation of sufficient mitigation measures, supported by an appropriate implementation plan.</p> <p>Rather than seek specific amendments to these policies Horizon proposes to rely on the Wylfa Newydd specific policies proposed above which would be the relevant policies against which to make consultation responses to the DCO application and to determine its associated development applications.</p>	
43.	Chapter 7 Managing growth and Development – Natural and Built Environment	Policy PS17	<p>Horizon submits that greater flexibility needs to be included in these policies so that proposals predicted to have an adverse effect will be permissible subject to the identification and implementation of sufficient mitigation measures, supported by an appropriate implementation plan.</p>	

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **325**

Enw / Name: **North Wales Wildlife Trust (Mr Chris Wynne) [2626]**

Rhan: **POLISI STRATEGOL PS16**

Section: **STRATEGIC POLICY PS16**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

NODER Bwriadwyd y sylwadau hyn ar gyfer PS16 ond ymddengys bod camgymeriad ar ddolen gyswllt y ddogfen ar lein sy'n cysylltu'r polisi hwn â PS19. Rydym yn croesawu polisi PS16 ac yn pwysleisio bod amgylchedd naturiol neilltuol Gwynedd a Môn yn cynnwys cynefinoedd a rhywogaethau prin, cyffredin a nodweddiadol. Awgrymwyr fod y polisi hwn a thestun cysylltiedig hefyd yn cyfeirio at gylchfeydd rhagod er mwyn gwarchod mwy ar seilwaith gwyrdd a glas (pwynt 5)

Representation Summary:

NB These comments are intended for PS16 but there seems to be an error on the contents link of the online document which links this policy to PS19. We welcome policy PS16 and stress that the distinctive natural environment of Gwynedd and Anglesey includes rare, common and a suite of typical habitats and species. We suggest that this policy and associated text also includes reference to buffer zones to further protect green and blue infrastructure (point 5)

Sylw Llawn / Full Representation:

NB These comments are intended for PS16 but there seems to be an error on the contents link of the online document which links this policy to PS19

We welcome policy PS16 and stress that the distinctive natural environment of Gwynedd and Anglesey includes rare, common and a suite of typical habitats and species.

We suggest that this policy and associated text also includes reference to buffer zones to further protect green and blue infrastructure (point 5)

Newid(iadau) i'r Cynllun

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Change(s) to the Plan

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Profion Cadernid / Soundness Tests: None

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **343**

Enw / Name: **North Wales Wildlife Trust (Mr Chris Wynne) [2626]**

Rhan: **POLISI STRATEGOL PS16**

Section: **STRATEGIC POLICY PS16**

Math / Type: **Cefnogi / Support**

Crynodeb o'r Sylw:

Rydym yn croesawu PS16 ac yn pwysleisio bod amgylchedd naturiol neilltuol Gwynedd a Môn yn cynnwys cynefinoedd a rhywogaethau prin, cyffredin a nodweddiadol. Awgrymwn fod cyfeiriad yn y polisi hwn ac mewn testun cysylltiedig hefyd at gylchfeydd rhagod er mwyn gwarchod mwy ar seilwaith gwyrdd a glas (pwynt 5). NODER Bwriadwyd y sylwadau hyn ar gyfer PS16 ond ymddengys bod camgymeriad ar ddolen gyswllt y ddogfen ar lein sy'n cysylltu'r polisi hwn â PS19.

Representation Summary:

We welcome this policy and stress that the distinctive natural environment of Gwynedd and Anglesey includes rare, common and a suite of typical habitats and species. We suggest that this policy and associated text also includes reference to buffer zones to further protect green and blue infrastructure (point 5)

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Newid(iadau) i'r Cynllun

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Change(s) to the Plan

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Profion Cadernid / Soundness Tests: None

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **232**

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

Rhan: **POLISI STRATEGOL PS16**

Section: **STRATEGIC POLICY PS16**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Nid yw'r polisi hwn yn eglur o ran lle mae'n berthnasol iddo e.e. (nid pob holl ased tirwedd a bioamrywiaeth sydd â'r un gwerth). Dylai'r polisi ymwneud â'r lefel leol yn hytrach nag ailadrodd y polisi cenedlaethol. Os ystyrir ei fod yn berthnasol i safleoedd cloddio mwynau, awgrymu newidiadau fel y nodir isod. Awgrymu hierarchaeth i asesu effeithiau amgylcheddol cynigion datblygu yn ddi ystyriaeth i bolisiau eraill yn y cynllun datblygu. Dylid pwysleisio yn gadarnhaol safleoedd echdynnu mwynau presennol, gan eu hystyriaeth ar draul datblygu safleoedd newydd. Dylid ystyried effeithiau tros dro ar yr amgylchedd yn wahanol i effeithiau hir dymor ar yr amgylchedd.

Representation Summary:

This policy lacks clarity as to where it applies e.g. (not all landscapes and biodiversity assets are of the same value). The policy should relate to the local level rather than repeat national policy. If it is considered to apply to mineral extraction sites suggest changes as set out below.

Suggest a hierarchy for assessing environmental effects of development proposals notwithstanding other policies in the development plan. There should be a positive emphasis toward existing mineral extraction sites, or extensions to those sites over new sites. Temporary environmental effects should be viewed differently to long term environmental effects.

Sylw Llawn / Full Representation:

This policy lacks clarity as to where it applies e.g. (not all landscapes and biodiversity assets are of the same value). The policy should relate to the local level rather than repeat national policy. If it is considered to apply to mineral extraction sites suggest changes as set out below.

Newid(iadau) i'r Cynllun

Awgrymu hierarchaeth i asesu effeithiau amgylcheddol cynigion datblygu yn ddi ystyriaeth i bolisiau eraill yn

Change(s) to the Plan

Suggest a hierarchy for assessing environmental effects of development proposals notwithstanding other policies in the development plan. There should be a positive emphasis toward existing mineral extraction sites, or extensions to those sites over new sites. Temporary environmental effects should be viewed differently to long term environmental effects.

Profion Cadernid / Soundness Tests: x, viii, ix

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **233**

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

Rhan: **POLISI STRATEGOL PS16**

Section: **STRATEGIC POLICY PS16**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Nid yw'r polisi hwn yn eglur o ran yr hyn y mae'n berthnasol iddo (e.e. nid pob ased tirwedd a bioamrywiaeth sydd â'r un gwerth). Dylai'r polisi ymwneud â'r lefel leol yn hytrach nag ailadrodd polisi cenedlaethol. Os ystyrir ei fod yn berthnasol i safleoedd cloddio mwynau, awgrymu newidiadau a nodir isod. Awgrymu hierarchaeth i asesu effeithiau amgylcheddol cynigion datblygu yn ddi ystyriaeth i bolisiau eraill yn y cynllun datblygu. Dylid pwysleisio yn gadarnhaol safleoedd echdynnu mwynau presennol, gan eu hymestyn ar draul datblygu safleoedd newydd. Dylid ystyried effeithiau tros dro ar yr amgylchedd yn wahanol i effeithiau hir dymor ar yr amgylchedd.

Representation Summary:

This policy lacks clarity as to where it applies e.g. (not all landscapes and biodiversity assets are of the same value). The policy should relate to the local level rather than repeat national policy. If it is considered to apply to mineral extraction sites suggest changes as set out below.

Suggest a hierarchy for assessing environmental effects of development proposals notwithstanding other policies in the development plan. There should be a positive emphasis toward existing mineral extraction sites, or extensions to those sites over new sites. Temporary environmental effects should be viewed differently to long term environmental effects.

Sylw Llawn / Full Representation:

This policy lacks clarity as to where it applies e.g. (not all landscapes and biodiversity assets are of the same value). The policy should relate to the local level rather than repeat national policy. If it is considered to apply to mineral extraction sites suggest changes as set out below.

Newid(iadau) i'r Cynllun

Awgrymu hierarchaeth i asesu effeithiau amgylcheddol cynigion datblygu yn ddi ystyriaeth i bolisiau eraill yn

Change(s) to the Plan

Suggest a hierarchy for assessing environmental effects of development proposals notwithstanding other policies in the development plan. There should be a positive emphasis toward existing mineral extraction sites, or extensions to those sites over new sites. Temporary environmental effects should be viewed differently to long term environmental effects.

Profion Cadernid / Soundness Tests: x, viii, ix

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **459**

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

Rhan: **POLISI STRATEGOL PS16**

Section: **STRATEGIC POLICY PS16**

Math / Type: **Cefnogi / Support**

Crynodeb o'r Sylw:

Mewn egwyddor mae Bourne Leisure yn cefnogi PS16 gan ei fod yn anelu i gadw a gwella'r amgylchedd naturiol.

Representation Summary:

Bourne Leisure endorses PS16 in principle as it seeks to conserve and enhance the natural environment.

Sylw Llawn / Full Representation:

Bourne Leisure endorses PS16 in principle as it seeks to conserve and enhance the natural environment. The exceptional natural environment of Gwynedd, comprises the key visitor attraction of the area and therefore the desire to protect and where possible enhance the natural environment is supported by Bourne Leisure. Indeed the Destination Management Plan 2013-2020 states that 54% of visitors visited Gwynedd because of the scenery/landscape.

As many of Bourne Leisure's sites are located in rural and/or coastal areas, incorporating or adjacent to environmentally and ecologically sensitive sites, Bourne Leisure has significant experience of operating within and adjacent to sensitive environmental locations and takes the need for their protection and enhancement fully into account in day to day operations and when drawing up development proposals for its sites.

Greenacres and Hafan y Môr holiday parks are both located in environmentally sensitive locations. Bourne Leisure comments that this should not rule out development at these sites providing that the development is appropriate to the location and that commensurate mitigation measures can be implemented to mitigate both direct and indirect impacts.

Bourne Leisure would like to stress that not all development has the potential to negatively impact on key landscape, public views and open spaces. For example, a number of Bourne Leisure's recent developments and current proposals have rationalised caravan plots and / or reconfigured site layouts, resulting in improved public views, positive impacts on the landscape and the provision of enhanced planting and open space.

Newid(iadau) i'r Cynllun

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Change(s) to the Plan

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Profion Cadernid / Soundness Tests: None

2768/2767/898

Bourne Leisure 31/3/15
(e-bon)

2768-2767-898-PS16



Strategic Policy PS16: Conserving and Enhancing the Natural Environment

Bourne Leisure endorses PS16 in principle as it seeks to conserve and enhance the natural environment. The exceptional natural environment of Gwynedd, comprises the key visitor attraction of the area and therefore the desire to protect and where possible enhance the natural environment is supported by Bourne Leisure. Indeed the Destination Management Plan 2013-2020 states that 54% of visitors visited Gwynedd because of the scenery/landscape.

As many of Bourne Leisure's sites are located in rural and/or coastal areas, incorporating or adjacent to environmentally and ecologically sensitive sites, Bourne Leisure has significant experience of operating within and adjacent to sensitive environmental locations and takes the need for their protection and enhancement fully into account in day to day operations and when drawing up development proposals for its sites.

Greenacres and Hafan y Môr holiday parks are both located in environmentally sensitive locations. Bourne Leisure comments that this should not rule out development at these sites providing that the development is appropriate to the location and that commensurate mitigation measures can be implemented to mitigate both direct and indirect impacts.

Bourne Leisure would like to stress that not all development has the potential to negatively impact on key landscape, public views and open spaces. For example, a number of Bourne Leisure's recent developments and current proposals have rationalised caravan plots and / or reconfigured site layouts, resulting in improved public views, positive impacts on the landscape and the provision of enhanced planting and open space.

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **165**

Enw / Name: **Rod Dixon [2774]**

Rhan: **POLISI STRATEGOL PS16**

Section: **STRATEGIC POLICY PS16**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Caiff hwn ei restru fel PS19 dan 7.5 yn y tabl cynnwys. Newid i PS16 yn y tabl cynnwys.

Representation Summary:

This is listed as PS 19 under 7.5 in the contents table

Change to PS16 in contents table

Sylw Llawn / Full Representation:

This is listed as PS 19 under 7.5 in the contents table

Newid(iadau) i'r Cynllun

Change to PS16 in contents table

Change(s) to the Plan

Change to PS16 in contents table

Profion Cadernid / Soundness Tests: None

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **311**

Enw / Name: **Cyfeillion Llyn (Mrs Sian Parri) [2871]**

Rhan: **POLISI STRATEGOL PS16**

Section: **STRATEGIC POLICY PS16**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Dylid cynnwys cyfeiriad penodol at warchod yr AHNE yn unol a Chynllun Rheoli'r AHNE yn unol a'r ddeddf cefn Gwlad a Hawliau Tramwy 2000

Representation Summary:

A specific reference to protecting the AONB should be included in line with the AONB Management Plan in line with the Countryside and Rights of Way Act 2000

Sylw Llawn / Full Representation:

Dylid cynnwys cyfeiriad penodol at warchod yr AHNE yn unol a Chynllun Rheoli'r AHNE yn unol a'r ddeddf cefn Gwlad a Hawliau Tramwy 2000

Newid(iadau) i'r Cynllun

Dylid cynnwys cyfeiriad penodol at warchod yr AHNE yn unol a Chynllun Rheoli'r AHNE yn unol a'r ddeddf c

Change(s) to the Plan

A specific reference to protecting the AONB should be included in line with the AONB Management Plan in line with the Countryside and Rights of Way Act 2000

Profion Cadernid / Soundness Tests: None

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **493**

Enw / Name: **Mr Glyn Jones [2971]**

Rhan: **POLISI STRATEGOL PS16**

Section: **STRATEGIC POLICY PS16**

Math / Type: **Cefnogi / Support**

Crynodeb o'r Sylw:

Polisi cryfach ar gyfer yr AHNE o ran yr angen am Asesiad Effaith Tirwedd a Gweledol o lefel priodol ar gyfer datblygiad a'r angen i gysylltu gyda swyddog tirwedd/ cynllunio yr awdurdod er mwyn cael cyngor am y lefel o AETG sy'n angenrheidiol.

Representation Summary:

Stronger policy for AONB as regards requirement for appropriate level of Landscape and Visual Impact Assessment for proposed development and requirement to contact relevant landscape / planning officer for the authority to provide guidance on level of LVIA that is required.

Sylw Llawn / Full Representation:

Unfortunately this is shown incorrectly as Policy 19 in the online consultation document. Policy AMG1 Special Landscape Areas refers to the need in certain circumstances for a Landscape and visual impact assessment (LVIA) to be carried out to consider potential impacts on the designated landscape. This should also apply when considering proposals within the nationally designated AONB. This requirement is not addressed appropriately in the policy and should be included. Policy AMG2 considers that an appropriate landscape assessment should be carried out to consider the effects on features and qualities that are unique to local landscape character and setting of AONB's. I believe a stronger wording of the policy in relation to carrying out an appropriate LVIA as it relates to the AONB itself is required and that it should be carried out by an appropriately qualified professional. I would also recommend adding under Explanation: Further guidance on the level of LVIA required can be received by contacting the relevant Landscape / Planning officer for the Authority

Newid(iadau) i'r Cynllun

Change(s) to the Plan

Profion Cadernid / Soundness Tests: None

2988/216

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p><i>For office use only:</i></p> <p>Representor No.</p> <p>Date received:</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 or 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 or 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	BANGOR CIVIC SOCIETY	
Address	c/o DAW MATHEW	
Postcode	[REDACTED]	
Telephone Number		
Email address		

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

2a. Which part of the Deposit Plan are you commenting on?

Policy number (please specify)	- AS BELOW
Paragraph number (please specify)	- AS BELOW
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	

2b. Are you objecting or supporting the Deposit Plan?

Objecting	<input checked="" type="checkbox"/> PARTLY	Supporting	<input checked="" type="checkbox"/> MOSTLY!
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2c. Please provide details of your representation on the Deposit Plan.

WE WISH IN PARTICULAR TO SUPPORT:

- PS1: WELSH LANGUAGE + CULTURE
- ISA1: INFRASTRUCTURE PROVISION
- PS4: SUSTAINABLE TRANSPORT
- PS6: CLIMATE CHANGE
- ARNA1: COASTAL CHANGE MANAGEMENT
- PS11: VISITOR ECONOMY
- PS12: RETAIL (NOTING SUB-REGIONAL IMPORTANCE OF BANGOR)
- MAN7: HOT FOOD TAKEAWAYS (NOTING CLUSTERS + NUISANCE)
- TA12: HMOS. WE WELCOME FIRST ATTEMPT TO PUT A CAP ON NON-SHARED ACCOMMODATION + USE A 'PREFERRED SEARCH ZONE'
- PS16: NATURAL ENVIRONMENT
- PS17: HERITAGE ASSETS (NOTING VERY POSITIVE SUPPORT FOR SCATE INDUSTRY WORLD HERITAGE SITE BID)

EWO

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).

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

ISA 4: OPEN SPACE, TO PROPOSALS MAP ADD 'PEN-Y-BAYN GARDENS' & 'PENRYN AIMS OPEN SPACE'

TRA1: TRANSPORT NETWORKS 4) 'TRANSPORT SCHEMES' - THERE IS A COMPLETE ABSENCE OF ANY RAIL PROPOSALS

7.1-37: TERN E22 - CLARIFICATION IS NEEDED OF WHETHER BRITANNIA BRIDGE & PARTS OF NORTH WALES ARE STILL ON E22.

TRA4: TRANSPORT IMPACTS. DELETE 'WHERE NECESSARY'. SAFE PROVISION SHOULD ALWAYS BE PROVIDED FOR GROUPS LISTED.

PS9: WYLEA NEWYDD. A 'PLAN B' IS NEEDED, IN CASE THIS PROJECT - WHICH IS YEARS AWAY FROM FINAL APPROVAL - DOES NOT GO AHEAD

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"/>
												1		2		3		4	

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



Publish Inspector's report



Plan's adoption



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

Signed:

[Redacted Signature]

Dated: 31 MARCH 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 or www.anglesey.gov.uk/ldp

BY EMAIL – planningpolicy@gwynedd.gov.uk

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

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

3062 802

3062-802-PS16

SLR 

11/3/15

10th March 2015

Joint Planning Unit
1st Floor
Bangor City Council Offices
Ffordd Gwynedd
Bangor
Gwynedd
LL57 1DT

Our Ref: 421.03735.00001
Your Ref:

Dear Sir

**RE: ANGLESEY AND GWYNEDD DEPOSIT JOINT LOCAL DEVELOPMENT PLAN
2011 – 2026
REPRESENTATIONS MADE ON BEHALF OF TY MAWR WEST LTD**

Following the initial representations dated 19 June 2013 made on behalf of the above named Company, my Client wishes to submit further formal representations and comments in respect of the Deposit Local Development Plan 2011 – 2026 – Initial Consultation Report – Feb 2015.

The general comments regarding firstly infrastructure and timescale and secondly the implication of constraints particularly relating to SLA's in quarrying areas are matters of some concern to my Client.

Q2a timescale

We would wish to see the timing to be in accord with Welsh Government guidance.

Q3ch

The inclusion of both the Chartered Institute of Building and Home Builders Federation is supported.

Appendix 10

Q1

The summary refers to "quarrying is coming to an end". Such activity remains a significant and important business not only to Anglesey and Gwynedd but also the Region with the need to protect permitted resources and adjoining future extensions.

Q5

SP1 fails to include minerals which needs to be remedied regardless of the reference to SP18.

PS14 Concerning and Enhancing the Natural Environment

My Client wishes to repeat his strongly held views that to designate the Nantlle Valley as a Special Landscape Area would be detrimental to the local economy which factor should be borne in mind in the detailed consideration of the possible adverse effects of such designation.

PS17 Waste Management

The waste hierarchy should include a provision for the appropriate use of suitable inert waste arising to be employed in the prudent restoration of previously disturbed land.

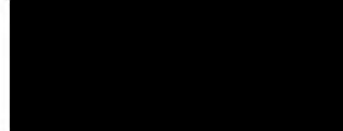
PS18 Minerals – Slate Waste

The summary relating to the rail connection at Bleanau Ffestiniog does not portray the total facts of the matter. Yes there is a passenger rail connection but the rail infrastructure itself is unsuitable for the passage of heavy goods wagons which remedial works would require major expenditure.

Should there be any points arising then please do not hesitate to contact the writer.

Yours sincerely

SLR Consulting Limited



John Hill

Principal

On behalf of Ty Mawr West Ltd

	 <p>CYNGOR SIR YNYS MON ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p>For office use only:</p> <p>Representor No. 3076/891</p> <p>Date received: 27/3/15 Morr</p> <p>Date acknowledged:</p>
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**Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026
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PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	Friends of Borth-y-Gest	Tom Brooks, Joint Secretary
Address	[REDACTED]	
Postcode		
Telephone Number		
Email address		

1

The Friends of Borth-y-Gest is a long established organisation for residents and others with close connections with the locality. All residents are entitled to be members and others accepted as members are included in a mailing list. A committee is elected annually at a General Meeting. The committee has approved this submission.

1

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

2a. Which part of the Deposit Plan are you commenting on?	
Policy number (please specify)	PS16 and AMG 4
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	

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

<p>2c. Please provide details of your representation on the Deposit Plan.</p> <p>Policy PS16 and AMG 4 - Conserving and enhancing the natural environment is a policy that we strongly support. We are not comfortable that the sites of local importance to Borth-y-Gest, namely the local nature reserves of Parc y Borth and Pen y Banc, and their adjacent ecological continuums are identified appropriately, in accordance with AMG 4 local biodiversity conservation.</p> <p>We note that the Gwynedd Unitary Development Plan recognised the value of local nature reserves to the community specifically by recording:</p> <p style="padding-left: 40px;">“In addition to these National Nature Reserves sites there are locally designated sites in the county, these have a lower level of protection, but their designation still marks them out as important for nature conservation, and are often locations for environmental education.”</p> <p>POLICY B16 (As originally numbered) - PROTECTING SITES OF REGIONAL OR LOCAL SIGNIFICANCE stated “Proposals likely to have a direct or indirect unacceptable impact on a Local Nature Reserve (LNR)¹, Non-statutory Nature Reserve (NsNR)² or Wildlife Site (WS) will be refused unless:” and “The Proposals Map and the relevant Inset Maps show those LNRs in existence when the Plan was published”.</p> <p>Table 23 is an important schedule of nature conservations designations but it makes no reference to local or non-statutory nature reserves. We believe that this omission should be rectified. Moreover the constraints map is too indistinct to identify features definitively, but it is uncertain that Parc y Borth is clearly identified as a local nature reserve and it seems certain that Pen y Banc is not marked as a nature reserve. We would like these omissions corrected also.</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.

Table 23 is an important schedule of nature conservations designations but it should be amended to make a clear reference by name to all local or non-statutory nature reserves.

The constraints map as published is too indistinct to identify features definitively, leaving it uncertain that Parc y Borth is clearly identified as a local nature reserve and apparently not marking Pen y Banc as a nature reserve. Clearer versions of the maps that Gwynedd Council have provided to us for reference should be formally included in the 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 checked="" type="checkbox"/>	C2	<input type="checkbox"/>	C3	<input checked="" 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"/>

3090/805

3090-805-PS16

31/3/15 ebaa
Cynllun Rheoli AHNE

Cydbwyllgor Ymgynghorol Ardal o Harddwch Naturiol Eithriadol Llŷn

Dynodwyd Ardal o Harddwch Naturiol Eithriadol (AHNE) Llŷn yn 1957 o dan Ddeddf Parciau Cenedlaethol a Mynediad i Gefn Gwlad 1949. AHNE Llŷn oedd yr 3ydd ardal i'w dynodi drwy Gymru, Lloegr a Gogledd Iwerddon.

Sefydlwyd Cydbwyllgor Ymgynghorol Ardal o Harddwch Naturiol Eithriadol Llŷn yn 1997 yn dilyn cyfarfod rhwng Cyngor Gwynedd, Cyngor Cefn Gwlad Cymru ac amrywiol sefydliadau eraill. Un o gyfrifoldebau'r Cydbwyllgor yw cyngor ar Gynlluniau Datblygu, strategaethau a rhaglenni gwaith yr awdurdod lleol a chyrrff eraill i'r graddau eu bod yn ymwneud â'r AHNE.

Yn y cyfarfod o'r Cydbwyllgor Ymgynghorol AHNE Llŷn a gynhaliwyd ar 25ain o Fawrth 2015 trafodwyd y Cynllun Datblygu Lleol Gwynedd a Môn 2011-26 a gwnaed y sylwadau canlynol:

1. **AHNE** - nid oes polisi penodol o ran cynnal a gwarchod yr AHNE. Yn hytrach mae polisiâu cyffredinol a chyfeiriad at ddeddwriaeth a pholisi cenedlaethol. Credir fod angen polisi penodol ar gyfer cynnal a chadw'r AHNE, tebyg i Bolisi B8 yn y Cynllun presennol.
2. **AMG 1** - Ardaloedd Tirwedd Arbennig. Mewn rhai mannau mae'r ardal yma (ATA Gorllewin Llŷn) yn ffinio gyda AHNE Llŷn ac yn creu gwarchodiad i osodiad yr AHNE. Fodd bynnag, mae rhai rhannau o'r AHNE heb y warchodaeth yma. Credir felly dylid cyfeirio at warchod gosodiad yr AHNE yn y polisiâu perthnasol felly (gweler 5 isod).
3. **AMG 2** - Mae'n bolisi canmoladwy ond braidd yn gymhleth a chredir y gall fod yn anodd ei weithredu.
4. **AMG 3** - Dynodiad lleol yw'r Arfordir Treftadaeth sydd yn dilyn ffin arfordirol yr AHNE i raddau helaeth yn Llŷn. Credir y dylai'r polisi adlewyrchu'r dynodiad yn fwy cadarnhaol drwy roi mwy o warchodaeth i'r AT.
5. **Polisi ADN 1** – Ynni Gwynt ar y Tir. Anghytunir â'r polisi:
 - Credir y dylid cadw at y polisi presennol (C26) o ddim tyrbinau yn yr AHNE.
 - Hefyd peidio a chaniatau tyrbeini uwch na 11m o fewn gwelededd yr AHNE.
 - Dylid defnyddio'r term "tyrbin" yn hytrach na "melin" sydd yn wahanol.
 - Credir y dylai maen prawf 2 gyfeiro at warchod gosodiad yr AHNE.
 - Mae pryder am y categorïau a dynodi datblygiadau dan 5MW fel rhai "Bach".
6. **Polisi ADN 2** – Technoleg Ynni Adnewyddadwy arall. Credir fod y polisi hwn yn rhy benagored o ran cynigion tu allan i ffiniau datblygu a dylid ei gryfhau.
7. **Polisi TWR 3** - Carafanau Sefydlog a Siale a Llety Gwersylla Amgen Parhaol. Cefnogir y polisi hwn gan y bwriedir gwrthod safleoedd newydd ac estyniadau o fewn yr AHNE a'r ATA.

8. **Polisi TWR 4** – Deiliadaeth Gwyliau. Roedd pryder am ganiatáu i safleoedd carafannau sefydlog/ sialetau fod yn agored 12 mis y flwyddyn. Heb adnoddau digonol i ellir monitro'r sefyllfa a mae posibilrwydd o fyw'n barhaol yn yr unedau – heb dalu trethi.
9. **Polisi TWR 5**- Safleoedd Carafannau Teithiol, Gwersylla a Llety Gwersylla Amgen dros dro. Roedd aelodau wedi sylw fod cynydd mewn ceisiadau a chryn bwysedd gan y math yma o ddatblygiad yn ardal Llŷn. Gofynwyd os sail i'r polisi ac oedd yna ddadansoddiad o gynydd mewn unedau/ effaith datblygiadau newydd wedi ei wneud? Credir y dyliai'r polisi fod yn fwy caeth oddi mewn, a gerllaw, yr ardal ddynodedig.
9. **Polisi PCYFF 2 – Dylunio a Siapio** – credir y dylai fod cyfeiriad penodol at ddylunio safonol sy'n gweddu i'r cyd-destun yn yr AHNE.
10. **Gorfodaeth.** Credir fod angen blaenoriaeth i fonitrio cydymffurfiaeth hawl cynllunio, amodau cynllunio, amodau tirweddu ac amodau preswyliaeth.
11. **Cynllun Rheoli'r AHNE** – mae hwn yn gynllun statudol a chreir y dylai fod cyfeiriad penodol ato yn y polisiâu perthnasol. *PS 16?*
12. **Tai newydd.** Roedd pryder am lefel y ddarpariaeth dai yn ardal Llŷn ac effaith posibl hynny ar y gymdeithas a lles yr Iaith Gymraeg. Yn benodol roedd pryder am y-ddarpariaeth ym Motwnnog a Phwllheli sydd yn ymddangos yn ormodol o ystyried maint a chymeriad yr anheddleodd.

Cydbwyllgor Ymgynghorol Ardal o Harddwch Naturiol Eithriadol Llŷn

Dynodwyd Ardal o Harddwch Naturiol Eithriadol (AHNE) Llŷn yn 1957 o dan Ddeddf Parciau Cenedlaethol a Mynediad i Gefn Gwlad 1949. AHNE Llŷn oedd yr 3ydd ardal i'w dynodi drwy Gymru, Lloegr a Gogledd Iwerddon.

Sefydlwyd Cydbwyllgor Ymgynghorol Ardal o Harddwch Naturiol Eithriadol Llŷn yn 1997 yn dilyn cyfarfod rhwng Cyngor Gwynedd, Cyngor Cefn Gwlad Cymru ac amrywiol sefydliadau eraill. Un o gyfrifoldebau'r Cydbwyllgor yw cyngor ar Gynlluniau Datblygu, strategaethau a rhaglenni gwaith yr awdurdod lleol a chyrrff eraill i'r graddau eu bod yn ymwneud â'r AHNE.

Yn y cyfarfod o'r Cydbwyllgor Ymgynghorol AHNE Llŷn a gynhaliwyd ar 25ain o Fawrth 2015 trafodwyd y Cynllun Datblygu Lleol Gwynedd a Môn 2011-26 a gwnaed y sylwadau canlynol:

1. **AHNE** - nid oes polisi penodol o ran cynnal a gwarchod yr AHNE. Yn hytrach mae polisiâu cyffredinol a chyfeiriad at ddeddwriaeth a pholisi cenedlaethol. Credir fod angen polisi penodol ar gyfer cynnal a chadw'r AHNE, tebyg i Bolisi B8 yn y Cynllun presennol.
2. **AMG 1** - Ardaloedd Tirwedd Arbennig. Mewn rhai mannau mae'r ardal yma (ATA Gorllewin Llŷn) yn ffinio gyda AHNE Llŷn ac yn creu gwarchodiad i osodiad yr AHNE. Fodd bynnag, mae rhai rhannau o'r AHNE heb y warchodaeth yma. Credir felly dylid cyfeirio at warchod gosodiad yr AHNE yn y polisiâu perthnasol felly (gweler 5 isod).
3. **AMG 2** - Mae'n bolisi canmoladwy ond braidd yn gymhleth a chredir y gall fod yn anodd ei weithredu.
4. **AMG 3** - Dynodiad lleol yw'r Arfordir Treftadaeth sydd yn dilyn ffin arfordirol yr AHNE i raddau helaeth yn Llŷn. Credir y dylai'r polisi adlewyrchu'r dynodiad yn fwy cadarnhaol drwy roi mwy o warchodaeth i'r AT.
5. **Polisi ADN 1** – Ynni Gwynt ar y Tir. Anghytunir â'r polisi:
 - Credir y dylid cadw at y polisi presennol (C26) o ddim tyrbinau yn yr AHNE.
 - Hefyd peidio a chaniatau tyrbeini uwch na 11m o fewn gwelededd yr AHNE.
 - Dylid defnyddio'r term "tyrbin" yn hytrach na "melin" sydd yn wahanol.
 - Credir y dylai maen prawf 2 gyfeiro at warchod gosodiad yr AHNE.
 - Mae pryder am y categorïau a dynodi datblygiadau dan 5MW fel rhai "Bach".
6. **Polisi ADN 2** – Technoleg Ynni Adnewyddadwy arall. Credir fod y polisi hwn yn rhy benagored o ran cynigion tu allan i ffiniau datblygu a dylid ei gryfhau.
7. **Polisi TWR 3** - Carafanau Sefydlog a Siale a Llety Gwersylla Amgen Parhaol. Cefnogir y polisi hwn gan y bwriedir gwrthod safleoedd newydd ac estyniadau o fewn yr AHNE a'r ATA.

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.