

Rhestr Wirio Sylwadau Cynllun Adnau

Cyfeirnod Person: 1169

Cyfeirnod y Sylw: 661

Dyddiad Derbyn: 30/3/15.

1) Mewnbynnu

A yw'r sylw ac atodiadau (sy'n cynnwys copi o'r ffurflen wreiddiol) wedi'i fewnbynnu i'r system JDi? Y / N

Dyddiad: 14/4/15..... Swyddog: M.

Oes angen crynhoad? Y / N

Ydy'r crynhoad yn gywir? Y / N (angen sicio fod y newid maent ei angen yn y crynhoad)

Dyddiad llythyr crynhoad sylwadau wedi'i yrru:.....

Dyddiad dderbyn ateb:.....

Dyddiad addasu'r crynhoad mewn ymateb i sylwadau'r gwrthwynebydd

2) Cyfieithu

Dyddiad gyrru i'r Uned Cyfieithu: 24/4/15.....

Dyddiad dderbyn y cyfieithiad:

A yw'r cyfieithiad wedi'i fewnbynnu i'r system JDi? Y / N Dyddiad:

3) Cadarnhau'r Sylw

A yw'r sylw wedi ei gadarnhau ar y System JDi? Y / N Dyddiad:

Nodyn:

REP NO: 661

10: 1189

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<i>For office use only:</i>
	<p>NEED TO SCAN</p>	<i>Representor No.</i>
		<i>Date received: 30/3/15</i>
		<i>Date acknowledged:</i>

**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	[REDACTED]	
Address	CPRW/Campaign for Protection of Rural Wales, [REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	
Email address	[REDACTED]	

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 6 Renewable Energy Strategies
Policy number (please specify)	PS6, PS7
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"/> Support

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

6. Renewable Energy

6.1 Support for Strategic Policy PS6: We agree that tackling climate change and reducing carbon emissions is a key objective. We support the ‘energy hierarchy’ concept proposed in **PS6** (Alleviating and Adapting to the Effects of Climate Change) where ranked priority is given to (1) Reducing need (2) Efficient use and supply, before (3) Using renewable energy. We also agree that renewable energy should be used wherever ‘*practical and viable*’ and should be ‘*consistent with the need to engage and involve local communities, protect visual amenities, the natural, built and historic environment and the landscape*’.

6.2 Support for Strategic Policy PS7: We also support the principles laid out in **PS7** (Renewable Energy Technology) which prescribe that renewable energy installations should not individually or cumulatively compromise the objectives of designated protected landscape areas, *including areas ‘visible beyond their boundaries’, and ‘especially with regard to landscape character, visual impact and residential amenity’.* Elsewhere, we agree that installations should not cause ‘*significant demonstrable harm, either individually or cumulatively, to landscape character, biodiversity or residential amenity.*’

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.

2dd. Is the Deposit Plan sound?

Yes 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

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

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

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

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

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

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

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

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

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

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **126**

Enw / Name: **Home Builders Federation Ltd (Mr Mark Harris) [1470]**

Rhan: **POLISI STRATEGOL PS6**

Section: **STRATEGIC POLICY PS6**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Nid yw'n glir sut mae'r gofynion hyn yn cysylltu â Rheoliadau Adeiladu. Os ydynt, fel mae'n ymddangos, yn edrych ar gael safonau uwch na Rheoliadau Adeiladu yna mae hyn yn debygol o gael effaith ar hyfywedd cynllun. A roddwyd caniatâd yn y cynllun ar gyfer effaith ariannol cwrdd â'r gofynion hyn wrth brofi hyfywedd darparu tai/tai fforddiadwy?Darparu eglurhad.

Representation Summary:

It is not clear how these requirements link to Building Regulations. If as appears they may be looking to achieve higher standards than Building Regulations then this is likely to affect the viability of a scheme. Has the financial impact of meeting these requirements been allowed for in the viability testing of housing/affordable housing delivery?

Provide clarification.

Sylw Llawn / Full Representation:

It is not clear how these requirements link to Building Regulations. If as appears they may be looking to achieve higher standards than Building Regulations then this is likely to affect the viability of a scheme. Has the financial impact of meeting these requirements been allowed for in the viability testing of housing/affordable housing delivery?

Newid(iadau) i'r Cynllun

Ychwanegu eglurder

Change(s) to the Plan

Provide clarification.

Profion Cadernid / Soundness Tests: None

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 nyraniadau TRA1, C14 a C15 a phrin yw'r dystiolaeth yn y cynllun i ddangos bod paragraff 4.10 wedi cael ei ystyried o gwbl wrth ddyrannu'r safleoedd hyn ar gyfer datblygu.

4. Ynni Adnewyddadwy

Mae Asesiad Effaith Ynni Adnewyddadwy wedi'i gynnal yn y ddwy ardal. Er hynny, nid yw'r Cynllun Adnau yn manteisio ar y cyfle i ystyried y cyfraniad y gallai'r ardal ei wneud at ddatblygu a hwyluso ynni adnewyddadwy a charbon isel ac i gynllunio'n bositif ar gyfer datblygiad addas. Mae angen ystyried yn fanylach sut i droi'r dystiolaeth yn set o bolisiau sy'n llywio datblygu addas. Er enghraifft, a allai'r asesiadau roi dystiolaeth 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.

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 ynglŷn 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.

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

Spatial distribution of employment land

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

Employment provision

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

Policy CYF1 "Safeguarding and Allocating Land and Units for Employment Use" -

Further clarification is required to explain why it is considered that over 800ha (excluding Wylfa) of land is required to be safeguarded for the plan period. Paragraph 7.3.23, states that the employment land review estimated a need of approximately 12 ha for the authorities over the plan period. This would equate to a need of approximately 180ha of employment land over the whole plan period. It is therefore unclear why the plan makes provision for approximately 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 180ha over the plan period. Further clarification is necessary to explain how the supporting assessment work, especially the Welsh Language Impact Assessment (WLIA) has taken account of this over-allocation. Some background information has been included on upskilling residents in both authorities (especially in relation to the new Wylfa proposed development) but what kind of jobs are the authorities expecting for these allocated sites? Are the required skills available locally, or would this encourage job migration into the area and increase pressure on housing/ Welsh language?

Best and Most Versatile Agricultural land

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

4. Renewable Energy

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

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

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

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

I. Deliverability

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

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

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

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

Rhestr Wirio Sylwadau Cynllun Adnau

Cyfeirnod Person: 15861

Cyfeirnod y Sylw: 1057

Dyddiad Derbyn: 31/3/15

1) Mewnbynnu

A yw'r sylw ac atodiadau (sy'n cynnwys copi o'r ffurflen wreiddiol) wedi'i fewnbynnu i'r system JDi? ~~Y/N~~ Y N

Dyddiad: 8/5/15 Swyddog: 

Oes angen grynhoad? Y N

Ydy'r crynhoad yn gywir? Y N (angen sicio fod y newid maent ei angen yn y crynhoad)

Dyddiad llythyr crynhoad sylwadau wedi'i yrru:.....

Dyddiad dderbyn ateb:

Dyddiad addasu'r crynhoad mewn ymateb i sylwadau'r gwrthwynebydd

2) Cyfieithu

Dyddiad gyrru i'r Uned Cyfieithu:

Dyddiad dderbyn y cyfieithiad:

A yw'r cyfieithiad wedi'i fewnbynnu i'r system JDi? Y N Dyddiad: 10/5/15

3) Cadarnhau'r Sylw

A yw'r sylw wedi ei gadarnhau ar y System JDi? Y / N Dyddiad:

Nodyn:

15/16

1057
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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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.

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

C. Mewn perthynas â'r profion cadernid CE2, CE3, CE4: Er na thybir eu bod yn faterion o bwysigrwydd sylfaenol i gadernid yr CDLI, rydym o'r farn bod diffyg sicrwydd neu eglurder ynglŷn 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.

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **398**

Enw / Name: **Dwr Cymru Welsh Water (Mr Dewi Griffiths) [2680]**

Rhan: **POLISI STRATEGOL PS6**

Section: **STRATEGIC POLICY PS6**

Math / Type: **Cefnogi / Support**

Crynodeb o'r Sylw:

Mae Dŵr Cymru'n cefnogi cynnwys y polisi hwn a'r gofyn i ddatblygwyr anelu am y safon uchaf bosib o ran effeithlonrwydd dŵr a defnyddio systemau draenio addas. Mae mynd i'r afael â dŵr wyneb yn y man mae'n tarddu yn elfen hanfodol o ddatblygu cynaliadwy a bydd yn mynd yn bell iawn i liniaru yn erbyn carthffosydd sydd wedi gorlwytho a all, yn y pen draw, arwain at lifogydd. Mae Deddf Rheoli Llifogydd a Dŵr 2010 yn ategu'r rhwymedigaethau i ddatblygwyr ymgorffori systemau draenio cynaliadwy fel rhan o'u datblygiadau.

Representation Summary:

DCWW support the inclusion of this policy and the requirement placed upon developers to aim for the highest possible standard in terms of water efficiency and the use of sustainable drainage systems. The tackling of surface water at source is a vital component of sustainable development and will go a long way to mitigate against overloading sewers which can ultimately lead to flooding. The Floods and Water Management Act 2010 reinforces the obligations for developers to incorporate sustainable drainage systems as part of their developments.

Sylw Llawn / Full Representation:

DCWW support the inclusion of this policy and the requirement placed upon developers to aim for the highest possible standard in terms of water efficiency and the use of sustainable drainage systems. The tackling of surface water at source is a vital component of sustainable development and will go a long way to mitigate against overloading sewers which can ultimately lead to flooding. The Floods and Water Management Act 2010 reinforces the obligations for developers to incorporate sustainable drainage systems as part of their developments.

Newid(iadau) i'r Cynllun

Change(s) to the Plan

Profion Cadernid / Soundness Tests: None

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **169**

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

Rhan: **POLISI STRATEGOL PS6**

Section: **STRATEGIC POLICY PS6**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Unwaith eto nid oes diffiniad yn y polisi cyffredinol yn nodi lle mae'n berthnasol iddo. Os ystyrir ei fod yn berthnasol i safleoedd cloddio mwynau, awgrymu newidiadau fel y nodir isod.

Representation Summary:

Again general policy lacking definition of where it applies. If considered applies to mineral extraction sites suggest changes as set out below.

At point 6 start "Where possible ..."

At point 10 start "Where possible ..."

Sylw Llawn / Full Representation:

Again general policy lacking definition of where it applies. If considered applies to mineral extraction sites suggest changes as set out below.

Newid(iadau) i'r Cynllun

Suggest a hierarchy for assessing effects of development proposals and notwithstanding other policies in th

Change(s) to the Plan

Suggest a hierarchy for assessing effects of development proposals and notwithstanding other policies in the development plan.

At point 6 start "Where possible ..."

At point 10 start "Where possible ..."

Profion Cadernid / Soundness Tests: None

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **170**

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

Rhan: **POLISI STRATEGOL PS6**

Section: **STRATEGIC POLICY PS6**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Unwaith eto nid oes diffiniad yn y polisi cyffredinol yn nodi lle mae'n berthnasol iddo. Os ystyrir ei fod yn berthnasol i safleoedd cloddio mwynau, awgrymu newidiadau fel y nodir isod.

Representation Summary:

Again general policy lacking definition of where it applies. If considered applies to mineral extraction sites suggest changes as set out below.

At point 6 start "Where possible ..."

At point 10 start "Where possible ..."

Sylw Llawn / Full Representation:

Again general policy lacking definition of where it applies. If considered applies to mineral extraction sites suggest changes as set out below.

Newid(iadau) i'r Cynllun

Suggest a hierarchy for assessing effects of development proposals and notwithstanding other policies in th

Change(s) to the Plan

Suggest a hierarchy for assessing effects of development proposals and notwithstanding other policies in the development plan.

At point 6 start "Where possible ..."

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Profion Cadernid / Soundness Tests: None

Strategic Policy PS6: Alleviating and adapting to the effects of climate change

Bourne Leisure welcomes Strategic Policy PS6 relating to climate change and flooding respectively. Bourne Leisure supports proposals which address the present and increasing threat of climate change, and notes the precautionary framework within TAN15, which directs new development away from those areas which are at high risk of flooding.

However, Bourne Leisure considers that the Local Plan should recognise that specific uses, such as tourism uses, are often already sited on the coast or in river floodplains and that such uses require to be located adjacent to water in order to continue to attract visitors. The Local Plan should therefore allow for proposals for the improvement/expansion of existing tourism accommodation and facilities to be considered on a more flexible basis to new developments in such locations; such flexible considerations should include taking account of the specific characteristics of particular and current uses and the merits of each individual proposal, as it relates to the existing development.

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

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

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **451**

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

Rhan: **POLISI STRATEGOL PS6**

Section: **STRATEGIC POLICY PS6**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Dylia'r Cynllun Lleol gydnabod bod defnyddiau penodol, fel twristiaeth, yn defnyddio ac mae nhw'n aml wedi eu lleoli'n barod ar yr arfordir neu mewn parth llifogydd afon a bod defnyddiau o'r math yma angen eu lleoli ger yr afon er mwyn cario'n mlaen i ddenu ymwelwyr. Fe ddylia Cynllun Lleol felly ganiatau cynigion am wellianau/ estyniadau i lety ymwelwyr a chyfleusterau i'w hystyried yn fwy hyblyg o'i gymharu a datblygiad newydd mewn lleoliadau o'r math yma.

Representation Summary:

The Local Plan should recognise that specific uses, such as tourism uses, are often already sited on the coast or in river floodplains and that such uses require to be located adjacent to water in order to continue to attract visitors. The Local Plan should therefore allow for proposals for the improvement/expansion of existing tourism accommodation and facilities to be considered on a more flexible basis to new developments in such locations.

Sylw Llawn / Full Representation:

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Newid(iadau) i'r Cynllun

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Sylwadau Dros y We / Representations via the Internet

Change(s) to the Plan

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Profion Cadernid / Soundness Tests: iv

Strategic Policy PS6: Alleviating and adapting to the effects of climate change

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