



SYLWADAU NMC090 COMMENTS

GWRTHWYNEBU / OBJECT

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p>Defnydd swyddfa yn unig/ Office use only</p> <p>Rhif Cyn./Rep No.:</p> <p>Derbyniwyd/Received:</p> <p>Cydnabod/Acknowledged</p>
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Cynllun Datblygu Lleol ar y Cyd Ynys Môn a Gwynedd 2011-2026

FFURFLEN SYLWADAU NEWIDIADAU MATERION SY'N CODI /

Anglesey and Gwynedd Joint Local Development Plan 2011-2026

MATTERS ARISING CHANGES COMMENTS FORM

26/1/17.

RHAN 2: Eich Sylwadau a Newidiadau a Awgrymir

PART 2: Your Comments and Suggested Changes

Eich enw/Sefydliad:

Your name/Organisation: Helen Ashby-Ridgway / Lichfields

1. Ar ba un o'r Newidiadau Materion sy'n Codi yr ydych chi'n gwneud sylwadau? (Cofiwch ddefnyddio un ffurflen ar gyfer pob sylw)

1. Which of the Matters Arising Changes are you commenting on? (Remember to use one form for each representation)

Rhif y Newid Materion sy'n Codi (NMC)	NMC 90	Cefnogi/ Support	<input type="checkbox"/>	Gwrthwynebu/ Object	<input checked="" type="checkbox"/>
Matters Arising Change Number (NMC)					

2. Cyn i chi esbonio eich sylwadau'n fanwl, byddai'n dda gwybod os ydych yn credu fod y Cynllun yn gadarn ai pheidio, o ganlyniad i'r Newidiadau Materion sy'n Codi, neu a ydych o'r farn bod rhannau ohono neu bob rhan ohono ddim yn gadarn a bod angen ei newid.

I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd. Os ydych yn ansicr, gadewch y rhan yma yn wag.

2. Before you set out your comments in detail, it would be helpful to know whether you think that, as a result of the Matters Arising Changes, the Plan is sound or that all or parts of it are unsound.

For more information on soundness and procedural requirements, see the guidance notes. If you are unsure, leave this section blank.

Cadarn/Sound	■	Dim yn gadarn a dylid ei newid /Unsound and should be changed	■
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3. Rhowch eich sylwadau isod gan ddefnyddio tudalennau ychwanegol fel bo angen. Dylech roi eich sylwadau chi'n llawn. Bydd hynny'n helpu'r Awdurdod a'r Arolygydd i ddeall y materion y byddwch yn eu codi. Ni fyddwch chi'n cael cyflwyno rhagor o wybodaeth gerbron yr Archwiliad oni fydd yr Arolygydd yn eich gwahodd chi i egluro unrhyw faterion y bydd yn godi.

Rhowch wybod os ydych chi'n cyflwyno deunyddiau eraill i ategu eich sylwadau.

3. Please set out your comments below using additional sheets as necessary. Your comments should be set out in full. This will help the Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the Examination if the Inspector invites you to address matters that he may raise. Please indicate if you are submitting other material to support your comments.

Draft Policy PCYFF 4 (NMC 90) states:

“Proposals will need to demonstrate how the energy hierarchy set out in Policy PS 6 has been applied and how the contribution from renewable or low carbon energy to satisfy the proposals need for energy and waste has been maximised.” (MAC in bold)

Whilst Bourne Leisure firmly supports sustainable development, the Company considers that the approach to renewable or low carbon energy should be proportionate to the impact of the proposed development. As it is currently worded, this draft policy provides a “one-size-fits-all” approach, which would be onerous for smaller development proposals. The Company therefore requests that draft Policy PCYFF 4 is amended as follows:

“Proposals which will result in a significant demand for energy will need to demonstrate how the energy hierarchy set out in Policy PS 6 has been applied and how the contribution from renewable or low carbon energy to satisfy the proposals need for energy and waste has been maximised.” (MAC in bold, proposed amendments in bold and underlined)

Bourne Leisure is also concerned with the following provision in the amended draft Policy PCYFF 4 (NMC 90):

“Residential development on sites for 100 housing units or more, and non-residential development of 100 sq. metres or more, will be required to submit a comprehensive Energy Assessment to determine the feasibility, including viability issues, of incorporating renewable or low carbon technology and/ or, where appropriate, connect to renewable or low carbon technology.” (MAC in bold)

Bourne Leisure considers that the threshold of 100 sqm for non-residential development for the requirement for an Energy Assessment is too low and would apply to very small developments. Furthermore, the requirement for a “comprehensive assessment” would be disproportionate to the scale of many smaller developments. The Company therefore requests that this threshold is increased to at least 1,000 sq m (to accord with the definition of major development) but provides flexibility to take into account the nature of the proposed non-residential development.

Bourne Leisure considers that, as drafted, emerging Policy PCYFF 4 does not meet the second soundness test (is the plan appropriate?) because it is not proportionate and does not take a logical, balanced approach in relation to the requirements for energy assessment.



4. Os yw eich sylw yn 3 yn fwy na 100 o eiriau, darparwch grynodeb os gwelwch yn dda (dim mwy na 100 o eiriau.

4. If your response to 3 above exceeds 100 words, please provide a summary (no more than 100 words).

As it is currently worded, this draft policy provides a “one-size-fits-all” approach, which would be onerous for smaller development proposals.

The threshold of 100 sqm for non-residential development for the requirement for an Energy Assessment is too low and would apply to very small developments. Furthermore, the requirement for a “comprehensive assessment” would be disproportionate to the scale of many smaller developments.

This threshold should be increased to at least 1,000 sq m (to accord with the definition of major development) but provide flexibility to take into account the nature of the proposed non-residential development.

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MATTERS ARISING CHANGES COMMENTS FORM
26/1/17.

PART 2: Your Comments and Suggested Changes

Your name/Organisation: [REDACTED] Home Builders Federation

1. Which of the Matters Arising Changes are you commenting on? (Remember to use one form for each representation)

Rhif y Newid Materion sy'n Codi (NMC) <i>Matters Arising Change Number (NMC)</i>	90	Cefnogi/ <i>Support</i>	<input type="checkbox"/>	Gwrthwynebu/ <i>Object</i>	<input checked="" type="checkbox"/>
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2. Before you set out your comments in detail, it would be helpful to know whether you think that, as a result of the Matters Arising Changes, the Plan is sound or that all or parts of it are unsound. For more information on soundness and procedural requirements, see the guidance notes. If you are unsure, leave this section blank.

Cadarn/ <i>Sound</i>	<input type="checkbox"/>	Dim yn gadarn a dylid ei newid <i>/Unsound and should be changed</i>	<input type="checkbox"/>
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3. Please set out your comments below using additional sheets as necessary. Your comments should be set out in full. This will help the Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the Examination if the Inspector invites you to address matters that he may raise. Please indicate if you are submitting other material to support your comments.

Object as it is not clear where the figure of 100 has come from, what evidence supports the need for such a detailed assessment on site of this size and over? The Impact will be dependent on the scale of the development in relation to the settlement in which it is planned to take place, although setting a threshold is helpful to developers as they can factor in the requirement.

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

4. If your response to 3 above exceeds 100 words, please provide a summary (no more than 100 words).

PART 3: What happens next?

All comments received by the closing date will be forwarded directly to the Inspector for consideration. Just in case the Inspector decides that further hearing sessions are necessary please indicate whether you would want to speak at a session. It is important to note that written comments will be given the same weight by the Inspector as those made verbally at a hearing session.

5. 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.

6. 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.

7. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard. (Please tick one of the following boxes)

Hoffwn i gael fy nghlywed yn Gymraeg
I wish to be heard in Welsh

Hoffwn i gael fy nghlywed yn Saesneg
I wish to be heard in English

DIOLCH AM EICH SYLWADAU / THANK YOU FOR YOUR COMMENTS