

SYLWADAU NMC101 COMMENTS

CEFNOGI / SUPPORT



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-29180-JOY0
Eich cyf/Your ref:

Maes y Ffynnon
Penrhosgarnedd
Bangor
Gwynedd
LL57 2DW

SNMC020

Ebost/Email:
angharad.crump@cyfoethnaturiolcymru.gov.uk
Ffôn/Phone: 03000 655 232

Miss Nia Haf Davies,
Uned Polisi Cynllunio ar y Cyd,
Swyddfeydd Cyngor Dinas Bangor,
Ffordd Gwynedd,
Bangor,
Gwynedd,
LL57 1DT

10/02/2017

Dear Miss Davies,

Matters Arising Changes Schedule – Ynys Mon and Gwynedd Joint Local Development Plan (LDP)

Thank you for forwarding the Matters Arising Change Schedule to us for the Ynys Mon and Gwynedd Joint Local Development Plan (LDP) which was received on the 25th January 2017.

We have the following comments on the Matters Arising Change Schedule Written Statement, Proposals Maps, Habitats Regulation Assessment and Strategic Appraisal Report.

Matters Arising Change Schedule – Written Statement

- *NMC 101 ADN 1*

We note the amendments to criteria i) and ii). As identified in the document we consider that the amendment ensures that the policy reflect the higher level of protection afforded to national and international biodiversity and landscape designations.

- *NMC 110 New Policy ADN 1A*

We note and welcome the inclusion of new policy ADN 1A to provide a framework to address proposals for PV solar energy.

We are satisfied with the wording of the policy but would suggest that policy criteria 1) also refers to the need for proposals to demonstrate how the mitigation measures incorporated into the scheme will be managed for the life of the development.

- *NMC 115 ADN 2*

We note and welcome the amendments to policy ADN 2 to better align with Policy PS 7.





CYNGOR SIR
YNYS MÔN
ISLE OF ANGLESEY
COUNTY COUNCIL

Defnydd swyddfa yn unig/ Office use only

Rhif Cyn./Rep No.:

Derbyniwyd/Received:

Cydnabod/Acknowledged

**Cynllun Datblygu Lleol ar y Cyd Ynys Môn a Gwynedd 2011-2026
FFURFLEN SYLWADAU I NEWIDIADAU MATERION SY'N CODI/
Anglesey and Gwynedd Joint Local Development Plan 2011-2026
MATTERS ARISING CHANGES COMMENTS FORM
26/1/17.**

Mae'r Cyngorau yn ymgynghori ar nifer o Newidiadau Materion sy'n Codi o ganlyniad i Sesiynau Gwrandawriad o Archwiliad Cynllun Datblygu Lleol ar y Cyd Gwynedd a Môn. Mae'r newidiadau hyn wedi eu rhoi yn y ddogfen ymgynghori: 'Cofrestr Newidiadau Materion sy'n Codi' (Ionawr 2017).

Sylwer bod RHAID i sylwadau ymwneud â'r Newidiadau Materion sy'n Codi yn unig, ac nid am agweddau eraill o'r Cynllun Datblygu Lleol ar y Cyd. Mae'r sylwadau a wnaethpwyd yn ystod y cyfnod Adnau, ynghyd â'r Newidiadau â Ffocws, eisoes wedi cael eu cyflwyno i'r Arolygydd ac felly dim ond ar gyfer gwneud sylwadau am y Newidiadau Materion sy'n Codi dylid defnyddio'r ffurflen hon. Bydd pob sylw arall yn cael eu hanwybyddu.

Dylid defnyddio'r ffurflen hon ar gyfer yr holl sylwadau (h.y. sylwadau neu wrthwynebiadau). Mae fersiynau electronig ar gael ar www.gwynedd.llyw.cymru/cdli neu www.ynysmon.gov.uk/cdli. Os ydych yn cyflwyno copi papur, dylech atodi tudalennau ychwanegol lle bod angen, gan nodi rhif y dudalen yn glir. **Dylech lenwi ffurflenni ar wahân ar gyfer pob sylw** yr hoffech ei wneud.

Mae'n rhaid derbyn eich sylwadau ddim hwyrach na hanner nos ar y 9 Mawrth 2017. NI FYDD SYLWADAU A DDERBYNNIR AR ÔL Y DYDDIAD YMA YN CAEL EU HYSTYRIED

Dychwelwch y ffurflenni i: **Uned Polisi Cynllunio ar y Cyd, Llawr 1af Swyddfa Cyngor Dinas Bangor, Ffordd Gwynedd, Bangor, Gwynedd, LL57 1DT neu polisicynllunio@gwynedd.llyw.cymru**

Diogelu Data - Bydd yr holl sylwadau ar gael i'w harchwilio gan y cyhoedd ac ni ellir eu hystyried yn gyfrinachol. Serch hynny, i sicrhau diogelwch data bydd manylion personol yn cael eu tynnu allan o'r dogfennau fydd ar gael yn gyhoeddus.

Mae'n bosib derbyn ffurflenni sylwadau ychwanegol gan yr Uned Polisi Cynllunio ar y Cyd drwy ffonio 01286 685003/ 679668 neu gellir eu llawr lwytho o wefan y Cyngor yn: www.gwynedd.llyw.cymru/cdli neu www.ynysmon.gov.uk/cdli neu gallwch lungopio'r ffurflen hon.

The Councils are consulting on a number of Matters Arising Changes as a result of the Hearing Sessions from the Examination of the Anglesey and Gwynedd Joint Local Development Plan. These changes are set out in the consultation document: 'Schedule of Matters Arising Changes (January 2017).

Please note that representations MUST relate only to the Matters Arising Changes, and not to other aspects of the Joint Local Development Plan. All comments made at the Deposit stage, together with the Focus Changes, have already been submitted to the Inspector, therefore this form can only be used to comment on the Matters Arising Changes. All other representations will be disregarded.

This form should be used for all representations (i.e. comments or objections). Electronic versions are available at www.gwynedd.llyw.cymru/ldp or www.anglesey.gov.uk/ldp. If you are submitting a paper copy, attach additional sheets as necessary, clearly numbering each consecutive sheet. **Separate forms should be completed for each comment** that you wish to make.

Your representations must be received by no later than midnight on the 9 March 2017. REPRESENTATIONS RECEIVED AFTER THIS TIME WILL NOT BE CONSIDERED

Please return forms to: **Joint Planning Policy Unit, 1st Floor Bangor City Council Offices, Ffordd Gwynedd, Bangor, Gwynedd, LL57 1DT or planningpolicy@gwynedd.llyw.cymru**

Data Protection – All representations will be made available for public inspection and cannot be treated as confidential. However to ensure data protection personal details from publically accessible documents will be removed.

Additional representation forms can be obtained from the Joint Planning Policy Unit on 01286 685003/ 679668 or may be downloaded from the Council's web site at: www.gwynedd.llyw.cymru/ldp or www.anglesey.gov.uk/ldp or you may photocopy this form.

RHAN 1/PART 1: Manylion cyswllt : Contact details:		
	Eich manylion neu manylion eich cleient <i>Your details or your client's details</i>	Manylion yr Asiant (os yn berthnasol) <i>Agent's details (If relevant)</i>
Enw <i>Name</i>	[REDACTED]	
Sefydliad (os yn berthnasol) <i>Organisation (If relevant)</i>	CYFOETH NATURLIOL CYMRU	
Cyfeiriad <i>Address</i>	[REDACTED]	
Côd Post <i>Postcode</i>	[REDACTED]	
Ffôn <i>Tel:</i>	[REDACTED]	
E-bost <i>Email:</i>	[REDACTED]	
Llofnodwyd <i>Signed</i>	[REDACTED]	
Dyddiad <i>Date</i>	Ogled Thuetha 2017	

Rhowch eich sylwadau yn Rhan 2 y ffurflen hon. Defnyddiwch dudalennau ychwanegol os oes angen, gan nodi rhif y dudalen yn glir.


Please set out your comments in Part 2 of this form. Use additional sheets of paper where necessary, clearly numbering each consecutive sheet.

Dylech lenwi ffurflenni ar wahân ar gyfer pob sylw yr hoffech ei wneud.

Separate forms should be completed for each comment that you wish to make.

Os yw grŵp yn rhannu barn gyffredin ynghylch Newid Materion sy'n Codi, bydd y Cynghorau'n derbyn deiseb wedi'i llofnodi. Wrth gyflwyno ffurflen sylwadau ar ran grŵp, dylai'r ffurflen sylwadau gynnwys manylion cyswllt unigolyn arweiniol yn Rhan 1 a dylid nodi'r sylwadau'n glir ar y ffurflen sylwadau. Dylai'r ddeiseb sydd wedi'i llofnodi nodi'n glir faint o bobl sy'n cael eu cynrychioli a sut mae'r sylwadau wedi'u hawdurdodi. Nid yw llofnodi deiseb yn atal neb rhag cyflwyno ffurflenni unigol.

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

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p>Defnydd swyddfa yn unig/ <i>Office use only</i></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:	Cyfoeth Naturiol Cymru.

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) Matters Arising Change Number (NMC)	<input type="checkbox"/>	Cefnogi/Support	<input checked="" type="checkbox"/>	Gwrthwynebu/Object	<input type="checkbox"/>
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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	<input checked="" type="checkbox"/>	Dim yn gadarn a dylid ei newid /Unsound and should be changed	<input type="checkbox"/>
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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.

Gweler ein lythyr dyddedig i'fed Chwefra 2017
yghlun.

Defnyddiwch dudalennau ychwanegol os bydd angen.
Nodwch faint o dudalennau ychwanegol rydych wedi'u defnyddio.....
Please use additional sheet if necessary.
Please state how many additional sheets have been used.....

- 4. Os yw eich sylw yn 3 yn fwy na 100 o eiriau, darparwch grynodedb 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).

RHAN 3: Beth sy'n digwydd nesaf**PART 3: What happens next?**

Bydd pob un o'r sylwadau a dderbyniwyd o fewn y cyfnod ymgynghori yn cael eu hanfon ymlaen yn syth i'r Arolygydd. Rhag ofn bydd yr Arolygydd yn penderfynu dylid cynnal sesiynau gwrandawriad pellach mae angen i chwi nodi isod os ydych yn dymuno ymddangos gerbron yr Arolygydd a siarad mewn 'sesiwn gwrandawriad'. Serch hynny, mae'n bwysig nodi y bydd yr Arolygydd yn rhoi'r un pwysau i'r sylwadau ysgrifenedig yr ydych chi wedi eu cyflwyno ar y ffurflen hon â'r rheiny a wneir ar lafar mewn sesiwn gwrandawriad.

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. A ydych am i'ch sylwadau gael eu hystyried fel 'sylwadau ysgrifenedig' neu a hoffech siarad mewn sesiwn gwrandawriad yn yr Archwiliad Cyhoeddus? (Ticiwch un o'r isod)

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)

Nid wyf am siarad mewn sesiwn gwrandawriad ac rwyf yn fodlon i'm sylwadau ysgrifenedig gael eu hystyried gan yr Arolygydd. <i>I do not want to speak at a hearing session and am happy for my written comments to be considered by the Inspector.</i>	<input checked="" type="checkbox"/>
Hoffwn siarad mewn sesiwn gwrandawriad. <i>I want to speak at a hearing session.</i>	<input type="checkbox"/>

6. Os hoffech siarad, cadarnhewch pam rydych yn ystyried ei bod hi'n angenrheidiol i chi siarad yn y Gwrandawriad.

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. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith hoffech chi gael eich clywed? (Ticiwch un o'r isod)

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>I wish to be heard in Welsh</i>	<input type="checkbox"/>
Hoffwn i gael fy nghlywed yn Saesneg <i>I wish to be heard in English</i>	<input type="checkbox"/>

DIOLCH AM EICH SYLWADAU / THANK YOU FOR YOUR COMMENTS

Nodiadau cyfarwyddyd	Guidance notes
<p>Mae Cynllun Datblygu Lleol ar y Cyd Gwynedd a Môn yn cael ei archwilio ar hyn o bryd gan Arolygwyr annibynnol a benodwyd gan Lywodraeth Cymru. Gwaith yr Arolygwyr yw ystyried a yw'r Cynllun yn bodloni gofynion gweithdrefnol ac a yw'n gadarn.</p> <p>Gellir ystyried 'Cadarn' yn y cyd-destun hwn o fewn ei ystyr arferol o 'dangos barnu da' a 'gellir ymddiried ynddo'. Y cwestiynau neu'r 'profion' y bydd yr Arolygydd yn eu hystyried wrth benderfynu a yw'r Cynllun yn gadarn yw:</p> <ol style="list-style-type: none"> 1. A yw'r cynllun yn ffitio? (h.y. a yw'n gyson â chynlluniau eraill?) 2. A yw'r cynllun yn briodol? (h.y. a yw'n briodol ar gyfer yr ardal yng ngoleuni'r dystiolaeth?) 3. A fydd y cynllun yn cyflawni? (h.y. a yw'n debygol o fod yn effeithiol?) <p>Darperir rhagor o wybodaeth am y profion cadernid a'r gofynion gweithdrefnol yn Arweiniad Gweithdrefnol ar Archwiliadau Cynllun Datblygu Lleol yr Arolygiaeth Gynllunio.</p> <p>Os ydych yn gwrthwynebu Newid Materion sy'n Codi, dylech ddweud pam nad yw'n gwneud y Cynllun yn gadarn a nodi pa newid y dylid ei wneud er mwyn sicrhau fod y Cynllun yn gadarn.</p> <p>Lle rydych yn cynnig diwygiad i'r Newidiadau Materion sy'n Codi byddai'n ddefnyddiol egluro pa brawf (profion) cadernid rydych yn credu ei fod yn methu. Fydd methu adnabod prawf ddim yn golygu na chaiff eich sylw ystyriaeth, cyn belled â'i fod yn ymwneud a'r Newid Materion sy'n Codi. Dylech gynnwys eich holl sylwadau ar y ffurflen, gan ddefnyddio dogfennau ychwanegol a thystiolaeth ategol lle bod angen.</p>	<p><i>The Joint Anglesey and Gwynedd Local Development Plan (LDP) is being examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound.</i></p> <p><i>'Sound' may be considered in this context within its ordinary meaning of 'showing good judgement' and 'able to be trusted'. The questions or 'tests' which the Inspector will consider in deciding whether the Plan is sound are:</i></p> <ol style="list-style-type: none"> <i>1. Does the plan fit? (i.e. is it consistent with other plans?)</i> <i>2. Is the plan appropriate? (i.e. is it appropriate for the area in the light of the evidence?)</i> <i>3. Will the plan deliver? (i.e. is it likely to be effective?)</i> <p><i>More information on the soundness tests and procedural requirements is provided in the Planning Inspectorate's Local Development Plan Examinations Procedural Guidance.</i></p> <p><i>If you are objecting to a Matters Arising Changes, you should say why you think it makes the Plan unsound, and which change should be made to make the Plan sound.</i></p> <p><i>Where you propose an amendment to a Matters Arising Changes it would be helpful to make clear which test(s) of soundness you believe it fails. Failing to identify a test will not mean that your comment will not be considered, providing it relates to the Matters Arising Changes. You should include all your comments on the form, using accompanying documents and supporting evidence where necessary.</i></p>

SYLWADAU NMC101 COMMENTS

GWRTHWYNEBU / OBJECTING

		<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) <i>Matters Arising Change Number (NMC)</i>	NMC 101	Cefnogi/ Support	<input type="checkbox"/>	Gwrthwynebu/ Object	<input checked="" type="checkbox"/>
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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.

NMC 101 has deleted the following requirement for on-shore wind energy facilities from draft Policy ADN 1 (i):

“the proposal will not have an unacceptable impact upon visual amenity or landscape character through: the number, scale, size, design and siting of turbines and associated infrastructure especially in areas designated for their historic or landscape value”.

Bourne Leisure considers that Policy ADN 1 should acknowledge the importance of protecting visual amenity and landscape character in relation to sensitive receptors from potential adverse impacts of renewable energy development. The justification text for emerging Policy ADN 1 should recognise holiday accommodation as one of such receptors. Given the importance of tourism to the local and regional economy, there is a risk that tourists may be deterred by these issues from visiting or returning to the area, thereby impacting on the local economy.

Hence, Bourne Leisure considers that Policy ADN 1 should specifically provide protection for the amenity and visual amenity of holiday accommodation from unacceptable harm from on-shore wind facilities. The Company requests that the deleted text at draft Policy ADN 1 (i) is included within the Joint LDP but amended as follows:

“the proposal will not have an unacceptable impact upon visual amenity or landscape character or visual amenity of sensitive receptors, through: the number, scale, size, design and siting of turbines and associated infrastructure especially in areas designated for their historic or landscape value” (proposed amendments

underlined).

Bourne Leisure considers that, as drafted, emerging Policy ADN 1 (i) does not meet the second soundness test (is the plan appropriate?), as it does not address the key issue of protection for sensitive receptors from demonstrable harm from on-shore wind facilities.

However, Bourne Leisure supports the requirement at draft Policy ADN 1 (ii) (NMC 101) for adequate mitigation for on-shore wind energy facilities in relation to landscape character. This draft policy states that all on-shore wind proposals should conform to the following criterion:

“all impacts on landscape character, heritage assets and natural resources have been adequately mitigated, ensuring that the special qualities of all locally, nationally and internationally important landscape, biodiversity and heritage designations, including, where appropriate, their settings are conserved or enhanced” (MAC in bold).

The Company considers that draft Policy ADN 1 (ii) meets the second soundness test (is the plan appropriate?) because it adequately addresses the key issue of potential impact on the special qualities of all locally, national and internationally important landscape, biodiversity and heritage designations.

Meanwhile, draft Policy ADN 1 (vii) (NMC 101) states:

“turbines and associated infrastructure will, at the end of the operational life of the facility, be removed in accordance with a restoration and aftercare scheme submitted to the Local Planning Authority ~~and an appropriate land restoration and aftercare scheme agreed.~~” (MAC in bold)

Bourne Leisure considers that this requirement is not sufficient to ensure that sites are restored at the end of the operation of an on-shore wind facility. The Company considers that an appropriate land restoration and aftercare scheme should be submitted to and agreed with the local authority in relation to end of the operational life of a facility, as stated by the previous version of draft Policy ADN 1 (vii). The following change is suggested:

“turbines and associated infrastructure will, at the end of the operational life of the facility, be removed in accordance with a restoration and aftercare scheme submitted to and agreed by the Local Planning Authority ~~and an appropriate land restoration and aftercare scheme agreed.~~” (MAC in bold, proposed amendments in bold and underlined)

Bourne Leisure considers that draft Policy ADN 1 (vii) fails the second soundness test (is the plan appropriate?) because it does not address the key issue of ensuring appropriate restoration and aftercare following the end of the operational life of an on-shore wind facility.

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).

Draft Policy ADN 1 should protect visual amenity and landscape character from potential adverse impacts of renewable energy development. Otherwise, there is a risk that tourists may be deterred by these issues from visiting or returning to the area, thereby impacting on the local economy.

Bourne Leisure supports the requirement at draft Policy ADN 1 (ii) (NMC 101) for adequate mitigation for on-

shore wind energy facilities in relation to landscape character.

Draft Policy ADN 1 (vii) is not sufficient to ensure that sites are restored at the end of the operation of an on-shore wind facility.

**JLDP - Consultation on the Matters Arising Changes
Comments from CPRW Caernarfonshire Branch**

[Redacted text block containing seven lines of blacked-out content]

Date: 7.3.17

1. NMC : 110
2. Object
3. Text



ADN1 On-Shore Wind Energy: deletion of criterion (i) and amendment of criterion (ii)

- a. The proposed text removes separate reference to impact on landscape character in (i) and combines this with reference to impact on heritage assets and natural resources, including biodiversity, in (ii). This dilutes the previous separate emphasis on visual issues relating to impact on landscape and heritage assets and brackets them with impact on biodiversity assets which are of a different character. This changes the emphasis and clarity of the original text. The deletion of reference to visual amenity is acceptable as this is separately identified in criterion (iii) and (iv).
- b. The amended (ii) text suggests that only designated landscapes are to be considered, whereas the original (i) text correctly allows for impact on all landscapes, whether or not designated.
- c. We maintain that the visual impact of wind turbines on landscape, by virtue of their intrinsic height, scale and prominence of their required siting, which are the essence of their satisfactory function, cannot be '*adequately mitigated*' as stipulated by (ii); vegetative screening is impractical, while turbine colouring can have at best a marginal effect. We think it unrealistic to imply that adequate mitigation can be a normal expectation in the case of wind turbines. The previous reference to avoiding 'unacceptable impact' was more meaningful.



Llywodraeth Cymru
Welsh Government

Department for Natural Resources
Adran Adnoddau Naturiol

Nia Davies
Yr Uned Polisi Cynllunio ar y Cyd
Gwynedd a Môn
Neuadd y Dref
Bangor
Gwynedd
LL57 1DT

Our ref:
Your ref:

20^{fed} Chwefror 2017

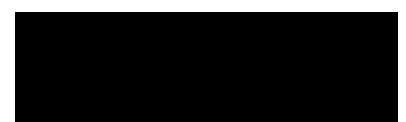
Annwyl Nia,

Cynllun Datblygu Lleol ar y Cyd Gwynedd ac Ynys Môn – Ymgynghoriad ar yr Amserlen o Newidiadau Materion sy'n Codi (NMCau)

Diolch am eich gohebiaeth ynghylch yr ymgynghoriad ar y NMCau arfaethedig. Rydym yn cydnabod ymrwymiad eich Awdurdod i sicrhau Cynllun Datblygu Lleol cadarn a'r gwaith sydd wedi'i wneud gan y tîm cynllunio ymlaen llaw er mwyn cyrraedd y cam hwn.

Mae'r Newidiadau i'r Materion sy'n Codi arfaethedig ar gyfer nifer y tai sydd ar gael, y cyfiawnhad drostynt a pha mor eglur yw'r sefyllfa, i'w croesawu. Mae bellach yn amlwg pa elfennau sy'n sylfaen i'r ddarpariaeth dai a sut y maent yn berthnasol i'r hierarchiaeth setliadau. Mae'r gwaith hwn bellach wedi roi ar ffurf tablau trywydd tai a chyflenwad tir sydd bellach wedi'u cynnwys yn y cynllun. Mae'r Newidiadau i'r Materion sy'n codi o ran yr angen am dai fforddiadwy a'u deiliadaeth, a tharged diwygiedig tair ffordd yn seiliedig ar gefnogi gwaith hyfywedd wedi'i ddiweddarau. Mae'r diffiniadau diwygiedig o ran y farchnad, y farchnad leol a thai fforddiadwy yn rhoi'r eglurder sydd ei angen i fframwaith y polisi. Hefyd, mae Llywodraeth Cymru yn cefnogi'r NMCau ar gyfer Sipsiwn a Theithwyr ac nid oes unrhyw wrthwynebiadau yn weddill o ran hyn. Ystyriwch bod **y NMCau arfaethedig, ar y cyfan, wedi mynd i'r afael â mwyafrif ein pryderon o ran strategaeth, tai, tai fforddiadwy a'r ddarpariaeth ar gyfer Sipsiwn a Theithwyr.**

Yr Arolygydd/Arolygwyr sydd wedi'u penodi sydd i benderfynu a yw cynllun yn cael ei ystyried yn gynllun 'cadarn'. Er ein bod yn credu bod y Cyngor wedi mynd i'r afael â mwyafrif y pryderon a nodir yn ein sylwadau ac mewn datganiadau mewn gwrandawiaadau i ddilyn, rydym yn **ystyried bod rhai materion pwysig sy'n parhau heb eu datrys wedi eu nodi yn yr Atodiad.**



Yn gywir,



Atodiad

Yr Iaith Gymraeg	
NMC 56	<u>Polisi PS1: Iaith a Diwylliant Cymraeg</u>
Gwrthwynebiad	<p>Maen Prawf 3a – Mae'r newidiadau arfaethedig i'r maen prawf hwn yn wael a drslyd. Cymal arall a awgrymir i roi eglurder yw, "caniatáu datblygiad na fyddai'n achosi niwed sylweddol i gymeriad a chydbwysedd iaith cymuned, a sicrhau bod mesurau lliniaru addas, neu gyfraniadau yn cael eu gwneud i sicrhau cyn lleied o effeithiau niweidiol â phosib."</p> <p>Maen Prawf 6 – Ymddengys bod y maen prawf sy'n cyfeirio at Enwau Cymreig yn mynd y tu hwnt i gwmpas gwaith y system gynllunio ac y dylid ei ddileu. Fodd bynnag, gellid cyfeirio at bolisi y Cyngor o gyflawni'r nod hwn drwy strategaethau eraill yn y testun atodol.</p>
Ynni Adnewyddadwy	
NMC 101	<u>Polisi ADN1: Ynni Gwynt ar y Tir</u>
Gwrthwynebiad	<p>Mae cyfeiriad at gytundebau lefel gwasanaeth yn parhau i fod ym Mholisi ADN 1. Dylid dileu hyn o'r polisi, a gosod yn ei le y sail resymegol fel a nodwyd yn ein datganiad ar gyfer Sesiwn 8, (C2a) o ran bod Cytundebau Lefel Gwasanaeth yn ddynodiadau anstatudol na ddylai gyfyngu ar ddatblygiadau derbyniol (PPW, 5.3.11) megis hwyluso cyfleoedd ar gyfer ynni adnewyddadwy.</p>
Wylfa Newydd	
NMC 141	<u>Polisi PS9 – Wylfa Newydd a Datblygiadau Cysylltiedig</u>
Gwrthwynebiad	<p>Maen Prawf 7 – Ymddengys nad oes sail resymegol/cyfiawnhad y tu ôl i'r trothwy 500 uned. (Gweler y sylw ar NMC 143 & 188).</p> <p>Maen Prawf 10: Mae'r cymal "...y bydd angen ei gymeradwyo gan..." yn rhy gryf ac afresymol, yn enwedig o'i gysylltu â rhoi caniatád cynllunio. Mae'r Cyngor yn ceisio cymeradwyo strategaeth trydydd parti (yr hyrwyddwr) oherwydd bod hyn yn angenrheidiol i gael caniatád cynllunio. Beth sy'n digwydd os nad yw'r Cyngor yn cymeradwyo'r strategaeth hon? A yw'n rhesymol i gysylltu cael caniatád cynllunio gyda strategaeth trydydd parti allanol nad oes gan y Cyngor unrhyw reolaeth drosto?</p>
NMC 143	<u>Polisi PS 9A – Llety Gweithwyr Dros Dro ar Raddfa Fawr ar ffurf Campws i Adeiladwyr Wylfa Newydd</u>
Gwrthwynebiad	<p>Mae'r trothwy polisi sy'n cael ei gynnig gan Horizon a'i gynnwys gan y Cyngor fel rhan o'r NMCau yn wahanol i ymateb y Cyngor i S7/PG15, ble yr ystyriwyd nad oedd gan y safle i 500 gwely "unrhyw sail cynllunio gydag ychydig o dystiolaeth i ddangos bod y trothwy hwn yn adlewyrchu pwynt o newid" (paragraff 2.4). Mae'n rhaid cael tystiolaeth gadarn i gefnogi polisiâu'r cynllun a byddai Llywodraeth Cymru yn croesawu eglurhad o'r dystiolaeth sy'n sail i'r gwahaniaeth rhwng Llety Gweithwyr Dros Dro mawr a bach.</p> <p>Maen Prawf 1 – Mae'r polisi yn cyfeirio at yr hierarchiaeth setliadau sy'n briodol, ond nid yw'n glir a oes gan bob haen statws cyfartal? Rwy'n cymeryd nad bwriad y Clystyrau yw rhoi llety i cymaint o bobl â phosib? Pa</p>

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20th February 2017

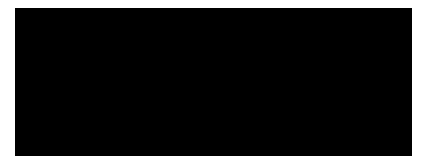
Dear Nia,

Gwynedd and Ynys Mon's Joint Local Development Plan (JLDP) – Consultation on the Schedule of Matters Arising Changes (MACs)

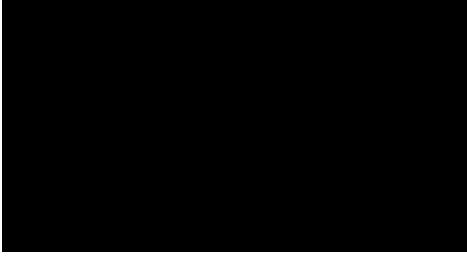
Thank you for your correspondence in relation to the consultation on the proposed MACs. We recognise your Authority's commitment to achieving a sound LDP and the amount of work undertaken by the forward planning team in reaching this stage.

The proposed MACs in respect of the level, justification and clarity of housing provision are welcome. It is now clear what components underpin the housing provision and how they relate to the settlement hierarchy. This work has been translated into a housing trajectory and land supply tables that are now embedded within the plan. The MACs in respect of affordable housing need and tenure, and a revised three way target based on updated viability work is supported. The revised definitions in respect of market, local market and affordable housing provide the necessary clarity in the policy framework. In addition, the Welsh Government supports the MACs in respect of Gypsy and Travellers and has no outstanding objections in this respect. It is considered that **the proposed MACs have in broad terms addressed the majority of our concerns in respect of strategy, housing, affordable housing and Gypsy and Traveller provision.**

The matter of whether a plan is considered 'sound' will be for the appointed Planning Inspector(s) to determine. Whilst we consider that the Council has addressed the majority of the concerns set out in our representations and subsequent hearing statements, we **consider there are some important matters that remain unresolved which are set out in the supporting Annex.**



Yours sincerely,



Welsh Language	
NMC 56	<u>Policy PS1: Welsh Language and Culture</u>
Objection	<p>Criterion 3a - The proposed changes to this criterion are 'clunky' and confusing. A suggested alternative phrase to provide clarity is, "permit development that would not cause significant harm to the character and language balance of a community and ensure suitable mitigation measures, or contributions, are provided to minimise adverse impacts."</p> <p>Criterion 6 - The criterion referring to Welsh Names appears to go beyond the scope of the planning system and should be deleted. However, reference could be made to the Council's policy of achieving this goal through other strategies in the supporting text.</p>
Renewable Energy	
NMC 101	<u>Policy ADN1: On-Shore Wind Energy</u>
Objection	SLAs are still referred to in Policy ADN 1. This should be deleted from the policy, for the rationale as set out in our statement for Session 8, (Q2a) in that SLAs are non-statutory designations which should not unduly restrict acceptable development (PPW, 5.3.11) such as facilitating renewable energy opportunities.
Wylfa Newydd	
NMC 141	<u>Policy PS9 – Wylfa Newydd and Related Development</u>
Objection	<p>Criterion 7 - There appears to be no rationale/justification for the 500 unit threshold. (See comment on NMC 143 & 188).</p> <p>Criterion 10: The phrase "...will be required to be approved by..." is too strong and unreasonable, particularly linking it to the gaining of a planning permission. The Council are in effect looking to approve a third party strategy (that of the promoter) on the premise that is necessary to achieve a planning permission. What happens if the Council do not approve the strategy? Is it reasonable to link the gaining of a planning permission to an external third party strategy over which the Council has no control?</p>
NMC 143	<u>Policy PS 9A – Wylfa Newydd Large Scale Campus Style Temporary Accommodation for Construction Workers</u>
Objection	<p>The policy threshold proposed by Horizon and included by the Council as part of their MACs is at odds with the Council's response to S7/PG15, in which the 500 bed space level is considered to have "no planning basis with little evidence to demonstrate this threshold reflects a tipping point" (paragraph 2.4). It is essential that plan policies are supported by robust evidence and the Welsh Government would welcome clarification on evidence that underpins the differential between large and small TCWA.</p> <p>Criterion 1 - The policy refers to the settlement hierarchy which is appropriate, but it is not clear if all tiers have equal status? Presumably it is not the intention for Clusters to accommodate the largest proportion? How close is "...in close proximity.."? </p> <p>Criterion 2 - This criterion does not have to relate to proximity to the main highway network, why?</p>