

SYLWADAU NMC143 COMMENTS

GWRTHWYNEBU / OBJECT



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 gwrandawiadau 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 dryslyd. 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>

mor agos yw "...yn agos iawn..."?
 Maen Prawf 2 – Nid oes yn rhaid i'r maen prawf hwn fod yn gysylltiedig â phamor agos yw i'r prif rwydwaith cefnffyrdd, pam?

Mae'r dull o gyfeirio Llety Gweithwyr Dros Dro i gefn gwlad yn cael ei ystyried gan y Cyngor "yn groes i agwedd y Cynllun a'i amcanion cynaliadwyedd" (S7/PG15 paragraff 2.7). Fodd bynnag, mae'r Polisi PS9A newydd (Maen Prawf 2) a'r Polisi TAI3 diwygiedig (Maen Prawf 4) yn caniatáu Llety Gweithwyr Dros Dro bach a mawr yng nghefn gwlad. Dylai'r Cyngor egluro sut y byddai Llety Gweithwyr Dros Dro mewn ardal wledig yn dilyn egwyddorion datblygu cynaliadwy ac yn hyrwyddo'r defnydd o'r adeilad yn y gymuned wedi cyfnod adeiladu Wylfa Newydd? Yn wir, byddai'n ddefnyddiol deall lleoliad y safleoedd sy'n cael eu hyrwyddo ar gyfer Llety Gweithwyr Dros Dro, yn enwedig mewn perthynas â chyflogi gweithwyr wrth gefn yn Rhosgoch, a sut y mae safleoedd o'r fath yn cyd-fynd â pholisïau y cynllun, gan gynnwys Polisi PS9B a Pholisi PS9C.

Maen Prawf 3 – Pam bod angen defnyddio polisi yr Iaith Gymraeg ar gyfer y math yma o ddatblygiad, h.y. mae rhan fwyaf y gweithwyr dros dro fel arfer o'r tu allan i'r ardal leol? Rwy'n cymeryd bod y math yma o ddatblygiad yn angenrheidiol ar gyfer prosiect Wylfa ac na fyddai'n cael ei wrthod? Pa fesurau lliniaru sydd eu hangen pe byddai cynnig o'r fath yn hunan-gynhaliol?

Maen Prawf 5 – A yw'n briodol i ofyn am restr o'r gweithwyr ar y safle, pam bod angen hyn, at pa ddiben? A yw hyn o fewn cwmpas gwaith y system gynllunio?

NMC 143
 NMC 188

Gwrthwynebiad

Polisi PS9A Llety Dros Dro ar Raddfa Fawr i Weithwyr / Polisi TAI3 Llety Dros Dro ar Raddfa Bach i Weithwyr

Mae'r maen prawf manwl ym Mholisi TAI3 Llety Dros Dro ar Raddfa Fechan yn ymddangos fel petae yn gwrthddweud Polisi PS9A Llety Dros Dro ar Raddfa Fawr. Dylai'r Cyngor ystyried y canlynol:

Polisi TAI3 Llety Dros Dro ar Raddfa Fechan		Polisi PS9A Llety Dros Dro ar Raddfa Fawr	
Maen Prawf 4(iv)	Darperir cyfleusterau cymunedol a hamdden ar safleoedd gwledig	Maen Prawf 4	Asesu beth sydd ar gael odd ar y safle a'r amser teithio cyn sicrhau darpariaeth cymunedol a hamdden ar y safle
Maen Prawf 5	Dylid llywio'r cynigion drwy ystyried y defnydd wedi cwblhau'r adeiladu	N/A	Dim sôn am ddefnydd wedi'r adeiladu
Maen Prawf 8	Cefnogi gwelliannau i'r rhwydwaith trafndiaeth	N/A	Dim sôn am welliannau i'r rhwydwaith trafndiaeth
Maen Prawf 10	Tynnu adeiladau dros dro i lawr os nad yw yn ymarferol i'w defnyddio wedi'r adeiladu	N/A	Dim crybwyll dychwelyd y tir i'w ddefnydd gwreiddiol

Dylai'r Cyngor hefyd ystyried cynnwys y testun cyfiawnhau canlynol ym Mholisiâu perthnasol TAI3 a PS9 gan ei fod yn cael ei ystyried yn angenrheidiol gan yr awdurdodau i lywio canlyniad unrhyw gais cynllunio yn y dyfodol:

Department for Natural Resources
Adran Adnoddau Naturiol



Llywodraeth Cymru
Welsh Government

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Yr Uned Polisi Cynllunio ar y Cyd
Gwynedd a Mon
Neuadd y Dref
Bangor
Gwynedd
LL57 1DT

Our ref:
Your ref:

20th February 2017

Dear Nia,

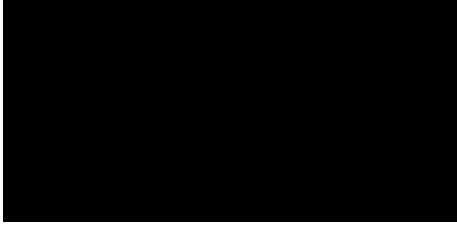
Gwynedd and Ynys Mon's Joint Local Development Plan (JLDP) – Consultation on the Schedule of Matters Arising Changes (MACs)

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>

The approach of directing large scale TCWA to the open countryside is considered by the Council as “contrary to the approach of the Plan and its sustainability objectives” (S7/PG15 paragraph 2.7). However, both new Policy PS9A (Criteria 2) and amended Policy TAI3 (Criteria 4) permit large and small scale TCWA in the open countryside. The Council should explain how new TCWA in rural areas will follow the principles of sustainable development and promote a community legacy use after the construction phase of Wylfa Newydd? Indeed, it would be useful to understand the location of sites promoted for TCWA, particularly in relation to the reserve employment site at Rhosgoch, and how such sites align to policies in the plan, including Policy PS9B and Policy PS9C.

Criterion 3 - Why do you need to apply the Welsh Language policy for this type of development, i.e. temporary workers who the majority of which will presumably from outside of the local area? Presumably this type of development is necessary to support the delivery of the Wylfa project and would not be refused? What mitigation is necessary if such a proposal was self contained?

Criterion 5 - Is it appropriate to require a list of workers operating from the site, for what purpose, to achieve what? Is this within the scope of the planning system?

NMC 143
NMC 188

Policy PS9A Large Scale TCWA / Policy TAI3 Small Scale TCWA

Objection

The detailed criterion in Policy TAI3 Small Scale TCWA appears at odds with Policy PS9A Large Scale TCWA. The Council’s should give consideration to the following:

Policy TAI3 Small Scale TWCA		Policy PS9A Large Scale TWCA	
Criteria 4(iv)	Communal and leisure facilities are provided on rural sites	Criteria 4	Assesses off-site capacity and travel distances before requiring on-site provision for communal and leisure facilities
Criteria 5	Proposals should be informed by a consideration of legacy uses	N/A	No mention of legacy uses
Criteria 8	Supports transport network improvements	N/A	No mention of transport network improvements
Criteria 10	Temporary buildings are removed if a legacy use is not feasible	N/A	No mention of reinstating land to original use

The Council’s should also consider including the following justification text in relevant Policies TAI3 and PS9 as they are considered necessary by the authorities to inform the outcome of any future planning application:

- Paragraph 7.4.26 requiring assessments to accompany proposals for TCWA;
- Paragraph 7.3.18 outlining the search sequence required before proposing modular accommodation, and
- Paragraph 7.3.18B requiring alignment of the LHMA to any proposals for a



Your ref: [REDACTED]

Our ref: [REDACTED]

09 March 2017

Anglesey and Gwynedd Joint Planning Policy Unit
1st floor Bangor City Council Offices
Ffordd Gwynedd
Bangor
Gwynedd
LL57 1DT

By Post and Email: planningpolicy@gwynedd.llyw.cymru

Dear Sir or Madam

**REPRESENTATIONS TO THE ANGLESEY AND GWYNEDD JOINT LOCAL DEVELOPMENT PLAN:
MATTERS ARISING CHANGES CONSULTATION (JANUARY 2017)**

These representations have been prepared by HOW Planning on behalf of Land & Lakes (Anglesey) Ltd ("Land & Lakes") in response to the consultation on the Anglesey and Gwynedd Joint Local Development Plan Matters Arising Changes document (January 2017).

The Matters Arising Schedule provides details of the relevant changes that have emerged from the Public Examination into the Local Plan. We understand that comments made at this stage can only address and relate to the 'Matters Arising Changes' as detailed in the Schedule. We also understand that all comments made (by the closing date) will be forwarded by Anglesey and Gwynedd Councils ("the Councils") to the Inspector and that the Councils will prepare a report responding to the comments.

We respectfully request that these representations are considered by the Councils in the preparation of their report responding to the consultation comments and the Inspector in assessing the Local Plan. We would also like to request to speak at a hearing session at the Public Examination about the representations set out in this letter. At the hearing session I wish to be heard in English.

BACKGROUND

Isle of Anglesey County Council ("IoACC") has prepared a range of policy statements relating to construction workers' accommodation associated with Wylfa Nuclear New Build. The policy statements establish IoACC's objectives for various accommodation solutions for construction workers including purpose built permanent accommodation situated in accessible locations and which will deliver future and legacy uses.

The Wylfa Nuclear New Build Construction Workers Accommodation Position Statement (March 2011) sets out IoACC's objectives for the provision of accommodation through an equal mix of purpose built accommodation, private rented (new and existing) and tourist accommodation (new and existing).

Planning and Environmental Advisers

[REDACTED]

settlement hierarchy which can re-use existing buildings or deliver permanent buildings capable of being adapted for permanent future and / or legacy use; and.

- (ii) *It is not feasible to deliver a future or legacy use for the temporary development on the proposed site”.*

Policy PS 9A

Policy PS 9A is a new policy under reference NMC 143. In principle, Land & Lakes support the policy however minor changes are sought to ensure that the policy wording reflects paragraphs 7.3.18 and Policy PS 9. To achieve this, Land & Lakes propose the following changes to criteria 1 and 2 as shown in red below:

1. *“The site is located **within or adjacent** ~~or in close proximity~~ to the development boundary of a Centre **or Service Village** identified within the Plan’s Settlement Hierarchy, and is close to the main highway network where adequate access can be provided without significantly harming landscape characteristics and features; or*
2. *In exceptional circumstances, the site is located in the open countryside, provided that the applicant can demonstrate that there is no available site which meets the criteria set out in criterion 1 for the proposed use and that there is an essential and proven need for the amount and type of accommodation for temporary workers **in that location**; and...”*

Policy TAI 3

Policy TAI 3 relates to small scale campus style accommodation for construction workers under reference NMC 188. For consistency, the changes proposed to policies PS 9 and PS 9A should be carried through into Policy TAI 3. In line with the representations set out above, Land & Lakes propose the following changes to the wording of Policy TAI 3 as shown in red below:

*“Proposals for small scale campus style accommodation (up to a maximum of 50 bed spaces) for construction workers will be permitted **where the proposal complies with Policy PS 9**, and ~~provided that they~~ forms part of the overall solution to providing temporary construction worker accommodation, and the following criteria are met...*

4. *...In exceptional circumstances, the site is located elsewhere provided:*
 - i. *the developer can demonstrate that there is an essential and proven need for the amount and type of accommodation **in that location** that cannot be met within or adjacent to development boundaries of Centres or Service Villages ~~in the locality~~ **identified within the Plan’s Settlement Hierarchy** through either existing accommodation or the re-use of an existing building **or the provision of new purpose built permanent accommodation**;*

In addition, Land & Lakes propose that an additional criterion is inserted between criteria 4 and 5 which should read:

“Proposals for the re-use of existing buildings or the provision of permanent buildings capable of being adapted for permanent future and / or legacy use will be supported by the Council. Proposals for temporary buildings which will be removed at the end of the temporary use will only be allowed on the Wylfa Newydd site or on alternative sites within or adjacent to the development boundary of Centres or Service Villages identified within the Plans settlement hierarchy where it has been demonstrated through rigorous assessment that:

- (iii) *There are no suitable and alternative sites available within or adjacent to the development boundary of Centres or Service Villages identified within the Plans*

Reserve Sites

Sites that have the potential to meet the demand resulting from Wylfa Newydd as well as the rest of the Anglesey Energy Island Programme / Enterprise Island.

To relate more closely to what we understand are the Councils intentions for the reserve sites, the following changes to the wording of this paragraph are proposed in red below:

Reserve Sites

*Sites that have the potential to meet the **B1, B2 or B8** demand resulting from Wylfa Newydd as well as the rest of the Anglesey Energy Island Programme / Enterprise Island.*

Policy CYF 4

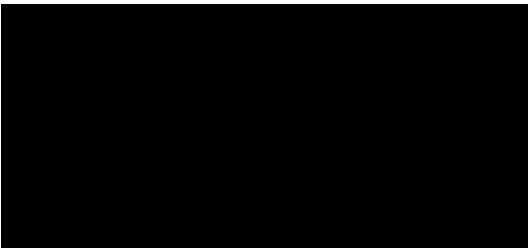
Policy CYF 4 states that *“Proposals to release employment land on existing employment sites safeguarded for Use Classes B1, B2 or B8 in accordance with Policy CYF1 for alternative uses will be granted only in special circumstances, provided they conform to one or more of the following criteria...”*

It is also understood following the meeting with Senior Officers at IoACC and the JPPU on 27 February 2017 that it is IoACC;s intention that proposals for alternative uses on existing employment sites safeguarded for Use Classes B1, B2 or B8 and only those sites in accordance with Policy CYF1 will be assessed against this policy. The existing employment sites safeguarded for Use Classes B1, B2 or B8 are identified in the first table in Policy CYF1. Confirmation on this matter from the IoACC is sought by Land & Lakes and specifically that proposals for alternative uses on reserve employment sites in accordance with Policy CYF1 will not be assessed against this policy.

We would be grateful if you could confirm safe receipt of this letter and we respectfully request that these representations are considered by the Councils in preparing its report responding to the consultation comments and by the Inspector in assessing the Local Plan.

Should you require further information or wish to discuss then please don't hesitate to contact me.

Yours faithfully





Llywodraeth Cymru
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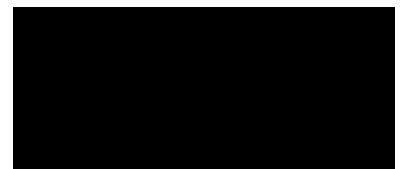
Annwyl Nia,

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

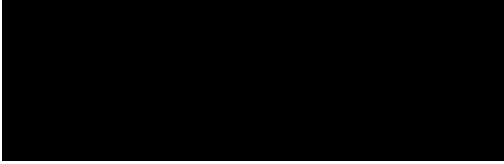
Diolch am eich gohebiaeth ynghylch yr ymgynghoriad ar y NMCau arfaethedig. Rydym yn cydnabod ymrwymiad eich Awdurdod i sicrhau Cynllun Datblygu Lleol cadarn a'r gwaith sydd wedi'i wneud gan y tîm cynllunio ymlaen llaw er mwyn cyrraedd y cam hwn.

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 gwrandawiadau i ddilyn, rydym yn **ystyried bod rhai materion pwysig sy'n parhau heb eu datrys wedi eu nodi yn yr Atodiad.**



Yn gywir,



Atodiad

mor agos yw "...yn agos iawn..."?
 Maen Prawf 2 – Nid oes yn rhaid i'r maen prawf hwn fod yn gysylltiedig â phamor agos yw i'r prif rwydwaith cefnffyrdd, pam?

Mae'r dull o gyfeirio Llety Gweithwyr Dros Dro i gefn gwlad yn cael ei ystyried gan y Cyngor "yn groes i agwedd y Cynllun a'i amcanion cynaliadwyedd" (S7/PG15 paragraff 2.7). Fodd bynnag, mae'r Polisi PS9A newydd (Maen Prawf 2) a'r Polisi TAI3 diwygiedig (Maen Prawf 4) yn caniatáu Llety Gweithwyr Dros Dro bach a mawr yng nghefn gwlad. Dylai'r Cyngor egluro sut y byddai Llety Gweithwyr Dros Dro mewn ardal wledig yn dilyn egwyddorion datblygu cynaliadwy ac yn hyrwyddo'r defnydd o'r adeilad yn y gymuned wedi cyfnod adeiladu Wylfa Newydd? Yn wir, byddai'n ddefnyddiol deall lleoliad y safleoedd sy'n cael eu hyrwyddo ar gyfer Llety Gweithwyr Dros Dro, yn enwedig mewn perthynas â chyflogi gweithwyr wrth gefn yn Rhosgoch, a sut y mae safleoedd o'r fath yn cyd-fynd â pholisïau y cynllun, gan gynnwys Polisi PS9B a Pholisi PS9C.

Maen Prawf 3 – Pam bod angen defnyddio polisi yr Iaith Gymraeg ar gyfer y math yma o ddatblygiad, h.y. mae rhan fwyaf y gweithwyr dros dro fel arfer o'r tu allan i'r ardal leol? Rwy'n cymeryd bod y math yma o ddatblygiad yn angenrheidiol ar gyfer prosiect Wylfa ac na fyddai'n cael ei wrthod? Pa fesurau lliniaru sydd eu hangen pe byddai cynnig o'r fath yn hunan-gynhaliol?

Maen Prawf 5 – A yw'n briodol i ofyn am restr o'r gweithwyr ar y safle, pam bod angen hyn, at pa ddiben? A yw hyn o fewn cwrpas gwaith y system gynllunio?

NMC 143
 NMC 188

Gwrthwynebiad

Polisi PS9A Llety Dros Dro ar Raddfa Fawr i Weithwyr / Polisi TAI3 Llety Dros Dro ar Raddfa Bach i Weithwyr

Mae'r maen prawf manwl ym Mholisi TAI3 Llety Dros Dro ar Raddfa Fechan yn ymddangos fel petae yn gwrthddweud Polisi PS9A Llety Dros Dro ar Raddfa Fawr. Dylai'r Cyngor ystyried y canlynol:

Polisi TAI3 Llety Dros Dro ar Raddfa Fechan		Polisi PS9A Llety Dros Dro ar Raddfa Fawr	
Maen Prawf 4(iv)	Darperir cyfleusterau cymunedol a hamdden ar safleoedd gwledig	Maen Prawf 4	Asesu beth sydd ar gael odd ar y safle a'r amser teithio cyn sicrhau darpariaeth cymunedol a hamdden ar y safle
Maen Prawf 5	Dylid llywio'r cynigion drwy ystyried y defnydd wedi cwblhau'r adeiladu	N/A	Dim sôn am ddefnydd wedi'r adeiladu
Maen Prawf 8	Cefnogi gwelliannau i'r rhwydwaith trafndiaeth	N/A	Dim sôn am welliannau i'r rhwydwaith trafndiaeth
Maen Prawf 10	Tynnu adeiladau dros dro i lawr os nad yw yn ymarferol i'w defnyddio wedi'r adeiladu	N/A	Dim crybwyll dychwelyd y tir i'w ddefnydd gwreiddiol

Dylai'r Cyngor hefyd ystyried cynnwys y testun cyfiawnhau canlynol ym Mholisiâu perthnasol TAI3 a PS9 gan ei fod yn cael ei ystyried yn angenrheidiol gan yr awdurdodau i lywio canlyniad unrhyw gais cynllunio yn y dyfodol:

	<ul style="list-style-type: none"> • Paragraff 7.4.26 yn galw am asesiadau i gyd-fynd â'r cynnig am Lety Dros Dro i Weithwyr; • Paragraff 7.3.18 yn rhoi amlinelliad o'r chwilio sydd angen ei wneud cyn cynnig llety modiwlwr, a • Paragraff 7.3.18B sy'n galw am sicrhau bod y LHMA yn cyd-fynd ag unrhyw gynigion am lety preswyl parhaol wedi i'r adeiladu ddod i ben.
NMC 144	<u>Polisi PS 9B & C – Datblygiad Cysylltiedig â Wylfa Newydd – Parcio a Theithio/ Canolfannau Logisteg</u>
Gwrthwynebiad	Golyga bolisiâu PS 9B & PS 9C y gallai canolfannau logisteg/cyfleusterau parcio a theithio gael eu sefydlu unrhyw le ar hyd coridor yr A5/A55. A yw hyn yn gywir ac yn briodol? Pa mor llydan yw'r coridor? A fyddai hyn yn cynnwys Llangefni?
Mwynau	
NMC 311	<u>Polisi MWYN 6 – Clustogfeydd o Amgylch Safleoedd Mwynau</u>
Gwrthwynebiad	Ardal atgyfeirio glo. Os yw Polisi MWYN 6 yn cyfeirio at ardaloedd o'r fath dylid eu dangos ar y Map Cynigion, gan eu bod yn rhan o'r cynllun. Os ydynt ar y Map Cyfyngiadau yna ni ddylid cyfeirio atynt yn y polisi.
Diogelu Tir Cyflogaeth	
NMC147 NMC148	<u>Polisi PS10: Cynnig Cyfleoedd ar gyfer Economi Ffyniannus / CYF 1: Diogelu, Dyrannu a Chadw Tir ac unedau at Ddefnydd Cyflogaeth</u>
Gwrthwynebiad	Mae Polisi PS10 wedi ei addasu i nodi bod 55.1ha o dir wedi ei neilltuo at ddibenion cyflogaeth gyda 643.8ha o'r tir presennol wedi ei ddiogelu. Fodd bynnag mae'r safleoedd a ddiogelwyd sydd wedi'u rhestru yn y Polisi CYF 1 cyfatebol (fel a ddiwygwyd drwy NMC148) yn cynnig cyfanswm o 633.3ha, 10.5ha yn llai na'r hyn a nodwyd ym Mholisi PS10. Dylai'r Cyngor sicrhau bod cyfansymiau cyflogaeth yn cyd-fynd â Pholisi PS10 a Pholisi CFY1.

Department for Natural Resources
Adran Adnoddau Naturiol



Llywodraeth Cymru
Welsh Government

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

Our ref:
Your ref:

20th February 2017

Dear Nia,

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

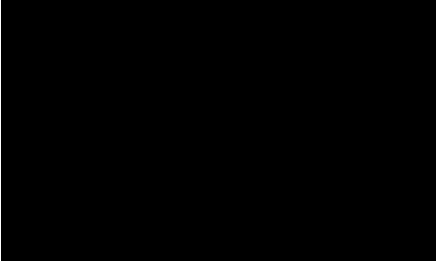
Thank you for your correspondence in relation to the consultation on the proposed MACs. We recognise your Authority's commitment to achieving a sound LDP and the amount of work undertaken by the forward planning team in reaching this stage.

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,



The approach of directing large scale TCWA to the open countryside is considered by the Council as “contrary to the approach of the Plan and its sustainability objectives” (S7/PG15 paragraph 2.7). However, both new Policy PS9A (Criteria 2) and amended Policy TAI3 (Criteria 4) permit large and small scale TCWA in the open countryside. The Council should explain how new TCWA in rural areas will follow the principles of sustainable development and promote a community legacy use after the construction phase of Wylfa Newydd? Indeed, it would be useful to understand the location of sites promoted for TCWA, particularly in relation to the reserve employment site at Rhosgoch, and how such sites align to policies in the plan, including Policy PS9B and Policy PS9C.

Criterion 3 - Why do you need to apply the Welsh Language policy for this type of development, i.e. temporary workers who the majority of which will presumably from outside of the local area? Presumably this type of development is necessary to support the delivery of the Wylfa project and would not be refused? What mitigation is necessary if such a proposal was self contained?

Criterion 5 - Is it appropriate to require a list of workers operating from the site, for what purpose, to achieve what? Is this within the scope of the planning system?

NMC 143
NMC 188

Policy PS9A Large Scale TCWA / Policy TAI3 Small Scale TCWA

Objection

The detailed criterion in Policy TAI3 Small Scale TCWA appears at odds with Policy PS9A Large Scale TCWA. The Council’s should give consideration to the following:

Policy TAI3 Small Scale TWCA		Policy PS9A Large Scale TWCA	
Criteria 4(iv)	Communal and leisure facilities are provided on rural sites	Criteria 4	Assesses off-site capacity and travel distances before requiring on-site provision for communal and leisure facilities
Criteria 5	Proposals should be informed by a consideration of legacy uses	N/A	No mention of legacy uses
Criteria 8	Supports transport network improvements	N/A	No mention of transport network improvements
Criteria 10	Temporary buildings are removed if a legacy use is not feasible	N/A	No mention of reinstating land to original use

The Council’s should also consider including the following justification text in relevant Policies TAI3 and PS9 as they are considered necessary by the authorities to inform the outcome of any future planning application:

- Paragraph 7.4.26 requiring assessments to accompany proposals for TCWA;
- Paragraph 7.3.18 outlining the search sequence required before proposing modular accommodation, and
- Paragraph 7.3.18B requiring alignment of the LHMA to any proposals for a

	permanent residential legacy.
NMC 144 Objection	<u>Policy PS 9B & C – Wylfa Newydd Associated Development – Park & Ride/Logistics Centres</u> Policies PS 9B & PS 9C effectively means that logistic centres/park and ride facilities could occur anywhere along the A5/A55 corridor. Is this correct and appropriate? How wide is the corridor? Would this include Llangefni?
Minerals	
NMC 311 Objection	<u>Policy MWYN 6 – Buffer Zones Around Mineral Sites</u> Coal referral areas. If Policy MWYN 6 refers to such areas they should be shown on the Proposals Map, as they are part of the plan. If they are shown on the Constraints Map then there should be no reference to them in the policy.
Employment Land Safeguarding	
NMC147 NMC148 Objection	<u>Policy PS10: Providing Opportunity for a Flourishing Economy / CYF 1: Safeguarding, Allocating and Reserving Land and units for Employment Use</u> Policy PS10 has been amended to identify that 55.1ha of land has been allocated for employment purposes with 643.8ha of existing land safeguarded. However, the safeguarded sites listed in corresponding Policy CYF1 (as amended through NMC148) total 633.3ha, 10.5ha less than identified in Policy PS10. The Council's should ensure employment totals align in both Policy PS10 and Policy CFY1.