

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p><b>Defnydd swyddfa yn unig/ Office use only</b></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 58	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.

Draft paragraph 7.1.4a (NMC 58) provides information on the content of the forthcoming Supplementary Guidance (SPG) documents, "Maintaining and creating distinctive and sustainable communities", "Type and Mix of Housing" and "Creating and Maintaining Distinctive and Sustainable Communities". It states:

***"The SPGs will look for evidence that the proposal has been discussed with Community, City and Town Councils and local community groups to obtain information and ask for their opinion, and that consideration has been given to surveys about the local housing market, and/ or the labour market. In addition, they will refer the applicant to such assistance as is available from the Office of Language Commissioner about designing bilingual signage and marketing material, the advice that is available to the private sector by the Welsh Government/Business Wales regarding bilingualism."*** (MAC in bold)

Bourne Leisure works closely with the local communities in which its assets are based and recognises the importance of supporting the Welsh language. However, the Company considers that any consultation and engagement requirements should reflect the type and scale of the proposed development and should be proportionate to the proposal. As the paragraph and the preceding paragraph are written, extensive work would need to be undertaken for even a single advertisement application. The Company considers that it is appropriate that the SPGs provide guidance on the types of considerations that applicants need to take into account in relation to the Welsh language. However, any requirements published in the Joint LDP should be based on robust evidence and should be proportionate and flexible enough to cover a wide range of development types.

TAN 20 states:

*“The land use planning system should where feasible and relevant contribute to the future well being of the Welsh language by establishing the conditions to allow sustainable communities to thrive.” (paragraph 1.6.3, emphasis added)*

This indicates that TAN 20 supports the contribution of the planning system to the Welsh language but recognises that it is not “feasible” or “relevant” for it to do so in every case.

The Company therefore requests that this section of draft paragraph 7.1.4a is amended as follows:

*“~~The SPGs will look for evidence that the proposal has been discussed with~~ **provide guidance and examples of the types of evidence that promoters can submit, where feasible and relevant, to demonstrate their contribution to supporting the Welsh language. This evidence should be proportionate to the type and scale of the proposed development. It could include discussions with Community, City and Town Councils and local community groups to obtain information and ask for their opinion, and that consideration has been given to surveys about the local housing market, and/ or the labour market. In addition, the SPGs will refer the applicants to such assistance as is available from the Office of Language Commissioner about designing bilingual signage and marketing material, the advice that is available to the private sector by the Welsh Government/Business Wales regarding bilingualism.**” (MAC in bold, proposed amendments in bold and underlined)*

Bourne Leisure considers that, as drafted, paragraph 7.1.4a does not meet the first soundness test (does the plan fit?) as it is inconsistent with the acknowledgement in TAN 20 that it is not always “feasible” or “relevant” for the planning system to contribute towards the future well-being of the Welsh language. It also fails the second soundness test (is the plan appropriate?) because it is not reasonable and the rationale behind these requirements has not been demonstrated. Finally, draft paragraph 7.1.4a also fails to meet the third soundness test (will the plan deliver?) as the proposed requirements are overly restrictive and so could serve to obstruct the delivery of the plan.

**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).**

Consultation and engagement requirements should reflect the type and scale of the proposed development and should be proportionate to the proposal.

It is appropriate that the SPGs provide guidance on the types of considerations that applicants need to take into account in relation to the Welsh language. However, any requirements published in the Joint LDP should be based on robust evidence and should be proportionate and flexible enough to cover a wide range of development types.

TAN 20 supports the contribution of the planning system to the Welsh language but recognises that it is not “feasible” or “relevant” for it to do so in every case.