

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 180hqa 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

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

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 ymrwymadau/dyraniadau tai yn seiliedig ar hierarchiaeth o aneddeoedd 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 gorddyraniad 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 gorddyraniad 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 dyraniadau 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