Cyf / ID: 2919

### HORIZON COMMERCIAL



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Joint Planning Policy Unit 1st Floor Bangor City Council Offices Ffordd Gwynedd Bangor Gwynedd LL57 1DT

12th April 2016

**FAO Nia Haf Davies** 

DCRM Ref. No: HNP-S2-RI-LET-00031 Unique Number: HNP9060N By e-mail: planningpolicy@gwynedd.gov.uk

By e-mail. planningpolicy@gwynedd

Dear Nia

#### ANGLESEY AND GWYNEDD JOINT LOCAL DEVELOPMENT PLAN 2011-2026 HORIZON NUCLEAR POWER WYLFA LIMITED REPRESENTATIONS ON FOCUSSED CHANGES (FEBRUARY 2016)

Horizon Nuclear Power Wylfa Limited ("Horizon") welcomes the opportunity to comment on the Isle of Anglesey County Council and Gwynedd Council ("Councils") Joint Local Development Plan ("JDLP") Focussed Changes (February 2016) and to continue dialogue with the Councils as part of the latest JLDP consultation.

The publication of the Focussed Changes follows earlier consultation on the Deposit Draft JLDP in March 2015 where Horizon made representations that included a number of important and fundamental proposed changes to the JLDP. Horizon is also aware that the Councils have submitted the JLDP to the Welsh Government and Planning Inspectorate for Public Examination.

As you know, Wylfa Newydd and the associated development represents a multi-billion pound investment and it will not only provide secure low carbon electricity for many decades, but will create significant long term employment opportunities and economic benefits for Anglesey, Gwynedd and North Wales.

We are therefore fully invested in the future of Anglesey and is committed to continued working with the Councils to ensure that the JLDP provides an appropriate balance to recognition and support for the Wylfa Newydd with the communities' needs.

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We are pleased that a number of our proposed changes to the Deposit JLDP have been incorporated into the 'Focussed Changes' which serves to strengthen support in the JLDP for the Wylfa Newydd. However, we are concerned that a number of our fundamental proposed changes to the Deposit Draft JLDP have not been supported.

Our primary concern is the absence of a clear suite of Wylfa Newydd specific policies, which has not been addressed by the Focussed Changes. It is currently for the reader to wade through a significant number of policies to 'pick out' and appropriately balance those elements that are appropriate for assessing development at Wylfa Newydd. This significantly affects the ability of the policies to be easily interpreted, particularly by members of the public, and so undermines their effectiveness.

Accordingly, please find enclosed the following in support of our representations:

- 1. A summary note explaining the nature of Horizon's further representations; and
- 2. A schedule setting out additional specific representations as a result of the Focussed Changes. Horizon has agreed with the Councils that given the format of the 'Focussed Changes', its representations can be provided in tabular form for ease of reference against Horizon's representations on the Deposit Draft JLDP.

We would also like to confirm our desire to appear at the hearing sessions relevant to the representations set out in our enclosed responses.

We would stress again that these concerns are raised in a constructive manner and with a continued desire to work alongside your Councils to successfully advance the Wylfa Newydd. With this in mind, we would welcome an early opportunity to meet to discuss the contents of our latest representations with you and your officers.

Yours sincerely,



Kieran Somers Head of Planning

Enc.

Signed Focussed Changes Representation Form 12.04.16 Horizon Focussed Changes Summary Notes 11.04.16 JLDP Additional Specific Representations Final V4 12.04.16

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Horizon Nuclear Power Wylfa Limited is a company registered in England & Wales with company number 06811987 and whose registered office is at Sunrise House, 1420 Charlton Court, Gloucester Business Park, Gloucester GL3 4AE





Defnydd swyddfa yn unig/ Office use only

Rhif Cyn./Rep No.:

Derbyniwyd/Received:

Cydnabod/Acknowledged

#### Cynllun Datblygu Lleol ar y Cyd Adnau Ynys Môn a Gwynedd 2011-2026 FFURFLEN SYLWADAU NEWIDIADAU Â FFOCWS/ Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026 FOCUSSED CHANGES COMMENTS FORM 25/2/16.

Yn dilyn ymgynghoriad ar y Cynllun Datblygu Lleol ar y Cyd arAdnau, mae Cynghorhau Gwynedd a Môn yn cynnig rhai 'Newidiadau â Ffocws.' Hoffem glywed eich barn ar y rhain.

Dylid defnyddio'r ffurflen hon ar gyfer yr holl sylwadau (h.y. sylwadau neu wrthwynebiadau). Mae fersiynau Uniongyrchol Ar-lein/Electronig a nodiadau cyfarwyddyd ar gael ar <u>www.gwynedd.llyw.cymru/cdll</u> neu <u>www.anglesey.gov.uk/cdll</u>. Os ydych yn cyflwyno copi ar bapur, dylech atodi tudalennau ychwanegol lle bod angen. Dylech lenwi ffurflenni ar wahân ar gyfer pob sylw yr hoffech ei wneud.

Sylwer bod RHAID i sylwadau fod yn ymwneud â'r Newidiadau â Ffocws yn unig, ac nid i agweddau eraill ar y Cynllun Datblygu Lleol ar y Cyd ar Adnau. Ni fydd sylwadau eraill yn derbyn sylw.

Mae'n rhaid derbyn eich sylwadau ddim hwyrach na 4.30yh ar yr 13 Ebrill 2016. <u>NI FYDD SYLWADAU A</u> <u>DDERBYNNIR WEDI'R DYDDIAD YMA YN CAEL EU</u> <u>HYSTYRIED</u>

Dychwelwch y ffurflenni at: Uned Polisi Cynllunio ar y Cyd, Swyddfa Cyngor Dinas Bangor, Ffordd Gwynedd, Bangor, Gwynedd, LL57 1DT neu polisicynllunio@gwynedd.gov.uk

**Diogelu Data** - Mae gan y ffurflen hon ddwy ran: Rhan A (Manylion Personol) a Rhan B (Eich sylw). Sylwer mai Rhan B yn unig fydd ar gael i'r cyhoedd a chaiff ei hanfon at yr Arolygiaeth Gynllunio.

Mae'n bosib derbyn ffurflenni sylwadau ychwanegol gan yr Uned Polisi Cynllunio ar y Cyd drwy ffonio 01286 685003 neu gellir eu llawr lwytho o wefan y Cyngor yn: www.gwynedd.llyw.cymru/cdll neu Following consultation on the Deposit Joint Local Development Plan (LDP), Anglesey and Gwynedd Councils are proposing some 'Focussed Changes'. We would like your views on these.

This form should be used for all representations (i.e. comments or objections). Direct Online/Electronic versions and guidance notes 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. Separate forms should be completed for each comment that you wish to make.

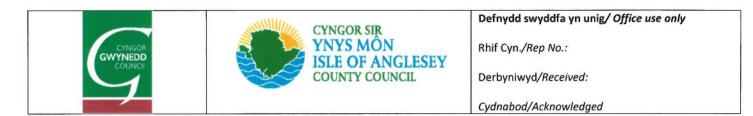
Please note that representations MUST relate only to the Focussed Changes, and not to other aspects of the Deposit Joint Local Development Plan. Other representations will be disregarded.

## Your representations must be received by no later than 4.30pm on the 13 April 2016. <u>REPRESENTATIONS</u> <u>RECEIVED AFTER THIS TIME WILL NOT BE CONSIDERED</u>

Please return forms to: Joint Planning Policy Unit, Bangor City Council Offices, Ffordd Gwynedd, Bangor, Gwynedd, LL57 1DT or planningpolicy@gwynedd.gov.uk

**Data Protection -** This form has two parts: Part A (Personal details) and Part B (Your representation). Please note that only Part B will be made publicly available and will be forwarded to the Planning Inspectorate.

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



#### Cynllun Datblygu Lleol ar y Cyd Adnau Ynys Môn a Gwynedd 2011-2026 FFURFLEN SYLWADAU NEWIDIADAU Â FFOCWS/ Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026 FOCUSSED CHANGES COMMENTS FORM 25/2/16.

RHAN B: Eich Sylwadau a N	ewidiadau a Awgrymir	
PART B: Your Comments an	d Suggested Changes	
Eich enw/Sefydliad:	Horizon Nuclear Power Wylfa Limited	
Your name/Organisation:		

1. Ar ba Newid â Ffocws yr ydych chi'n gwneud sylwadau? (Cofiwch defnyddio un ffurflen ar gyfer pob cynrychiolaeth)

1. Which Focussed Change are you commenting on? (Remember to use one form for each representation)

Rhif y Newid â Ffocws (NF)	Ce	efnogi/	Gwrthwynebu/	
Focussed Change Number (NF)	Su Su	pport	Object	

2. Cyn i chi esbonio eich sylwadau'n fanwl, byddai'n dda gwybod os ydych yn credu fod y Cynllun yn gadarn a'i pheidio , o ganlyniad i'r Newidiadau â Ffocws, 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 Focussed 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 ac dylid ei		
	newid/Unsound and should be	IV.	
	changed		

#### 3. Rhowch fanylion eich sylwadau ar y Newid â Ffocws yn y blwch nesaf.

Esboniwch pam rydych yn gwrthwynebu neu'n cefnogi'r Newid â Ffocws a nodir a pha newidiadau sydd eu hangen i'r Newid â Ffocws i wneud y Cynllun yn gadarn. Dylech gynnwys yr holl wybodaeth, tystiolaeth a gwybodaeth ategol sy'n angenrheidiol i gefnogi eich sylw. Bydd hyn yn helpu'r Awdurdod a'r Arolygydd i ddeall y materion y byddwch yn eu codi. Ni fyddwch yn gallu cyflwyno rhagor o wybodaeth i'r Archwiliad

dim ond os bydd yr Arolygydd yn eich gwahodd i wneud hynny.

3. Please provide details of your representation on the Focussed Change in the next box.

Explain why you object to or support the identified Focussed Change and outline what changes are needed to the Focussed Change to make the Plan sound. Include all the information, evidence and supporting information necessary to support your representation. 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 do so.

Please refer to the attached schedule of "Additional Specific Representations to Focussed Changes"

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 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).

Please refer to the attached schedule of "Additional Specific Representations to Focussed Changes"

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

Ar y cam hwn, gallwch wneud sylwadau'n ysgrifenedig yn unig (gelwir y rhain yn 'sylwadau ysgrifenedig'). Fodd bynnag, gall pawb sydd am newid y Cynllun ymddangos gerbron yr Arolygydd a siarad mewn 'sesiwn gwrandawiad' yn ystod yr Archwiliad Cyhoeddus. Ond dylech gofio y bydd yr Arolygydd yn rhoi'r un pwysau ar eich sylwadau ysgrifenedig ar y ffurflen hon â'r rheiny a wneir ar lafar mewn sesiwn gwrandawiad. Sylwer, bydd yr Arolygydd yn dewis y weithdrefn fwyaf priodol er mwyn darparu ar gyfer y rhai sydd eisiau rhoi tystiolaeth lafar.

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)

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the Public Examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

Nid wyf am siarad mewn sesiwn gwrandawiad ac rwyf yn fodlon i'm sylwadau

ysgrifenedig gael eu hystyried gan yr Arolygydd.		
I do not want to speak at a hearing session and am happy for my written		
comments to be considered by the Inspector.		
Hoffwn siarad mewn sesiwn gwrandawiad.	IV.	
I want to speak at a hearing session.		

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

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.

Please refer to the attached schedule of "Additional Specific Representations to Focussed Changes". In particular, the JDLP needs to provide sufficiently clear policies to support and provide the necessary control for significant elements of the Wylfa Newydd Project.

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

6. 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	۲
Louis Boot 1 (Builting In Church	-
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 AM Y NEWIDIADAU Â FFOCWS/ THANK YOU FOR YOUR COMMENTS ON THE FOCUSSED CHANGES

Nodiadau cyfarwyddyd	Guidance notes
Bydd Cynllun Datblygu Lleol Gwynedd a Môn ar y Cyd yn cael ei archwilio gan Arolygydd annibynnol a benodir gan Lywodraeth Cymru. Gwaith yr Arolygydd yw ystyried a yw'r Cynllun yn bodloni gofynion gweithdrefnol ac a yw'n gadarn.	The Joint Anglesey and Gwynedd Local Development Plan (LDP) will be 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.
<ul> <li>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:</li> <li>1. A yw'r cynllun yn ffitio? (h.y. a yw'n gyson â chynlluniau eraill?)</li> <li>2. A yw'r cynllun yn briodol? (h.y. a yw'n briodol ar gyfer yr ardal yng ngoleuni'r dystiolaeth?)</li> <li>3. A fydd y cynllun yn cyflawni? (h.y. a yw'n debygol o fod yn effeithiol?)</li> </ul>	<ul> <li>'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:</li> <li>1. Does the plan fit? (i.e. is it consistent with other plans?)</li> <li>2. Is the plan appropriate? (i.e. is it appropriate for the area in the light of the evidence?)</li> <li>3. Will the plan deliver? (i.e. is it likely to be effective?)</li> </ul>
Darperir rhagor o wybodaeth am y profion cadernid a'r gofynion gweithdrefnol yn Arweiniad Gweithdrefnol ar Archwiliadau Cynllun Datblygu Lleol yr Arolygiaeth Gynllunio.	More information on the soundness tests and procedural requirements is provided in the Planning Inspectorate's Local Development Plan Examinations Procedural Guidance.
Wedi ymgynghori ar fersiwn adneuo'r Cynllun Datblygu Lleol, mae Cynghorau Gwynedd a Môn yn gwneud nifer gyfyngedig o Newidiadau â Ffocws er mwyn gwneud y Cynllun yn gadarn cyn iddo gael ei archwilio. Ymgynghorir ar y newidiadau rwan. Caiff unrhyw ymatebon eu hanfon ymlaen yn uniongyrchol at yr Arolygydd Cynllunio.	Having consulted on the Deposit version of the Local Development Plan, Anglesey and Gwynedd Councils are making a limited number of 'Focussed Changes' to make the Plan sound before it is examined. These changes are being consulted upon now. Any responses will be forwarded directly to the Planning Inspector. If you are objecting to a Focussed Change, you should say why you think it makes the Plan unsound, and how the
Os ydych yn gwrthwynebu Newid â Ffocws, dylech ddweud pam nad yw'n gwneud y Cynllun yn gadarn a sut dylid newid y Newid â Ffocws er mwyn gwneud y Cynllun yn gadarn.	Focussed Change should be amended to make the Plan sound. Where you propose an amendment to a Focussed
Lle rydych yn cynnig newid i 'r Newid â Ffocws 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 Newidiadau â Ffocws. Dylech gynnwys eich holl sylwadau ar y ffurflen, gan ddefnyddio dogfennau ychwanegol a thystiolaeth ategol lle bod angen.	Change 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 Focussed Changes. You should include all your comments on the form, using accompanying documents and supporting evidence where necessary.

Dychwelwch y ffurflen i: Uned Polisi Cynllunio ar y Cyd,	Please return the form to: Joint Planning Policy Unit,
Swyddfa Cyngor Dinas Bangor, Ffordd Gwynedd,	Bangor City Council Offices, Ffordd Gwynedd, Bangor,
Bangor, Gwynedd, LL57 1DT neu	Gwynedd, LL57 1DT or
polisicynllunio@gwynedd.gov.uk erbyn 4.30yh ar	planningpolicy@gwynedd.gov.uk by 4.30pm on
13/4/16	13/4/16

#### CYNLLUN DATBLYGU LLEOL AR Y CYD ADNAU YNYS MÔN A GWYNEDD 2011-2026 ANGLESEY AND GWYNEDD DEPOSIT JOINT LOCAL DEVELOPMENT PLAN 2011-2026

#### HORIZON NUCLEAR POWER WYLFA LIMITED REPRESENTATIONS TO FOCUSSED CHANGES (APRIL 2016)

#### a) Introduction

- 1.1 Horizon Nuclear Power Wylfa Limited ("Horizon") welcomes the opportunity to comment on the Isle of Anglesey County Council and Gwynedd Council ("Councils") Joint Local Development Plan ("JLDP") Focussed Changes (February 2016).
- 1.2 The publication of the Focussed Changes follows earlier consultation on the Deposit Draft JLDP in March 2015 where Horizon made representations that included a number of important and fundamental proposed changes to the JLDP.
- 1.3 Horizon is also aware that the Councils have submitted the JLDP to the Welsh Government and Planning Inspectorate for Public Examination.
- 1.4 Horizon is advancing proposals for the construction and operation of a new nuclear power station at Wylfa ("Wylfa Newydd"). As outlined in Horizon's representations to the Deposit Draft JLDP, Wylfa Newydd and the associated development ("Wylfa Newydd Project" or "Project") is likely to be one of the biggest, if not the biggest, energy investment in Wales. Horizon is therefore fully invested in the future of Anglesey and welcomes continued dialogue with the Councils as part of the latest JLDP consultation.
- 1.5 Accordingly, please find enclosed a table of representations entitled 'Additional Specific Representations to Focussed Changes' setting out Horizon's detailed comments to the Focussed Changes.
- 1.6 Horizon has agreed with the Councils that given the format of the Focussed Changes, its representations are provided in tabular form for ease of reference against Horizon's representations on the Deposit Draft JLDP.
- 1.7 Horizon's representations have particular regard to the Government's requirements relating to soundness and legal compliance, further emphasised in national planning policy as set out in Planning Policy Wales (Edition 8, 2016) ("PPW"). The accompanying table provides Horizon's detailed comments, sets out whether Horizon considers that the Focussed Changes meet the soundness tests, and makes recommendations including, where appropriate, proposed changes to the JLDP.

#### b) <u>Representations to the JLDP Focussed Changes</u>

1.8 Horizon is pleased that a number of its proposed changes to the Deposit Draft JLDP have been incorporated into the Focussed Changes which seeks to strengthen support in the JLDP for the Wylfa Newydd Project. Horizon considers this to be a positive move, particularly as Wylfa is identified within the National Infrastructure Plan 2014 (published December 2014) as a 'Top 40 priority infrastructure investments' energy project in the UK. It is crucial therefore that the JLDP recognises and reinforces the importance of the Wylfa Newydd Project.

- 1.8 Horizon is concerned however that the Wylfa Newydd specific policies it proposed to the Deposit Draft JLDP have been rejected by the Councils and have not been incorporated as part of the Focussed Changes. A copy of the proposed Wylfa Newydd specific policies, which are proposed to sit beneath draft Policy PS9, are provided at Appendix of this note for ease of reference.
- 1.9 Horizon considers that the magnitude, timing (the duration of the Project) and national context of the Wylfa Newydd Project justifies the need for a clear suite of Wylfa Newydd specific policies enshrined in the Development Plan, rather than any Wylfa specific Supplementary Planning Guidance alone, to recognise the unique status of the Project.
- 1.10 Horizon considers that the emerging JLDP (as amended by the Focussed Changes) does not provide a sufficiently clear policy framework to support and provide the necessary control for significant elements of the Wylfa Newydd Project. It is critical that there is a clear suite of policies against which the Councils can determine applications where they are the decision maker and make representations where they are a consultee, i.e. for the DCO. It is particularly important that the policies perform this joint role given the emerging changes in the draft Wales Bill, which are now likely to include the option to combine the consenting process for associated development for major electricity generating projects (over 350MW) in Wales within the DCO regime.
- 1.11 As Horizon explained in its original representations to the Deposit Draft JLDP, in Wales the consent regime for Nationally Significant Infrastructure Projects ("NSIP's") operates alongside the town and country planning regime. While Wylfa Newydd itself will therefore be determined under the Planning Act 2008, a significant amount of development will need to come forward under the Town and Country Planning Act 1990 (as amended) ("TCPA") as associated development in connection with the Project (or through the DCO if the changes currently proposed through the draft Wales Bill come into effect).
- 1.12 Crucially, Horizon anticipates the need for TCPA applications for associated development to be consented early will become increasingly necessary. This is because examining authorities for Welsh DCO's continue to put increasing pressure on developers to have their TCPA applications approved by the time of DCO examination to provide certainty and to ensure that there is no impediment for bringing forward such important and significant infrastructure projects. It is critical therefore that the JLDP provides the appropriate planning policy framework so as not to create a barrier or unnecessary hurdles for applications for associated development proposed in connection with the Project.
- 1.11 For those reasons, Horizon strongly urges the Councils to reconsider incorporating the proposed Wylfa Newydd specific policies as part of the JLDP. Incorporating the proposed Wylfa Newydd specific policies provides an opportunity for those policies to clarify, where appropriate, where the Wylfa Newydd specific policies carry greater weight or create exceptions to other policies in the JLDP while still providing a robust assessment framework.
- 1.12 As currently drafted however, Horizon considers the draft JLDP policies to be insufficiently flexible and lacking the clarity required by planning policies to appropriately assess planning application proposals for associated development. As currently drafted it is for the reader to wade through a significant number of policies to 'pick out' and appropriately balance those elements that are appropriate for assessing development at Wylfa Newydd. This significantly affects the ability of the policies to be easily interpreted, particularly by members of the public, and undermines their effectiveness.

- 1.13 Horizon made it clear that its representations to the Deposit Draft JLDP were based on those Wylfa Newydd site specific policies being incorporated into the future JLDP. It therefore reserved its right to make further representations/comments to any future consultation such as these Focussed Changes if that was not accepted. This meant that it was able to take a lighter touch approach to commenting on the remainder of the Deposit Draft JLDP on the basis that the Wylfa Newydd specific policies would establish the primary relevant policies for the Project.
- 1.14 It was for those reason that Horizon's representations for the JLDP did not comment in any detail (nor seek specific amendments) on a number of other policies, which would in the absence of Wylfa Newydd site specific policies, form the policy context for the Project.
- 1.15 As the Focussed Changes do not incorporate the Wylfa Newydd site specific policies proposed in Horizon's representations to the Deposit Draft JLDP, the enclosed table now proposes specific and fundamental changes to a number of policies including: ISA2, ISA3, ISA5, ARNA1, CYF1, CYF2, CYF4, PS12, MAN6, Chapter 7.4, TAI2, TIA3, PS14, PS16 and MWYN9. While Horizon remains of the view that the inclusion of Wylfa Newydd site specific policies is the most robust way forward, in the event the Councils do not do so it is crucial that the JLDP is further amended so that there is a clear distinction between those policies that relate to general application proposals and those that relate to the Wylfa Newydd Project (associated development in particular) to ensure that the JLDP is sufficiently flexible and that there is a clear mechanism for implementing JLDP policies in relation to the Project. To that end, Horizon now makes representations that some policies should specifically exclude the Wylfa Newydd Project where they are potentially too restrictive if applied to associated development proposed in connection with the Project. In these cases, Horizon have proposed alternative wording which would be more appropriate to apply to the primarily temporary and bespoke associated development uses proposed as part of the Project.

#### c) <u>Soundness Test</u>

- 1.16 PPW stresses the need for Local Development Plans (LDP's) to meet the three soundness tests which comprise:
  - Does the plan fit? (i.e. is it clear that the LDP is consistent with the other plans?)
  - Is the plan appropriate? (i.e. is the plan appropriate for the area in the light of the evidence?)
  - Will the plan deliver? (i.e. is it likely to be effective?)
- 1.17 The Deposit Draft JLDP set out ten criteria for assessing soundness, which Horizon assumes also apply to the Focussed Changes. These are referred to, in summary and where relevant, in the accompanying table of representations.
- 1.18 In its current form, Horizon does not consider that the JLDP meets the soundness tests because:
  - The policies do not create a coherent framework of policies in respect of associated development that will be promoted in connection with the Wylfa Newydd Project and is at odds with the Planning and Compulsory Purchase Act 2004. The JLDP does not therefore meet the "Does the plan fit?" soundness test (soundness test CE1 of the Deposit Draft JLDP).

- The policies are not realistic or appropriate having considered relevant alternatives and could constrain the ability of the plan to adapt to changes in the number and type of major infrastructure projects associated with the Wylfa Newydd Project. The JLDP therefore fails to meet the "Is the Plan appropriate?" soundness test (soundness test CE2 in the Deposit Draft JLDP).
- The JLDP is insufficiently flexible to appropriately provide for associated development. In order for the JLDP to be effective, Horizon considers it fundamental that the JLDP include Wylfa Newydd specific policies as proposed at the Deposit stage. In the absence of such specific policies, further focussed changes are required to other relevant policies to ensure that they are fit for purpose for determining applications for associated development proposed in connection with the Project and for providing consultation responses in relation to the DCO application.
- 1.19 As currently drafted, Horizon considers that the draft JLDP does not meet the three soundness tests and does not therefore provide the appropriate and necessary planning policy framework for the Wylfa Newydd Project.
- 1.20 Horizon urges the Councils to incorporate the Wylfa Newydd site specific policies and proposed changes to ensure that there is a clear planning policy framework so as to help realise (and not create a barrier to) the very urgent need for new nuclear power generation in the UK.

	J	JLDP Policy	Paragraph ref	Consultation responses	Specific amendments sought	Previous Represe Further Specific
				transformation sought, should be included within these paragraphs.	<ul> <li>important that the Plan acts as a facilitator of economic development. This will be achieved through a policy framework that supports the principles of each Authority's Strategic Plans, the Anglesey and Gwynedd Single integrated Plan, Employment Plans and the Anglesey Energy Island Programme. <u>Specifically the Plan will facilitate the timely development of the Wylfa Newydd Project in accordance with the National Policy Statements.</u></li> <li>6.28 [] The Plan has an important role in facilitating the sustainable development of these projects whilst protecting the</li> </ul>	
					unique culture, heritage and natural environment of the area. The Councils in partnership with Welsh Government. project promoters, and business organisations will promote and support sustainable economic development.[]	
	N 9 1 S	Chapter 7 Managing growth and Development – Safe, healthy, Distinctive and	Paragraph 7.1.3	-		Focused Change introduced the fol the right level and development com- without damaging
	١	vibrant communities				However, it is appropriate mitig might be caused to
						Horizon is commi languages and a W in support of the V Language Staten applications, as ne
1	ן 1 2 1 2	Chapter 7 Managing growth and Development – Safe, healthy, Distinctive and	Strategic Policy PS1, Paragraph 2	Horizon considers that in the absence of the SPG (cited as forthcoming in paragraph 7.1.4), it is unclear how this policy test will be applied. As currently drafted, this element of the Strategic Policy may risk becoming a barrier to economic growth and other aspirations in the Plan.	Amend the policy as follows:STRATEGIC POLICY PS1:WELSH LANGUAGE AND CULTUREThe Councils will promote and support the use of the Welsh	No –Whilst Polic amended (Focused in the absence of t applied. As amen a potential barrier Plan. This is parti
	١	vibrant communities		Horizon submits that the paragraph needs to be amended to build in further flexibility and clarify, among other things, what is meant by "significant harm", the factors relevant to assessing potential harm, and how other policy objectives in the Plan will be weighed against this policy objective.	<ol> <li>Language in the Plan area. This will be achieved by:</li> <li>1. Ensuring that in applications that may have an effect on the future of the Welsh language and culture within communities, applicants will normally be expected to submit a:</li> </ol>	that may include r (c) $-$ it is not cle provides an "adeq (b) continues to ap what has been ass
					(a) Language impact statement to accompany a planning application for smaller developments.	Horizon also con specific enough a sites. It is also s
					(b) More detailed assessment in the form of a "Language Impact Assessment" to accompany a planning application where developments are on a larger scale or for large scale infrastructure projects with potential long term impacts.	windfall sites with language is consider and where they re
					2. Refusing proposals that due to its size, scale or its location, would cause significant harm to the character and language balance of a community_Using appropriate mechanisms to ensure that suitable	It is considered th with the previous flexibility and me plan needs to be su

esentation Addressed by Focused Changes? and c Amendments Sought

ge Ref: NF 14 has amended paragraph 7.1.3 and following sentence, "...<u>Policies will help ensure that</u> and type of need is met and that the rate at which the mes forward allows the development to be absorbed ng the character of the community..."

s considered that provision should be made for igation measures to remedy any "damage" which to the character of the community.

nitted to the equal treatment of the Welsh and English Welsh Language Impact Assessment will be provided e Wylfa Newydd project DCO and a WLIA or Welsh ement will be provided for associated TCPA necessary.

licy PS1: 'Welsh Language and Culture' has been sed Change Ref: NF 15), Horizon still considers that f the SPG it is still unclear how this policy test will be ended, this Strategic Policy is still considered to pose ier to economic growth and other aspirations in the rticularly the case for associated TCPA applications e residential proposals. It is proposed to delete criteria clear who makes an assessment that any proposal(s) equate range of sizes and types of housing units". Part apply to any residential development that goes beyond ssessed as part of JLDP preparation.

onsiders that Part 2 of proposed Policy PS1 is not and suggest thresholds are introduced for windfall suggested that this requirements should relate to ithin areas identified by the LPA as areas where the sidered to be of particularly sensitivity or significance relate to major development.

that this paragraph must be amended in accordance usly proposed wording in order to build in further neet the soundness test "will the plan deliver", as the sufficiently flexible to be effective.



Defnydd swyddfa yn unig/ Office use only

Rhif Cyn./Rep No.:

Derbyniwyd/Received:

Cydnabod/Acknowledged

Cynllun Datblygu Lleol ar y Cyd Adnau Ynys Môn a Gwynedd 2011-2026 FFURFLEN SYLWADAU NEWIDIADAU Â FFOCWS/ Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026 FOCUSSED CHANGES COMMENTS FORM

#### 25/2/16.

Yn dilyn ymgynghoriad ar y Cynllun Datblygu Lleol ar y Cyd arAdnau, mae Cynghorhau Gwynedd a Môn yn cynnig rhai 'Newidiadau â Ffocws.' Hoffem glywed eich barn ar y rhain.

Dylid defnyddio'r ffurflen hon ar gyfer yr holl sylwadau (h.y. sylwadau neu wrthwynebiadau). Mae fersiynau Uniongyrchol Ar-lein/Electronig a nodiadau cyfarwyddyd ar gael ar <u>www.gwynedd.llyw.cymru/cdll</u> neu <u>www.anglesey.gov.uk/cdll</u>. Os ydych yn cyflwyno copi ar bapur, dylech atodi tudalennau ychwanegol lle bod angen. Dylech lenwi ffurflenni ar wahân ar gyfer pob sylw yr hoffech ei wneud.

Sylwer bod RHAID i sylwadau fod yn ymwneud â'r Newidiadau â Ffocws yn unig, ac nid i agweddau eraill ar y Cynllun Datblygu Lleol ar y Cyd ar Adnau. Ni fydd sylwadau eraill yn derbyn sylw.

Mae'n rhaid derbyn eich sylwadau ddim hwyrach na 4.30yh ar yr 13 Ebrill 2016. <u>NI FYDD SYLWADAU A</u> <u>DDERBYNNIR WEDI'R DYDDIAD YMA YN CAEL EU</u> <u>HYSTYRIED</u>

Dychwelwch y ffurflenni at: Uned Polisi Cynllunio ar y Cyd, Swyddfa Cyngor Dinas Bangor, Ffordd Gwynedd, Bangor, Gwynedd, LL57 1DT neu polisicynllunio@gwynedd.gov.uk

**Diogelu Data** - Mae gan y ffurflen hon ddwy ran: Rhan A (Manylion Personol) a Rhan B (Eich sylw). Sylwer mai Rhan B yn unig fydd ar gael i'r cyhoedd a chaiff ei hanfon at yr Arolygiaeth Gynllunio.

Mae'n bosib derbyn ffurflenni sylwadau ychwanegol gan yr Uned Polisi Cynllunio ar y Cyd drwy ffonio 01286 685003 neu gellir eu llawr lwytho o wefan y Cyngor yn: www.gwynedd.llyw.cymru/cdll neu

www.ynysmon.gov.uk/cdll neu gallwch lungopïo'r ffurflen hon. Wrth wneud sylwadau, defnyddiwch dudalennau ychwanegol os oes angen, gan nodi rhif y dudalen yn glir. Following consultation on the Deposit Joint Local Development Plan (LDP), Anglesey and Gwynedd Councils are proposing some 'Focussed Changes'. We would like your views on these.

This form should be used for all representations (i.e. comments or objections). Direct Online/Electronic versions and guidance notes 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. Separate forms should be completed for each comment that you wish to make.

Please note that representations MUST relate only to the Focussed Changes, and not to other aspects of the Deposit Joint Local Development Plan. Other representations will be disregarded.

Your representations must be received by no later than 4.30pm on the 13 April 2016. <u>REPRESENTATIONS</u> <u>RECEIVED AFTER THIS TIME WILL NOT BE CONSIDERED</u>

Please return forms to: Joint Planning Policy Unit, Bangor City Council Offices, Ffordd Gwynedd, Bangor, Gwynedd, LL57 1DT or planningpolicy@gwynedd.gov.uk

**Data Protection -** This form has two parts: Part A (Personal details) and Part B (Your representation). Please note that only Part B will be made publicly available and will be forwarded to the Planning Inspectorate.

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

<u>www.anglesey.gov.uk/ldp</u> or you may photocopy this form. When making comments please use additional sheets as required clearly numbering each consecutive sheet.

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CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL

Rhif Cyn./Rep No.:

Defnydd swyddfa yn unig/ Office use only

Derbyniwyd/Received:

Cydnabod/Acknowledged

Cynllun Datblygu Lleol ar y Cyd Adnau Ynys Môn a Gwynedd 2011-2026 FFURFLEN SYLWADAU NEWIDIADAU Â FFOCWS/ Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026 FOCUSSED CHANGES COMMENTS FORM 25/2/16.

RHAN B: Eich Sylwadau a Newidiadau a Awgrymir					
PART B: Your Comments and Su	PART B: Your Comments and Suggested Changes				
Eich enw/Sefydliad:	Nathaniel Lichfield & Partners on behalf of Bourne Leisure Ltd.				
Your name/Organisation:					

1. Ar ba Newid â Ffocws yr ydych chi'n gwneud sylwadau? (Cofiwch defnyddio un ffurflen ar gyfer pob cynrychiolaeth)

1. Which Focussed Change are you commenting on? (Remember to use one form for each representation)

Rhif y Newid â Ffocws (NF)	NF 14	Cefnogi/	Gwrthwynebu/	$\boxtimes$
Focussed Change Number (NF)		Support	Object	

2. Cyn i chi esbonio eich sylwadau'n fanwl, byddai'n dda gwybod os ydych yn credu fod y Cynllun yn gadarn a'i pheidio , o ganlyniad i'r Newidiadau â Ffocws, 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 Focussed 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 ac dylid ei	_
	newid/Unsound and should be	¥
	changed	

3. Rhowch fanylion eich sylwadau ar y Newid â Ffocws yn y blwch nesaf.

Esboniwch pam rydych yn gwrthwynebu neu'n cefnogi'r Newid â Ffocws a nodir a pha newidiadau sydd eu hangen i'r Newid â Ffocws i wneud y Cynllun yn gadarn. Dylech gynnwys yr holl wybodaeth, tystiolaeth a gwybodaeth ategol sy'n angenrheidiol i gefnogi eich sylw. Bydd hyn yn helpu'r Awdurdod a'r Arolygydd i ddeall y materion y byddwch yn eu codi. Ni fyddwch yn gallu cyflwyno rhagor o wybodaeth i'r Archwiliad dim ond os bydd yr Arolygydd yn eich gwahodd i wneud hynny. **3. Please provide details of your representation on the Focussed Change in the next box.** 

Explain why you object to or support the identified Focussed Change and outline what changes are needed to the Focussed Change to make the Plan sound. Include all the information, evidence and supporting information necessary to support your representation. 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 do so.

By way of background, Bourne Leisure operates more than 50 holiday sites in the form of holiday parks, family entertainment resorts and hotels in Great Britain and is therefore a significant contributor to the national tourism economy, as well as local visitor economies. Within Gwynedd, Bourne Leisure operates Hafan y Mor Holiday Park near Pwllheli and Greenacres Holiday Park near Porthmadog.

Focused Change NF 14 recognises that the promotion of healthy local economies is of "most importance" in sustaining local communities and strengthening the Welsh language (Section 7.1.3). Bourne Leisure agrees with the Councils that the strength of local economies is of key importance in this regard, as it helps provide opportunities for people to remain in the area rather than having to move to find work elsewhere.

However, this Focused Change also requires retail, industrial or commercial development to recognise the status of Welsh as "the official language in Wales" (Section 7.1.3). Bourne Leisure objects to this proposed requirement, as the Company considers that Welsh should be treated as <u>one</u> of the official languages in Wales, rather than *the* official language. This stance is reflected by another sentence within Focused Change NF 14, which states that there should be a commitment to treat Welsh and English "on an equal basis".

The Welsh language is granted official status within the Welsh Language (Wales) Measure 2011. However, this legislation "does not affect the status of the English language in Wales" (Section 1, point 4). By de facto, English is also an official language in Wales.

Therefore, Bourne Leisure requests that the text is amended as follows: "Additionally, it is expected that any retail, industrial or commercial development demonstrates an understanding of the linguistic composition of the area where the planning application relates and recognition of the status of Welsh as <u>one of the official languages</u> in Wales" (Section 7.1.3,

Suggested amendments underlined).

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 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).

Bourne Leisure agrees with the Councils that the strength of local economies is of key importance in this regard, as it helps provide opportunities for people to remain within the area rather than having to move to find work elsewhere.

However, the Company considers that Welsh should be treated as <u>one</u> of the official languages in Wales, rather than *the* official language. Therefore, Bourne Leisure requests that the Policy is amended as follows:

"Additionally, it is expected that any retail, industrial or commercial development demonstrates an understanding of the linguistic composition of the area where the planning application relates and recognition of the status of Welsh as <u>one of</u> the official languages in Wales" (Suggested amendments underlined).

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

Ar y cam hwn, gallwch wneud sylwadau'n ysgrifenedig yn unig (gelwir y rhain yn 'sylwadau ysgrifenedig'). Fodd bynnag, gall pawb sydd am newid y Cynllun ymddangos gerbron yr Arolygydd a siarad mewn 'sesiwn gwrandawiad' yn ystod yr Archwiliad Cyhoeddus. Ond dylech gofio y bydd yr Arolygydd yn rhoi'r un pwysau ar eich sylwadau ysgrifenedig ar y ffurflen hon â'r rheiny a wneir ar lafar mewn sesiwn gwrandawiad. Sylwer, bydd yr Arolygydd yn dewis y weithdrefn fwyaf priodol er mwyn darparu ar gyfer y rhai sydd eisiau rhoi tystiolaeth lafar.

# 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)

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the Public Examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

Nid wyf am siarad mewn sesiwn gwrandawiad ac rwyf yn fodlon i'm sylwadau ysgrifenedig gael eu hystyried gan yr Arolygydd. I do not want to speak at a hearing session and am happy for my written comments to be considered by the Inspector.	
Hoffwn siarad mewn sesiwn gwrandawiad. I want to speak at a hearing session.	Г

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

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)

6. 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	Г
I wish to be heard in Welsh	
Hoffwn i gael fy nghlywed yn Saesneg	Г
I wish to be heard in English	

#### DIOLCH AM EICH SYLWADAU AM Y NEWIDIADAU Â FFOCWS/ THANK YOU FOR YOUR COMMENTS ON THE FOCUSSED CHANGES

Nodiadau cyfarwyddyd	Guidance notes
Bydd Cynllun Datblygu Lleol Gwynedd a Môn ar y Cyd yn	The Joint Anglesey and Gwynedd Local Development Plan
cael ei archwilio gan Arolygydd annibynnol a benodir gan	(LDP) will be examined by an independent Inspector
Lywodraeth Cymru. Gwaith yr Arolygydd yw ystyried a	appointed by the Welsh Government. It is the Inspector's
yw'r Cynllun yn bodloni gofynion gweithdrefnol ac a yw'n	job to consider whether the Plan meets procedural
gadarn.	requirements and whether it is sound.
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: 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?) Darperir rhagor o wybodaeth am y profion cadernid a'r	<ul> <li>'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:</li> <li>1. Does the plan fit? (i.e. is it consistent with other plans?)</li> <li>2. Is the plan appropriate? (i.e. is it appropriate for the area in the light of the evidence?)</li> <li>3. Will the plan deliver? (i.e. is it likely to be effective?)</li> </ul>
gofynion gweithdrefnol yn Arweiniad Gweithdrefnol ar Archwiliadau Cynllun Datblygu Lleol yr Arolygiaeth Gynllunio.	Local Development Plan Examinations Procedural Guidance.
Wedi ymgynghori ar fersiwn adneuo'r Cynllun Datblygu	Having consulted on the Deposit version of the Local
Lleol, mae Cynghorau Gwynedd a Môn yn gwneud nifer	Development Plan, Anglesey and Gwynedd Councils are
gyfyngedig o Newidiadau â Ffocws er mwyn gwneud y	making a limited number of 'Focussed Changes' to make
Cynllun yn gadarn cyn iddo gael ei archwilio.	the Plan sound before it is examined. These changes are
Ymgynghorir ar y newidiadau rwan. Caiff unrhyw	being consulted upon now. Any responses will be
ymatebon eu hanfon ymlaen yn uniongyrchol at yr	forwarded directly to the Planning Inspector.
Arolygydd Cynllunio.	If you are objecting to a Focussed Change, you should say
Os ydych yn gwrthwynebu Newid â Ffocws, dylech	why you think it makes the Plan unsound, and how the
ddweud pam nad yw'n gwneud y Cynllun yn gadarn a sut	Focussed Change should be amended to make the Plan
dylid newid y Newid â Ffocws er mwyn gwneud y Cynllun	sound.
yn gadarn. Lle rydych yn cynnig newid i 'r Newid â Ffocws 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 Newidiadau â Ffocws. Dylech gynnwys eich holl sylwadau ar y ffurflen, gan ddefnyddio dogfennau ychwanegol a thystiolaeth ategol lle bod angen.	Where you propose an amendment to a Focussed Change 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 Focussed Changes. You should include all your comments on the form, using accompanying documents and supporting evidence where necessary.
Dychwelwch y ffurflen i: Uned Polisi Cynllunio ar y Cyd,	Please return the form to: Joint Planning Policy Unit,
Swyddfa Cyngor Dinas Bangor, Ffordd Gwynedd,	Bangor City Council Offices, Ffordd Gwynedd, Bangor,
Bangor, Gwynedd, LL57 1DT neu	Gwynedd, LL57 1DT or
polisicynllunio@gwynedd.gov.uk erbyn 4.30yh ar	<u>planningpolicy@gwynedd.gov.uk</u> by 4.30pm on
13/4/16	13/4/16

