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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

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.

#### HORIZON COMMERCIAL

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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.

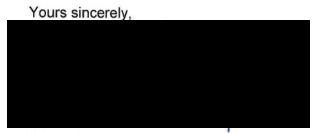
Our primary concern is the absence of a clear suite of Wylfa Newydd specific policies, which has not been addressed by the Focussed Changes. It is currently for the reader to wade through a significant number of policies to 'pick out' and appropriately balance those elements that are appropriate for 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
- 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.



#### **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

#### HORIZON COMMERCIAL

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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 <a href="www.gwynedd.llyw.cymru/cdll">www.gwynedd.llyw.cymru/cdll</a> neu <a href="www.anglesey.gov.uk/cdll">www.anglesey.gov.uk/cdll</a>. 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. NI FYDD SYLWADAU A DDERBYNNIR WEDI'R DYDDIAD YMA YN CAEL EU HYSTYRIED

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 <a href="https://www.gwynedd.llyw.cymru/ldp">www.gwynedd.llyw.cymru/ldp</a> or <a href="https://www.anglesey.gov.uk/ldp">www.anglesey.gov.uk/ldp</a>. 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: <a href="https://www.gwynedd.llyw.cymru/ldp">www.gwynedd.llyw.cymru/ldp</a> or



DUAN P. Fish Culmaday a Nowidiaday a Awarmair



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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.

KITAN B. EICH Sylwadad a Nev	•						
PART B: Your Comments and	Suggested Chan	ges					
Eich enw/Sefydliad:	Horizon Nuclear Power Wylfa Limited						
Your name/Organisation:							
	900 100						
1. Ar ba Newid â Ffocws yr yc	lych chi'n gwneu	ıd sylwadau?	(Cofiwch	defnyddio un ffurf	flen ar gyfer pob		
cynrychiolaeth)							
1. Which Focussed Change ar	e you commentii	ng on? (Rem	ember to u	ise one form for ed	ach representation)		
Rhif y Newid â Ffocws (NF)	All	Cefnogi/		Gwrthwynebu/			
Focussed Change Number (NI	F)   P(1)	Support		Object			
				<del></del>	to the state of th		
2. Cyn i chi esbonio eich sylw	adau'n fanwl, by	ddai'n dda g	wybod os	ydych yn credu fo	d y Cynllun yn		
gadarn a'i pheidio, o ganlyni	ad i'r Newidiada	u â Ffocws, n	eu a ydycł	n o'r farn bod rhar	nnau ohono neu		
bob rhan ohono ddim yn gad	arn a bod angen	ei newid.					
I gael rhagor o wybodaeth am	gadernid a gofyi	nion gweithd	refnol, gwe	eler y nodiadau cyf	farwyddyd. Os		
ydych yn ansicr, gadewch y rh	an yma yn wag.						
2. Before you set out your con	mments in detail	, it would be	helpful to	know whether yo	u think that, as a		
result of the Focussed Change	es, the Plan is so	und or that a	ll or parts	of it are unsound.			
For more information on soun	dness and proced	dural require	nents, see	the guidance note	s. If you are unsure,		
leave this section blank.							
Cadarn/Sound		Dim yn	gadarn ac	dylid ei			
-		newid/	Unsound a	nd should be	14		
		change					
		1					

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.

Nic	l wy	t am siarac	i mewn sesiwn	gwrandawiad	i ac rwyt y	n tod/	lon i'	'm sylwadau
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1

ysgrifenedig gael eu hystyried gan yr Arolygydd.	
I do not want to speak at a hearing session and am happy for my written	<u> </u>
comments to be considered by the Inspector.	
Hoffwn siarad mewn sesiwn gwrandawiad.	الآية
I want to speak at a hearing session.	
<ul> <li>6. Os hoffech siarad, cadarnhewch pam rydych yn ystyried ei bod hi'n angenrh Gwrandawiad.</li> <li>6. If you wish to speak, please confirm which part of your representation you wish to speak at the Hearing</li> </ul>	vish to speak to the
Please refer to the attached schedule of "Additional Specific Representations to particular, the JDLP needs to provide sufficiently clear policies to support and pr for significant elements of the Wylfa Newydd Project.	_
7. Os vduch am siarad, hyddai'n ddofayddiol no gallach nodi ym mha iaith hoff	och shi gool oigh shousi?
<ol> <li>Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith hoff</li> <li>(Ticiwch un o'r isod)</li> </ol>	ech chi gaei eich ciywed?
6. If you wish to speak, it would be helpful if you could indicate in which langu	age you would like to be
heard. (Please tick one of the following boxes)	
Hoffwn i gael fy nghlywed yn Gymraeg	i -
I wish to be heard in Welsh	

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

Hoffwn i gael fy nghlywed yn Saesneg

I wish to be heard in English

#### Nodiadau cyfarwyddyd

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.

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 gofynion gweithdrefnol yn Arweiniad Gweithdrefnol ar Archwiliadau Cynllun Datblygu Lleol yr Arolygiaeth Gynllunio.

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.

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.

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.

#### Guidance notes

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.

'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:

- 1. Does the plan fit? (i.e. is it consistent with other plans?)
- 2. Is the plan appropriate? (i.e. is it appropriate for the area in the light of the evidence?)
- 3. Will the plan deliver? (i.e. is it likely to be effective?)

More information on the soundness tests and procedural requirements is provided in the Planning Inspectorate's Local Development Plan Examinations Procedural Guidance.

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 Focussed Change should be amended to make the Plan sound.

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, Swyddfa Cyngor Dinas Bangor, Ffordd Gwynedd, Bangor, Gwynedd, LL57 1DT neu polisicynllunio@gwynedd.gov.uk erbyn 4.30yh ar 13/4/16

Please return the form to: Joint Planning Policy Unit, Bangor City Council Offices, Ffordd Gwynedd, Bangor, Gwynedd, LL57 1DT or planningpolicy@gwynedd.gov.uk by 4.30pm on 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) Representations to the JLDP Focussed Changes

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) Soundness Test

- 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.

	JLDP Policy	Paragraph ref	Consultation responses	Specific amendments sought	Previous Representation Addressed by Focused Changes? and Further Specific Amendments Sought
			does not mention travel plans. How do travel plans fit with these other two concepts?	solutions are likely to include development of park and ride schemes and construction logistics centres to control the numbers and timing of traffic movements to the power station site. The promoter and the Councils will work together in partnership to develop an appropriate Integrated Traffic and Transport Strategy (ITTS) in respect of the Wylfa Newydd Project.	detail regarding the relationship between travel plans and these other two concepts.  These changes are required in order to make the plan effective in terms of the soundness tests in PPW.  Paragraph 7.1.44 is considered to have been adequately addressed by Focused Change Ref: NF 25.
23	Managing	Policy PS5: 'Sustainable Development' and Explanation	Horizon considers that it would be beneficial to remove some of the repetition, circularity and potential inconsistencies arising from references to other policies. For example, criteria 5, 6, 16, 10, 11, 12, 13, 14 simply cross refer to other policies which will apply to and control these matters.	-	Horizon still consider that it would be beneficial to remove some of the repetition, circularity and potential inconsistencies arising from references to other policies as several of the criteria set out in Policy PS5: 'Sustainable development' which simply cross refer to other policies which will apply to and control these matters.  These changes are required in order to make the plan effective in terms of the soundness tests in PPW.
24	Chapter 7 Managing growth and Development – Sustainable Living	Policy PCYFF1: 'Development Criteria'	<ul> <li>Horizon has proposed amendments to the policy to ensure that it is meaningful and achievable.</li> <li>Horizon has the following additional comments:</li> <li>Although it has not proposed amendments or deletions, Horizon has residual concerns that criterion 3 is more restrictive in terms development siting than the Executive Summary (Settlement Hierarchy – para. 1.26 ff) and paragraph 6.22; the former indicates a number of circumstances in which development in open countryside will be permitted. Horizon also notes that Policy PS15 relates exclusively to housing whereas the wording of PCYFF1 implies that it relates to all forms of development, which risks creating confusion.</li> <li>The drafting and specificity of criterion 4 which Horizon considers is inconsistent with the drafting of the other criteria.</li> <li>The criteria 9 and 10 requirements dealt with elsewhere in the Plan and could be deleted here.</li> <li>Criterion 14 is not sufficiently clear. If by "other uses" the council means existing established uses or something that has status in a plan as an allocation, this should be made clear. If not, the policy is too openended for it to be understood and applied effectively by a developer.</li> <li>More broadly, it is not clear how "acceptability" and "unacceptability' is to be assessed in the Plan.</li> </ul>	Amend Policy PCYFF1 as follows:  POLICY PCYFF1: DEVELOPMENT CRITERIA  A proposal should demonstrate its compliance with:  1. must comply with all relevant policies in the Plan;  2. must comply with national planning policy and guidance.  A proposal:  3. Will be approved within defined development boundaries or the built form of identified clusters listed in the settlement framework set out in Strategic Policy PS15, subject to detailed material planning considerations;  4. Should make the most efficient use of land, including achieving densities of a minimum of 30 housing units per hectare for residential development (unless there are local circumstances that dictate a lower density);  5. Must provide appropriate amenity space to serve existing and future occupants;  6. Should have regard to the generation, treatment and disposal of waste;  7. Includes, where applicable, provision for the appropriate management and eradication of invasive species;  Additionally, planning permission will be refused where the proposed development would have an unacceptable adverse impact on:	No – Despite some amendments to the wording of this policy (Focused Change Ref: NF 29), Horizon still considers that criterion 3 is more restrictive in terms development siting than the Executive Summary (Settlement Hierarchy – para. 1.26 ff) and paragraph 6.22; for example, the former indicates a number of circumstances in which development in open countryside will be permitted.  Horizon also still considers that there is the potential for confusion as Policy PS15 relates exclusively to housing whereas the wording of PCYFF1 implies that it relates to all forms of development.  The drafting of criterion 4 is considered by Horizon to be inconsistent with the drafting of the other criteria.  It is still considered that references to criteria 9 and 10 requirements (as labelled in the Deposit Plan: Written Statement [2015]) are dealt with elsewhere in the Plan and could be deleted.  It is still not clear how "acceptability" and "unacceptability' is to be assessed in the Plan.  Horizon suggest that Policy PCYFF1 be amended as per the wording previously proposed in the cell to the left.  Amend the revised wording of Policy PCYFF1 as follows:  "POLICY PCYFF1: DEVELOPMENT CRITERIA  A proposal should demonstrate its compliance with:  1. must comply with all relevant policies in the Plan;  2. must comply with national planning policy and guidance.  Proposals should:

	JLDP Policy	Paragraph ref	Consultation responses	Specific amendments sought	Previous Representation Addressed by Focused Changes? and Further Specific Amendments Sought
					•
				8. Prominent public views into, out of, or across any settlement or area of open countryside;	3. give priority to sites within defined development boundaries or the built form of identified clusters listed in the settlement framework set out in Strategic Policy PS15, unless a rural location is essential or
				9. Vehicular access to and from the highway network and public transport, cycling and pedestrian infrastructure (in line with Policy TRA4);	
				10. The highway network as a result of the volume and type of traffic generated from a proposal (in line with Policy TRA4);	4. make the most efficient use of land, including achieving densities of a minimum of 30 housing units per hectare for residential development (unless there are local circumstances or site constraints that dictate a lower density);
				11. The health, safety or amenity of occupiers of local residences, other land and property uses or characteristics of the locality due to increased activity, disturbance, vibration, noise, dust, fumes, litter, drainage, light pollution, or other forms of pollution or nuisance;	5. provide appropriate amenity space to serve existing and future occupants;
				12. The quality of ground or surface water;	6. have regard to the generation, treatment and disposal of waste;
				13. The best and most versatile agricultural land;	7. Include, where applicable, provision for the appropriate management and eradication of invasive species;
				14. Land safeguarded for other uses, or impairs the development and use of adjoining land.	Additionally, planning permission will be refused where the proposed development would have an unacceptable adverse impact on:
					8. Prominent public views into, out of, or across any settlement or area of open countryside;
					9. Vehicular access to and from the highway network and public transport, cycling and pedestrian infrastructure (in line with Policy TRA4);
					10. The highway network as a result of the volume and type of traffic generated from a proposal (in line with Policy TRA4);
					11. The health, safety or amenity of occupiers of local residences, other land and property uses or characteristics of the locality due to increased activity, disturbance, vibration, noise, dust, fumes, litter, drainage, light pollution, or other forms of pollution or nuisance;
					12. The quality of ground or surface water;
					13. The best and most versatile agricultural land".
					14. Land allocated for other development/uses,"
					This change is required in order to meet the test of "does the plan fit". In its current wording, the Plan is considered to be at odds with the requirement in Section 38(6) of the Planning and Compulsory Purchase Act, which provides that where regard is to be had to the development plan in determining a planning application, then such determination shall be made in accordance with the Plan unless material considerations indicate otherwise.
1	Chapter 7 Managing growth and	Policy PCYFF4: 'Carbon Management'	It is not clear what requirement this policy imposes on developers in relation to the "Potential Options". For example, do all options need to be considered and at least	-	No – Whilst it is noted that there have been some amendments to Policy PCYFF4 (Focused Change Ref: NF 32), Horizon still considers that there is insufficient clarity regarding what requirement this policy

44. Chapter 7	Policy PS14: 'Affordable	Rather than seek for specific amendments to this policy,		creating a mixed, inclusive and sustainable community, and does not cause an over-concentration of such a use in the local area or harm to the residential amenity or the surrounding area;  If an alternative legacy use is not feasible, or is not proposed as part of the application being considered by the Council, the Council shall require that temporary buildings are removed and  i. the serviced land is left in a neat and tidy condition following the removal of the structures, or  ii. all waste disposal facilities, roads, parking areas and drainage facilities are permanently removed from the site and the land is reverted to its original state to the satisfaction of the Local Planning Authority.  Planning permission will always only be granted-subject to for a time-limited period consistent with the construction methodology and phasing and Construction Worker Accommodation Strategy for the Wylfa Newydd Project in order to enable the Council to review the overall trend the construction project's associated accommodation needs. Appropriate planning mechanisms will be applied to secure the agreed legacy use, if proposed as part of the application being considered by the Council.  Operators will be required to keep a register of all workers living in the accommodation and to make this register immediately available, on request, to the Council."
Managing growth and Development – Supply and Quality of Housing	Housing'	Horizon proposes to rely on the Wylfa Newydd specific policies proposed above which would be the relevant policies against which to make consultation responses to the DCO application and to determine associated development applications. For this reason Horizon is not proposing specific exclusion to its associated development from this policy.		WNP1, WNP2, WNP3 and WNP4 are incorporated into the Plan. These would then be the relevant policies against which to make consultation responses to the DCO application and to determine associated development applications.  As the Focussed Changes do not include specific policies for Wylfa Newydd, further focussed changes are required to the other relevant policies to make sure that they are fit for purpose for determining applications for associated development (i.e. Temporary Construction Worker Accommodation) coming forward as part of the Project and for providing consultation responses in relation to the DCO application.  If these Wylfa Newydd specific policies are not to be incorporated into the Plan then Horizon considers it imperative that Policy PS14 be reworded in order to specifically exclude Wylfa Newydd associated development applications from this policy.  Add the following wording at the end of the Policy PS14:  "For the avoidance of doubt, this policy does not apply to Temporary Construction Worker Accommodation provided in connection with the Wylfa Newydd Project, but it will be a consideration in any future planning applications for appropriate legacy uses for such sites."
Managing	Policy PS16: 'Conserving and Enhancing the Natural Environment'	There is a typographical error in the introduction: It should be "effect", not "affect".  Horizon submits that greater flexibility needs to be included in these policies so that proposals predicted to have an	-	No – Horizon recommends that proposed Wylfa Newydd specific policies WNP1, WNP2, WNP3 and WNP4 are incorporated into the Plan. These would then be the relevant policies against which to make





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 <a href="www.gwynedd.llyw.cymru/cdll">www.gwynedd.llyw.cymru/cdll</a> neu <a href="www.anglesey.gov.uk/cdll">www.anglesey.gov.uk/cdll</a>. 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: <a href="https://www.gwynedd.llyw.cymru/cdll">www.gwynedd.llyw.cymru/cdll</a> neu <a href="mailto:www.ynysmon.gov.uk/cdll">www.ynysmon.gov.uk/cdll</a> 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 <a href="https://www.gwynedd.llyw.cymru/ldp">www.gwynedd.llyw.cymru/ldp</a> or <a href="https://www.anglesey.gov.uk/ldp">www.anglesey.gov.uk/ldp</a>. 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.

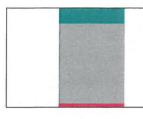
Please note that representations MUST relate only to the Focussed Changes, and not to other aspects of the Deposit Joint Local Development Plan. Other representations will be disregarded.

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

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: <a href="https://www.gwynedd.llyw.cymru/ldp">www.gwynedd.llyw.cymru/ldp</a> or <a href="https://www.anglesey.gov.uk/ldp">www.anglesey.gov.uk/ldp</a> or you may photocopy this form. When making comments please use additional sheets as required clearly numbering each consecutive sheet.





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.

RHAN B: Eich Sylwadau a Newidiadau a Awgrymir

Eich enw/Sefydliad: Your name/Organisation:	Nathaniel Lichfield & Partners on behalf of Bourne Leisure Ltd.					
1. Ar ba Newid â Ffocws yr ydyd pob cynrychiolaeth) 1. Which Focussed Change are y representation)						
Rhif y Newid â Ffocws (NF)	NF 29	Cefnogi/		Gwrthwynebu/	$\boxtimes$	
Focussed Change Number (NF)		Support		Object		
neu bob rhan ohono ddim yn ga I gael rhagor o wybodaeth am ga ydych yn ansicr, gadewch y rhan 2. Before you set out your comn as a result of the Focussed Chan For more information on soundn	adernid a go yma yn wag nents in det nges, the Pla	fynion gweitho g. ail, it would bo an is sound or t	drefnol, g e helpful that all o	to know whether you r parts of it are unso	u think that, und.	
unsure, leave this section blank.						

#### 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 29 seeks to prioritise development within the defined development boundaries, unless the development has a "specific locational requirement" for the development (Policy PCYFF 1). However, the draft Policy does not define this criterion.

Whilst Bourne Leisure welcomes the recognition that some developments will require a location outside of specified development boundaries, the Company considers that it is important that these circumstances are defined in order that they can be properly taken into account in the determination of planning applications. For holiday parks, there is a need to consider their future development in relation to factors such as the needs of the business, visitor demand and wider changes in the tourism industry. One example of such a requirement for holiday parks is the need to be located on, or in close proximity to the coast.

Bourne Leisure therefore requests that the Council defines the term "specific locational requirement" and references the locational needs of holiday accommodation providers. The following change is suggested:

#### "Proposals should

"3. give priority to sites will be approved within defined development boundaries or the built form of identified clusters listed in the settlement framework set out in Strategic Policy PS15, unless a rural location is essential or there is a specific locational requirement, subject to detailed material planning considerations; specific locational requirements to be considered include the need for development at holiday parks to be located on or near the coast" (NF 29, Policy PCYFF1, Focused Changes in bold, suggested amendments in bold and 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	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).

Whilst Bourne Leisure welcomes the recognition that some developments will require a location outside of specified development boundaries, the Company considers that it is important that these circumstances are defined in order that they can be properly taken into account in the determination of planning applications. For holiday parks, there is a need to consider the location of future development in relation to factors such as the needs of the business, visitor demand and wider changes in the industry. The following change is suggested:

#### "Proposals should

"3. give priority to sites will be approved within defined development boundaries or the built form of identified clusters listed in the settlement framework set out in Strategic Policy PS15, unless a rural location is essential or there is a specific locational requirement, subject to detailed material planning considerations; specific locational requirements to be considered include the need for development at holiday accommodation parks to be located near the coast" (Focused Change in bold, suggested amendments in bold and 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.	
6. Os hoffech siarad, cadarnhewch pam rydych yn ystyried Gwrandawiad.	ei bod hi'n angenrheidiol i chi siarad yn y
6. If you wish to speak, please confirm which part of your re Inspector about and why you consider it to be necessary to	
7. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nod	di 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 indic	cate in which language you would like to be
heard. (Please tick one of the following boxes)	
Hoffwn i gael fy nghlywed yn Gymraeg	Γ
I wish to be heard in Welsh	
Hoffwn i gael fy nghlywed yn Saesneg	Γ-
I wish to he heard in Fnalish	

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

#### Nodiadau cyfarwyddyd

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.

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 gofynion gweithdrefnol yn Arweiniad Gweithdrefnol ar Archwiliadau Cynllun Datblygu Lleol yr Arolygiaeth Gynllunio.

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.

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.

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.

Dychwelwch y ffurflen i: Uned Polisi Cynllunio ar y Cyd, Swyddfa Cyngor Dinas Bangor, Ffordd Gwynedd, Bangor, Gwynedd, LL57 1DT neu polisicynllunio@gwynedd.gov.uk erbyn 4.30yh ar 13/4/16

#### **Guidance** notes

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.

'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:

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If you are objecting to a Focussed Change, you should say why you think it makes the Plan unsound, and how the Focussed Change should be amended to make the Plan sound.

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.

Please return the form to: Joint Planning Policy Unit, Bangor City Council Offices, Ffordd Gwynedd, Bangor, Gwynedd, LL57 1DT or

planningpolicy@gwynedd.gov.uk by 4.30pm on 13/4/16





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 <a href="www.gwynedd.llyw.cymru/cdll">www.gwynedd.llyw.cymru/cdll</a> neu <a href="www.anglesey.gov.uk/cdll">www.anglesey.gov.uk/cdll</a>. 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. NI FYDD SYLWADAU A DDERBYNNIR WEDI'R DYDDIAD YMA YN CAEL EU HYSTYRIED

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: <a href="https://www.gwynedd.llyw.cymru/cdll">www.gwynedd.llyw.cymru/cdll</a> neu <a href="https://www.ynysmon.gov.uk/cdll">www.ynysmon.gov.uk/cdll</a> 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 <a href="https://www.gwynedd.llyw.cymru/ldp">www.gwynedd.llyw.cymru/ldp</a> or <a href="https://www.anglesey.gov.uk/ldp">www.anglesey.gov.uk/ldp</a>. 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. REPRESENTATIONS RECEIVED AFTER THIS TIME WILL NOT BE CONSIDERED

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: <a href="https://www.gwynedd.llyw.cymru/ldp">www.gwynedd.llyw.cymru/ldp</a> or <a href="https://www.anglesey.gov.uk/ldp">www.anglesey.gov.uk/ldp</a> or you may photocopy this form. When making comments please use additional sheets as required clearly numbering each consecutive sheet.



RHAN B: Eich Sylwadau a Newidiadau a Awgrymir



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Rhif Cyn./Rep No.:

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## 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.

PART B: Your Comments and Suggested Changes					
Eich enw/Sefydliad:					
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 (N	F)	Cefnogi/	Gwrthwynebu/		
Focussed Change Numbe	er (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	Dim yn gadarn ac dylid ei		
		newid/Unsound a	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.

Defnyddiwch dudalennau ychwanegol os bydd anger
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).

5. A ydych am i'ch sylwadau gael eu hystyried fel 'sylwadau ysgrifenedig' neu a h 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 's Fodd bynnag, gall pawb sydd am newid y Cynllun ymddangos gerbron yr Arolygydd gwrandawiad' yn ystod yr Archwiliad Cyhoeddus. Ond dylech gofio y bydd yr Aroly ar eich sylwadau ysgrifenedig ar y ffurflen hon â'r rheiny a wneir ar lafar mewn ses Sylwer, bydd yr Arolygydd yn dewis y weithdrefn fwyaf priodol er mwyn darparu a rhoi tystiolaeth lafar.  5. Do you want your comments to be considered by 'written representations' or de sesiment of the sylwadau ysgrifenedig yn yn dewis y weithdrefn fwyaf priodol er mwyn darparu a rhoi tystiolaeth lafar.	ylwadau ysgrifenedig'). d a siarad mewn 'sesiwn gydd yn rhoi'r un pwysau siwn gwrandawiad. r gyfer y rhai sydd eisiau				
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 rep everyone that wants to change the Plan can appear before and speak to the Inspec during the Public Examination. But you should bear in mind that your written comm given the same weight by the Inspector as those made verbally at a hearing session Inspector will determine the most appropriate procedure for accommodating those oral evidence.	presentations'). However, ctor at a 'hearing session' ments on this form will be n. Please note that the e who want to provide				
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.					
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  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

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.

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 gofynion gweithdrefnol yn Arweiniad Gweithdrefnol ar Archwiliadau Cynllun Datblygu Lleol yr Arolygiaeth Gynllunio.

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.

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.

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.

Dychwelwch y ffurflen i: Uned Polisi Cynllunio ar y Cyd, Swyddfa Cyngor Dinas Bangor, Ffordd Gwynedd, Bangor, Gwynedd, LL57 1DT neu polisicynllunio@gwynedd.gov.uk erbyn 4.30yh ar 13/4/16

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