



Department for Natural Resources
Adran Adnoddau Naturiol

Llywodraeth Cymru
Welsh Government

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

Ein cyf:
Eich cyf:

13 Ebrill 2016

Annwyl Nia,

Cynllun Datblygu Lleol ar y cyd Gwynedd ac Ynys Môn – Ymgynghori ar Gofrestr y Newidiadau â Ffocws

Diolch ichi am eich llythyr dyddiedig 23 Chwefror 2016 at Lywodraeth Cymru am ymgynghoriad Cynghorau Gwynedd ac Ynys Môn ar eu Cofrestr o Newidiadau â Ffocws

Mater i'r Arolygydd Cynllunio a benodwyd fydd penderfynu a yw cynllun yn un "cadarn" ai peidio. Mae'r Newidiadau â Ffocws sy'n cael eu cynnig wedi cael eu hystyried yng ngoleuni'r sylwadau a wnaed ar y Cynllun Adnau ar 31 Mawrth 2015 ac yn unol â'r profion cadernid.

Mae'r **Atodiad** amgaeedig yn ymateb manwl a yw'r Gofrestr o Newidiadau â Ffocws yn mynd i'r afael â'r materion a godwyd yn ein sylwadau ar y Cynllun Adnau, yn ogystal â'r newidiadau hynny nad oeddent yn rhan o'r Cynllun Adnau. Yn ogystal, rydym yn credu **nad yw'r newidiadau â ffocws** yn mynd i'r afael â nifer o faterion pwysig a godwyd yn ein sylwadau ar y Cynllun Adnau. Mae'r atodiad hwn yn nodi pa rai o'n gwrthwynebiadau sy'n sefyll o hyd, a pham.

Hoffwn dynnu'ch sylw yn benodol at:

- **Gwarchod a chyflenwi tir ar gyfer defnydd cyflogaeth**
- **Isadeiledd a'r datblygiadau sy'n gysylltiedig â phrosiect Wylfa**
- **Tai: yn benodol, cyfraddau lleoedd gwag; tafluniad darparu; a datblygiadau gam wrth gam**
- **Darparu ar gyfer Sipsiwn a Theithwyr – addasrwydd ac ymarferoldeb i gwrdd â'r angen**
- **Ynni Adnewyddadwy – nid yw'n cynrychioli polisi cenedlaethol**

Yn ogystal, mae gennym ragor o sylwadau lle gwelwn fod angen mwy o eglurder yng ngoleuni polisi cenedlaethol a/neu am fod diffyg sail tystiolaeth.

- Tai fforddiadwy – cyfraniad o ymrwymïadau a dyraniadau
- Asesiad o'r Dirwedd
- Y Gymraeg – cydymffurfio â pholisi cenedlaethol
- Fframwaith monitro

Credir y gallai fod yn bosibl esbonio a mynd i'r afael â'r materion uchod fel rhan o'r gwrandawiadau neu fel Newidiadau o Faterion sy'n Codi (MACs) os bydd yr arolygydd yn teimlo bod angen hynny.

Yn gywir,

Mark Newey
Pennaeth y Gangen Cynlluniau
Cyfarwyddiaeth Gynllunio

Atodiad

	byddai angen cynnydd sylweddol yn y cyfraddau adeiladu i sicrhau'r strategaeth a'r lefel o adeiladu sydd eu hangen. Mater i'r awdurdod fydd dangos ei fod yn gallu adeiladu'r cyfraddau gofynnol a chynnal cyflenwad 5 mlynedd. Fodd bynnag, gan fod y tafluniad yn dangos y bydd hi'n anodd cynnal cyfradd adeiladu o'r fath, gallai hynny negyddu'r cyfiawnhad o blaid 'Polisi TAI X newydd' o ran y cyfyngiadau ar ddatblygiadau cam wrth gam.
NF61	Nid yw'n glir beth yw ystyr y mewnosodiad 'capasiti'r gymuned'.
NF62	Mae'r newid â ffocws a gynigir yn cynnwys polisi newydd sydd i bob golwg yn cyfyngu ar bob dyraniad tai a datblygiad ar hap dros gyfnod y cynllun. Rydym yn ei wrthwynebu am nad oes cyfiawnhad clir dros y rhesymau dros reoli dyraniadau a safleoedd ar hap gam wrth gam. Ni fydd y cyfraddau adeiladu uwch yn ymarferol oni bai bod modd cyflwyno'r safleoedd mwy gam wrth gam. Mae'n hanfodol fod y fframwaith monitro'n cael hyd i ddiffygion arwyddocaol a'i fod yn ddigon cydnerth i gynnal y strategaeth. Mae PCC (paragraff 2.5) yn argymhell fod strategaethau ar gyfer datblygu gam wrth gam yn hyblyg er mwyn rhoi dewis ac i sicrhau bod marchnadoedd tai'n effeithlon. Dywed y dylai polisïau cam wrth gam yn y cynllun ond rhoi syniad bras o'r amserlenni ar gyfer rhyddhau'r prif safleoedd datblygu neu'r safleoedd sydd wedi'u clustnodi, yn hytrach na rhoi hap derfyn rhifol ar ganiatadau neu drefn bendant ar gyfer rhyddhau safleoedd mewn cyfnodau penodol. Ar sail hynny, nid ydym o'r farn bod y polisi a gynigir yn cydymffurfio â pholisi cenedlaethol. Ni fyddai'n briodol arafu safleoedd nad oes cyfyngiad arnynt neu nad ydynt yn hanfodol i ddarparu isadeiledd allweddol yn y cynllun lle ceir lefel uchel o alw am dai preifat a fforddiadwy. Byddai dilyn y fath drywydd yn drysu'r problemau ynghylch cyflenwi tir ar gyfer tai.
NF67	Roedd ymateb Llywodraeth Cymru i'r Cynllun Adnau yn gofyn am esboniad o'r targed o 1,415 o unedau fforddiadwy. Nid oedd yn glir ai ymrwymadau a dyraniadau cyfredol ynte ffynonellau posibl eraill fydd yn cyfrannu at daro'r targedau hyn. Mae Llywodraeth Cymru o'r farn bod y Newid â Ffocws yn gwneud y cynllun yn fwy eglur. Ond byddai'r cynllun yn fwy eglur ac yn haws ei ddeall pe gellid cynnwys tabl tebyg ynghylch Polisi PS13. Ar hyn o bryd, nid oes un tabl sy'n crynhoi elfennau amrywiol y cyflenwad o dai.

Llety ar gyfer Sipsiwn a Theithwyr

NF 70	Er bod Llywodraeth Cymru'n cefnogi'r dystiolaeth ychwanegol a gafwyd yn Asesiad o Anghenion Llety Sipsiwn a Theithwyr 2015, bydd angen i Is-adran Dyfodol Tecach Llywodraeth Cymru graffu arni ac i'r Gweinidog ei chymeradwyo (hyn i ddigwydd yn Haf 2016). Dylai'r awdurdodau ddarparu'r asesiad gan ei fod yn rhan o sail tystiolaeth y Cynllun Datblygu Lleol. Nid yw'r cynllun eto yn cyflawni ei ddyletswyddau statudol o dan Ddeddf Dai (Cymru) 2015 (Adran 103) i ddarparu digon i ddiwallu lefel yr angen a nodwyd ar gyfer 2015 i 2020 am leiniau parhaol (4 llain yn brin). Gan nad oes astudiaeth fwy diweddar wedi'i chynnal, nid yw'n glir chwaith ai'r lleoedd aros dros dro (3 yn ofynnol) yw'r ateb priodol o ran y lleiniau dros dro sydd eu hangen yn yr ardal. Yn ei hanfod, nid oes digon o fanylder ynghylch nifer y lleiniau sydd eu hangen na'r amserlen ar gyfer eu darparu. Mae angen i'r cynllun fesur lefel yr angen dros gyfnod llawn y cynllun (hyd at 2026) a'i ddiwallu yn unol â gofynion Cylchlythyr 30/2007, paragraff 17, Llywodraeth Cymru. Nid yw'r cynllun fel y mae yn gwneud hynny.
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Nia Davies
Yr Uned Polisi Cynllunio ar y Cyd
Gwynedd a Mon
Neuadd y Dref
Bangor
Gwynedd
LL57 1DT

Our ref:
Your ref:

13th April 2016

Dear Nia,

Gwynedd and Ynys Mon's joint Local Development Plan – Consultation on the Schedule of Focussed Changes

Thank you for your letter of 23rd February 2016 notifying the Welsh Government of Gwynedd and Ynys Mon's Council's Schedule of Proposed Focussed Changes consultation.

The matter of whether a plan is considered 'sound' will be for the appointed Planning Inspector to determine. The proposed Focussed Changes have been considered in the light of the representations made to the Deposit Plan on 31 March 2015 and in accordance with the tests of soundness.

The attached **Annex** provides a detailed response on whether the Schedule of Proposed Focussed Changes meets the matters raised in our deposit representations, in addition to those changes that were not part of the Deposit Plan. Further to the above, we consider **the focussed changes are silent** in respect of a number of key issues that were raised within our deposit representation. The annex sets out where and why our objections are still maintained.

I wish to draw your attention specifically to:

- **Safeguarding and allocating land for employment purposes**
- **Infrastructure and Wylfa project associated development**
- **Housing: specifically vacancy rates; delivery trajectory; and phasing**
- **Gypsy and Traveller Provision – suitability and deliverability to meet need**
- **Renewable Energy – does not transcribe national policy**

In addition, we have further representations where the approach requires clarification in light of national policy and/or limited supporting evidence base.

- Affordable housing – contribution from commitments and allocations
- Landscape assessment
- Welsh Language – conformity with national policy
- Monitoring framework

It is considered that it may be possible for the above matters to be addressed and explained as part of the hearing sessions or as Matters Arising Changes (MACs) if deemed necessary by the Inspector.

Yours sincerely,

Mark Newey
Head of Plans Branch
Planning Directorate

Annex

	The trajectory flags up that there has been under delivery in the early years of the plan and there would need to be a significant step increase in build rates to deliver the strategy and level of provision required. It will be for the authority to demonstrate that it can deliver the necessary rates and maintain a 5 year supply. However, given the challenging build rate as highlighted from the trajectory this could negate the justification for 'new Policy TAI X' in respect of phasing restrictions.
NF61	It is unclear what is meant by the proposed insertion of 'community capacity'.
NF62	The proposed focussed change includes a new policy that appears to restrict and control all housing allocations and windfall development over the plan period. We object on the basis that the rationale for controlling the phasing of allocations and windfalls sites is not clearly justified. Attaining the higher build rates will only be feasible if the larger sites come forward as phased. It is vital that the monitoring framework identifies any significant shortfalls and is sufficiently robust to ensure the strategy is delivered. PPW (paragraph 2.5) advocates that phasing strategies should be flexible to allow for choice and to ensure that housing markets are effective. It states that phasing policies in the plan should only give a broad indication of the timescales for the release of the main development areas or identified sites, rather than an arbitrary numerical limit on permissions, or a precise order of release of sites in particular periods. On this basis we consider the proposed policy does not comply with national policy. It would not be appropriate to delay sites that are not constrained or integral to the delivery of key infrastructure in the plan where there is a high level of demand for private and affordable homes. Such an approach would compound the problems of housing land supply.
NF67	The WG Deposit response requested clarification on the target of 1,415 affordable units. It was unclear what the contribution to meeting these targets would be from current commitments, allocations and other potential sources of provision. The Welsh Government considers that the proposed FC adds clarity to the plan. However, the clarity and understanding of the plan would be further improved if a similar table was included to support the overarching housing Policy PS13. At present there is no single summary table setting out the various components of supply, in relation to the housing provision.

Gypsy and Traveller Provision

NF 70	<p>Whilst the Welsh Government is supportive of the updated evidence base provided in the Gypsy and Traveller Accommodation Needs Assessment 2015, this is subject to scrutiny by the Welsh Government's Fairer Futures Division and Ministerial approval (anticipated Summer 2016). The authorities should make this assessment available as it forms part of the LDP's evidence base.</p> <p>The plan is still failing to meet its statutory duties under the Housing (Wales) Act 2015 (Section 103) to make sufficient provision to meet the immediate level of identified need from 2015 to 2020 for permanent pitches (shortfall of 4 pitches). In the absence of the updated study, it is also unclear as to whether temporary stopping places (requirement for 3 sites) are the appropriate solution in relation to transit pitch needs for the area. In essence there is a lack of detail on the number of pitches required and the timescale for their delivery.</p> <p>The plan is also required to quantify and meet the level of need over the whole plan period (up to 2026) in line with the requirements of the Welsh</p>
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	Government's Circular 30/2007, paragraph 17. At present the plan does not do this.
NF 71	<p><u>Policy TAI11: Safeguarding Existing Gypsy & Traveller Sites</u></p> <p>The wording in Policy TAI 11 should be broadened to cover both Gypsies <u>and Travellers</u> to accord with the wording in Policy TAI 12.</p>
NF 72	<p><u>Policy TAI 12: Gypsy and Traveller Site Allocations</u></p> <p>We support the change in the policy wording which covers 'Gypsy and Traveller use'. The authorities should consider making a corresponding change in the table, in the 'occupants' column to widen the scope to include both Gypsies and Travellers, in order to be consistent with the policy wording.</p>
NF 73	<p>Paragraph 7.4.99:</p> <p>We do not object to the amendment made by the authority in relation to the number of pitches and caravans.</p> <p>Our objection remains in relation to the restriction for the stopping site to not be occupied by Gypsies or Travellers for more than 5 days which we consider to be overly restrictive. The authority should clarify whether this time restriction is required by legislation.</p>
NF 74	<p><u>TAI13: Sites for Gypsies and Traveller Pitches</u></p> <p>The scope of the criteria based policy should extend from 'permanent' sites and 'extensions to existing authorised sites' to apply to all Gypsy and Traveller proposals and include transit sites.</p> <p>The amendment to criterion 4 is supported and our objection is withdrawn. For additional clarity and to accord with national policy, criterion 4 should be more specific and amend 'high risk of flooding' to specify that no highly vulnerable development should be within zone C2.</p> <p>Criterion 6 partially satisfies our objection, however the wording should clearly state that the Welsh Government's Designing Gypsy and Traveller Sites guidance applies to Local Authority sites, with private sites being regulated under the Mobile Homes (Wales) Act 2013.</p> <p>The amendment to criterion 9 satisfies our concern.</p>
NF 75	<p>Paragraph 7.4.104:</p> <p>The amendments to paragraphs 7.4.104 and 7.4.105 are supported and satisfy our objection.</p>
Affordable Housing	
NF68	<p>The Welsh Government supports this FC. This FC introduces changes to TAI 9 to clarify the provision of affordable dwellings where the contribution would be less than one unit; and the process for involving external advice where agreement cannot be reached on viability issues.</p> <p>However, the Welsh Government objects to the omission of the following. As raised</p>