

1236-887-834-6.8

1236/834

CYNGOR CYMUNED TUDWEILIOG  
Tudweiliog Community Council

Derbyn - 18/3/15  
(wedi scanio)

Glenys Ll. Peters,  
Clerc/clerk



13/3/2015

Uned Polisi Cynllunio ar y Cyd,  
Llawr Cyntaf Swyddfeydd Cyngor Dinas Bangor,  
Ffordd Gwynedd,  
Bangor.  
Gwynedd  
LL57 1DT.

Annwyl Syr/Madam,

Parthed: Ymgynghori am y Cynllun Adnau.

'Rwyf ar ran Cyngor Cymuned Tudweiliog yn ymateb i'r uchod fel a ganlyn:-

1. Dylid codi tai yn ol yr angen.
2. Dylai'r pentrefi sydd ddim ar y rhestr gael eu hystyried yn ol y galw lleol. *Para 6.8*
3. Mae pryder mawr am or-ddatblygiad yn Botwnnog a Pwllheli yn mynd i gael effaith mawr ar yr Iaith Gymraeg.
4. Argymhell na ddylid caniatáu Tyrbin Gwynt sydd uwch na 15 metr a dim mewn Ardal o Harddwch Naturiol. Mae Cyngor Cymuned Tudweiliog yn gwrthwynebu bob Tyrbin Gwynt o fewn AHNE Llyn a phob cais am dyrbin uwch na 11 metr o fewn ffin a golygfeydd yr AHNE.

Shat Dos

Gyda diolch,

Yn gywir,



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## Sylwadau Dros y We / Representations via the Internet

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Rhif Sylw / Rep Id: **403**

Enw / Name: **Welsh Highland Railway (Mr Graham Farr) [254]**

Rhan: **6.10**

Section: **6.10**

Math / Type: **Cefnogi / Support**

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**Crynodeb o'r Sylw:**

Cefnogi

**Representation Summary:**

Support.

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**Sylw Llawn / Full Representation:**

Support.

**Newid(iadau) i'r Cynllun**

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**Change(s) to the Plan**

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**Profion Cadernid / Soundness Tests:** None

1.15 It is considered that amending policy PS16 as recommended would help to meet test of soundness C2.

### **Proposed Employment and Housing Site Allocations**

1.16 NRW is satisfied with the strategy's aim to disperse development proportionately around the plan area. The focus being on locating development within those locations that provide the best opportunity for achieving sustainable development i.e. developing the Sub regional, urban and local service centres, and an appropriate amount of development in villages with a focus on service villages and then some development in Clusters.

1.17 NRW welcomes that housing within the rural clusters will be 100% affordable housing.

1.18 It is acknowledged that the Plan does not propose any housing allocations in Porthmadog due to large parts of the settlement being categorised as being within Zone C1 and with no alternative sites identified as being available beyond the flood risk areas. Criccieth and Penrhyndeudraeth have therefore been identified as being appropriate to meet the housing requirement of Porthmadog.

1.19 NRW has reviewed the allocations included under the following policies;

*CYF1: Safeguarding and Allocating Land and Units for Employment Use,  
TAI14: Housing in Sub-Regional Centre and Urban Service Centres,  
TAI15: Housing in Local Service Centre  
TAI16: Housing in Service Villages and;  
TAI17 Housing in Local, Rural and Coastal Villages.*

1.20 In addition to the sites referred to in our covering letter we also provide the following advice with regards to the allocations proposed under the above listed policies.

### **Protected Species**

1.21 The possible impact of development on the favourable conservation status of protected species needs further consideration. Species present in Gwynedd and Ynys Mon include otters, bats and water voles.

1.22 It is assumed that none of the proposed allocations have been subject to ecological assessments.

## Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **302**

Enw / Name: **North Wales Wildlife Trust (Mr Chris Wynne) [2626]**

Rhan: **6.11**

Section: **6.11**

Math / Type: **Gwrthwynebu / Object**

### Crynodeb o'r Sylw:

Dylai'r frawddeg olaf bwysleisio'r themâu sydd mewn rhan arall o'r cynllun o ran gwarchod yr amgylchedd naturiol. Newid "cefn gwald" i "amgylchedd naturiol" yn y frawddeg diwethaf.

### Representation Summary:

The last sentence should emphasis the themes elsewhere in the plan of protecting the natural environment. Replace the word "countryside" in the last sentence with "natural environment".

### Sylw Llawn / Full Representation:

The last sentence should emphasis the themes elsewhere in the plan of protecting the natural environment

### Newid(iadau) i'r Cynllun

Newid "cwfn gwald" i "amgylchedd naturiol" yn y frawddeg diwethaf.

### Change(s) to the Plan

Replace the word "countryside" in the last sentence with "natural environment";

Profion Cadernid / Soundness Tests: None

Cynaliadwy newydd: <http://llyw.cymru/topics/planning/policy/dear-cpo-letters/strategic-monitoring-framework/?skip=1&lang=cy>

a'r

Adroddiad Mireinio:

<http://wales.gov.uk/topics/planning/policy/guidanceandleaflets/ldp-process-refinement-report/?lang=en>

<http://llyw.cymru/topics/planning/policy/guidanceandleaflets/ldp-process-refinement-report/?skip=1&lang=cy>

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**D. Materion ynglŷn ag eglurder y cynllun yn gyffredinol, y tybiwn y gallent fod o gymorth i'ch awdurdod ac i'r Arolygydd wrth ystyried newidiadau priodol.**

**Materion technegol penodol:**

**Tabl 13** – Mae dau o'r meini prawf atodol yn debyg iawn 'mawr/ yn fawr iawn', mae angen egluro'r gwahaniaeth rhwng y ddau.

**Gwahanol hierarchaeth i fanwerthu a thai** – beth yw'r rhesymeg dros y gwahaniaeth?

**Polisi PS12** – nid yw'n glir ble fydd y ddarpariaeth o ofod manwerthu'n cael ei leoli.

**Methodoleg Asesu Safleoedd** - Er mwyn i'r asesiad hwn fod yn effeithiol, bydd angen i'r awdurdodau egluro faint yn union o'r safle sydd ar dir a ddynodwyd fel Tir Gorau a Mwyaf Amlbwrrpas, a sut mae hyn wedi effeithio ar benderfyniadau ynghylch defnydd o dir o'r fath.

**Paragraff 7.2.34** - Er bod Llywodraeth Cymru'n cefnogi'r egwyddor o sicrhau manteision cymunedol cynaliadwy drwy drefniadau gwirfoddol, rhaid iddynt beidio ag amharu ar y broses benderfynu ac ni ddylid eu trin fel ystyriaeth berthnasol oni bai eu bod yn bodloni'r profion a nodir yng Nghylchlythyr 13/97.

**ARNA 1** - Cefnogir y Polisi mewn egwyddor ond byddai'n fuddiol ei fân olygu i sicrhau eglurder. Cymal 1 - awgrymir cynnwys "y rhagwelir y bydd dan fygythiad" yn lle "sydd dan fygythiad", er mwyn sicrhau cysylltiad â'r SMP. Cymal 2 - egluro a oes rhaid i'r cynigion fodloni'r ddau is-gymal, (i) a (ii), neu ddim ond un neu'r llall. Cymal 6 - nid yw'n glir pam fod y gofyniad am ganiatâd Cyfoeth Naturiol Cymru yn benodol ac yn unigryw i'r cymal hwn. Cymal 8 - Mae'r testun o fewn y cromfachau'n aneglur, ymddengys fel petai'n awgrymu y byddai rhai datblygiadau penodol yn dderbyniol ar ôl y cyfnod polisi cychwynnol (2025). Nid yw'n glir sut mae hynny'n cyfateb i bolisi sy'n dod i ben yn 2026.

**Polisi TRA2** - Dylid nodi bod Polisi Cynllunio Cymru'n datgan y dylai awdurdodau lleol sicrhau bod datblygiadau newydd yn darparu lefelau is o ofod parcio na'r hyn a wnaed yn y gorffennol. Mae TAN 18 yn datgan y dylid defnyddio uchafswm safonau parcio ceir fel ffordd o reoli'r galw.

**'gormodedd' neu 'orddarpariaeth'** - Nid yw'n glir sut y bydd Cynghorau'n dangos bod gorddarpariaeth o ofod agored, fel sy'n cael ei ddisgrifio yng nghymal 1 a pharagraff 7.1.21.

**Polisi TWR2 – Llety Gwyliau**- Byddai'r polisi'n gryfach pe bai'n cynnwys esboniad o'r hyn y byddai Cynghorau'n ei ystyried fel perygl o 'ormodedd' (Cymal 8) o lety penodol.

**Polisi AMG 4** (Cadwraeth Bioamrywiaeth Leol) - angen ailddrafftio pellach. Mae'r polisi drafft ar hyn o bryd yn ymddangos yn rhy feichus ar gyfer ystyried cynigion datblygu ar dir dynodedig lle mae materion cadwraeth natur lleol anstatudol.

**Materion technegol ynghylch gwybodaeth am Sipsiwn a Theithwyr**

- Paragraff 7.4.97 - mae angen eglurhad pellach ynghylch cam 4 (mewn perthynas â'r 'asesiad manwl o safleoedd') ac fe ddylai'r polisi hefyd adlewyrchu'r ffaith bod y broses

- In the context of LDP manual guidance (section 9.5) the implications of the recently published Sustainable Development Indicators to be collected from April 2013 onwards and the ongoing LDP Process Refinement Exercise should be considered in finalising the MF; see at following links: new SD indicators link: <http://gov.wales/topics/planning/policy/dear-cpo-letters/strategic-monitoring-framework/?skip=1&lang=en>; and PRE Report link: <http://gov.wales/topics/planning/policy/guidanceandleaflets/ldp-process-refinement-report/?lang=en>

**D. Matters relating to clarity of the plan generally which we consider may be of assistance to your authority and to the Inspector in considering suitable changes.**

**Specific technical issues:**

**Table 13** – Two of the supplementary criteria are very similar 'large/ very large', clarity required on the difference between these two.

**Different hierarchy to retail and housing** – what is the rational for the difference?

**Policy PS12** – it is unclear where the provision of retail space will be located.

**SA Methodology** - For this assessment to be effective, the authorities will need to clarify exactly how much of the site is BMV and how it has influenced decisions regarding uses on such lands.

**Paragraph 7.2.34** - While the Welsh Government supports the principle of securing sustainable community benefits for communities through voluntary arrangements, they must not impact on the decision making process and should not be treated as a material consideration unless it meets the tests set out in Circular 13/97.

**ARNA 1** - The Policy is supported in principle but would benefit from minor editing to ensure clarity. Clause 1 - suggest insertion of "predicted to be" immediately before "threatened", to ensure link to SMP. Clause 2 - clarify whether proposals must meet both sub-clauses (i) and (ii), or either one of the sub-clauses. Clause 6 - it is not clear why the requirement for NRW consent is specific and unique to this clause. Clause 8 - The text within brackets is unclear, as it appears to suggest that after the first policy epoch (2025) certain developments would be acceptable. It is not clear how that fits with a plan with an end date of 2026.

**Policy TRA2** - It should be noted that PPW sets out that local authorities should ensure that new developments provide lower levels of parking than have generally been achieved in the past. TAN 18 states that maximum car parking standards should be used as a form of demand management.

**'surplus provision' or 'over provision'** - It is not clear how the Councils will demonstrate surplus/ over provision of open space, as described at clause 1 and in Para 7.1.21.

**Policy TWR2 – Holiday Accommodation** - The policy would be strengthened with an explanation of where the Councils consider 'over-concentration' (Clause 8) of certain accommodation might be a risk.

**Policy AMG 4** (Local Biodiversity Conservation) requires further re-drafting. As drafted the policy seems overly onerous for the consideration of development proposals on local non-statutory nature conservation designations.

**Technical issues relating to information on Gypsies and Travellers**

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## Sylwadau Dros y We / Representations via the Internet

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Rhif Sylw / Rep Id: **404**

Enw / Name: **Welsh Highland Railway (Mr Graham Farr) [254]**

Rhan: **6.17**

Section: **6.17**

Math / Type: **Cefnogi / Support**

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### Crynodeb o'r Sylw:

Nid yw'r Cwmni'n dymuno gweld y ffin ddatblygu ar ochr ogleddol Porthmadog yn cael ei hymestyn.

### Representation Summary:

Para 6.17.

The Company does not wish to see extended the development boundary on the northern side of Porthmadog.

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### Sylw Llawn / Full Representation:

Para 6.17.

The Company does not wish to see extended the development boundary on the northern side of Porthmadog.

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### Newid(iadau) i'r Cynllun

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### Change(s) to the Plan

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Profion Cadernid / Soundness Tests: None

2919  
1112

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
9.	Chapter 6 The Strategy	6.19	Refers to "Habitats Regulation Appraisal" which is a typographical error and should refer to "Habitats Regulation Assessment" ("HRA").  In any event this text should be clear as to what steps of HRA have been undertaken (i.e. screening, appropriate assessment etc).	-
10.	Chapter 6 The Strategy	6.26 - 6.28 (Heading: Economic Strategy)	As stated in the representations above there is insufficient support for the Wylfa Newydd Project in the Plan.  As per the above representations, support for the Wylfa Newydd Project, as the biggest driver of the economic transformation sought, should be included within these paragraphs.	<b><u>Amend the paragraphs to read:</u></b>  6.26 The anticipated transformational economic change arising from the unique scale of major infrastructure projects on the Isle of Anglesey and the Island's Enterprise Zone status will be the biggest driver of spatial and social change over the Plan period. It is 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>  6.28 [...] The Plan has an important role in facilitating the sustainable development of these projects whilst protecting the unique culture, heritage and natural environment of the area. The Councils in partnership with Welsh Government, <u>project promoters</u> , and business organisations will promote and support sustainable economic development.[...]
11.	Chapter 7 Managing growth and	Strategic Policy PS1 para. 2	Horizon considers that in the absence of the SPG (cited as forthcoming in paragraph 7.1.4), it is unclear how this	<b><u>Amend the policy as follows:</u></b>  STRATEGIC POLICY PS1: WELSH LANGUAGE AND CULTURE