

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p>For office use only:</p> <p>Representor No. 1647/622</p> <p>Date received: 27/3/15 <i>ebw</i></p> <p>Date acknowledged:</p>
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**Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026
Representation Form**

Data Protection

How your representation and the information that you give us will be used. All information submitted will be seen in full by the Joint Planning Policy Unit staff dealing with the Joint Local Development Plan (Joint LDP). Your name and comments as set out in your representation form will be published together with the Councils' response. This helps to show that the consultation was carried out properly. Please note that this form may also be made available to any Public Examination on the Joint LDP.

We would prefer that you submit your representations directly online. Alternatively, an electronic version of this form can be completed online at www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp Separate forms should be completed for each comment that you wish to make.

Additional representation forms can be obtained from the Joint Planning Policy Unit on 01286 685003 or may be downloaded from the Council's web site at: www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp or you may photocopy this form. When making comments please use additional sheets as required clearly numbering each consecutive sheet.

PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	Malcolm Ratcliff Mineral Products Association	
Address	[REDACTED]	
Postcode		
Telephone Number		
Email address		

PART 2: Your Comments and Suggested Changes. (Please use one Part 2 section for each comment that you wish to make)

2a. Which part of the Deposit Plan are you commenting on?	
Policy number (please specify)	POLICY MWYN3: PREFERRED AREAS OF SEARCH
Paragraph number (please specify)	7.5.66 - 68
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	

2b. Are you objecting or supporting the Deposit Plan?			
Objecting	<input checked="" type="checkbox"/>	Supporting	<input type="checkbox"/>

2c. Please provide details of your representation on the Deposit Plan.

This policy is deficient in confusing terminology mentioned in national policy. It thus fails soundness tests C2 and CE1.

The objection is not to the sites listed but to the way they are referred to. The policy uses the term 'preferred areas of search'. This confuses two completely different and distinct types of mineral provision in Local Plans which it is important to maintain. MPPW para 14 mentions three types of mineral local plan provision. These are Specific Sites which have a high certainty of planning permission being granted because of the extent of information provided. Next comes Preferred Areas which are areas of known resources where planning permission might be reasonably be expected. Last come Areas of Search (AoS) which are broad areas where the mineral content is uncertain. Local Plans should not rely on AoS alone unless there is clear justification for doing so.

Paragraph 7.5.68 appears to suggest that the allocations proposed are Areas of Search since the Councils do not have sufficient information to identify specific sites. This is bolstered by the comment in para 7.5.69 that the areas have the potential to deliver much more than the identified RTS shortfall.

We believe it is important to retain the correct terminology in LDPs for mineral allocations since the approach of the industry to them will depend on their categorisation. It is also incumbent on the authorities to justify their approach to the shortfall, about which nothing is said in the Plan, in order to satisfy the requirements of national policy. We trust the confused terminology is not an attempt to avoid this obligation. In this respect, the Plan needs to include additional text to support the approach taken.

In addition, there is a typographical error in para 7.5.67 in respect of Anglesey's shortfall of crushed rock which should be 1.31 Million tonnes.

Moreover the implications for provision have not been set out in a logical way. Paragraph 7.5.66 says that where it is not possible to maintain a minimum landbank the 'preferred areas of search' will serve to maintain provision. We are not certain of the latter's status since Policy PS19 and Policy MWYN4 mention a preference for extensions. We also assume that the 'preferred areas of search' are not by their nature extensions, which raises the question of whether they are likely to be considered favourably. Readers of the Plan need more information about the allocation process before knowing how policy MWYN3 fits into the Local Plan strategy. For example, if an operator invested in an area of search and another operator presented an extension, which proposal would be preferred by the authorities? Have the authorities already canvassed the industry for sites? To what extent does a poor response to a call for sites reflect current depressed economic conditions rather than point to levels of longer term need?

*Please use additional sheet if necessary.
Please state how many additional sheets have been used.....*

2ch. If your response to 2c above exceeds 100 words, please provide a summary (no more than 100 words).

This policy is deficient in confusing terminology mentioned in national policy. The objection is not to the sites listed but to the way they are referred to. The policy uses the term 'preferred areas of search'. This confuses two completely different and distinct types of mineral provision in Local Plans which it is important to maintain.

2d. Please detail the changes you wish to see made to the Deposit Plan.

At present we suggest the dropping of the word 'preferred' from areas of search to align more closely with national policy. However, whilst we ask for further clarification about the mineral site strategy we are unable to make any suggestions for changes at this time.

2dd. Is the Deposit Plan sound?

Yes No

2e. If you think that the Deposit Plan is unsound which test of soundness do you think that it fails? (Please tick below). More details are provided at the back of this form.

Procedural				Consistency				Coherence & Effectiveness											
P1	<input type="checkbox"/>	P2	<input type="checkbox"/>	C1	<input type="checkbox"/>	C2	<input checked="" type="checkbox"/>	C3	<input type="checkbox"/>	C4	<input type="checkbox"/>	CE 1	<input checked="" type="checkbox"/>	CE 2	<input type="checkbox"/>	CE 3	<input type="checkbox"/>	CE 4	<input type="checkbox"/>

ANGLESEY AND GWYNEDD JOINT LOCAL DEVELOPMENT PLAN

DEPOSIT DRAFT PLAN

Comments of the Mineral Products Association

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. With the recent addition of The British Precast Concrete Federation (BPCF) and the British Association of Reinforcement (BAR), it has a growing membership of 450 companies and is the sectoral voice for mineral products. MPA membership is made up of the vast majority of independent SME companies throughout the UK, as well as the 9 major international and global companies. It covers 100% of GB cement production, 90% of aggregates production and 95% of asphalt and ready-mixed concrete production and 70% of precast concrete production. Each year the industry supplies £9 billion of materials and services to the £120 billion construction and other sectors. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors.

Given the government's recognition of the economic and employment benefits of the extractive industries we should like to direct your attention to 'Making the Link', a document produced by the MPA to highlight the contribution that the sector makes to the economy. The document can be downloaded from the following website.

http://www.mineralproducts.org/documents/MPA_MTL_Document.pdf

STRATEGIC POLICY PS19 MINERALS

In accordance with our previous comments on this policy, we believe this policy is in danger of confusing separate objectives of mineral planning by putting them under the general heading of supply and is thus UNSOUND by reason of being incoherent (test CE1).

Safeguarding is a resource protection issue for the long term and not a supply issue which must concentrate on the provision of landbanks and alternative materials within the plan period.

Similarly, restoration is not a supply issue and should be listed separately.

The policy deals at a strategic level with minerals but only refers explicitly to aggregates when the supporting text makes it clear the building stone and industrial minerals are also important. We

consider that the strategic policy context requires that mention is also made of all minerals present in the Joint Plan area, which can then be referenced in more detailed policies.

In addition, the policy has been amended to reflect national policy on supply. For example, in item 1 the change is designed to more fully reflect the wording of MPPW para 17 and MTAN1 para 49.

We suggest the reordering of the policy as follows,

The Councils will contribute to regional and local demand for a continuous, secure and sustainable supply of minerals by:

1. Maintaining a **minimum** 7 year land bank of Sand and Gravel and **minimum** 10 year land bank of crushed rock aggregate reserves **throughout the plan period** in line with national guidance.
2. **Making provision for the production of dimension stone.**
3. **Making provision for the production of industrial minerals.**
4. Maximising the use of secondary and recycled materials and mineral wastes **for which appropriate provision will be made in land allocations**
5. Acknowledging that where the principles of sustainable development can be achieved, the extension of existing quarries and/or new quarries is likely to be appropriate.
6. **Requiring that** where there is a need for new capacity of minerals, these should come from locations of low environmental constraint and take into account transport implications.
7. Minimising potential conflict between mineral and non-mineral land uses.

The Councils will safeguard ~~ing~~ known / potential mineral resources from permanent development that would sterilize them or hinder extraction **and protect** maritime wharf and railhead facilities as a means of encouraging sustainable transport of aggregates.

The Councils will ensure good restoration and aftercare.

All Dormant and long-inactive minerals sites identified on the proposals map will be reviewed to assess their potential to contribute to the land bank and the likelihood of their re-opening. Where appropriate, Prohibition Orders will be served.

POLICY MWYN1: SAFEGUARDING MINERAL RESOURCES

This policy is incoherent, contradictory and does not demonstrate accordance with national policy. It thus fails soundness tests C2, CE1, CE2 & CE3. In particular, we could not find any reference to Mineral Safeguarding Areas (MSAs) on either the Proposals Map or its Key. The plan cannot be considered sound unless this information is shown and can be checked. We reserve our position until we can see this information and enter an objection to the Proposals Map on the basis that it is not shown and consequently the soundness of this policy cannot be demonstrated.

Unfortunately, we consider the proposed criteria for assessing non mineral development are incoherent. The problem is essentially the inclusion of prior extraction in both criteria, which is confusing. On the face of it, criterion 1 allows development where prior extraction takes place, but criterion 2 also requires the demonstration of outweighing need and prior extraction. Arguably, if there is an outweighing need, prior extraction is not required.

The text of the policy follows the wording of paragraph 13 of MPPW but the policy does not fully in our view provide for an effective system of development management for mineral safeguarding.

The BGS report 'Aggregate Safeguarding Maps for Wales' was published in 2012 (under the auspices of the Welsh Government). The Introduction says, *'Identifying the distribution of known mineral resources in Wales, identifying areas where other forms of development might prohibit or restrict access to them, and adopting development plan policies that aid management of development in those areas, allows minerals to be considered with other land-use information when applications for development are determined. This process is commonly known as 'mineral safeguarding'.*

Whilst national policy (MPPW) says nothing about how development should be managed in MSAs it is clear that the BGS expects effective policies to be developed.

In this respect the safeguarding regime in Wales is similar to that pertaining in England. Whilst there is no guidance or policy for developing development management criteria for mineral safeguarding in Wales, such guidance has been developed by the BGS, government and the industry for England and represents best practice which surely must apply everywhere a similar regime exists.

The deficiencies of the current policy are that it does not specify a minerals report which should provide information on the quantity and quality of mineral potentially sterilised; it does not distinguish between forms of permanent development that pose a real risk to mineral sterilisation

and those like minor applications, that do not; and it does not require that a statement of relative need between the mineral and the proposed development is submitted for the mpa to make a judgement of the planning balance.

We have therefore proposed a replacement policy for mineral safeguarding development management criteria for the Draft LDP based on the BGS good practice guidance¹ which is designed to assist the mpa in the management and determination of non mineral applications in MSAs.

The principle of this model policy has already been accepted in recent examinations in Wales, particularly in Carmarthenshire and is likely to be proposed and adopted elsewhere.

This proposed replacement policy is as follows,

“Mineral Safeguarding Areas have been identified and are shown on the Proposals Map to ensure that known mineral resources are safeguarded for the future. **Planning permission will not be granted for any form of development within a Mineral Safeguarding Area that is incompatible with safeguarding the mineral and significant infrastructure unless:**

- **the applicant can demonstrate to the satisfaction of the Local Planning Authority that the mineral concerned is no longer of any value or potential value; or**
- **the mineral can be extracted satisfactorily prior to the incompatible development taking place; or**
- **the incompatible development is of a temporary nature and can be completed and the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed; or**
- **there is an overriding need for the incompatible development; or**

it constitutes ‘exempt development’, namely householder application and development already allocated in a statutory plan.”

With the exception of exempt development, all applications in Minerals Safeguarding Areas should be accompanied by a Mineral Assessment Report prepared by a qualified person, which includes a site-specific desk-based assessment of the existing surface and solid geological and mineral resource information, including where appropriate, borehole data leading to an estimate of the economic value (for

¹ ‘Mineral safeguarding in England: good practice advice’ BGS, Keyworth, 2011

example quality and quantity) of the mineral resource, its potential for use in the forthcoming development and an assessment of whether it is feasible and viable to extract the mineral resource ahead of development to prevent unnecessary sterilisation. Where prior extraction can be undertaken, an explanation should be included of how this will be carried out as part of the overall development scheme.

~~Mineral resources will be safeguarded from non-mineral development which would sterilise or hinder their extraction. Proposals for non-mineral development will only be granted within Mineral Safeguarding Areas where:-~~

- ~~1. Such development would not have a significant impact on the viability of future exploitation of the mineral; or extraction of the mineral is undertaken prior to the carrying out of the development.~~
- ~~2. It can be demonstrated that the need for the development outweighs the need to protect the mineral resource and, where feasible, extraction of the mineral is undertaken prior to the carrying out of the development.~~

POLICY MWYN2: SUSTAINABLE SUPPLY OF MINERAL RESOURCES

In view of the fact that the size of the landbank to be secured by policy is indicated in sufficient detail in policy PS19 we question whether this policy is necessary and is not a duplication. It thus fails soundness test CE1. We suggest it is deleted.

POLICY MWYN3: PREFERRED AREAS OF SEARCH

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comment in para 7.5.69 that the areas have the potential to deliver much more than the identified RTS shortfall.

We believe it is important to retain the correct terminology in LDPs for mineral allocations since the approach of the industry to them will depend on their categorisation. It is also incumbent on the authorities to justify their approach to the shortfall, about which nothing is said in the Plan, in order to satisfy the requirements of national policy. We trust the confused terminology is not an attempt to avoid this obligation. In this respect, the Plan needs to include additional text to support the approach taken.

In addition, there is a typographical error in para 7.5.67 in respect of Anglesey's shortfall of crushed rock which should be 1.31 Million tonnes.

Moreover the implications for provision have not been set out in a logical way. Paragraph 7.5.66 says that where it is not possible to maintain a minimum landbank the 'preferred areas of search' will serve to maintain provision. We are not certain of the latter's status since Policy PS19 and Policy MWYN4 mention a preference for extensions. We also assume that the 'preferred areas of search' are not by their nature extensions, which raises the question of whether they are likely to be considered favourably. Readers of the Plan need more information about the allocation process before knowing how policy MWYN3 fits into the Local Plan strategy. For example, if an operator invested in an area of search and another operator presented an extension, which proposal would be preferred by the authorities? Have the authorities already canvassed the industry for sites? To what extent does a poor response to a call for sites reflect current depressed economic conditions rather than point to levels of longer term need?

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POLICY MWYN4: MINERAL DEVELOPMENTS

This policy is unsound because it fails soundness test CE1. The following criteria are the subject of objection,

1. We question whether the inclusion of odour in the list of amenity effects relates to minerals at all. Surely, this is limited to the deposit of waste?
7. We object to the inclusion of this criterion because we believe it is not needed since all aspects of the environment are already covered by other criteria in the policy and it thus serves no useful purpose because an overall assessment of all environmental effects would be carried out in the

determination process. It is moreover, notoriously difficult to define environmental capacity for all types of effects for which the concept is unsuited.

We suggest the following changes to the policy

Mineral exploration, working or extension to existing operations will be granted to maintain the Plan area's landbank of aggregates, or to meet a demonstrated need for other minerals provided the following criteria are met:

1. There is no unacceptable harm to the amenity or health of local residents in terms of visual impact, levels of dust, noise, vibration, ~~odour~~ and light as a result of the operation itself or the resulting traffic movements;
2. There is a suitable buffer between mineral development and sensitive development;
3. There is no unacceptable harm to the stability and support of adjacent land;
4. The development is sensitively screened and landscaped;
5. The development will not have a significant adverse impact on sites of international, national, regional or local environmental, nature conservation, landscape and /or heritage importance;
6. The proposal does not sterilize or otherwise prevent the working of other significant mineral deposits;
- ~~7. The proposal does not increase the extent of active mineral working in a particular locality beyond its environmental capacity;~~
8. There is no unacceptable harm to land drainage groundwater and water resources;
9. The proposal ensures that the potential use of the resource is maximised and there is satisfactory disposal of any waste arising from the mineral operation;
10. Where blasting is proposed, the proposal includes a scheme of blasting to demonstrate that it can be controlled to meet the conditions detailed in Mineral Technical Advice Note MTAN (Wales) 1: Aggregates, or any amendments;
11. The proposal includes a scheme for the after use of the site and details of the restoration and aftercare required to achieve it in accordance with Policy MWYN/11;
12. Wherever economically feasible, mineral waste or products should be transported by rail or water;

POLICY MWYN5: LOCAL BUILDING STONE

We caution against this policy as worded since it is overly onerous and will be ineffective, this failing soundness test CE2 and is contrary to national policy failing test C2.

The MPA has a dedicated Dimension Stone Group and our members are among the largest producers of dimension stone in the country. We lobby mpas extensively on the problems our members face and seek a more understanding planning system.

The reference to 'small scale' in the policy presumably comes from MPPW para 72. This document was published in 2001 and predates the 2004 Symonds report, *Planning for the Supply of Natural Building and Roofing Stone in England and Wales*. The Symonds report emphasised the small scale nature of the industry and stressed its difference from aggregates operations, and the importance of the heritage repair market. This continues to be emphasis of English and Welsh policy, but our members report that typically, only 10% to 30% of their business is in the heritage market and the occurrence of contracts for it are so sporadic that they cannot retain highly skilled labour forces nor provide operating margins to run a modern business if they are dependant on it solely. In these circumstances the policy must be considered out of date.

Dimension stone producers face a number of commercial obstacles which other mineral operators do not have.

- There is a significant competition with imports which are often a third of the price of indigenous natural stone and competition with reconstituted stone products which are typically half the price.
- Prospecting is risky and very expensive being dependent on core drilling at close intervals. Known sources of dimension stone tend to be located adjacent to existing workings.
- Health and safety requirements are increasingly onerous especially for siliceous products where operators have a duty to protect their workforce against Respirable Crystalline Silica (RCS). Current European-led initiatives are likely to cut the current British Workplace Exposure Limit (WEL) of 0.1 mg/m³ by half, which would require substantial new investment in workforce protection. On top of that health surveillance and Stone Saw Guarding are additional (and necessary) burdens for a professional operator.
- Planning and development costs constitute one of the most costly and difficult things for dimension stone operators to deal with because of its open ended nature.
- Dimension stone is not a commodity like aggregates. It is often site or regionally specific and the major operators' products are branded. For new-build projects architects require demonstration that stone of consistent quality and colour will be available for decades or even centuries for any necessary repairs. Major new-build projects often specify the supply of extensive quantities of stone which many traditional operators are unable to supply, due to planning restrictions.

- Dimension stone production requires the retention of skilled workforces able to operate complicated and often dangerous machinery to make products of consistently high quality.

Bearing the mind the foregoing, the industry needs planning policy to do the following,

- Allow long term reserves, not short term planning permissions which do not provide the necessary security of supply required by customers. Specifications of dimension stone require consistency of performance over long time scales – approaching the lifetime of buildings – and it takes time for a product to become established and for customers to have confidence in the consistency of colour, durability, hardness, porosity, workability and that volumes required will be guaranteed. Members continually report that they lose out to imports because they cannot guarantee volumes either because they have no security of supply or planning restrictions prevent them from doing so.
- Not limit proposals to local markets only which reflect the historic circumstances of the industry and the emphasis on heritage end uses. Local market means restricted outlets, low volumes and low turnover/operating profit. This scenario does not allow the operator to invest in the technology and training, and his low sales forecast means that he will be turned away by his bank manager for loans to keep the business going. This is a serious threat to continuity of security of supply. Conversely, serving wider markets makes it easier to guarantee that stone will also be available to serve the local market.
- Not limit proposals to small scale which will in the long term result in scarcity of supply because it leads to restrictions in income generation and money for investment.
- Not impose arbitrary restrictions on output volumes, traffic, aggregates output as a by-product, etc. Aggregates produced as by-products of dimension stone manufacture (coming from quarry waste or overburden removal) often provide an essential accounting contribution to keep the high costs of production down and to supplement income between dimension stone contracts.

As the trade federation for the industry we very much doubt that any building stone quarry operated to modern professional and sustainable standards can meet the requirements of the policy. The policy as drafted does not in our opinion provide a realistic prospect to encourage new dimension stone operations, although it may allow continuation of existing ones. An application for more than a small operation (undefined) proposing to serve a wider market not limited to the heritage market by building a sustainable local business would undoubtedly fail. As would an application that produced material already available even if in tiny quantities from another site. There is no reason adduced that would justify such draconian and punitive conditions. One would have thought that

encouraging local businesses to use local Welsh resources would have found favour in terms of the positive economic effects.

We believe the policy is profoundly anti-business and unsound at this point because although MPPW para 72 mentions local markets and small scale operations this is descriptive of the traditional character of the industry and is not prescriptive. As we have sought to show, this should not be taken as a description of how the industry must be since it is changing rapidly in the light of regulatory drivers and commercial pressures. We believe that the plan is further unsound by reference to para 71 where mpas are told to recognise the importance of maintaining a continuing supply of these materials (i.e. non-aggregates) and to para 7 of MPPW because the way the policy is framed it will not *"provide for the benefits of increased prosperity through an adequate supply of minerals that society needs now and in the future"*. On the contrary, it will tend to discourage proposals because its requirements are too onerous.

We suggest the following changes to the policy

~~The temporary working or reopening of small-scale mineral operations to provide traditional building materials for the repair and/or alteration of buildings or walls of architectural or historic importance or the construction of new buildings, walls or other structures on sensitive sites will be granted provided that:~~

- ~~1. It is compatible with other Plan policies and that it is in the interests of building conservation, the local landscape and sustainability.~~
- ~~2. Where it can be demonstrated that the need cannot be met from existing reserves/sources.~~

~~The duration should be considered on a case by case basis, taking into account the need for the mineral type concerned. The Council will attach a condition specifying end use to which the stone is to be put.~~

Templed Cyfieithu Sylwadau ar y Cynllun Datblygu Lleol – Cynllun Adnau

Rhif y Gwrthwynebiad:	1647_ 622
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Geirfa i'w Gyfieithu:

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Suggested Changes

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Cyfieithiad

Mae'r polisi'n ddiffygiol wrth ddrysu terminoleg a gynhwysir mewn polisi cenedlaethol. Nid yw'r gwrthwynebiad yn cyfeirio at y safleoedd a restrwyd, yn hytrach, mae'n ymwneud â'r modd y cyfeirir atynt. Mae'r polisi'n defnyddio'r term 'ardaloedd chwilio dethol'. Mae hyn yn drysu rhwng dau fath gwahanol ac unigryw o ddarpariaeth mwynau mewn Cynlluniau Lleol, sy'n bwysig i'w cynnal.

Awgrymwn y newidiadau hyn:

Ar hyn o bryd, awgrymwn wneud i ffwrdd â'r gair 'dethol' o ardaloedd chwilio er mwyn bod yn debycach i bolisi cenedlaethol. Fodd bynnag, er ein bod yn gofyn am eglurhad pellach am y strategaeth safleoedd mwynau, nid ydym yn medru gwneud unrhyw awgrymiadau ar gyfer newid ar hyn o bryd.

		<p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p>Defnydd swyddfa yn unig: Rhif Cynrychiolydd: Dyddiad derbyn: 25/3/15 (lebor) Dyddiad cydnabod:</p>
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**Cynllun Datblygu Lleol ar y Cyd Adnau Ynys Môn a Gwynedd 2011-2026
Ffurflen Sylwadau**

Diogelu Data - Y modd y bydd eich sylwadau a'r wybodaeth a roddwch i ni yn cael eu defnyddio. Bydd yr holl wybodaeth a gyflwynir yn cael ei gweld yn llawn gan staff yr Uned Polisi Cynllunio ar y Cyd sy'n ymdrin â'r Cynllun Datblygu Lleol ar y Cyd (CDLI ar y Cyd). Bydd eich enw a'ch sylwadau fel y maent wedi'u nodi yn eich ffurflen sylwadau yn cael eu cyhoeddi, ynghyd ag ymateb y Cyngor. Bydd hyn yn gymorth i ddangos fod yr ymgynghoriad wedi'i wneud yn iawn. Nodwch hefyd y gall y ffurflen hon gael ei rhoi i unrhyw Ymchwiliad Cyhoeddus ar y CDLI ar y Cyd.

Byddai'n well gennym pe baech yn cyflwyno'ch sylwadau'n uniongyrchol ar-lein. Fel arall, gellir llenwi fersiwn electronig o'r ffurflen hon ar-lein yn www.gwynedd.gov.uk/cdll neu www.ynysmon.gov.uk/cdll. Dylech lenwi ffurflenni ar wahân ar gyfer pob sylw yr hoffech ei wneud. Cewch 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.gov.uk/cdll neu www.ynysmon.gov.uk/cdll neu gallwch lungopio'r ffurflen hon. Wrth wneud sylwadau, defnyddiwch dudalennau ychwanegol os oes angen, gan nodi rhif y dudalen yn glir.

RHAN 1: Manylion cyswllt

	Eich manylion/ Manylion eich cleient	Manylion yr Asiant (os yw hynny'n berthnasol)
Enw	Dafydd Gareth Jones	
Cyfeiriad	Gwasanaeth Cynllunio Mwynau a Gwastraff Gogledd Cymru,	
Cod Post		
Rhif Ffôn		
Cyfeiriad e-bost		

RHAN 2: Eich Sylwadau a Newidiadau a Awgrymir. (Defnyddiwch un adran Rhan 2 ar gyfer pob sylw yr hoffech ei wneud)

2a. Ar ba ran o'r Cynllun Adnau yr ydych chi'n gwneud sylwadau?	
Polisi rhif (nodwch)	Mwyn3 Mwyn6
Paragraff rhif (nodwch)	Rhestr Safleoedd Tywod a Graean Cychfeydd Rhagod Safleoedd Mwynau
Cynigion/ Map Mewnosod (nodwch y rhif cyfeirnod)	Map Cynigion 1
Map Cyfyngiadau	Map Cyfyngiadau Môn a Gwynedd
Atodiadau (nodwch)	Mwynau

2b. A ydych yn gwrthwynebu neu gefnogi?			
Gwrthwynebu	<input type="checkbox"/>	Cefnogi	<input checked="" type="checkbox"/>

2c. Rhowch fanylion eich sylwadau ar y Cynllun Adnau.
<p>Nid yw'r ardaloedd diogelu mwynau (Polisi Mwyn1) yn ymddangos ar y map rhyngweithiol ar gwefan Cyngor Gwynedd na chwaith y cyfan o'r ardaloedd chwilio a ffafrir tywod a graean ym mholisi Mwyn3.</p> <p>Anghysondeb gyda'r ardaloedd chwilio a ffafrir sydd wedi'u hadnabod ar gyfer tywod a graean ym Mholisi Mwyn3 a Map Cynigion 1.</p> <p>Angen diweddarau'r cylchfeydd rhagod safleoedd mwynau sydd wedi'u hadnabod ar Map Cynigion 1.</p> <p>Nodiant ar gyfer rhai o'r cyfyngiadau sydd wedi'u mapio yn anodd ei dehongli, e.e. diogelu tywod a graean lle mae'r ardal yn croesi gyda dynodiadau eraill megis 'ardaloedd tirwedd arbennig'.</p>

2ch. Os yw eich sylw yn 2c yn fwy na 100 o eiriau, darparwch grynodedb os gwelwch yn dda (dim mwy na 100 o eiriau.

2d Rhowch fanylion y newidiadau yr hoffech eu gweld i'r Cynllun Adnau

Angen cynnwys yr oll ardaloedd chwilio a ffafrir sydd wedi'u hadnabod ar gyfer tywod a graean ym Mholisi Mwyn3 ar Fap Cynigion 1, h.y. sicrhau fod yr ardaloedd canlynol yn cael eu marcio ar y map cynigion yn ogystal i'r rhai sydd wedi'u cynnwys eisoes sef;

- Fferm Bodychain, Llanllyfni
- Derwyn Fawr, Garndolbenmaen,
- Llecheiddior Uchaf, Garndolbenmaen.

Diweddarau'r cylchfeydd rhagod safleoedd mwynau sydd wedi'u hadnabod ar Map Cynigion 1 i gynnwys Chwarel Nanhoron a dyddodion gweithio mwynau Nant Gwrtheyrn. Mae angen adolygu'r sefyllfa i gynnwys cronfeydd wrth gefn newydd o fwynau (os caniateir) ond hefyd yr ymarferoldeb o gynnwys safleoedd bychan, fel Nant Gwrtheyrn a chyflwyniad Gorchmynion Gwahardd ailgychwyn cloddio ar unrhyw safle mwynau 'cwsgr', e.e. Chwarel Dorothea.

Mae angen cynnwys yr ardaloedd diogelu mwynau, (Polisi Mwyn1) ar y map rhyngweithiol sy'n ymddangos ar gwefan Cyngor Gwynedd a hefyd y cyfan o'r ardaloedd chwilio a ffafrir tywod a graean ym mholisi Mwyn3.

2dd. Ydi'r Cynllun yn gadarn?																			
Ydi					<input checked="" type="checkbox"/>					Nac ydi					<input type="checkbox"/>				
2e. Os ydych chi'n meddwl nad yw'r Cynllun Adnau yn gadarn, pa brawf cadernid ydych chi'n meddwl y mae'n ei fethu? (Ticiwch isod os gwelwch yn dda) Rhoddir mwy o fanylion am y profion cadernid ar gefn y ffurflen hon																			
Gweithdrefnol				Cysondeb								Cydlyniaid ac Effeithiolrwydd							
P1	<input type="checkbox"/>	P2	<input type="checkbox"/>	C1	<input type="checkbox"/>	C2	<input type="checkbox"/>	C3	<input type="checkbox"/>	C4	<input type="checkbox"/>	CE 1	<input type="checkbox"/>	CE 2	<input type="checkbox"/>	CE 3	<input type="checkbox"/>	CE 4	<input type="checkbox"/>

Rhan 3: Beth sy'n digwydd nesaf?

Ar y cam hwn o broses y CDLI ar y Cyd, dim ond sylwadau ar bapur y gallwch eu gwneud (a elwir yn 'sylwadau ysgrifenedig'). Fodd bynnag, gall yr Arolygwr alw ar y rheini sydd am newid y Cynllun i ymddangos a siarad â'r Arolygwr mewn 'sesiwn gwrandawriad' yn ystod yr Ymchwiliad Cyhoeddus. Dylech gofio y bydd yr Arolygwr yn rhoi'r un pwys i'ch sylwadau ysgrifenedig ag i'r rheini a wnewch ar lafar yn y sesiwn gwrandawriad.

3a. A ydych am i'ch sylwadau gael eu hystyried fel 'sylwadau ysgrifenedig' neu a hoffech siarad mewn sesiwn gwrandawriad yn yr Ymchwiliad Cyhoeddus? (Ticiwch un o'r isod)

Nid wyf am siarad mewn sesiwn gwrandawriad ac rwy'n fodlon i'm sylwadau ysgrifenedig gael eu hystyried gan yr Arolygwr.

Hoffwn siarad mewn sesiwn gwrandawriad.

3b. Os hoffech siarad, cadarnhewch pam rydych yn ystyried ei bod hi'n angenrheidiol i chi siarad yn y Gwrandawriad.**3c. A fydddech yn hoffi cael gwybod am y canlynol (Ticiwch y blychau perthnasol)**

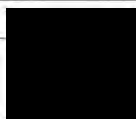
Cyflwyno'r dogfennau a'r dystiolaeth i'r archwiliad

Cyhoeddi adroddiad yr Arolygydd

Mabwysiadu'r Cynllun

Os ydych wedi darparu dogfennau ychwanegol i gefnogi'ch sylwadau, rhestrwch hwy isod:

Llofnod:



Dafydd Gareth Jones

Dyddiedig: 25 Mawrth 2015

DIOLCH AM EICH SYLWADAU AR Y CYNLLUN ADNAU

Cofiwch gynnwys unrhyw ddogfennau perthnasol (e.e. Arfarniad Cynaliadwyedd) gyda'r ffurflen hon.

Dylech ddychwelyd ffurflenni sylwadau wedi'u llenwi i'r Uned Polisi Cynllunio ar y Cyd:

AR-LEIN – drwy lenwi'r ffurflen electronig yn www.gwynedd.gov.uk/cdli neu www.vnysmon.gov.uk/cdli

DRWY E-BOST - polisicynllunio@gwynedd.gov.uk

DRWY'R POST - ei hanfon i: Uned Polisi Cynllunio ar y Cyd, Llawr Cyntaf, Swyddfeydd Cyngor Dinas Bangor, Ffordd Gwynedd, Bangor, Gwynedd LL57 1DT

**DYLECH DDYCHWELYD Y FFURFLENNI SYLWADAU DDIM HWYRACH NA 5.00yh ar 31 Mawrth 2015
NI FYDD SYLWADAU A DDERBYNNIR WEDI'R AMSER A'R DYDDIAD YMA YN CAEL EU HYSTYRIED**

Profion Cadernid

Prawf	Profion Gweithdrefnol
P1	Nid yw wedi'i baratoi yn unol â'r Cytundeb Cyflawni yn cynnwys y Cynllun Cyswilt Cymunedol.
P2	Nid yw'r cynllun a'i bolisiau wedi bod drwy Arfarniad Cynaliadwyedd yn cynnwys Asesiad Amgylcheddol Strategol.
	Profion Cysondeb
C1	Mae'n gynllun defnydd tir nad yw'n rhoi ystyriaeth i gynlluniau, polisiau a strategaethau perthnasol eraill sy'n ymwneud â'r ardal neu ardaloedd cyfagos.
C2	Nid yw'n rhoi ystyriaeth i bolisi cenedlaethol.
C3	Nid yw'n rhoi ystyriaeth i Gynllun Gofodol Cymru.
C4	Nid yw'n rhoi ystyriaeth i'r strategaeth gymunedol berthnasol.
	Profion Cydlyniad ac Effeithiolrwydd
CE1	Nid yw'r cynllun yn gosod strategaeth gydlynol ble mae ei bolisiau a'i ddynodiadau yn llifo'n rhesymegol ohono a/neu pan fo materion trawsffiniol yn berthnasol, nid yw'n gydnaws â'r cynlluniau datblygu a ddarparwyd gan awdurdodau cyfagos.
CE2	Nid yw'r strategaethau, y polisiau na'r dynodiadau'n realistig nac yn briodol o ystyried y dewisiadau amgen a/neu nid ydynt wedi'u seilio ar sail tystiolaeth gredadwy.
CE3	Nid oes mecanwaith clir ar gyfer gweithredu a monitro.
CE4	Nid yw'n rhesymol hyblyg i alluogi iddo ymdrin ag amgylchiadau sy'n newid.

Noda Deddf Cynllunio a Phrynu Gorfodol 2004 mai pwrpas ymchwiliad i Gynllun Datblygu Lleol (y Cynllun) yw ystyried a yw'n "gadarn". Golyga hyn y dylai unrhyw un sydd am roi sylwadau ar y Cynllun Adnau neu wrthwynebu iddo geisio dweud pam nad yw'n gadarn a beth sydd ei angen er mwyn ei wneud yn gadarn. Yn y cyd-destun hwn, gellir ystyried cadarn i olygu ei ystyr gwreiddiol o "*dangos barn dda*" a "*y gellir ymddiried ynddo*". Er mwyn asesu'r Cynllun Adnau, rydym yn defnyddio'r 10 prawf uchod. Bydd y Cynllun Adnau yn cael ei archwilio gan Arolygwr annibynnol a benodir gan Lywodraeth Cymru a thasg yr Arolygwr fydd ystyried a yw'r Cynllun yn gadarn.

Os ydych yn cynnig newid i'r Cynllun Adnau, fe ddylech nodi'n glir pa brawf/broffion cadernid y credwch y mae'r Cynllun Adnau yn ei fethu/eu methu. Mae'r profion mewn tri grŵp – 'Gweithdrefnol' (dau prawf); 'Cysondeb' (pedwar prawf) a 'Cydlyniad ac Effeithiolrwydd' (pedwar prawf). Os hoffech wneud sylwadau ar y ffordd y mae'r Cynghorau wedi paratoi'r Cynllun Adnau, mae'n debygol y byddai'ch sylwadau neu'ch gwrthwynebiadau yn disgyn o dan un o'r profion gweithdrefnol. Os hoffech wneud sylwadau neu wrthwynebu i gynnwys y Cynllun Adnau, gallai fod yn gymorth i chi edrych ar y profion 'cysondeb' a 'cydlyniad ac effeithiolrwydd'.

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **348**

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

Rhan: **POLISI MWYN3**

Section: **POLICY MWYN3**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Mae'r ardal chwilio a ffefrir i'r gogledd a gogledd-orllewin o chwarel Rhuddlan Bach yn cynnwys tir yn ein perchenogaeth. Rydym yn gwrthwynebu ei gynnwys yn yr Ardal Chwilio ac yn nodi ein bod yn rheoli'r tir ar hyn o bryd fel rhan o gylch rhagod safle Cors Goch gerllaw, sef Ardal Gadwraeth Arbennig/Ardal o Ddiddordeb Gwyddonol Arbennig/Gwarchodaeth Natur Genedlaethol. Ni fyddem, dan unrhyw amgylchiadau, yn caniatáu chwarela ar ein tir.

Representation Summary:

The preferred area of search to the north and north-west of Rhuddlan Bach quarry includes land within our ownership. We object to its inclusion with the AoS and note that the land is currently managed by us as part of and a buffer to the adjacent Cors Goch Ramsar site/SAC/SSSI/NNR. We would under no circumstances permit quarrying on our land.

Sylw Llawn / Full Representation:

The preferred area of search to the north and north-west of Rhuddlan Bach quarry includes land within are ownership. We object to its inclusion with the AoS and note that the land is currently managed by us as part of and a buffer to the adjacent Cors Goch Ramsar site/SAC/SSSI/NNR. We would under no circumstances permit quarrying on our land.

Newid(iadau) i'r Cynllun

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Change(s) to the Plan

Alter boundary of AoS to remove our land. We would be happy to provide a detailed boundary map of our holding to help with this.

Profion Cadernid / Soundness Tests: None

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **252**

Enw / Name: **Ellesmere Sand & Gravel Company Limited [2686]**

Rhan: **POLISI MWYN3**

Section: **POLICY MWYN3**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Mae'r ardal chwilio a ffefrir, sef Bodychain, Llanllyfni wedi'i nodi yn y polisi ysgrifenedig ond nid ar y map cynigion. Dylid ei dangos ar y map cynigion. Mae posibilrwydd masnachol sylweddol i'r adnodd a gellid rhesymol ddisgwyl cynllunio. O'r herwydd, dylai fod yn Ardal a Ffefrir i'w gweithio fel estyniad i Gefn Graiainog. Byddai hyn, o bosib, yn goresgyn y diffyg sylweddol. Byddai'r union ardal weithio'n elwa ar Asesiad o'r Effaith ar yr Amgylchedd. Caiff y bloc adnoddau yn Llanllyfni a Cae Efa Lwyd, Penygroes ei gefnogi fel Ardal Chwilio.

Representation Summary:

The preferred area of search at Bodychain, Llanllyfni is identified in the written policy but not on the proposals map. It should be shown on the proposals map. There is significant commercial potential for the resource and planning might reasonably be anticipated. It should therefore be a Preferred Area to be worked as an extension to Cefn Graiainog. This would potentially overcome the significant shortfall. The precise working area would be informed by EIA. The resource block at Llanllyfni and Cae Efa Lwyd, Penygroes is supported as an Area of Search.

Sylw Llawn / Full Representation:

The preferred area of search at Bodychain, Llanllyfni is identified in the written policy but not on the proposals map. It should be shown on the proposals map. There is significant commercial potential for the resource and planning might reasonably be anticipated. It should therefore be a Preferred Area to be worked as an extension to Cefn Graiainog. This would potentially overcome the significant shortfall. The precise working area would be informed by EIA. The resource block at Llanllyfni and Cae Efa Lwyd, Penygroes is supported as an Area of Search.

Newid(iadau) i'r Cynllun

Gweler y cynlluniau atodol sy'n dangos yr Ardal a Ffefrir sydd wedi eu hamlygu'n goch ym Modychain, Llanll

Change(s) to the Plan

Please see attached plans showing Preferred Area highlighted red at Bodychain, Llanllyfni and preferred areas of search at Cae Efa Lwyd, Penygroes.

Profion Cadernid / Soundness Tests: iv, viii, ix

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **372**

Enw / Name: **Ellesmere Sand & Gravel Company Limited [2686]**

Rhan: **7.5.68**

Section: **7.5.68**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Efallai na cheid digon o wybodaeth i gefnogi dyraniadau ar gyfer Safleoedd Penodol. Er hynny, ceir digon o wybodaeth ar Fodychain, Llanllyfni iddi gael ei hyrwyddo'n Ardal a Ffefrir.

Representation Summary:

There may not be sufficient information to support allocations for Specific Sites. There is though sufficient information on Bodychain, Llanllyfni for it to be promoted as a Preferred Area.

Sylw Llawn / Full Representation:

There may not be sufficient information to support allocations for Specific Sites. There is though sufficient information on Bodychain, Llanllyfni for it to be promoted as a Preferred Area.

Newid(iadau) i'r Cynllun

Adjust paragraph text to acknowledge there is commercial potential, operator interest and a reasonable pros

Change(s) to the Plan

Adjust paragraph text to acknowledge there is commercial potential, operator interest and a reasonable prospect that planning permission may be granted as at Bodychain, Llanllyfni as an extention to Cefn Graianog Quarry. An accompanying policy is required:

To maintain future provision to meet the demonstrated need of the industry concerned, 'Preferred Areas' for future supplies of sand and gravel have been identified on the Proposals Map at Bodychain, Llanllyfni.

Profion Cadernid / Soundness Tests: viii

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **314**

Enw / Name: **Lafarge Tarmac Trading Limited [2735]**

Rhan: **7.5.67**

Section: **7.5.67**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Mae tebygolrwydd rhesymol y bydd y Cynllun Datblygu Lleol yn methu cael banc tir o o leiaf ddeg mlynedd ar gyfer cerrig mâl yng Ngwynedd. Mae'r deg mlynedd o ddirwasgiad y cyfrifwyd y galw yn ei erbyn yn debygol o fod yn danamcan. Nid yw'n adlewyrchu'r prosiectau seilwaith mawr a nodir yn y Datganiad Technegol Rhanbarthol. Mae cyfrifiad y banc tir yn wallus gan iddo gyfuno llechi ag agregau crai. Mae llechi'n cyfrif am rhwng 11.7% a 14.8% o ddefnydd a wneir o agregau. Mae gan y banc tir sydd wedi'i gyfrifo gyfraniad uwch ac anghymesur o lechi. Ni ystyriwyd yn gywir y cyfyngiadau ar ddefnyddio llechi fel y tanlinellir yn y Datganiad Technegol Rhanbarthol. Mae gofyn cydnabod Agregau o bwys strategol ag iddynt fanyleb uchel.

Representation Summary:

There reasonable likelihood of the LDP failing to achieve a minimum 10 year landbank for crushed rock in Gwynedd. The recessionary 10 years upon which demand has been calculated is likely to be an underestimate. It does not reflect the major infrastructure projects identified in the RTS. The landbank calculation is flawed by combining slate with primary aggregates. Slate accounts for between 11.7% and 14.8% aggregates usage. The calculated landbank has a higher and disproportionate contribution from slate. The constraints on using slate as highlighted in the RTS have not been properly considered. Strategically important high Specification Aggregates require recognition.

Sylw Llawn / Full Representation:

There reasonable likelihood of the LDP failing to achieve a minimum 10 year landbank for crushed rock in Gwynedd. The recessionary 10 years upon which demand has been calculated is likely to be an underestimate. It does not reflect the major infrastructure projects identified in the RTS. The landbank calculation is flawed by combining slate with primary aggregates. Slate accounts for between 11.7% and 14.8% aggregates usage. The calculated landbank has a higher and disproportionate contribution from slate. The constraints on using slate as highlighted in the RTS have not been properly considered. Strategically important high Specification Aggregates require recognition.

Newid(iadau) i'r Cynllun

MTAN1: Aggregates treats Crushed Rock and secondary Materials under separate paragraph provisions. A

Change(s) to the Plan

MTAN1: Aggregates treats Crushed Rock and secondary Materials under separate paragraph provisions. A better considered landbank calculation should be undertaken recognising the accurate and reduced contribution that slate will have to the crushed rock landbank. This would identify a landbank shortfall in primary crushed rock aggregates. Provision is therefore needed for future reserves of primary crushed rock aggregate in Gwynedd to meet that planned shortfall. Preference should be given to extensions to the supply from existing sites. The policy text requires recognition of the strategic importance of high specification stone and appropriate sites should be allocated. An extension to those supplies should therefore be explored during the LDP period to secure supplies of HSA.