



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

	Polisi TAI 9 ddweud yn fwy pendant y bydd yr awdurdodau'n trafod â datblygwyr pan fydd angen darparu tai fforddiadwy, hynny yn unol â PCC 9.2.19.
NF69	<p>Mae Llywodraeth Cymru'n cefnogi'r newid â ffocws hwn. Fodd bynnag, bydd angen i'r Cyngor sicrhau bod y fframwaith monitro'n cael ei newid i gofnodi a chasglu'r data angenrheidiol.</p> <p>Fodd bynnag, mae Llywodraeth Cymru'n gwrthwynebu hepgor y canlynol. Fel a godwyd yn ein hymateb i'r Cynllun Adnau, dylai'r testun sy'n cefnogi TAI 9 esbonio y gallai'r ystod/math/cymysgedd o dai fforddiadwy gael effaith ariannol ar ddarparu tai ar y safle. Gellid codi/gostwng y ganran i adlewyrchu hynny. Byddai cydnabod hynny a rhoi cyd-destun ar gyfer trafodaethau yn y dyfodol yn cryfhau'r polisi hwn.</p>
Yr Amgylchedd Naturiol ac Adeiledig	
NF35	Newid â Ffocws NF35; nid yw'n ofyn penodol yn y polisi cenedlaethol i gymhwyso polisi ATA wrth ystyried effaith cynigion datblygu y tu allan i'r ATA. Nid yw polisiâu MG1 (union y tu allan) ac ADN1 (gosodiad yr AHNE a'r ATA) yn adlewyrchu'r trywydd hwnnw. Yn ei hanfod, nid yw Llywodraeth Cymru yn credu ei bod yn briodol gosod llain glustogi o gwmpasATA
Y Gymraeg	
NF15	Dylid aileirio meini prawf a) a b) i wneud yn siŵr eu bod yn cydymffurfio â TAN20. Ni ddylai'r meini prawf fod yn gymwys i safleoedd ar hap yr aseswyd eu bod yn rhan o'r cynllun, gan gynnwys Asesiad Amgylcheddol Strategol/Asesiad Strategol a'u bod o fewn ffiniau diffiniedig aneddeleoedd. Byddai'r geiriad fel y mae yn effeithio ar bob safle ar hap. Hefyd, dylai'r geiriad ymwneud ag anheddau, nid pobl. Dylid diffinio 'sylweddol' a dileu'r gair 'denu'.
NF16	Yn cyfeirio at 'raddfa' datblygiad. Lle ceir cyfeiriad at hyn? Bernir hyn, mae'n debyg, fesul safle a/neu yn ôl tafluniad. Pa 'wybodaeth' sydd ei hangen trwy WLIA?
Isadeiledd	
NF20	Dileu 'Mae Papur Testun 13 yn gwahaniaethu rhwng isadeiledd hanfodol a dewisol'. Pennir y profion adran 106 mewn deddfwriaeth ac adlewyrchir hynny ym mharagraff 7.1.9a (NF17) sy'n eu disgrifio fel profion angenrheidiol, â pherthnasedd uniongyrchol a theg/rhesymol. Nid yw'n glir a yw'r isadeiledd hanfodol a dewisol yn cyfateb i'r profion.
NF18	Cefnogir hyn. Mae'n ychwanegu at eglurder y cynllun o ran sut y caiff y gofynion am isadeiledd eu blaenoriaethu a rôl adran 106 a CIL.
Ynni Adnewyddol	
NF33	Mae'r testun ychwanegol yn dyblygu llythyr y Gweinidog 'Ynni Adnewyddadwy' Medi 2015 heb ychwanegu unrhyw beth at y cynllun. Dylid cynnwys canlyniad yr asesiad solar yn y cynllun, nawr.
NF34	Mae 'Tai a ddefnyddir gan ymwelwyr ar eu gwyliau' yn perthyn i'r un dosbarth â thai preswyl C3. Nid yw'n glir pam mae angen y testun ychwanegol.
Economi Ymwelwyr	
NF52	Mae'n amhosib deall pwrpas, perthnasedd a gweithrediad y Newid â Ffocws a gynigir. Ymddengys ei fod yn mentro i fyd y tu allan i'r byd cynllunio. Hefyd, ceir



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

	in our Deposit response, given the evidence identifies areas of strong viability, policy TAI 9 should include text to explain that contributions higher than the specified targets may be sought where supported by evidence. Policy TAI 9 should more explicitly state that, in accordance with PPW 9.2.19, the authorities will seek to negotiate with developers when affordable housing is being sought.
NF69	<p>The Welsh Government supports the focussed change, however the Council will need to ensure that the monitoring framework is amended to record and capture the necessary data.</p> <p>However, the Welsh Government objects to the omission of the following. As raised in our Deposit response, the supporting text to TAI 9 should explain that the range/type/mix of affordable housing can have financial implications for the delivery of housing on site. The percentage sought could be higher/lower to reflect this. Acknowledging this and providing a context for future discussions would strengthen the policy approach.</p>
Natural and Built Environment	
NF35	Focussed change NF35: it is not a specific requirement of national policy to apply SLA policy when considering the impact of development proposals outside SLAs this is not the approach reflected in policies MG1 (located directly outside) and ADN1 (the setting of the AONB and SLA). In essence, the Welsh Government does not think it is appropriate to apply a buffer to SLA designations.
Welsh Language	
NF15	Criteria a) and b) should be reworded to ensure that they are TAN20 compliant. The criteria should not apply to windfalls that have been assessed as part of the plan, including SEA/SA and are within defined settlements boundaries. The current wording, as written, would apply to all windfalls. Furthermore, the wording should relate to dwellings, not people, 'significant' should be defined, 'attract' should be deleted.
NF16	Refers to 'rate' of development. Where is this specified? Presumably by site and/or overall, linked to a trajectory? What 'information' is being sought through a WLIA?
Infrastructure	
NF20	Delete 'Topic Paper 13 on Community Infrastructure differentiates between essential and preferred infrastructure.' The tests for s106 are set out in legislation and reflected in paragraph 7.1.9a (NF17) which describes them necessary, directly related and fair/reasonable. It is unclear as to how essential and preferred infrastructure aligns with the tests.
NF18	Support. Adds clarity to the plan in terms of how infrastructure requirements will be prioritised and the role of S106 and CIL.
Renewable Energy	
NF33	The additional text duplicates the Ministerial Letter 'Renewable Energy' September 2015 and adds nothing to the plan. The outcome of the solar assessment should be included in the plan, now.
NF34	'Housing used by visitors on holiday' falls within the same use class as C3 residential. It is unclear as to why the additional text is necessary.
Visitor Economy	
NF52	The purpose, applicability and implementation of this proposed FC is impenetrable

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ENERGY WORKING FOR BRITAIN

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 FOCUSED 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 ("JLDP") Focussed Changes (February 2016) and to continue dialogue with the Councils as part of the latest JLDP consultation.

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

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

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

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

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

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

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

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

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

Yours sincerely,



Kieran Somers
Head of Planning

Enc.

Signed Focussed Changes Representation Form 12.04.16

Horizon Focussed Changes Summary Notes 11.04.16

JLDP Additional Specific Representations Final V4 12.04.16

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	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p>Defnydd swyddfa yn unig/ Office use only</p> <p>Rhif Cyn./Rep No.:</p> <p>Derbyniwyd/Received:</p> <p>Cydnabod/Acknowledged</p>
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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
FOCUSED CHANGES COMMENTS FORM

25/2/16.

Yn dilyn ymgynghoriad ar y Cynllun Datblygu Lleol ar y Cyd ar Adnau, mae Cyngorhau 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/Electronic a nodiadau cyfarwyddyd ar gael ar www.gwynedd.llyw.cymru/cdll neu www.anglesey.gov.uk/cdll. 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 www.gwynedd.llyw.cymru/ldp or www.anglesey.gov.uk/ldp. If you are submitting a paper copy, attach additional sheets as necessary. **Separate forms should be completed for each comment that you wish to make.**

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

Your representations must be received by no later than 4.30pm on the 13 April 2016. 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: www.gwynedd.llyw.cymru/ldp or

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		<p>Defnydd swyddfa yn unig/ <i>Office use only</i></p> <p>Rhif Cyn./Rep No.:</p> <p>Derbyniwyd/Received:</p> <p>Cydnabod/Acknowledged</p>
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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.

RHAN B: Eich Sylwadau a Newidiadau a Awgrymir PART B: Your Comments and Suggested Changes	
Eich enw/Sefydliad: Your name/Organisation:	Horizon Nuclear Power Wylfa Limited

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

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

Rhif y Newid â Ffocws (NF) Focussed Change Number (NF)	All	Cefnogi/ Support	<input type="checkbox"/>	Gwrthwynebu/ Object	<input type="checkbox"/>
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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	<input type="checkbox"/>	Dim yn gadarn ac dylid ei newid/Unsound and should be changed	<input checked="" type="checkbox"/>
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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

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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 gwrandawriad 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 gwrandawriad' 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 gwrandawriad. 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 gwrandawriad ac rwyf yn fodlon i'm sylwadau

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ysgrifenedig gael eu hystyried gan yr Arolygydd. <i>I do not want to speak at a hearing session and am happy for my written comments to be considered by the Inspector.</i>	
Hoffwn siarad mewn sesiwn gwrandawriad. <i>I want to speak at a hearing session.</i>	<input checked="" type="checkbox"/>

<p>6. Os hoffech siarad, cadarnhewch pam rydych yn ystyried ei bod hi'n angenrheidiol i chi siarad yn y Gwrandawriad.</p> <p><i>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.</i></p>
<p>Please refer to the attached schedule of "Additional Specific Representations to Focussed Changes". In particular, the JDLP needs to provide sufficiently clear policies to support and provide the necessary control for significant elements of the Wylfa Newydd Project.</p>

<p>7. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith hoffech chi gael eich clywed? (Ticiwch un o'r isod)</p> <p><i>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)</i></p>				
<table border="1" style="width: 100%;"> <tr> <td style="width: 80%;">Hoffwn i gael fy nghlywed yn Gymraeg <i>I wish to be heard in Welsh</i></td> <td style="width: 20%; text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>Hoffwn i gael fy nghlywed yn Saesneg <i>I wish to be heard in English</i></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> </tr> </table>	Hoffwn i gael fy nghlywed yn Gymraeg <i>I wish to be heard in Welsh</i>	<input type="checkbox"/>	Hoffwn i gael fy nghlywed yn Saesneg <i>I wish to be heard in English</i>	<input checked="" type="checkbox"/>
Hoffwn i gael fy nghlywed yn Gymraeg <i>I wish to be heard in Welsh</i>	<input type="checkbox"/>			
Hoffwn i gael fy nghlywed yn Saesneg <i>I wish to be heard in English</i>	<input checked="" type="checkbox"/>			

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

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Nodiadau cyfarwyddyd	Guidance notes
<p>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.</p> <p>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:</p> <ol style="list-style-type: none"> 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?) <p>Darperir rhagor o wybodaeth am y profion cadernid a'r gofynion gweithdrefnol yn Arweiniad Gweithdrefnol ar Archwiliadau Cynllun Datblygu Lleol yr Arolygiaeth Gynllunio.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p><i>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.</i></p> <p><i>'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:</i></p> <ol style="list-style-type: none"> <i>1. Does the plan fit? (i.e. is it consistent with other plans?)</i> <i>2. Is the plan appropriate? (i.e. is it appropriate for the area in the light of the evidence?)</i> <i>3. Will the plan deliver? (i.e. is it likely to be effective?)</i> <p><i>More information on the soundness tests and procedural requirements is provided in the Planning Inspectorate's Local Development Plan Examinations Procedural Guidance.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p>

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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

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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 FOCUSED 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.

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- 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.

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- 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).

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- 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.

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	JLDP Policy	Paragraph ref	Consultation responses	Specific amendments sought	Previous Representation Addressed by Focused Changes? and Further Specific Amendments Sought
			transformation sought, should be included within these paragraphs.	<p>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></p> <p>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.[...]</p>	
12.	Chapter 7 Managing growth and Development – Safe, healthy, Distinctive and vibrant communities	Paragraph 7.1.3	-	-	<p>Focused Change Ref: NF 14 has amended paragraph 7.1.3 and introduced the following sentence, “...<u>Policies will help ensure that the right level and type of need is met and that the rate at which the development comes forward allows the development to be absorbed without damaging the character of the community...</u>”</p> <p>However, it is considered that provision should be made for appropriate mitigation measures to remedy any “damage” which might be caused to the character of the community.</p> <p>Horizon is committed to the equal treatment of the Welsh and English languages and a Welsh Language Impact Assessment will be provided in support of the Wylfa Newydd project DCO and a WLIA or Welsh Language Statement will be provided for associated TCPA applications, as necessary.</p>
13.	Chapter 7 Managing growth and Development – Safe, healthy, Distinctive and vibrant communities	Strategic Policy PS1, Paragraph 2	<p>Horizon considers that in the absence of the SPG (cited as forthcoming in paragraph 7.1.4), it is unclear how this policy test will be applied. As currently drafted, this element of the Strategic Policy may risk becoming a barrier to economic growth and other aspirations in the Plan.</p> <p>Horizon submits that the paragraph needs to be amended to build in further flexibility and clarify, among other things, what is meant by "significant harm", the factors relevant to assessing potential harm, and how other policy objectives in the Plan will be weighed against this policy objective.</p>	<p><u>Amend the policy as follows:</u></p> <p>STRATEGIC POLICY PS1: WELSH LANGUAGE AND CULTURE</p> <p>The Councils will promote and support the use of the Welsh Language in the Plan area. This will be achieved by:</p> <p>1. <u>Ensuring that in applications that may have an effect on the future of the Welsh language and culture within communities, applicants will normally be expected to submit a:</u></p> <p><u>(a) Language impact statement to accompany a planning application for smaller developments.</u></p> <p><u>(b) More detailed assessment in the form of a "Language Impact Assessment" to accompany a planning application where developments are on a larger scale or for large scale infrastructure projects with potential long term impacts.</u></p> <p>2. <u>Refusing proposals that due to its size, scale or its location, would cause significant harm to the character and language balance of a community. Using appropriate mechanisms to ensure that suitable</u></p>	<p>No –Whilst Policy PS1: ‘Welsh Language and Culture’ has been amended (Focused Change Ref: NF 15), Horizon still considers that in the absence of the SPG it is still unclear how this policy test will be applied. As amended, this Strategic Policy is still considered to pose a potential barrier to economic growth and other aspirations in the Plan. This is particularly the case for associated TCPA applications that may include residential proposals. It is proposed to delete criteria (c) – it is not clear who makes an assessment that any proposal(s) provides an “adequate range of sizes and types of housing units”. Part (b) continues to apply to any residential development that goes beyond what has been assessed as part of JLDP preparation.</p> <p>Horizon also considers that Part 2 of proposed Policy PS1 is not specific enough and suggest thresholds are introduced for windfall sites. It is also suggested that this requirements should relate to windfall sites within areas identified by the LPA as areas where the language is considered to be of particularly sensitivity or significance and where they relate to major development.</p> <p>It is considered that this paragraph must be amended in accordance with the previously proposed wording in order to build in further flexibility and meet the soundness test “will the plan deliver”, as the plan needs to be sufficiently flexible to be effective.</p>

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JLDP Policy	Paragraph ref	Consultation responses	Specific amendments sought	Previous Representation Addressed by Focused Changes? and Further Specific Amendments Sought
			<p><u>measures that mitigate negative impacts on Welsh language are provided or a contribution is made towards them;</u></p> <p>3. Encouraging, <u>where appropriate</u>, all signage by public bodies and by commercial and business companies to be bilingual;</p> <p>4. Encouraging the use of Welsh place names for new developments, house and street names.</p> <p><u>In appropriate circumstances, mitigation against any adverse effects will be secured through requiring a financial contribution by a section 106 agreement.</u></p>	<p>Amend revised wording of Policy PS1 as follows:</p> <p><i>“STRATEGIC POLICY PS1: WELSH LANGUAGE AND CULTURE</i></p> <p><i>The Councils will promote and support the use of the Welsh Language in the Plan area. This will be achieved by:</i></p> <p><i>1. Requiring a Welsh Language Statement, which will set out how the proposed development will protect, promote and enhance the Welsh language, where the proposed development falls within one of the following categories:</i></p> <ul style="list-style-type: none"> <i>a) <u>Tourist, [SR1] industrial or commercial development employing more than 50 employees and/ or with an area of 1000 sq m or more on unallocated sites; or</u></i> <i>b) <u>Residential development which will individually or cumulatively provide more than the indicative housing target set out for the settlement in Policies TAI 14 – 18. or</u></i> <i>e) Residential development of 5 or more housing units on allocated or windfall sites that does not doesn't propose to provide an adequate range of sizes and types of housing units;</i> <p><i>2. Requiring a Welsh Language Impact Assessment, which will set out how the proposed development will protect, promote and enhance the Welsh Language, where the proposed development:</i></p> <ul style="list-style-type: none"> <i>a) <u>involves a windfall site in an area identified by the Local Planning Authority as an area where the Welsh language is considered to be of particular sensitivity or significance;</u></i> <i>and</i> <i>b) will attract or accommodate significant numbers of people than originally anticipated in the Plan's policies and proposals;</i> <i>b) <u>Residential development of 20 units or more on sites in sub-regional centres or urban service centres and 10 units or more in local service centres, service villages, local/rural/coastal villages and clusters; or</u></i> <i>c) <u>Tourist, commercial or industrial development with an area of 2000sqm or more. [SR2]</u></i> <p><i>3. Using appropriate mechanisms to ensure that suitable measures that mitigate negative impacts are provided or a contribution is made towards mitigating those impacts;</i></p> <p><i>4. Refusing proposals that due to its size, scale or its location, would cause significant harm to the character and language balance of a community</i></p> <p><i>5. Requiring Encouraging, where appropriate, all operational signage by public bodies and by commercial and business companies to be bilingual;</i></p> <p><i>6. Expect that Welsh names are used for new developments, house and street names.</i></p>

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	JLDP Policy	Paragraph ref	Consultation responses	Specific amendments sought	Previous Representation Addressed by Focused Changes? and Further Specific Amendments Sought
					<i>In appropriate circumstances, mitigation against any adverse effects will be secured through a planning condition and/or [SR3] through requiring a financial contribution by a section 106 agreement”.</i>
14.	Chapter 7 Managing growth and Development – Safe, healthy, Distinctive and vibrant communities	Paragraph 7.1.7 – 7.1.9	<p>Horizon considers the clarity of these paragraphs should be improved.</p> <p>The Councils' position on how it will manage pooling restrictions going forward after 6 April 2015 should be set out in full as this is critical for developers including Horizon to understand.</p> <p>Horizon makes further representations on the terminology surrounding and use of CIL receipts, section 106 agreements and community benefits below.</p>	<p><u>Amend the paragraphs to read:</u></p> <p>7.1.7 A new planning charge came into force on 6 April 2010 through the Community Infrastructure Levy Regulations 2010. These Regulations allow local authorities in England and Wales to raise funds from developers undertaking new building projects in their area. The money can be used to fund a wide range of infrastructure that is needed as a result of development. This includes transport schemes, flood defences, schools, hospitals and other health and social care facilities, parks, green spaces and leisure centres.</p> <p>7.1.8 After the 6th April 2015 only 5 contributions from section 106 agreements, since 6th April 2010, can be included within a fund for sharing resources, for example contribution towards play areas from a number of developments within a settlement.</p> <p>7.1.98 The Community Infrastructure Levy (CIL) regime was introduced in an effort to create a more standardised tariff regime in respect of indentified infrastructure for developers and councils to work from and therefore to reduce the time taken to negotiate individual planning obligation agreements for developments is a voluntary mechanism. It was therefore designed to supersede the present section 106 system. <u>Introduction of a CIL regime however is not compulsory - it is a voluntary mechanism and requires</u> However, evidence is required to show that the market is viable to allow for this.</p> <p>7.1.9 However the CIL Regulations do limit the use of section 106 agreements from 6th April 2015. From this date the Councils may only pool contributions from up to five section 106 agreements (entered into from 6th April 2010) to a fund or to provide infrastructure. <u>Previously unlimited contributions, could be included within a fund for sharing resources, for example contribution towards play areas from a number of developments within a settlement could be pooled.</u></p> <p>7.1.10 The Plan intends to allow contributions through Section 106 Agreements where <u>they meet the statutory tests of: being necessary to make the development acceptable in planning terms; directly related to the development; fairly and reasonably related in scale and kind to the development; and they are within the pooling restrictions</u> the Regulations continue to allow this (see paragraph above). The Councils are investigating the possibility of introducing a CIL, by having regard to the impact upon viability of development. The CIL will be subject to a separate process and documents to the Plan. Information will be gathered upon the costs of preparing strategic infrastructure, the different sources to pay for the infrastructure and viability of sites. Discussions will also be held with other developers and stakeholders who have an interest and information about the area.</p>	<p>Yes – No further comments (addressed by Focused Change Ref. NR 17).</p>

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p>Defnydd swyddfa yn unig/ Office use only</p> <p>Rhif Cyn./Rep No.:</p> <p>Derbyniwyd/Received:</p> <p>Cydnabod/Acknowledged</p>
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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.

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

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.

Dylid defnyddio'r ffurflen hon ar gyfer yr holl sylwadau (h.y. sylwadau neu wrthwynebiadau). Mae fersiynau Uniongyrchol Ar-lein/Electronic a nodiadau cyfarwyddyd ar gael ar www.gwynedd.llyw.cymru/cdll neu www.anglesey.gov.uk/cdll. 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.**

This form should be used for all representations (i.e. comments or objections). Direct Online/Electronic versions and guidance notes are available at www.gwynedd.llyw.cymru/ldp or www.anglesey.gov.uk/ldp. If you are submitting a paper copy, attach additional sheets as necessary. **Separate forms should be completed for each comment that you wish to make.**

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.

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.

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

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

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**

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

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.

Mae'n bosib derbyn ffurflenni sylwadau ychwanegol gan yr Uned Polisi Cynllunio ar y Cyd drwy ffonio 01286 685003 neu gellir eu llawr lwytho o wefan y Cyngor yn: www.gwynedd.llyw.cymru/cdll neu www.ynysmon.gov.uk/cdll neu gallwch lungopio'r ffurflen hon. Wrth wneud sylwadau, defnyddiwch dudalennau ychwanegol os oes angen, gan nodi rhif y dudalen yn glir.

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

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p>Defnydd swyddfa yn unig/ <i>Office use only</i></p> <p>Rhif Cyn./Rep No.:</p> <p>Derbyniwyd/Received:</p> <p>Cydnabod/Acknowledged</p>
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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.

RHAN B: Eich Sylwadau a Newidiadau a Awgrymir
PART B: Your Comments and Suggested Changes

Eich enw/Sefydliad: Nathaniel Lichfield & Partners on behalf of Bourne Leisure Ltd.
 Your name/Organisation:

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

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

Rhif y Newid â Ffocws (NF) Focussed Change Number (NF)	NF 15	Cefnogi/ Support	<input type="checkbox"/>	Gwrthwynebu/ Object	<input checked="" type="checkbox"/>
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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	<input type="checkbox"/>	Dim yn gadarn ac dylid ei newid/Unsound and should be changed	<input checked="" type="checkbox"/>
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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 15 proposes that all operational signage by public bodies and commercial and business companies should be bilingual. Bourne Leisure considers that this Focused Change is unnecessarily onerous, as it will not always be appropriate for companies to provide signage in both Welsh and English. It is also unclear from the policy which signage would be classed as “operational”.

The recent proposed changes to Technical Advice Note (TAN) 20, as presented in the consultation ending 30 March 2016, indicate that LDPs may “promote” the provision of bilingual signs:

“Policies in LDPs relating to signage and advertising that are subject to planning control may promote the provision of bilingual signs.” (TAN 20: Planning and the Welsh language Consultation, paragraph 4.1.1)

However, Bourne Leisure notes that the proposed changes to the TAN do not indicate that LDPs are to “require” signs to be provided bilingually. Bourne Leisure therefore requests that the requirement for operational signage to be bilingual is encouraged, rather than required and that “operational signage” is defined within the Plan.

This Focused Change also states that it will be expected that Welsh names will be used for new developments and street names.

The proposed changes to TAN 20 indicate that local authorities can encourage the use of Welsh names for developments and streets:

“Encouragement may also be given to using traditional Welsh names for new developments and streets.” (TAN 20: Planning and the Welsh language Consultation, paragraph 4.1.2)

However, Bourne Leisure notes that the proposed changes to the TAN do not state that LDPs can “expect” names to be provided in Welsh. Bourne Leisure considers that in some cases English names with local, historical or cultural significance may be more appropriate or of equal value and that such flexibility allows for the consideration of individual circumstances.

Planning Policy Wales (PPW) indicates that the Welsh language should be seen as part of the “cultural fabric of Wales”:

“The Welsh language is part of the social and cultural fabric of Wales. The Welsh Government is committed to ensuring that the Welsh language is supported and encouraged to flourish as a language of many communities all over Wales.” (paragraph 4.14.1)

Therefore, Bourne Leisure considers that the Welsh language should be treated as part of this cultural fabric but that English language elements of this fabric should also be recognised.

The Company therefore requests that the use of Welsh names is encouraged, rather than required. In addition to defining “operational signage” Bourne Leisure requests that the Focused Change is amended as follows:

“5. Requiring Encouraging all operational signage by public bodies and by commercial and business companies to be bilingual;

6. **Encouraging the use** ~~Expect that~~ of Welsh place names are used for new developments, house and street names." (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.....

4. Os yw eich sylw yn 3 yn fwy na 100 o eiriau, darparwch grynodeb os gwelwch yn dda (dim mwy na 100 o eiriau).

4. *If your response to 3 above exceeds 100 words, please provide a summary (no more than 100 words).*

Bourne Leisure considers that it will not always be appropriate for companies to provide signage in both Welsh and English. It is also unclear from the policy which signage would be classed as “operational”.

The Company considers that in naming developments and street names, in some cases English names with local or cultural significance may be equally or more appropriate.

In addition to defining “operational signage” Bourne Leisure requests that the Focused Change is amended as follows:

“5. ~~Requiring Encouraging~~ all operational signage by public bodies and by commercial and business companies to be bilingual;

6. Encouraging the use ~~Expect that~~ of Welsh place names ~~are used~~ for new developments, house and street names.” (Focused Changes 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 gwrandawriad 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 gwrandawriad' 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 gwrandawriad. 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 gwrandawriad 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 gwrandawriad.

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 Gwrandawriad.

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 FOCUSED CHANGES

Nodiadau cyfarwyddyd	Guidance notes
<p>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.</p> <p>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:</p> <ol style="list-style-type: none"> 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?) <p>Darperir rhagor o wybodaeth am y profion cadernid a'r gofynion gweithdrefnol yn Arweiniad Gweithdrefnol ar Archwiliadau Cynllun Datblygu Lleol yr Arolygiaeth Gynllunio.</p> <p>Wedi ymgynghori ar fersiwn adnewid'r Cynllun Datblygu Lleol, mae Cyngorau 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.</p> <p>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.</p> <p>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.</p>	<p><i>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.</i></p> <p><i>'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:</i></p> <ol style="list-style-type: none"> 1. <i>Does the plan fit? (i.e. is it consistent with other plans?)</i> 2. <i>Is the plan appropriate? (i.e. is it appropriate for the area in the light of the evidence?)</i> 3. <i>Will the plan deliver? (i.e. is it likely to be effective?)</i> <p><i>More information on the soundness tests and procedural requirements is provided in the Planning Inspectorate's Local Development Plan Examinations Procedural Guidance.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p>
<p>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</p>	<p>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</p>