

Angelsey & Gwynedd Joint Local Development Plan

2011-2026

Deposit Plans - Comments

1. The Total Document is very impressive - it has been well "engineered" with logical order and generally most lucid. Very professionally done.

No of Comments on Depth of Emphasis and the lack of positivity about implementation, thereby:-

A. Safeguarding Mineral Assets. 875
Use of State Waste Restoration - Legal and Financial Restraints (cite South Wales - open cast sites) [MWIN4(II)]

B. Transport
i) Too much emphasis on cars [Not positive enough] 876
ii) Cycle Ways to be implemented [TRA1] 876
iii) Rail & Bus. Electrify Rail - as extension of H.S.R.

iv) Talks only of maintaining stations Holyhead to Hull. New Strait Crossing on H.S.R. Rail Why not submerged tunnel from

v) Has thought been given to a) reversible 2 lane crossing on A55. b) The rail deck beneath A55 is only used by the crossing [TRA1 2.1.37] 877

C. Sustainability & Energy
i) Carbon Management - not emphatic enough [WILTS HIRE 878] ADN2
ii) Solar Panels in mega scale - leave space between lan antenna
for green life beneath. step graze. 879

Angelsey & Gwynedd Joint Local Development Plan

2011 - 2026

252

Deposit Plan - Comments

1. The Total Document is Very Impressive - it has been well "engineered" with logical order and generally most "niche". Very professionally done. No of Comments on Depth of Emphasis and the lack of positivity about implementation, thereby:-

A. Safeguarding Mineral Assets.

875

Use of Slate Waste Restoration - Legal and Financial Restraints (cite South Wales - open cast sites) MWIN4 (ii)

B. Transport

7/1/15

- i) Too much emphasis on cars
- ii) Cycle Ways to be implemented TRAI 876 [Not positive enough]
- iii) Rail & Bus.
- iv) Electrify Rail - as extension of H.S.3

7/1/15

v) Talks only of maintaining stations [would rather more]

p. 70

vi) New strait crossing [on H.S.3 Rail]
Why not submerged tunnel from TRAI 2.1.37

- a) Reversible 2 ~~lane~~ lane crossing
- b) The rail deck beneath A55 is only TRAI 2.1.40
used

877

C. Sustainability & Energy

- i) Carbon Management - not emphatic enough WILTS HIRE 878
- ii) Solar Panels in mega scale - leave space between for green life beneath step graze.

ADN2
lan
antenna

879

REP NO: 656

ID: 1169

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p> <p>NEED TO SCAN</p>	<p>For office use only:</p> <p>Representor No.</p> <p>Date received: 30/3/15 <i>[Signature]</i></p> <p>Date acknowledged:</p>
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**Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026
Representation Form**

PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	Noel Davey	
Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	
Email address	[REDACTED]	

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?	
	CPRW ADN2 Solar Energy
Policy number (please specify)	ADN2
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	

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

8. ADN2 Solar Energy

8.1 ADN2 Other Renewable Energy Technologies. We support the general principle that only small-scale proposals for types of renewable energy installations other than onshore wind should be considered in rural areas, i.e. outside settlement development boundaries, subject to an acceptable impact. In practice, in Gwynedd solar ground arrays are the main potential source of concern, particularly in respect of their visual impact. In view of the increasing number of applications for these we suggest that there should be a separate, explicit policy for solar energy which defines size categories and siting criteria. The first priority in our view should be to encourage use of solar panels on all suitable roof areas, including public, commercial and agricultural buildings, following the Council's excellent lead of fitting them on many of the county's school roofs.

8.2 Paras 7.2.45-48 refer for guidance to the LSCS which contains recommendations on the appropriate scale of solar arrays in different rural areas. Within Gwynedd the study recommends at most micro-scale solar arrays with an area of less than 1 ha and capacity of less than 500kW. Several of this size have already been approved, while two 'large' to 'very large' arrays have also been permitted, contrary to the recommendations of the LSCS and at least 3 others have been subject to EIA screening. We agree that there are unlikely to be many other sites where large-scale field arrays would be acceptable. However, we consider small-scale solar arrays to be potentially much less visually damaging than wind turbines and see scope for some where there is good natural screening and the areas are not overlooked from high ground.

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

8.3 ADN2 Summary. A separate explicit policy is needed for solar energy proposals which should prioritise use of commercial and farm building roofs, presume in favour of micro-solar field arrays in suitable sites and allow larger scale arrays in rural areas only outside the AONB and SLA and only in exceptional circumstances where the site has good natural screening and is not overlooked from nearby higher ground.

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

Add explicit policy covering field solar arrays

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	P2	C1	C2	C3	C4	CE 1	CE 2	CE 3	CE 4
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

adnewyddadwy? Gellid defnyddio'r asesiad ynni i wella geiriad polisïau PS6 a PCYFF4, gan eu bod fel y maen nhw, yn aneglur. Gallai'r asesiad ynni ei gwneud hi'n glir beth yn union a ddisgwylir ac ar gyfer pa fath/faint o ddatblygiad y mae'r polisïau yn ymwneud â nhw.

1059

Mae Polisi **ADN2** yn ceisio cadw technolegau ynni anadnewyddadwy o fewn ffiniau datblygu. Mae hyn yn cyfyngu gormod ac yn groes i bolisi cynllunio cenedlaethol. Dylai'r asesiad ynni roi'r dystiolaeth sydd ei hangen i allu cynllunio'n bositif ar gyfer pob math o ddatblygiad adnewyddadwy ac ynni isel.

C. Mewn perthynas â'r profion cadernid CE2, CE3, CE4: Er na thybir eu bod yn faterion o bwysigrwydd sylfaenol i gadernid yr CDLI, rydym o'r farn bod diffyg sicrwydd neu eglurder ynglŷn â'r materion canlynol, y tybiwn y byddai'n fuddiol tynnu eich sylw atynt, i'ch galluogi i ystyried amgenach ffyrdd o'u dangos:

I. Y gallu i gyflawni

Mae'r awdurdod wedi ystyried y gallu i gyflawni i raddau, ac mae Papur Testun 13, Seilwaith Cymunedol yn rhoi cyd-destun defnyddiol gan ddangos y mathau o seilwaith sydd eu hangen yn yr ardal. Fodd bynnag, nid yw hyn wedi'i drosi ar gyfer yr asesiadau fesul safle unigol. Rhaid i'r awdurdodau egluro pa seilwaith sy'n angenrheidiol er mwyn cyflawni'r safleoedd a ddynodwyd, a dangos sut a phryd y bydd hyn yn cael ei gyflawni yn ystod cyfnod y cynllun, ac ystyried p'un oes angen datblygu graddol. Ni ddylai gyfyngu ar newid o fewn y cynllun, ond dylai sicrhau bod y strategaeth yn cael ei chyflawni. Dylai'r awdurdodau gadarnhau pa seilwaith sy'n angenrheidiol a sut y bydd hyn yn cael ei roi ar waith o fewn y cyfyngiadau (fel y nodwyd yn y cynllun) sy'n dod i rym ar gytundebau Adran 106 ym mis Ebrill 2015, yn arbennig o ran y cyfyngiadau ar gronni adnoddau a nodir yn y rheoliadau.

Gall anawsterau godi os nad oes systemau yn eu lle i gydio yn y manteision ariannol a ddaw drwy ddatblygu, er mwyn eu defnyddio i helpu i ddarparu'r seilwaith priodol. Nid yw'n glir a yw Polisi ISA1 yn blaenoriaethu'r seilwaith gofynnol neu ai rhestr yn unig yw hon. Mae'r gwaith ar hyfywedd safle mewn perthynas â'r gallu i gyflawni hefyd yn wan.

Yr awdurdodau ddylai ddangos beth fydd, a beth na fydd yn cael eu cwmpasu gan gyfraniadau/rhwymedigaethau cynllunio eraill, sut mae hyn yn berthnasol i Reoliad 122 o Reoliadau'r Ardoll Seilwaith Cymunedol 2010, megis mesurau lliniaru uniongyrchol ar gyfer datblygiad, sut y gellir cyflawni rhwymedigaethau eraill y mae Cylchlythyr 13/97 yn eu ceisio, newidiadau hysbys i ddeddfwriaeth, megis Rhan L a systemau chwistrellu, a chostau seilwaith. Dylai'r awdurdod hefyd fedru dangos rhestr flaenoriaeth gyffredinol ynghylch y rhwymedigaethau y bydd yn eu ceisio gan ddatblygiad a baich ariannol rhwymedigaethau o'r fath ynghyd ag effaith hyfywedd.

Os nad oes Ardoll Seilwaith Cymunedol mewn lle, mae perygl bydd bwlch yn y polisi ac yng ngallu'r cynllun i gasglu arian i helpu gyda'r datblygiadau. Ni ddylid gadael hyn nes adolygiad cynnar o'r cynllun. Nid yw bwlch o'r fath yn fuddiol i'r cynllun. Mae angen esboniad pellach i ddangos nad yw hyn yn broblem neu, os yw'n broblem, sut y gellir ei ddatrys. Dylid egluro'r berthynas rhwng darparu seilwaith ar gyfer tai a chyflogaeth yn nhermau datblygiad graddol.

1516

opportunities for higher sustainable building standards on strategic sites or can the co-location of developments optimise opportunities for renewable energy? The energy assessment could also be used to improve the policy wording for PS6 and PCYFF4, as these stand they lack clarity. The energy assessment could make it clear what is expected and to what scale/ type of development the policies apply.

1059

Policy ADN2 seeks to constrain non-renewable energy technologies to within development boundaries. This is overly restrictive and contrary to national planning policy. The energy assessment should provide the evidence to plan positively for all forms of renewable and low energy development.

C. In relation to soundness tests CE2, CE3, CE4: whilst not considered to be fundamental to the soundness of the LDP, we consider there to be a lack of certainty or clarity on the following matters which we consider we can usefully draw to your attention to enable you to consider how they might be better demonstrated:

I. Deliverability

Whilst the authority has considered deliverability to some degree, Topic paper 13, 'Community Infrastructure' provides a helpful context illustrating the types of infrastructure requirements in the area. However, this has not been transposed to a site by site assessment. The authorities need to clarify what infrastructure is required to deliver the allocated sites and how and when this will be delivered within the plan period, and whether any phasing of development will be required. It should not limit change within the plan but it should ensure the strategy is delivered. The authorities should secure the infrastructure required and how this will be implemented within the limitations (as identified in the plan) coming into force on Section 106 agreements in April 2015, particularly having regard to the pooling limitations as set out in the regulations.

If there is no mechanism in place to capture the financial benefits arising from development which can be used to assist the provision of appropriate infrastructure, this could cause difficulties. It is not clear whether Policy ISA1 prioritises the infrastructure requirement or whether this is merely a list. The viability work relating to the site deliverability is also weak.

It is for the authorities to demonstrate what other planning obligations/contributions will, or will not cover, how this relates to Regulation 122 of the Community Infrastructure Levy (CIL) Regulations 2010, i.e. direct mitigation for development, how other obligations sought by Circular 13/97 can be achieved, known changes to legislation, i.e. Part L & sprinklers, as well as infrastructure costs. The authority should also be able to indicate a priority list, in the generality, of what obligations it will seek from development and the financial magnitude of such obligations and the impact of viability.

If a CIL is not in place, there could be a policy vacuum in the plans ability to capture financial receipts to support development. This should not be left to an early review of the plan. It is not in the interest of the plan to create a policy void. Further explanation is required to demonstrate how this is not an issue or, if it is, how it is to be resolved. The

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **182**

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

Rhan: **POLISI ADN2**

Section: **POLICY ADN2**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Ystyrir bod y polisi hwn yn ailadrodd y polisi cenedlaethol (e.e. nid pob tirwedd sydd â'r un gwerth). Mae'r polisi'n rhy gaeth ac nid yw'n gadarnhaol o ran technolegau ynni adnewyddadwy ar safleoedd cloddio mwynau presennol neu yng nghyswllt tir sydd eisoes wedi'i ddefnyddio. Cael gwared ar y cyfeiriad i ffiniau datblygu. Cyfeirio at ddefnydd dros dro ar gyfer ffynonellau ynni adnewyddol ar safleoedd echdynnu mwynau presennol gyda phwyslais cadarnhaol ar ffynonellau ynni adnewyddol ar dir sydd eisoes wedi ei ddatblygu.

Representation Summary:

Consider this policy is repetitive of national policy e.g. (not all landscapes are of the same value). The policy is too restrictive and not positive toward renewable energy technologies on existing mineral extractions sites or toward previously used land

Remove reference to development boundaries. Reference to temporary use of renewable energy sources on existing mineral extraction sites and positive emphasis toward renewable energy sources on previously used land

Sylw Llawn / Full Representation:

Consider this policy is repetitive of national policy e.g. (not all landscapes are of the same value). The policy is too restrictive and not positive toward renewable energy technologies on existing mineral extractions sites or toward previously used land

Newid(iadau) i'r Cynllun

Cael gwared ar y cyfeiriad i ffiniau datblygu. Cyfeirio at ddefnydd dros dro ar gyfer ffynonellau ynni adnewyddol

Change(s) to the Plan

Remove reference to development boundaries. Reference to temporary use of renewable energy sources on existing mineral extraction sites and positive emphasis toward renewable energy sources on previously used land

Profion Cadernid / Soundness Tests: x, viii, ix

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **93**

Enw / Name: **Mr Jon Cottrell [2734]**

Rhan: **7.2.45**

Section: **7.2.45**

Math / Type: **Cefnogi / Support**

Crynodeb o'r Sylw:

Mae Solar Ffotofoltäig yn llawer mwy derbyniol nag ynni gwynt oherwydd y bydd uchder llwyr y tyrbinau'n hawlio'r dirwedd am filltiroedd ac yn cael effaith negyddol ar dwristiaeth.

Representation Summary:

Solar PV is far more acceptable than wind energy because the shear height of the turbines will totally dominate the landscape for miles around and have a negative impact on tourism.

Sylw Llawn / Full Representation:

Solar PV is far more acceptable than wind energy because the shear height of the turbines will totally dominate the landscape for miles around and have a negative impact on tourism.

Newid(iadau) i'r Cynllun

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Change(s) to the Plan

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Profion Cadernid / Soundness Tests: None

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **183**

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

Rhan: **POLISI ADN2**

Section: **POLICY ADN2**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Ystyrir bod y polisi hwn yn ailadrodd y polisi cenedlaethol (e.e. nid pob tirwedd sydd â'r un gwerth). Mae'r polisi'n rhy gaeth ac nid yw'n gadarnhaol o ran technolegau ynni adnewyddadwy ar safleoedd cloddio mwynau presennol neu yng nghyswllt tir sydd eisoes wedi'i ddefnyddio. Cael gwared ar y cyfeiriad i ffiniau datblygu. Cyfeirio at ddefnydd dros dro ar gyfer ffynonellau ynni adnewyddol ar safleoedd echdynnu mwynau presennol gyda phwyslais cadarnhaol ar ffynonellau ynni adnewyddol ar dir sydd eisoes wedi ei ddatblygu.

Representation Summary:

Consider this policy is repetitive of national policy e.g. (not all landscapes are of the same value). The policy is too restrictive and not positive toward renewable energy technologies on existing mineral extractions sites or toward previously used land.

Remove reference to development boundaries. Reference to temporary use of renewable energy sources on existing mineral extraction sites and positive emphasis toward renewable energy sources on previously used land.

Sylw Llawn / Full Representation:

Consider this policy is repetitive of national policy e.g. (not all landscapes are of the same value). The policy is too restrictive and not positive toward renewable energy technologies on existing mineral extractions sites or toward previously used land

Newid(iadau) i'r Cynllun

Cael gwared ar y cyfeiriad i ffiniau datblygu. Cyfeirio at ddefnydd dros dro ar gyfer ffynonellau ynni adnewyddol

Change(s) to the Plan

Remove reference to development boundaries. Reference to temporary use of renewable energy sources on existing mineral extraction sites and positive emphasis toward renewable energy sources on previously used land

Profion Cadernid / Soundness Tests: x, viii, ix

REP NO: 944
ID: 3090
NEED TO SCAN

31/3/15 eboez

Cydbwyllgor Ymgynghorol Ardal o Harddwch Naturiol Eithriadol Llŷn

Dynodwyd Ardal o Harddwch Naturiol Eithriadol (AHNE) Llŷn yn 1957 o dan Ddeddf Parciau Cenedlaethol a Mynediad i Gefn Gwlad 1949. AHNE Llŷn oedd yr 3ydd ardal i'w dynodi drwy Gymru, Lloegr a Gogledd Iwerddon.

Sefydlwyd Cydbwyllgor Ymgynghorol Ardal o Harddwch Naturiol Eithriadol Llŷn yn 1997 yn dilyn cyfarfod rhwng Cyngor Gwynedd, Cyngor Cefn Gwlad Cymru ac amrywiol sefydliadau eraill. Un o gyfrifoldebau'r Cydbwyllgor yw cyngor ar Gynlluniau Datblygu, strategaethau a rhaglenni gwaith yr awdurdod lleol a chyrrff eraill i'r graddau eu bod yn ymwneud â'r AHNE.

Yn y cyfarfod o'r Cydbwyllgor Ymgynghorol AHNE Llŷn a gynhaliwyd ar 25ain o Fawrth 2015 trafodwyd y Cynllun Datblygu Lleol Gwynedd a Môn 2011-26 a gwnaed y sylwadau canlynol:

1. **AHNE** - nid oes polisi penodol o ran cynnal a gwarchod yr AHNE. Yn hytrach mae polisiau cyffredinol a chyfeiriad at ddeddwriaeth a pholisi cenedlaethol. Credir fod angen polisi penodol ar gyfer cynnal a chadw'r AHNE, tebyg i Bolisi B8 yn y Cynllun presennol.
2. **AMG 1** - Ardaloedd Tirwedd Arbennig. Mewn rhai manau mae'r ardal yma (ATA Gorllewin Llŷn) yn ffinio gyda AHNE Llŷn ac yn creu gwarchodiad i osodiad yr AHNE. Fodd bynnag, mae rhai rhannau o'r AHNE heb y warchodaeth yma. Credir felly dylid cyfeirio at warchod gosodiad yr AHNE yn y polisiau perthnasol felly (gweler 5 isod).
3. **AMG 2** - Mae'n bolisi canmoladwy ond braidd yn gymhleth a chredir y gall fod yn anodd ei weithredu.
4. **AMG 3** - Dynodiad lleol yw'r Arfordir Treftadaeth sydd yn dilyn ffin arfordirol yr AHNE i raddau helaeth yn Llŷn. Credir y dylai'r polisi adlewyrchu'r dynodiad yn fwy cadarnhaol drwy roi mwy o warchodaeth i'r AT.
5. **Polisi ADN 1** – Ynni Gwynt ar y Tir. Anghytunir â'r polisi:
 - Credir y dylid cadw at y polisi presennol (C26) o ddim tyrbinau yn yr AHNE.
 - Hefyd peidio a chaniatau tyrbeini uwch na 11m o fewn gwelededd yr AHNE.
 - Dylid defnyddio'r term "tyrbin" yn hytrach na "melin" sydd yn wahanol.
 - Credir y dylai maen prawf 2 gyfeiro at warchod gosodiad yr AHNE.
 - Mae pryder am y categorïau a dynodi datblygiadau dan 5MW fel rhai "Bach".
6. **Polisi ADN 2** – Technoleg Ynni Adnewyddadwy arall. Credir fod y polisi hwn yn rhy benagored o ran cynigion tu allan i ffiniau datblygu a dylid ei gryfhau.
7. **Polisi TWR 3** - Carafanau Sefydlog a Siale a Llety Gwersylla Amgen Parhaol. Cefnogir y polisi hwn gan y bwriedir gwrthod safleoedd newydd ac estyniadau o fewn yr AHNE a'r ATA.

8. **Polisi TWR 4** – Deiliadaeth Gwyliau. Roedd pryder am ganiatáu i safleoedd carafannau sefydlog/ sialetau fod yn agored 12 mis y flwyddyn. Heb adnoddau digonol i ellir monitro'r sefyllfa a mae posibilrwydd o fyw'n barhaol yn yr unedau – heb dalu trethi.
9. **Polisi TWR 5-** Safleoedd Carafannau Teithiol, Gwersylla a Llety Gwersylla Amgen dros dro. Roedd aelodau wedi sylw fod cynydd mewn ceisiadau a chryn bwysedd gan y math yma o ddatblygiad yn ardal Llŷn. Gofynwyd os sail i'r polisi ac oedd yna ddadansoddiad o gynydd mewn unedau/ effaith datblygiadau newydd wedi ei wneud? Credir y dyliai'r polisi fod yn fwy caeth oddi mewn, a gerllaw, yr ardal ddynodedig.
9. **Polisi PCYFF 2 – Dylunio a Siapio** – credir y dylai fod cyfeiriad penodol at ddylunio safonol sy'n gweddu i'r cyd-destun yn yr AHNE.
10. **Gorfodaeth.** Credir fod angen blaenoriaeth i fonitrio cydymffurfiaeth hawl cynllunio, amodau cynllunio, amodau tirweddu ac amodau preswyliaeth.
11. **Cynllun Rheoli'r AHNE** – mae hwn yn gynllun statudol a chreir y dylai fod cyfeiriad penodol ato yn y polisiau perthnasol.
12. **Tai newydd.** Roedd pryder am lefel y ddarpariaeth dai yn ardal Llŷn ac effaith posibl hynny ar y gymdeithas a lles yr Iaith Gymraeg. Yn benodol roedd pryder am y-ddarpariaeth ym Motwnnog a Phwllheli sydd yn ymddangos yn ormodol o ystyried maint a chymeriad yr anheddleoedd.