

Anglesey & 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 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 Slate 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]
ii) Cycle Ways to be implemented [TRA1 876]
iii) Rail & Bus. as extension of H.S.R.

7.1 P968
iv) Electrify Rail - as extension of H.S.R.
Holyhead to Hull.
7.1 P967 v) Talks only of maintaining stations would rather money

P970 vi) New Strait Crossing tunnel from
Why not submerged tunnel from benefits crossing
vii) Has thought been given to on H.S.R. Rail
a) Reversible 2 lane crossing
on A55
b) The rail dock beneath A55 is only 1.1.40
used 877

C. Sustainability & Energy
i) Carbon Management - not emphatic enough
Air/Zero Emission - WILTS HIRE 878
ii) Solar Panels
in mega scale - leave space between lan
for green life beneath antenna
for sheep graze. 879

C. (continued)

- iii) I am beginning to wonder about Wylfa 2 - MONEY
- iv) of course there is much opposition to the high wind turbines

D Landscape/Water Drainage

- 880 **AMBI** i) Delighted to see 5 New Conservation areas in Anglesey
- ii) The Uplands - Moor - a lot are overgrazed. Would like to see more "regreening" - to stop the IMMEDIATE RUN-OFF & flooding. Also CO2 collect with Trees.

881
PCYFF2
+3

E Employment/Flourishing

- i) The contractors on Wylfa B to employ 25% + ~ local people
- ii) The main supplies to set up a big Training School (As did C.E.G.B.)
- iii) The N.D.A will begin to dismantle Wylfa A. Ensure they set up a commensurate Training School!
- iv) Aim for Holyhead to develop industry

882
PS9

- i) Explore Wylfa 'B' - power to smelt.
- ii) Ancillary industry - if Holyhead & port - main port from Ireland

883
CYF1

- Farming & Fishing
- i) Commend Anglesey Salt & many farm outlets.
- ii) I particularly feel sad about the mussels being exported to Holland for treatment

884
CYF5

885 Welsh. ~~At the~~ Remember need to protect the language. Not enough done

TANK at LOCAL AGENDA 21 P.T.O

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **436**

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

Rhan: **POLISI PCYFF2**

Section: **POLICY PCYFF2**

Math / Type: **Cefnogi / Support**

Crynodeb o'r Sylw:

Cefnogi.

Representation Summary:

Support.

Sylw Llawn / Full Representation:

Support.

Newid(iadau) i'r Cynllun

.

Change(s) to the Plan

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Profion Cadernid / Soundness Tests: None

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?	
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Policy number <i>(please specify)</i>	Ch 7.2 Sustainable Development esp. PCYFF1-3
Paragraph number <i>(please specify)</i>	Mainly 7.2.1-7.2.13
Proposals/ Inset Map <i>(please specify ref no.)</i>	
Constraints Map	
Appendices <i>(please specify)</i>	

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Yes No NO

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5.16 PCYFF3 Design and Landscaping. We agree with the aims, but have concern about the ability to monitor and enforce landscaping plans and conditions in practice.

5.17 PCYFF#1. We have been unable to locate online detailed Seascape Character Area Assessments.

5.18 PCYFF4 We support the proposed broad approach to carbon management including the priority to be given to improving energy efficiency (#1,2) and subject to the useful general conditions regarding siting and design in #3,4.

5.19 PCYFF4 #4. We would like to add ‘...carbon measures must not **(iii) ‘damage the landscape’** (giving more emphasis to the weaker statement in #3(ii) ‘*be sympathetic to the character and appearance of the landscape*’.

5.20 ARNA1 Coastal Change Management Areas

ARNA1 #8 significance of ‘(outside the indicative policy epoch up to 2025)’ ? – clarify under what circumstances these non-residential developments (beach huts, shops, camp sites, etc.) will be permitted.

5.21 ARNA1. We have been unable to locate online the CCMA maps. The maps in the Shoreline Management Plan show the location of coastal sections, but not the width of the affected management areas extending back from the coast.

5.22 ARNA1 # 3. ‘*Either cleared **or** made safe*’ (rather than ‘and’)

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

5.23 Summary Sustainable Development: We have a number of points of detail; but our principle concern is doubt that generalised sustainable development principles can be applied effectively to local planning developments of smaller scale. We fear that the weight to be given to testing all proposals against a few generalised policies, accompanied by a loss in emphasis or omission of policies for specific types of development, will result in a less effective planning framework and more arbitrary planning decisions.

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

2dd. Is the Deposit Plan sound?
 Yes No NO

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

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

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 5 Sustainable Development
Policy number <i>(please specify)</i>	Ch 7.2 Sustainable Development esp. PCYFF1-3
Paragraph number <i>(please specify)</i>	Mainly 7.2.1-7.2.13
Proposals/ Inset Map <i>(please specify ref no.)</i>	
Constraints Map	
Appendices <i>(please specify)</i>	

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

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

5. Sustainable Development

5.1 Context. We appreciate that emerging national policy sees ‘sustainable development’ as the main purpose of the land use planning system and requires the LDP to place these principles at the heart of its local strategy. We have no quarrel with the broad aims and aspirations of sustainable development. However, we question whether the proposed sustainable development policies can be applied effectively at the more local scale in the planning system. Permitted development rights are recognised for the least intrusive proposals, but the great majority of proposals where planning permission is required are for relatively small developments where it will be difficult to demonstrate sustainable development principles in any meaningful way.

5.2 We have a major concern that so much weight is to be placed on three generalised policies related to sustainable development (PCYFF1-3). We understand the intention to reduce duplication, but we think that the testing of all proposals against these overarching principles could readily become a bland ritual without much meaning in every Design and Access Statement, while at the same time planning decisions could become more arbitrary and less objective when tested against these generalised statements. The emphasis gained from explicit criteria attached to individual policies for each type of proposal will be lost. In many cases there will be no explicit policy, but only a requirement to refer to the broad sustainable development policies. ‘The baby may be thrown out with the bathwater’. The net effect risks being a less effective planning framework and poorer planning decisions.

5.3 Para 7.2.2 *'Sustainable development means making sure that people can satisfy their basic needs in the present, while ensuring that future generations can also look forward to the same quality of life'* - Should there not be an aspiration also to improve the quality of life of future generations? Add **'at least'** the same quality of life?

5.4 The interlocking and equivalent character of the three 'interconnected pillars' of sustainable development should be shown and expressed graphically as a more triangular relationship, illustrating more clearly how they inter-relate and need to be considered together.

5.5 PS5 All development proposals are required to fulfil nine objectives. We fully agree with the objectives in principle but do not see how all proposals, such as small extension to houses, could demonstrate in practice how they would contribute to all of them, especially #6 *'preserve and enhance' the quality of .. assets'* and #7 *protect and improve' the quality of the natural environment*. There is probably a need to add some qualifier e.g. *'wherever possible'*. It is noted that the introduction of objectives #10-14 does include the words *'proposals should also where appropriate:'*

5.6 PS5 #4 *'Promote greater self-containment of Centres and Villages by contributing to balanced communities that are supported by sufficient services; cultural, arts, sporting and entertainment activities; a varied range of employment opportunities; physical and social infrastructure; and a choice of modes of travel;'* This approach will clash with pressure for 'economies of scale' e.g. the current arguments about concentration of services in N Wales NHS.

5.7 PS5 #13 Improve sense by inserting 'car' and deleting 'means of' : *'Reduce the need to travel by car and encourage the opportunities for all users to travel when required as often as possible by ~~means of~~ alternative modes'*.

5.8 PS6 #1 We fully support the proposed energy hierarchy.

5.9 PCYFF 1-3 The Welsh words or other source for the derivation of the policy code letters are not clear. 'PCYFF' is a mouthful as a mnemonic for these policies and difficult to recall, unlike other policies which have useful and memorable abbreviation codes where the derivation is evident. (Perhaps PCY1-3?).

5.10 PCYFF1 #4 Housing density. While agreeing that dense settlement can be efficient in terms of land use etc. the impression on the landscape of dense estates of detached houses is alien to the traditional landscape in North Wales where settlement has not been significantly concentrated, except in 19th century quarrying areas. (See PCYFF2) If density is to be encouraged it should be through the building of terraces, rather than 'little boxes'. The terrace or even semi-detached units produce much better proportioned building blocks. The social (and economic) value of gardens should not be forgotten.

5.11 PCYFF2 #1 How practical is it to prove it *'enhances'* as well as complements? When will it be judged *'relevant'*?

5.12 PCYFF2 # 5,9,11,12 Use of design jargon – ‘*Secured by design.. inclusive design.. be legible.. active frontage*’ – meanings may not be intelligible to the lay reader; re-word, provide explanatory text or glossary.

5.13 PCYFF2# 7.ii must surely mean NOT precluding the reasonable use of neighbouring land...

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Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **400**

Enw / Name: **Dwr Cymru Welsh Water (Mr Dewi Griffiths) [2680]**

Rhan: **POLISI PCYFF2**

Section: **POLICY PCYFF2**

Math / Type: **Cefnogi / Support**

Crynodeb o'r Sylw:

Mae Dŵr Cymru'n cefnogi'r gofyn bod systemau draenio'n cael eu dylunio i gyfyngu ar ddŵr wyneb yn llifo oddi ar y wyneb a pherygl llifogydd ac atal llygredd.

Representation Summary:

DCWW support the requirement that drainage systems are designed to limit surface water run-off and flood risk and prevent pollution.

Sylw Llawn / Full Representation:

DCWW support the requirement that drainage systems are designed to limit surface water run-off and flood risk and prevent pollution.

Newid(iadau) i'r Cynllun

Change(s) to the Plan

Profion Cadernid / Soundness Tests: None

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **173**

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

Rhan: **POLISI PCYFF2**

Section: **POLICY PCYFF2**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Mae'n debygol y caiff polisi cyffredinol ei anelu at ddatblygu trefol ond nid yw'n mynd i fanylion e.e. (nid pob tirwedd sydd â'r un gwerth). Os ystyrir ei fod yn berthnasol i safleoedd cloddio mwynau, awgrymu newidiadau a nodir isod.

Representation Summary:

General policy likely to be aimed at urban development but does not specify e.g. (not all landscape is of the same value). If considered to apply to mineral extraction sites suggest changes set out below.

Sylw Llawn / Full Representation:

General policy likely to be aimed at urban development but does not specify e.g. (not all landscape is of the same value). If considered to apply to mineral extraction sites suggest changes set out below.

Newid(iadau) i'r Cynllun

Each proposal should be dealt with on its merits however this policy if applied to mineral extraction sites it would

Change(s) to the Plan

Each proposal should be dealt with on its merits however this policy if applied to mineral extraction sites it would prove very difficult to comply with. Suggest start the policy with "Where relevant ..." then amend points two to start "Where possible"

Profion Cadernid / Soundness Tests: x, viii, ix

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **174**

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

Rhan: **POLISI PCYFF2**

Section: **POLICY PCYFF2**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Mae'r polisi cyffredinol yn debygol o fod wedi'i anelu at ddatblygu trefol ond nid yw'n mynd i fanylion. Nid oes cydnabyddiaeth i amgylchiadau penodol gweithio mwynau a'r angen lleoliadol i weithio mwynau lle ceir hyd iddynt. Awgrymu hierarchaeth ar gyfer asesu effeithiau amgylcheddol cynigion datblygu gan nad yw'r holl asedau amgylcheddol â'r un gwerth. Os caiff ei ddefnyddio'n rhy gaeth yng nghyswllt safleoedd cloddio mwynau yna ceir risg o steryllu diangen.

Representation Summary:

General policy likely to be aimed at urban development but does not specify. There is no recognition of the particular circumstances of mineral working and the locational need for minerals to be worked where they are found. Suggest a hierarchy for assessing environmental effects of development proposals as not all environmental assets are of the same value. If applied too rigidly to mineral extraction sites then there is a risk of unnecessary sterilisation.

Sylw Llawn / Full Representation:

General policy likely to be aimed at urban development but does not specify. There is no recognition of the particular circumstances of mineral working and the locational need for minerals to be worked where they are found. Suggest a hierarchy for assessing environmental effects of development proposals as not all environmental assets are of the same value. If applied too rigidly to mineral extraction sites then there is a risk of unnecessary sterilisation.

Newid(iadau) i'r Cynllun

Each proposal should be dealt with on its merits however this policy if applied to mineral extraction sites it would

Change(s) to the Plan

Each proposal should be dealt with on its merits however this policy if applied to mineral extraction sites it would prove very difficult to comply with. Suggest start the policy with 'Where relevant ...' then amend points to start 'Where possible'.

Profion Cadernid / Soundness Tests: x, viii, ix

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 polisïau 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 polisïau 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 gweledd 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 dylai'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.

Cynllun Datblygu Lleol Gwynedd a Môn

Hoffai NFU Cymru wneud y sylwadau cyffredinol canlynol ar y Polisiâu Rheoli Datblygu sydd wedi ei gynnwys yn y Cynllun drafft

Cyfleoedd na fyddai'n rhwystro'r datblygiadau canlynol:-

1. Ehangu busnesau priodol
2. Ailddefnyddio adeiladau gwledig sy'n addas ar gyfer creu cyflogaeth
3. Darparu unedau gwaith trwy addasu adeiladau gwledig traddodiadol
4. Arallgyfeirio yn yr economi amaethyddol
5. Mentrau sy'n gysylltiedig â thwristiaeth briodol
6. Hamdden ond dim ond pan fyddant yn briodol i leoliad cefn gwlad a defnydd arall o dir yn yr ardal yn cynnwys amaethu
7. Caniatáu datblygiadau technolegol i hwyluso datblygiad cyflogaeth mewn ardaloedd gwledig
8. Mentrau yn angenrheidiol i gwrdd ag anghenion ffermio a choedwigaeth gyfoes. Hefyd isadeiledd yn cynnwys egni gwyrdd, twristiaeth a mentrau eraill a fydd yn helpu i gefnogi'r economi gwledig cynaliadwy.
9. Byddai'n darparu cyfleusterau cymunedol sy'n diwallu angen lleol
10. Mewn amgylchiadau, lle y byddai'n helpu i fodloni angen lleol am dai, gan gynnwys cynlluniau sy'n gyson â'r Polisi Tai Fforddiadwy.
11. Byddai'n gwneud darpariaeth ar gyfer cynhyrchu ynni adnewyddadwy, sy'n briodol o raddfa a dyluniad i'w leoliad
12. Byddai'n cefnogi adfywiad cymdeithasol ac economaidd ardaloedd gwledig
13. Adeiladau amaethyddol newydd sy'n addas ar gyfer amaethu cyfoes wedi ystyried eu graddfa, lleoliad, dyluniad a'r deunyddiau lleihau'r effaith weledol ar y dirwedd
14. Lle mae'n bosib dylai adeiladau newydd yn cael eu grwpio gydag unrhyw adeiladau presennol er mwyn lleihau eu heffaith weledol ar y dirwedd. Fodd bynnag, dylai adeiladau ynysig cael eu caniatáu lle mae eu lleoliad yn hanfodol i'r gweithgaredd amaethyddol sy'n cael ei wneud lle nad ydynt yn cael eu lleoli mewn man amlwg.

15. Dylai'r addasu neu newid defnydd adeiladau gwledig segur y tu allan i unrhyw ffin datblygu tai yn cael eu caniatáu ar gyfer defnydd cyflogaeth.

Dylai'r Cynllun hefyd

1. Wneud defnydd mwyaf effeithiol o dir yr ardal ac mae angen cyfeiriad penodol yn y Cynllun o werth amaethyddiaeth a chynnyrch lleol.
2. Annog nid gwrthod twf ffermio ac arallgyfeirio
3. Caniatáu cymysgedd o dai gan gynnwys yr hawl i ddatblygu hen adfeilion nid yn unig i ymwelwyr ond i'r boblogaeth gynhenid gael byw ynddynt.
4. Hyrwyddo tirwedd o safon uchel a chydabyddiaeth mae amaethyddiaeth yn ei chwarae yn hyn
5. Gydabod gwerth manddaliadau Môn a Gwynedd fel modd i ffermwyr ifanc gychwyn a datblygu ei busnesau
6. Cydnabyddiaeth o werth amaeth a'r diwydiannau bwyd lleol i'r economi wledig, cyfleon, cyflogaeth a'r iaith Gymraeg.
7. Gefnogi gweithio o gartref a mesurau a fydd yn gwella'r band eang a chyfathrebu yn yr ardaloedd anghysbell yn arbennig
8. Cynllun hyfyw sydd a gallu i addasu i ofynion cyfredol ffermio a busnesau i ffynnu yng nghefn gwlad.