

**At Uned Polisi Cynllunio ar y Cyd****Ymateb i'r Ymgynghoriad ar y Cynllun Datblygu Lleol gan Hwylusydd Tai Gwledig Gwynedd****Polisi 1: Cymysgedd briodol o dai**

Mae darpariaeth addas o dai mewn ardaloedd gwledig yn bwysig er mwyn hyrwyddo cymunedau cynaliadwy ac mae newidiadau mewn hawliau lles yn golygu bod pobl yn gorfod symud i eiddo llai. Mae canran uwch o'r boblogaeth wledig yn awyddus i fyw yn eu cynefin ac mae'n bwysig medru cynnig y math o dai ar eu cyfer. Ceir hefyd poblogaeth sy'n heneiddio ar angen i gael tai sydd yn hawdd i'w haddasu ac i bobl allu byw o fewn eu cartrefi a'u cymunedau cyn hired ag sydd bosib. Mae gan Hwylusydd Tai Gwledig Gwynedd rôl ganolog er mwyn sicrhau bod y polisi hwn yn cyfrannu at y math cywir o ddarpariaeth yn y Sir.

**POLISI MANWL TAI5: TAI MARCHNAD LLEOL**

Mae'r Papur Testun 17: Tai Marchnad Lleol yn cynnwys gwybodaeth sydd yn nodi'r angen i gael Polisi Tai Marchnad Lleol oherwydd y ffactorau isod:

'7.12 Ariannu tai fforddiadwy, yn nodi lleihad mewn grant tai cymdeithasol (GTC) sy'n dangos yr angen i ddatblygu dulliau eraill o ddatblygu tai sydd tu allan i'r gyfundrefn arferol o ariannu tai. Mae hyn yn wir iawn am ardaloedd gwledig lle mae datblygu nifer fach o dai mewn pentref yn ddigonol i gynnal y gymuned honno am flynyddoedd.

Fel yr wyf yn cyfeirio yn '7.13.2 sylwadau gan yr Hwylusydd Tai Gwledig (HTG)' rwy'n cyfeirio yn glir am yr angen i gael lefel o gymorthdal, yn bennaf GTC, ac fel sydd wedi nodi eisoes nid yw dibynnu ar y dull hwn o gyllido tai fforddiadwy yn gynaliadwy gan ystyried bod lefel y grant yn lleihau.'

Mae sefydlu cofrest Tai Teg gyda'r bwriad i gynorthwyo unigolion i fedru prynu tai yn ffordd o gasglu gwybodaeth am anghenion tai yn y Sir. Mae'r cofrestr yn ffordd o gynorthwyo i adnabod angen ond nid yw yn cael ei ddefnyddio gan bawb ac mae angen mwy o hyrwyddo er mwyn canfod yr angen. Wrth ymateb i lle ddylid codi tai yn y dyfodol bydd y cofrestr yma yn allweddol i sicrhau cymunedau cynaliadwy.

Fel HTG rwy'n croesawu'r papur sydd yn delio yn benodol gyda rhoi cymorth i bobl allu byw yn eu hardaloedd a chyfrannu i'w cymunedau. Mae'r papur yn adnabod yr her sydd i 'ddiwallu anghenion penodol lleol am dai ar y farchnad agored'. Cyfeirir at fodel canolraddol yn y papur a byddai'r Uned yn croesawu'r opsiwn hwn. Rydym yn ymwybodol bod nifer o bobl yn methu fforddio ty i'w brynu a ddim yn disgyn i'r categori o fod mewn angen ar gyfer tai cymdeithasol.

Mae tabl 8.1 yn nodi nifer o unedau sydd wedi eu datblygu yn ystod y blynyddoedd diwethaf. Mae gwybodaeth o Tai Teg a Chofrestr Tai Cyffredin Gwynedd yn dangos yn glir bod angen am dai yn bodoli, a bod angen mwy o waith ar lawr gwlad hefyd i sicrhau dilysrwydd yr angen yma o safbwynt angen lleol.

**POLISI MANWL TAI9: TROTHWY TAI FFORDDIADWY A'U DOSBARTHAD**

Mae'r Polisi Tai 19 yn nodi'r angen i gael 'taliad pro-rata yn hytrach na dim darpariaeth fforddiadwy o gwbl ar y safle' i'w groesawu gan fod hyn yn sicrhau cymorth i gael cyflenwad o dai fforddiadwy ac fe all fod o gymorth i Bartneriaid Tai er mwyn sicrhau bod cynllun yn hyfyw.

**TAI10: SAFLEOEDD EITHRIO**

Rwy'n croesawu'r Polisi hwn a fydd o gymorth i sicrhau bod model addas yn cael ei ddatblygu o fewn ardaloedd, mwy na thebyg ardaloedd gwledig. Mae darparu cynlluniau tai fforddiadwy yn anos i'w gwireddu heb y sicrwydd bod unedau marchnad ar gael i groes gymorth cynllun.

Mae'r tabl 7.13 ym Mhapur Tesun Tai a Phoblogaeth ar Safleoedd eithrio gwledig yn dangos faint o ddatblygiadau ar safle eithriedig sydd wedi bod gyda chymariaethau clir i'w gweld yn y niferoedd.

Mae cyswllt cryf yma gyda Pholisi Tai Marchnad Lleol yn ddull o sicrhau bod datblygiadau yn digwydd o fewn ardaloedd lle mae angen clir am dai fforddiadwy gydag elfen o werthu ar y farchnad agored er mwyn sicrhau bod cynlluniau yn hyfyw.

Mae dynodi safleoedd o fewn ffiniau heb sicrwydd bod cefnogaeth i ddatblygiad boed yn dirfeddiannwr neu ddatblygwr yn bryder a bod safleoedd eithriedig eraill a gynigwyd wedi eu gwrthod yn benbleth.

Wrth ddynodi nifer yr unedau mewn cymunedau mae peth amheuaeth a yw'r angen yn bodoli ac fe hoffwn weld mwy o gymunedau bach a phentrefi yn cael canran o dai fforddiadwy a marchnad lleol.

Gellir ystyried arolygon y bum yn ymwneud a hwy i ddangos bod gor ddatblygiadau yn y pentrefi i'w weld yn y mapiau adneuo.

Hoffwn petae mwy o ystyriaeth i angen lleol cyn cytuno ar y safleoedd a'r niferoedd hyn.

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henwi. Mae Llywodraeth Cymru'n gwrthwynebu bod cymaint o 'glystyrau' wedi'u henwi heb ddigon o gyfiawnhad.

### **Polisi PS15 – Strategaeth aneddeoedd**

Nid ydym yn cwestiynu strategaeth y cynllun; fodd bynnag, nid ydych wedi cyfiawnhau'r cyfyngiad twf a grëir gan eiriad y polisi ar gyfer y prif ganolfannau. Byddai'n fwy rhesymegol creu cyfyngiadau twf ar gyfer yr haenau is yn hytrach nag ar gyfer yr ardaloedd mwyaf cynaliadwy.

### **Materion nad ydynt yn cydymffurfio â Pholisi Cynllunio Cymru**

Mae'r awdurdodau wedi gosod tystiolaeth ym 'Mhapur Testun 17: Tai Marchnad Angen Lleol' sy'n dangos y materion sy'n wynebu cymunedau lleol. Mae Paragraff 9.2.4 Polisi Cynllunio Cymru (PCC) yn gwneud yn glir na fyddai amod meddiannaeth fel arfer ar gyfer tai marchnad ar gyfer anghenion lleol penodol. Byddai'n rhaid wrth dystiolaeth gref i gyfiawnhau gwyro o'r polisi cenedlaethol yn hyn o beth. Felly, dylai'r dystiolaeth fynd ymhellach ac esbonio'n fanwl pam na allai'r polisiâu tai fforddiadwy a darparu tai fforddiadwy canolraddol, helpu i ddiwallu'r angen a nodwyd

At hynny, dywed paragraff 7.4.39 y cyfyngir tai'r farchnad leol a ganiateir o dan Bolisi TA15 i'r rheini sy'n gymwys trwy gytundebau Adran 106 lleol. Nid yw felly yn cydymffurfio â PCC h.y. bod yr ymrwymiad yn angenrheidiol i "wneud y datblygiad yn dderbyniol o safbwynt cynllunio" (PCC 3.7.6).

Yn ôl Polisi TAI10, Datblygu ar safleoedd eithrio, o dan amgylchiadau eithriadol gellid cynnwys tai marchnad i wneud cynnig yn hyfyw. Er hynny, ni ellir dosbarthu safleoedd sy'n gymysgedd o dai fforddiadwy a thai marchnad yn 'safleoedd eithrio' o dan bolisi cenedlaethol – dywed TAN 2 yn benodol nad yw safleoedd o'r fath yn briodol ar gyfer tai marchnad (para. 10.14).

### **Tai fforddiadwy**

#### **Tystiolaeth ategol**

Dywed Polisi Cynllunio Cymru (PCC, paragraff 9.1.4) ei bod yn bwysig bod awdurdodau lleol yn deall eu system dai yn ei chyfanrwydd er mwyn iddynt allu datblygu polisiâu tai marchnad a fforddiadwy sy'n seiliedig ar dystiolaeth. Elfen allweddol o'r dystiolaeth hon fydd yr Aseiad o'r Farchnad Dai Leol (LHMA). Dywed paragraff 9.2.16 (PCC) hefyd y dylai'r CDLI gynnwys targed cyflawni tai fforddiadwy ar gyfer yr awdurdod lleol, yn seiliedig ar yr LHMA. Dylai'r CDLI fynegi cyfanswm yr angen am dai fforddiadwy (gan gynnwys unrhyw ôlgroniad) dros gyfnod cyfan y cynllun, yng nghyfiawnhad rhesymegol y polisi tai fforddiadwy.

#### **Darparu tai fforddiadwy**

Mae'r cynllun a'r dogfennau ategol wedi nodi faint yr angen am dai fforddiadwy dros 5 mlynedd cyntaf y cynllun (gan gynnwys yr ôlgroniad) ac mae darparu tai fforddiadwy wrth reswm yn flaenoriaeth i'r ddau awdurdod. Bydd angen i'r awdurdodau esbonio'r berthynas rhwng y targed o fewn yr LHMA a lefel y tai fforddiadwy/marchnad a gynigir yn y cynllun. Bydd gofyn i'r awdurdodau ddangos eu bod yn darparu cymaint ag y gallent trwy'r CDLI gan fod yr angen mor fawr.

Mae angen mwy o eglurhad i esbonio'r cyfraddau darparu a ddisgwylir trwy'r ymrwymadau cyfredol a sut y bydd y dyraniadau'n cyfrannu at gyflawni'r targed am dai fforddiadwy. Pery'n aneglur sut y disgwylir darparu 1,400 o dai fforddiadwy a ph'un a

and facilities, hence the need to explain why these have been identified. The Welsh Government objects to the identification of so many 'clusters' which lack justification.

### **Policy PS15 – Settlement strategy**

The strategy of the plan is not questioned; however the growth limitation created by policy wording for the main centres has not been justified. It would seem logical to create growth limitations for the lower tiers rather than for the most sustainable areas.

### **Issues not in accordance with Planning Policy Wales**

The authorities have set out evidence in 'Topic Paper 17: Local Market Housing' which demonstrates the issues facing local communities. Paragraph 9.2.4 of Planning Policy Wales (PPW) makes it clear that market housing to meet specific local housing needs would normally have no occupancy condition. Such a departure from national policies need to be justified with robust evidence. Therefore, the evidence should go further and detail why the affordable housing policies, and the provision of intermediate affordable housing, could not assist in meeting the identified need.

Furthermore, paragraph 7.4.39 states that local market housing, allowed under Policy TAI5, will be restricted to those who are eligible by S106 legal agreements. Therefore, it does not comply with PPW, i.e. that the obligation is "necessary to make the development acceptable in planning terms" (PPW 3.7.6).

Development on exception sites - Policy TAI10 states that in exceptional circumstances open market housing may be included to make a proposal viable. However, sites that include a mix of market and affordable housing cannot be classed as 'exception sites' under national policy – TAN 2 explicitly states that such sites are not appropriate for market housing (para. 10.14).

### **Affordable housing**

#### **Supporting evidence**

Planning Policy Wales (PPW, paragraph 9.1.4) states the importance of local authorities understanding their whole housing system so they can develop evidence-based market and affordable housing policies. A key component of this evidence base will be a Local Housing Market Assessment (LHMA). Paragraph 9.2.16 (PPW) also states that LDPs should include an authority-wide delivery target for affordable housing, based on an LHMA. The LDP should express the total affordable housing need (including any backlog) over the whole plan period in the reasoned justification to the affordable housing policy.

#### **Deliverability of affordable housing**

The plan and supporting documents have identified the need for affordable housing over the first 5 years of the plan (including backlog), and the delivery of the affordable housing is obviously a priority for both authorities. The authorities need to explain the relationship between the target within the LHMA and the level of affordable/ market housing proposed in the plan. It is necessary for the authorities to demonstrate that they are maximising provision through the LDP given the high level of need.

Further clarification is required to explain what delivery rates are expected from current commitments and how allocations will contribute to the affordable housing need target. It remains unclear how 1,400 affordable housing will be delivered and whether the

## Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **309**

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

Rhan: **POLISI TAI10**

Section: **POLICY TAI10**

Math / Type: **Gwrthwynebu / Object**

### Crynodeb o'r Sylw:

Mae'r polisi hwn yn mentro niweidio safleoedd neu nodweddion gwerth bioamrywiaeth leol neu nodweddion pwysig mewn coridorau bywyd gwyllt/gwyrdd. Ychwanegu cyfeiriad i'r angen i gydymffurfio gyda pholisïau'r cynllun yn enwedig y rhai sy'n ymwneud â gwarchod bioamrywiaeth.

### Representation Summary:

This policy risks damaging sites or features of local biodiversity value or important features in wildlife/green corridors. Insert reference to the need to comply with other policies of the Plan especially those related to the protection of biodiversity.

### Sylw Llawn / Full Representation:

This policy risks damaging sites or features of local biodiversity value or important features in wildlife/green corridors.

### Newid(iadau) i'r Cynllun

Ychwanegu cyfeiriad i'r angen i gydymffurfio gyda pholisïau'r cynllun yn enwedig y rhai sy'n ymwneud â gwa

### Change(s) to the Plan

Insert reference to the need to comply with other policies of the Plan especially those related to the protection of biodiversity

Profion Cadernid / Soundness Tests: None

## Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **446**

Enw / Name: **Grŵp Cynefin (Rhys Dafis) [2953]**

Rhan: **POLISI TAI10**

Section: **POLICY TAI10**

Math / Type: **Cefnogi / Support**

### Crynodeb o'r Sylw:

Mae'r Polisi TAI10 i'w groesawu yn fawr. Bydd yn caniatáu darparu cartrefi i rai y mae pris tai lleol ar y farchnad agored allan o'u cyrraedd. Bydd angen canllaw Cynllunio ynglŷn â natur a ffynhonnell y dystiolaeth angen fydd yn rhaid ei gyflwyno i gefnogi cais Cynllunio.

### Representation Summary:

Policy TAI10 is greatly welcomed. It will provide homes for those that local house prices on the open market are well out of their reach. A planning guideline will be required regarding the nature and source of the evidence needed, it will have to be submitted to support a planning application.

### Sylw Llawn / Full Representation:

Mae'r Polisi TAI10 i'w groesawu yn fawr. Bydd yn caniatáu darparu cartrefi i rai y mae pris tai lleol ar y farchnad agored allan o'u cyrraedd.  
Bydd angen canllaw Cynllunio ynglŷn â natur a ffynhonnell y dystiolaeth angen fydd yn rhaid ei gyflwyno i gefnogi cais Cynllunio.

### 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: **449**

Enw / Name: **Grŵp Cynefin (Rhys Dafis) [2953]**

Rhan: **7.4.83**

Section: **7.4.83**

Math / Type: **Cefnogi / Support**

### Crynodeb o'r Sylw:

Bydd hyn yn osgoi stigma ac yn sicrhau bod y tai fforddiadwy yn cael yr un sylw adeiladu.

### Representation Summary:

This will avoid stigma and will ensure that the affordable housing receives the same construction focus.

### Sylw Llawn / Full Representation:

Bydd hyn yn osgoi stigma ac yn sicrhau bod y tai fforddiadwy yn cael yr un sylw adeiladu.

### Newid(iadau) i'r Cynllun

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### Change(s) to the Plan

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Profion Cadernid / Soundness Tests: None

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## Sylwadau Dros y We / Representations via the Internet

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Rhif Sylw / Rep Id: **452**

Enw / Name: **Grŵp Cynefin (Rhys Dafis) [2953]**

Rhan: **7.4.79**

Section: **7.4.79**

Math / Type: **Cefnogi / Support**

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### Crynodeb o'r Sylw:

Dylid darparu canllaw Cynllunio i egluro natur y dystiolaeth fydd yn dderbyniol wrth geisio cyfiawnhau cynnwys tai marchnad agored

### Representation Summary:

A planning guideline should be provided to explain the nature of the evidence that will be acceptable when aiming to justify including open market housing

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### Sylw Llawn / Full Representation:

Dylid darparu canllaw Cynllunio i egluro natur y dystiolaeth fydd yn dderbyniol wrth geisio cyfiawnhau cynnwys tai marchnad agored

### Newid(iadau) i'r Cynllun

### Change(s) to the Plan

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Profion Cadernid / Soundness Tests: None



Davies Nia Haf (Rh-CTGC)

NEED TO SCAN

**From:** [REDACTED]  
**Sent:** 30 March 2015 19:43  
**To:** Polisi Cynllunio  
**Subject:** LDP comments  
**Attachments:** LDP.doc

The attached document are my written representations on the joint LDP for Gwynedd and Mon.

I do not wish to speak at the hearing session.

Rob Booth  
[REDACTED]

Ant In general I am pleased to see that the documents refer to sustainable developments and seeks to ensure that communities are healthy and vibrant places with natural landscapes and culture.

#### Written Statement


Key Issues 10, on page 36, is "rationalization and centralization of education and health facilities" will not benefit communities and it will result in a decrease in facilities for the local community, especially communities with an aging population. The rationalization and centralization of health and education facilities will lead to a greater number of people requiring to travel and more car journeys. Key Issue 10 is conflicting with Key Issue 11 "Promote opportunities for people to live healthy lives and have reasonable health care, especially in a healthy population". Again Key Issue 10 for the rationalization of schools and health care is not appropriate for one of the strategic policies under PS5 on p.75 point 4 "Promote greater self-containment of centres and villages by contributing to balanced communities that are supported by sufficient services..." I want Key Issue 10 removed.

p.37 Key Issue 20 is the decline in the prosperity and vitality of town centres. This has occurred due to large supermarkets and business parks being built out of town centres. Out of town shops and offices encourage the use of cars. I suggest a policy that favours retaining shops and business in town centres and does not increase the development of business parks and supermarkets outside of towns and villages.

Page 40. It is very disappointing to see that Gwynedd and Anglesey Council have a vision that includes a new nuclear power station, the building of a new nuclear power station has great risks as we have seen in the recent disaster at Fukushima. The enormous risk to our homes, culture and tourism is great. A new power station would need many major associated developments such as housing for the construction workers and infrastructure (e.g. roads, pipers and pylons). The building of the nuclear power station will affect the Welsh culture due to the influx of temporary construction workers. Nuclear power is not sustainable, it requires toxic fuel and the waste is very problematic.

On p. 46 in table 8 on of the main elements of the strategy is economic growth. Economic growth is not sustainable. I suggest that the main strategy should seek to maintain economic status.

Housing: there should be more housing that is part of a housing association. The policies should emphasize the requirement for social and mixed housing. All housing developments should include a proportion of social housing i.e. houses that belong to housing associations.

 Policy TAI10 p.146 there should be NO open market houses outside the development boundary.

p.156 Policy TAI14 & TAI 15 should state that developments of more than 9 houses must include at least 10% of houses that are affordable. Developments of more than 20 houses must include at least 20% of affordable houses, developments of more than 50 houses should include 30% of affordable housing/housing association houses and developments of 100 or more should include 50% of affordable/housing association houses.

Page 191 GWA3 is a policy for radioactive waste treatment and storage. This highlights one of the main problems of having a nuclear power station. The waste is extremely hazardous and difficult dangerous and had to store. The radioactive waste cannot be neutralized, when the half-life of Plutonium is 24,000 years. There is a need for the definition of low level and very low level radioactive waste; what type of radioactive waste? I suggest that if this policy is retained it must lists which radioactive isotopes e.g. plutonium 239. If a radioactive waste is required to be stored it should be stored at the power station.

Pages 201 onwards monitoring and implementation

p.203 I agree with the monitoring indicators for public transport(D4, D6,D7) however I disagree with the indicator D5 for a decrease on car journey times. Why is one of the indicators a decrease in journey times? The faster cars travel the more fuel they use and the more dangerous the journey. Also increases the likelihood of people using cars rather than buses. Also an indicator should be the public transport network is retained as it is or increased the number of buses has not declines, but increased. The times available for bus services are e.g. early morning and late buses enhanced.

Health Impact Assessment Feb 2015. This document fails to mention the potential main impact to health in the area which is the building of a new nuclear power station. We have seen from the recent disaster at Fukushima in Japan that the risk to our community is too great. The towns and villages in a 30km radius round Fukushima have had to be permanently abandoned due to radioactive levels. The risk is not just to the current communities but the future population of the area. I would like to contest to the completeness of this document because it does not include the possible impact of a nuclear disaster at the power station and during transport of radioactive waste.

REP NO: 645

ID: 3036

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p>For office use only:</p>
		<p>Representor No.</p>
		<p>Date received: 27/3/15 etm</p>
		<p>Date acknowledged:</p>
<p>NEED TO SCAN</p>		

**Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026  
Representation Form**

SUMMARY EMAIL SENT

**Data Protection**

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

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

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

**PART 1: Contact details**

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

Tom Brooks

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

<b>2a. Which part of the Deposit Plan are you commenting on?</b>	
Policy number (please specify)	TAI 10
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	

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

<b>2c. Please provide details of your representation on the Deposit Plan.</b>
<p>TAI 10 states</p> <p><i>Where it is demonstrated that there is a proven local need for affordable housing that cannot reasonably be delivered on a market site inside the development boundary within a reasonable timescale, as an exception, proposals for 100% affordable housing schemes on sites immediately adjacent to development boundaries will be granted. Proposals must be for a small scale development, which are proportionate to the size of the settlement, unless it can be clearly demonstrated that there is a demonstrable requirement for a larger site, with priority given to suitable previously developed land, In exceptional circumstances, subject to evidence that it is not viable to provide a 100% affordable housing to meet a proven local need for affordable housing on sites immediately adjacent to the development boundary, proposals for an enabled exception site will be granted provided that all the following criteria are satisfied:</i></p> <ol style="list-style-type: none"> <li>1. Only a minimum number of open market housing dwellings are included to make the proposal viable;</li> <li>2. The development is by or in partnership with a Registered Social Landlord and/or a Community Land Trust and/or the Strategic Housing Authority;</li> <li>3. The open market provision does not exceed the growth level anticipated within the Plan's settlement strategy.</li> </ol> <p><b>Exception sites adjoining but outside development boundaries lead to unplanned development creep and ribbon development creation. This may be justifiable for 100% affordable housing sites where a need for such small developments exist but is not justifiable for any open market exceptions. As drafted this policy would go well beyond Planning Policy Wales guidance.</b></p> <p style="text-align: right;"><i>Please use additional sheet if necessary. Please state how many additional sheets have been used.....</i></p>

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

Empty response box for 2ch.

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

**That TAI 10 be amended to refer only to permitting 100% affordable housing. This can be achieved by deleted the latter part of the Policy as drafted leaving the statement below.**

*"Where it is demonstrated that there is a proven local need for affordable housing that cannot reasonably be delivered on a market site inside the development boundary within a reasonable timescale, as an exception, proposals for 100% affordable housing schemes on sites immediately adjacent to development boundaries will be granted. Proposals must be for a small scale development, which are proportionate to the size of the settlement."*

2dd. Is the Deposit Plan sound?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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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 checked="" type="checkbox"/>	C2	<input checked="" type="checkbox"/>	C3	<input type="checkbox"/>	C4	<input type="checkbox"/>	CE 1	<input checked="" type="checkbox"/>	CE 2	<input type="checkbox"/>	CE 3	<input type="checkbox"/>	CE 4	<input type="checkbox"/>

NEED TO SCAN

<b>I Sylw</b>	<b>Uned Polisi Cynllunio ar y Cyd</b>
<b>Testun</b>	<b>Ymateb i'r Ymgynghoriad ar y Cynllun Datblygu Lleol</b>
<b>Gan</b>	<b>Partneriaeth Tai Gwynedd</b>

Sefydlwyd Partneriaeth Tai Gwynedd er mwyn sicrhau perchnogaeth gyda rhan ddeiliad ar faterion strategol tai yn y Sir. Ceir cynrychiolaeth o drawsddoriad o asiantaeth a mudiadau sy'n ymwneud â thai o fewn y Sir. Bu i'r sylwadau hyn gael eu cylchredeg gyda'r aelodau cyn ei gyflwyno i'r ymgynghoriad ar Gynllun Datblygu Lleol.

#### **Mae'r Bartneriaeth yn nodi'r isod:**

Ceir cyfeiriadau priodol at Strategaeth Tai a Strategaeth Letya Pobl Hyn (drafft) o fewn y dogfennau sy'n rhoi sicrwydd bod amcanion yn cael eu cyd blethu er mwyn cynllunio yn briodol ar gyfer anghenion tai yn y Sir.

#### **Polisi 1: Cymysgedd briodol o dai**

Mae darpariaeth addas o dai yn bwysig er mwyn hyrwyddo cymunedau cynaliadwy ac mae newidiadau mewn hawliau lles yn golygu bod pobl yn gorfod symud i eiddo llai. Ceir hefyd poblogaeth sy'n heneiddio ar angen i gael tai sydd yn hawdd i'w haddasu ac i bobl allu byw o fewn eu cartrefi gyn hired ag sydd bosib. Mae gan Bartneriaeth Tai Gwynedd rôl ganolog er mwyn sicrhau bod y polisi hwn yn cyfrannu at y math cywir o ddarpariaeth yn y Sir.

#### **Polisi Manwl TAI 2: ISRANNU EIDDO PRESENNOL I FFLATIAU HUNANGYNHALIOL A THAI AMLFEDDIANNAETH**

Mae maint cyfartalog aelwydydd yn lleihau sy'n golygu newid mewn cyfansoddiad aelwydydd gyda nifer uwch o aelwydydd un person ynghyd â newidiadau mewn polisi lles yn golygu bod mwy o bobl yn chwilio am unedau llai.

Mae gwybodaeth o ran nifer o bobl sydd yn chwilio am eiddo 1 llofft sydd wedi eu hadnabod i fod yn ddigartref gan y Cyngor yn dangos hyn yn glir. Mae'r tabl isod yn dangos enghraifft o'r angen mewn un ardal yng Ngwynedd. Mae'r isod ar gyfer Bangor yn unig

Nifer sydd wedi cofrestru gyda Tim Opsiynau Tai	O'r ffigwr hwn, nifer sydd yn ddigartref	Nifer o stafelloedd gwely maent yn dymuno ei gael
335	27	1
405	19	2

Yn yr un modd mae angen ar gyfer eiddo 2 lofft er mwyn sicrhau bod teuluoedd sydd yn cael eu heffeithio gan polisi lles yn gorfod edrych i symud i eiddo llai.

Gall y Polisi hwn fod o gymorth er mwyn sicrhau bod darpariaeth briodol o eiddo 1 a 2 ystafell wely ar gael.

#### **Polisi Manwl Tai 4: CARTREFI GOFAL PRESWYL, TAI GOFAL YCHWANEGOL NEU LETY GOFAL ARBENIGOL AR GYFER YR HENOED**

Mae'r boblogaeth yn heneiddio ac felly mae angen darpariaeth o dai addas megis byngalos, fflatiau neu unedau gellir eu trosi yn hawdd. Mae dau gynllun tai gofal ychwanegol wedi eu datblygu yn y Sir gyda thrydydd cynllun i ddechrau ym mis Medi. Er bod y model hwn yn diwallu ychydig o'r angen mae angen cyflenwad cyson sy'n addas neu gellir ei addasu ar gyfer poblogaeth sy'n heneiddio megis 'lifetime homes a safon ar gyfer datblygu tai sydd yn derbyn grant tai Cymdeithasol (Design Quality Requirement).

Mae'r Strategaeth Letya Pobl Hyn (Drafft) wedi ei lunio gyda gwaith dadansodol wedi ei gynnal i adnabod ardaloedd sydd gyda dwysder uwch o bobl hyn a all olygu mwy o ddibyniaeth ar wasanaethau gofal yn y dyfodol. Bydd hyn yn rhoi cyfle i gydweithio gyda'r Tîm Polisi Cynllunio i

adnabod datrysiadau posib am ddarpariaeth gwasanaethau ar gyfer pobl hyn. Bydd angen bod yn ymwybodol bod cyflenwad o ddarpariaeth gwahanol i gwrdd ac angen pobl leol yn bwysig.

### **POLISI MANWL TAI5: TAI MARCHNAD LLEOL**

Mae'r Papur Testun 17: Tai Marchnad Lleol yn cynnwys gwybodaeth sydd yn nodi'r angen i gael Polisi Tai Marchnad Lleol oherwydd y ffactorau isod:

'7.12 Ariannu tai fforddiadwy

Yn nodi lleihad mewn grant tai cymdeithasol (GTC) sy'n dangos yr angen i ddatblygu dulliau eraill o ddatblygu tai sydd tu allan i'r gyfundrefn arferol o ariannu tai.

Mae 7.13.2 sylwadau gan yr Hwylusydd Tai Gwledig (HTG) yn dangos yn glir yr angen i gael lefel o sybsidi, yn bennaf GTC, ac fel sydd wedi nodi eisoes nid yw dibynnu ar y dull hwn o gyllido tai fforddiadwy yn gynaliadwy gan ystyried bod lefel y grant yn lleihau.'

Sefydlwyd Tai Teg gyda'r bwriad o gasglu gwybodaeth am anghenion tai yn y ddwy Sir. Ei brif nod yw rhoi dull syml i bobl allu cofrestru eu diddordeb i brynu, rhan berchnogi neu rentu ar lefel ganolraddol. Mae'r rhestr yn cynorthwyo'r Uned Strategol Tai i adnabod angen o fewn ardaloedd ac yn cynorthwyo wrth roi sylwadau ar geisiadau cynllunio. Mae 496 o geisiadau wedi eu cofrestru gyda Tai Teg.

Mae'r Uned yn croesawu'r papur sydd yn delio yn benodol gyda rhoi cymorth i bobl allu byw yn eu hardaloedd a chyfrannu i'w cymunedau. Mae'r papur yn adnabod yr her sydd i 'ddiwallu anghenion penodol lleol am dai ar y farchnad agored'. Cyfeirir at fodol canolraddol yn y papur a byddai'r Uned yn croesawu'r opsiwn hwn. Rydym yn ymwybodol bod nifer o bobl yn methu fforddio t? i'w brynu a ddim yn disgyn i'r categori o fod mewn angen ar gyfer tai cymdeithasol. Ar hyn o bryd, mae 196 o geisiadau wedi cofrestru ar Tai Teg heb flaendal i brynu eiddo.

Mae tabl 8.1 yn nodi nifer o unedau sydd wedi eu datblygu yn ystod y blynyddoedd diwethaf. Mae gwybodaeth o Tai Teg a Chofrestr Tai Cyffredin Gwynedd yn dangos yn glir bod angen am dai yn bodoli i gyfarch anghenion pobl leol.

### **POLISI MANWL TAI9: TROTHWY TAI FFORDDIADWY A'U DOSBARTHIAD**

Mae Partneriaid Tai yn barod i hybu datblygiadau addas o fewn ardaloedd sydd ac angen ac mae Papur Tesun Tai a Phoblogaeth, tabl 8.2, yn nodi yn glir bod 'caniatadau cynllunio am dai a roddwyd i gyrff cyhoeddus/Cymdeithasau Tai yn ffurfio cyfran isel o'r unedau preswyl a ystyriwyd yn arolwg argaeledd tir ar gyfer tai Gwynedd (Ebrill 2013).' Sydd yn dangos effaith isel sydd i waith cyfredol Cymdeithasau Tai mewn cymhariaeth â'r sector breifat.

Mae'r Polisi Tai 19 yn nodi'r angen i gael 'taliad pro-rata yn hytrach na dim darpariaeth fforddiadwy o gwbl ar y safle' i'w groesawu gan fod hyn yn sicrhau cymorth i gael cyflenwad o dai fforddiadwy ac fe all fod o gymorth i Bartneriaid Tai er mwyn sicrhau bod cynllun yn hyfyw.

### **TAI10: SAFLEOEDD EITHRIO**

Mae'r Partneriaid yn croesawu y Polisi hwn fydd o gymorth i sicrhau bod model addas yn cael ei ddatblygu o fewn ardaloedd, mwy na thebyg ardaloedd gwledig. Gallwn ddarparu gwybodaeth sydd yn dangos bod rhai cynlluniau yn anoddach i'w gwireddu heb y sicrwydd bod unedau ar gael i sybsideiddio'r cynllun.

Mae'r tabl 7.13 ym Mhapur Tesun Tai a Phoblogaeth ar Safleoedd eithrio gwledig yn dangos faint o ddatblygiadau ar safle eithriedig sydd wedi bod gyda chymariaethau clir i'w gweld yn y niferoedd. Mae cyswllt cryf yma gyda Pholisi Tai Marchnad Lleol yn ddull o sicrhau bod datblygiadau yn digwydd o fewn ardaloedd lle mae angen clir am dai fforddiadwy gydag elfen o werthu ar y farchnad agored er mwyn sicrhau bod cynlluniau yn hyfyw. Bydd hyn yn hwyluso datblygiadau megis Ymddiriedolaeth Tir mewn ardaloedd penodol.



<b>For the attention of</b>	<b>Joint Planning Policy Unit</b>
<b>Subject</b>	<b>Response to the Consultation on the Local Development Plan</b>
<b>By</b>	<b>Gwynedd Housing Partnership</b>

The Gwynedd Housing Partnership was established to ensure that stakeholders have ownership of strategic housing matters in the County. A wide range of agencies and organisations working within the field of housing in the County are represented in the partnership. These comments have been circulated to members prior to their submission to the consultation on the Local Development Plan.

**The Partnership notes the following:**

There are appropriate references to the Housing Strategy and the (draft) Older People Accommodation Strategy within the documents, which provides assurance that objectives are being interlinked in order to plan appropriately for the County's housing needs.

**Policy 1: Appropriate Housing mix**

Suitable housing provision is important in order to promote sustainable communities, and the changes in welfare rights mean that people are forced to move to smaller properties. With an ageing population, there is a need for housing which can be easily adapted, to enable people to live in their own homes for as long as possible. The Gwynedd Housing Partnership has a central role in ensuring that this policy contributes to the correct type of provision in the County.

**TAI 2 Detailed Policy: SUBDIVISION OF EXISTING PROPERTIES TO SELF-CONTAINED FLATS & HOUSES IN MULTIPLE OCCUPATION**

The average size of households is decreasing which leads to a change in their constitution, with a higher number of single person households. This, coupled with the changes in welfare policy, means that more people are seeking smaller housing units.

Information on the numbers of people seeking one-bedroom properties who have been identified as homeless by the Council clearly demonstrates this; the table below demonstrates the need as example for one area in Gwynedd. The information below is for Bangor only.

No. of applicants registered with the Housing Options Team	Of this figure, the amount that are homeless	No. of bedrooms they require
335	27	1
405	19	2

In the same vein, there is a need for 2 bedroom properties to ensure that families who are affected by the welfare policy are able to move to smaller properties.

This Policy can assist in ensuring that an adequate provision of 1 and 2 bedroom properties are available.

**TAI 4 Detailed Policy: RESIDENTIAL CARE HOMES, EXTRA CARE HOUSING OR SPECIALIST CARE ACCOMMODATION FOR OLDER PEOPLE**

The population is ageing and therefore there is a need for appropriate housing provision such as bungalows, flats or units that can easily be converted. Two extra care housing schemes have been developed in the County with a third scheme due to start in September. Although this model meets some of the demand there is a need for a constant supply of suitable or easily adaptable housing for the ageing population such as lifetime homes and the Design Quality Requirement for homes which receive Social Housing Grant.

The (Draft) Older People Housing Strategy is based on analytical work to identify areas with a higher density of older people, which can lead to a higher dependency on care services in the future. This will provide an opportunity to collaborate with the Planning Policy Team to identify possible solutions for older people's service provision.

#### **TAI5 DETAILED POLICY: LOCAL MARKET HOUSING**

Topic Paper 17: Local Market Housing Need includes information which notes the need for a Local market Housing Policy due to the following factors:

'7.12 Funding affordable housing

notes a decrease in social housing grants (SHG) which demonstrates the need to develop alternative methods of housing developments outside the normal methods of funding for housing.

The Rural Housing Enabler's comments under 7.13.2 clearly shows the need for a level of subsidy, mainly SHG, and as already noted, this method of sustainable funding for affordable housing cannot be relied upon as the level of grant is decreasing.'

Tai Teg was established with the intention of collecting information about housing needs in both Counties. Its main aim is to provide a simple method for people to register their interest in ownership, part-ownership, or in intermediate rental schemes. The list assists the Strategic Housing Unit to identify need within areas, and when commenting on planning applications. Currently there are 496 applicants registered on Tai Teg.

The Unit welcomes the paper which specifically deals with assisting people to live within their areas and to contribute to their communities. The paper acknowledges the challenge to meet specific local housing needs for open market housing. The paper makes reference to the intermediate model, and the Unit would welcome this option. We are aware that a number of people cannot afford to buy a house, but do not fall into the category of needing social housing. Currently, there are 196 applicants registered with Tai Teg without an adequate deposit to buy a property.

Table 8.1 notes the number of units developed over the last few years. Information from Tai Teg and Gwynedd's Common Housing Register clearly demonstrates that there exists a need for housing.

#### **TAI9 DETAILED POLICY: THRESHOLD OF AFFORDABLE HOUSING AND THEIR DISTRIBUTION**

The Housing Partnership is eager to promote suitable developments within areas of need, and table 8.2 of the Housing and Population Topic Paper clearly states 'that planning permissions for housing granted to public bodies / Housing Associations form a low proportion of the residential units considered within the joint housing land availability studies for Gwynedd (April 2013).' This shows the small impact of the work of the Housing Associations compared to the private sector.

Housing Policy 19 notes that 'a pro-rata payment... rather than no affordable provision on the site' would be welcomed as this would ensure assistance for a supply of affordable housing, and could help housing Partners in ensuring that a scheme was viable.

#### **TAI10: EXCEPTION SITES**

The Partners welcome this Policy that will assist in ensuring that suitable models are developed within areas, probably rural areas. We can provide information that shows that some schemes are more difficult than others to realize without assurance that there are units available to subsidise the scheme.

Table 7.13 in the 'Housing and Population' Topic Paper on Rural Exception Sites shows the numbers of developments on exception sites, with clear comparisons to be seen in the numbers. The strong link here with the Local Market Housing Policy is a means of ensuring that

developments occur within areas where there is a clear need for affordable housing, with an element of selling on the open market in order to ensure that schemes are viable. This will facilitate the development of Community Land Trusts within specific areas

**TAI11 DETAILED POLICY: SAFEGUARDING EXISTING GYPSY & TRAVELLER SITES**

Local authorities must conduct a survey of the needs of Gypsies and Travellers by February 2015, and this will be a follow-up to the work undertaken in 2011. This will provide us with current information on needs, and we intend to commission this work on a regional basis. The Housing Partners will support this work.

Officers of the Joint Policy Unit have not contributed to this response.