

Arweinydd y Cyngor
Leader of the Council
Cynghorydd / Councillor Dyfrig Siencyn

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Ein Cyf / Our Ref: **DS/SEW**

Eich Cyf / Your Ref:



12 Tachwedd 2021

Mark Drakeford AS
Prif Weinidog Cymru

Annwyl Brif Weinidog,

Gwella Mynediad Safle Parth Menter Eryri, Llanbedr

Cyfeiriaf at benderfyniad Llywodraeth Cymru i beidio ariannu ffordd fynediad newydd i Safle Parth Menter Eryri.

Hoffwn ddatgan ar y cychwyn fod Cyngor Gwynedd wedi ymrwymo'n llwyr i'r agenda i leihau allyriadau carbon. Yn 2019 fe wnaeth Cyngor Gwynedd ddatgan Argyfwng Hinsawdd ac o ganlyniad rydym fel Awdurdod Lleol yn adolygu ein polisïau a threfniadau i wneud ein cyfraniad; i warchod a gwella ein hamgylchedd i genedlaethau'r dyfodol. Nid oes amser i laesu dwylo, mae angen i ni gyd fod yn barod i gymryd penderfyniadau anodd ac amhoblogaidd os oes datblygiadau yn debygol o fod yn niweidiol. Ond roedd yn siom aruthrol imi, ac i gymunedau Meirionnydd, eich clywed fel Llywodraeth yn gwneud penderfyniad i beidio ariannu cynllun a gomisiynwyd gennych drwy'r Bwrdd Parth Menter, a hynny ar sail adroddiad rhagfarnllyd a gwallus, heb hyd yn oed wirio'r dystiolaeth nac ystyried effaith y penderfyniad i beidio buddsoddi ar y gymuned i'r dyfodol.

Mae Cyngor Gwynedd yn anochel yn ystyried opsiynau cyfreithiol am ddilysrwydd eich penderfyniad i wyrdroi eich ymrwymiad cytundebol ariannol i'r cynllun.

Dwi'n credu fod Llywodraeth Cymru wedi ein camarwain drwy'r Adolygiad. Rhoddwyd addewidion a datganiadau cadarnhaol i Gyngor Gwynedd mewn gwahanol gyfarfodydd gyda gweision sifil a Gweinidogion lle cytunwyd ei bod yn briodol i barhau gyda phrosesau cyllidol a chyfreithiol. Ar sail hyn, rydym wedi parhau gyda gorchmynion prynu gorfodol (wedi seilio ar drafodaethau gyda thirfeddianwyr ers nifer o flynyddoedd) a thendro am gytundebwyr i ddylunio a chodi'r ffordd. Mae rhai o'r tendrwy'r wedi rhannu gyda ni graddfa sylweddol eu buddsoddiad hyd yma yn y broses o baratoi tendrau.

Gyda'r ddealltwriaeth yma, gofynnwyd i Weinidogion ystyried achos Llanbedr yn yr Adolygiad mor gyflym â phosib a hynny gan fod y broses o brynu tir a thendro'r gwaith wedi cychwyn, a bod risg i Gymru golli bron i £4m o arian oedd wedi'i sicrhau o Ewrop. Serch hynny, credwn fod y broses adolygu wedi bod yn llawer rhy arwynebol i ddiddymu cefnogaeth i gynllun oedd eisoes ar waith ac oedd mor sylweddol i'r ardal; yn gymdeithasol, economaidd ac amgylcheddol. Mae ein rhesymau dros anghytuno gyda chasgliadau'r adroddiad wedi eu rhestru yn Atodiad 1.

Yn fy rôl fel Arweinydd Cyngor Gwynedd, fy mlaenoriaeth i yw lles cymunedau Gwynedd heddiw ac i'r dyfodol. Mae hyn yn cynnwys pwyso a mesur 7 amcan ein Deddf Cenedlaethau'r Dyfodol wrth arwain ar

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benderfyniadau. Mae'r diffyg i roi ystyriaeth lawn i amcanion y ddeddf yn bryderus ac yn gosod cynsail sydd ag oblygiadau pellgyrhaeddol iawn i unrhyw ymdrech i greu swyddi o ansawdd mewn ardaloedd gwledig fyddai'n galluogi pobl ifanc fyw a gweithio yn ein cymunedau i'r dyfodol.

Dwi'n credu bod cyfrifoldeb arnoch i ystyried cynnwys y llythyr hwn yn ofalus. Mae cyfle gwirioneddol yma i wneud y peth iawn i'r gymuned ac i'r amgylchedd. Mae cyfle i ddangos sut gall Llywodraeth Cymru fuddsoddi mewn rhaglen sydd yn creu gwaith o ansawdd mewn cymuned wledig a lleihau allyriadau carbon yr un pryd. Mae'n gyfle i wella'r amgylchedd er lles cenedlaethau'r dyfodol. Hoffwn drefnu cyfarfod gyda chi, Julie James AS Gweinidog Newid Hinsawdd a Vaughan Gething AS, Gweinidog dros yr Economi, mor fuan â phosibl er mwyn cytuno ar y camau nesaf.

Yn gywir,



Y Cyng. Dyfrig Siencyn
Arweinydd Cyngor Gwynedd
Leader of Gwynedd Council

Nid ydi Cyngor Gwynedd yn cytuno gyda chasgliadau'r Panel Adolygu am y rhesymau canlynol:

1. Cylch Gorchwyl yr Adolygiad

Ni derbyniwyd unrhyw wybodaeth ynglŷn â chylch gorchwyl yr adolygiad cyn i gyfarfod cael ei gynnal gyda Chadeirydd y panel ar Hydref 4ydd 2021.

Derbyniwyd profforma i'w lenwi blaenllaw, gyda nifer o gwestiynau ynglŷn â'r cynllun. Rhoddwyd sylwadau ynglŷn ag allyriadau Carbon o dan adran ansawdd awyr a nwyon tŷ gwyr. Ymatebodd Cyngor Gwynedd i'r adrannau yma (a phob adran arall) gyda gwybodaeth fanwl a chyfeiriadau at ddogfennaeth bellach. Ni welwn unrhyw gyfeiriad at yr wybodaeth yma yn yr adroddiad gorffenedig. Yn wir, ni welwn gyfeiriad at beth helaeth o'r wybodaeth a rhoddwyd yn y profforma, na chwaith y ddogfennaeth atodol, ac rydym yn cwestiynu os cafodd yr wybodaeth yma ei ystyried o gwbl gan y panel.

Wrth ddeall y ddau "gwestiwn" oedd yn destun yr adolygiad, cynigiodd Cyngor Gwynedd baratoi ymateb ysgrifenedig i'w cyfarch. Gwrthododd y Chadeirydd ein cynnig gan nodi nad oedd angen. Eglurodd mai proses o ddeialog fydda'r penderfyniad, felly byddai cyfleoedd pellach i ymateb i unrhyw argymhellion. Syndod o'r mwyaf, felly oedd derbyn y newyddion fod y cynllun wedi'i ddiddymu heb unrhyw fath o ddeialog pellach.

Nid oedd Cyngor Gwynedd yn rhan o'r ymweliad safle ac ni gafwyd cyfle i gyflwyno'r cynlluniau a'r camau oedd yn cael eu cymryd gan y cwmnïau oedd yn tendro i gyfarch materion oedd yn allweddol i sgôp yr adolygiad.

Mae'r adroddiad, felly, wedi'i seilio ar un sgwrs, ac rydym o'r farn ei fod yn adlewyrchiad gwael iawn o hynny, gyda rhai elfennau wedi'i anwybyddu'n llwyr, ac elfennau eraill wedi'u cam-ddehongli neu gam-adrodd.

Mae'r cynllun dan sylw yn gynllun mynediad yn ei hanfod i oresgyn rhwystr i ddatblygiad safle unigryw o arwyddocâd rhyngwladol. Adnabuwyd yr angen am y ffordd gan Weinidog Llywodraeth Cymru dros yr Economi. Gan gymryd i ystyriaeth y problemau traffig dwys sydd hefyd yn bodoli ym mhentref Llanbedr ei hun, gwelwyd cyfle i uchafu buddsoddiad mynediad trwy fanteisio ar y cyfle i ddod â'r ddwy elfen ynghyd a datblygu ffordd osgoi i'r pentref ar yr un pryd a ffordd mynediad i'r safle. Roedd yn gyfle i ddatrys problem sylweddol sydd wedi wynebu trigolion Llanbedr ers degawdau fel rhan o raglen ehangach i leihau traffig ac allyriadau carbon i bentref Llanbedr a'r ardal yn ehangach.

Er nad ydi cylch gorchwyl yr adolygiad felly yn gyson gydag amcanion y buddsoddiad yn Llanbedr, roeddem yn hyderus fod y cynllun yn ymateb i'r gofynion. Ond erbyn gweld yr adroddiad a'i ganlyniadau, rydym yn cwestiynu os ydi'r wybodaeth gywir wedi'i ystyried gan y panel.

Nid oedd yr un o'r ddau gwestiwn wedi ffurfio rhan o'r broses WelTAG na'r prosesau eraill mae'r cynllun yma wedi bod trwyddo megis y broses caniatâd cynllunio. Mae'r cynllun wedi ateb gofynion pob proses berthnasol ar y pryd yn llawn, a dyma'r dystiolaeth mae Chadeirydd y Panel wedi ei adolygu. Nid ydi'n rhesymol disgwyl i'r ddogfennaeth yma fod yn dystiolaeth ddigonol i ateb y ddau gwestiwn newydd. Yn hytrach, dylid bod wedi rhoi'r cyfle i ni ddarparu ymateb ysgrifenedig i'w cyfarch a dangos sut byddai'r cynllun yn gallu cyfrannu yn gadarnhaol.

Rydym yn teimlo fod y ddau gwestiwn sy'n sail i'r adolygiad dim ond yn rhoi peth o'r darlun o werth y buddsoddiad mewn isadeiledd. Pwrpas datblygu Maes Awyr Llanbedr yw datblygu technolegau i alluogi defnydd carbon isel o gerbydau awyr e.e. awyrennau trydan, a thrwy hynny lleihau ôl-troed carbon y diwydiannau awyrofod. Byddai ei gyfraniad cadarnhaol i newid hinsawdd yn llawer mwy sylweddol nag unrhyw un cynllun ffordd.

2. Y Panel

Nid ydym yn glir os oedd Panel mewn lle i adolygu'r cynllun yntau dim ond Cadeirydd. Os nad oedd Panel mewn lle, hoffem herio'r ddibyniaeth ar farn un person.

3. Cywirdeb yr Adroddiad

Rydym yn hynod siomedig gydag ansawdd yr adroddiad ei hun, sydd yn gyson anghywir, yn ein barn ni, o ran nifer o'r prif ffeithiau a ddefnyddiwyd fel sail i ddod i'r casgliad y caiff mwy o CO2 ei greu o ganlyniad i'r cynllun.

Fel sydd wedi cael ei ddangos yn y Profforma Adolygu Ffyrdd a yrrwyd i Llywodraeth Cymru yn Medi 2021 mae'r asesiad yn dangos byddai gostyniad o 3.6% yn y lefel o CO2. Roedd y dystiolaeth yma yn y Datganiad Amgylcheddol oedd yn rhan o'r cais cynllunio llwyddiannus.

Roeddem o'r farn bod cyfle gwirioneddol yma i gael model o ymarfer da, fyddai wedi ymateb yn gadarnhaol i'r her ac wedi arwain at leihad, nid cynnydd mewn allyriadau CO2 traffig, a gwelliant mewn ansawdd awyr rhanbarthol gyda'r cynllun yn ei le.

Yn bennaf, hoffem godi'r pwyntiau allweddol canlynol:

- 3.1 Yn ystod ein cyfarfod gyda Chadeirydd y Panel, fe wnaed y pwynt yn glir fod cyfle i newid safon y ffordd i leihau'i cyflymdra i 40mya. Nid oes sôn am yr ymrwymiad yma o gwbl o fewn yr adroddiad, ac felly mae'r asesiad wedi'i seilio yn gyfan gwbl ar gyflymdra o 60mya. Rydym o'r farn fod hyn yn gyfwerth ag atal gwybodaeth hanfodol bwysig i'r Panel, a dylai'r Panel ail asesu'r allyriadau carbon honedig ar sail ffordd gyda chyflymdra o 40mya.
- 3.2 Fe drafodwyd hefyd y mesurau teithio llesol y byddai'n dod fel rhan o'r cynllun ffordd newydd. Eglurwyd fod y mesurau yma yn ofynnol ar unrhyw gytundebwr llwyddiannus, ond bod yr union ymyraethau yn destun tendrau masnachol oedd yn y broses o gael eu hasesu. Derbyniodd y Cadeirydd hyn yn y cyfarfod fel cyfle, ond yn yr adroddiad ei hun, disgrifir y tebygolrwydd o gyflwyno mesurau teithio llesol fel "gobaith ofer", gan nodi "nad yw cyfleusterau i gerddwyr a beicwyr yn rhan o'r dyluniad". Mae hyn yn dangos naill ai diffyg dealltwriaeth o'r hyn a drafodwyd, neu fod yr wybodaeth yma wedi'i atal.
- 3.3 Roedd mesurau teithio llesol wedi'i ffurfio yn y cynllun fel rhan o'r sgôp, ac hefyd fel rhan o'r dogfennau a pharatowyd i sicrhau caniatâd cynllunio yn 2019, oedd yn cynnwys:
 - Gwelliannau i ffordd Mochras, i gysylltu gyda'r rheilffordd
 - Gwelliannau ym mhentref Llanbedr (A496)
 - Cysylltiadau i NCR 8
- 3.4 Fel rhan o'r cyflwyniad i dderbyn caniatâd cynllunio ar gyfer y cynllun, cynhyrchwyd dogfen penodol – "Datganiad Amgylcheddol: Asesiad Ansawdd Awyr". Mae'r ddogfen yn nodi yn glir y buasai symud traffig allan o ganol y pentref yn gwella ansawdd yr awyr. Byddai'r traffig yn teithio i ac o Faes Awyr Llanbedr/Mochras a Llanbedr yn cael ei ail-gyfeirio bellach i orllewin Llanbedr ac i ffwrdd o ardaloedd preswyl a chyfleusterau lleol. Rhagwelir i NOx, PM10 a CO2 leihau gyda'r cynllun yn ei le. Mae effeithiau'r cynllun arfaethedig yn fuddiol ar ansawdd awyr. Nid oes unrhyw gyfeiriad at y ddogfen hon yn yr adroddiad, er i ni ei chyflwyno i Gadeirydd y Panel. Rhaid tybio, felly, na gafodd ei darllen. Yn wir, nid oes cyfeiriad at nifer fawr o ddogfennau perthnasol gyflwynwyd fel tystiolaeth i'r Cadeirydd yn yr adroddiad i'r Panel.
- 3.5 Rydym wedi disgrifio mesurau i leihau CO2 o adeiladwaith o dan cwestiwn allyriadau nwyon tŷ gwydr o fewn y Profforma Adolygu Ffyrdd, ac mae'r broses Trafodaeth Contractwyr Cynnar sydd wedi'i ddewis ar gyfer y tendr yma yn rhoi cyfle euraidd i Gyngor Gwynedd weithio gyda'r timau gorau i reoli carbon. Mae'r cytundebwyr sydd yn y broses o dendro am y gwaith yma yn hyderus y gallwn fod yn arloesol wrth gyfrannu at leihau carbon, target Zero Net Llywodraeth Cymru, a Chynllun Rheoli Carbon Cyngor Gwynedd.

- 3.6 Mae nifer o ragdybiaethau yn cael eu gwneud gan awdur yr adroddiad ynglŷn â thebygolrwydd datblygiadau o wahanol lefel ar Faes Awyr Llanbedr, gan gyfeirio ato ar un pwynt fel “hype”. Rydym o’r farn nad oedd hyn yn rhan o gyloch gorchwyl yr adolygiad ac nid oes gan Dr Sloman yr arbenigedd sydd angen i gynnig barn ar faterion economaidd.
- 3.7 Mae datblygiad safle Llanbedr yn destun nifer o strategaethau datblygu economaidd Llywodraeth Cymru ei hunain, gan gynnwys eich strategaeth ‘Wales: A Sustainable Space Nation’. Awgrymir y dylai Llywodraeth Cymru ymddiried yn y Gweinidog Economi sydd wedi amlygu potensial y Safle fel ased economaidd cenedlaethol. Ni allwn ddeall sut fod datblygiad llwyddiannus y safle cenedlaethol allweddol bwysig yma yn cael ei ddefnyddio fel tystiolaeth yn erbyn gweithrediad y cynllun ffordd, yn hytrach na ymfalchïo yn y potensial sydd yma i greu cyflogaeth o ansawdd mewn ardal wledig. Mae hyn yn gam allweddol bwysig er mwyn galluogi i genedlaethau’r dyfodol aros a ffynnu o fewn eu cymunedau.
- 3.8 Mae’r awgrymiadau o ran cludo llwythi mawrion i’r safle ar y môr neu ar y rheilffordd eto yn camadrodd yr hyn a drafodwyd gyda’r Cadeirydd. Mae’r ddau opsiwn yma wedi’u hystyried yn fanwl o fewn yr adolygiad WELTag (tud 62-64), felly nid ydi’n gywir awgrymu bod dim ystyriaeth wedi’i roi iddynt. Trafodwyd y ddau bwynt yma yn fanwl gyda’r Cadeirydd, gan gytuno y byddai’n afresymol, o ystyried natur datblygiad y maes awyr, cyfiawnhau creu porthladd newydd neu i uwchraddio’r rheilffordd yr holl ffordd i’r Amwythig.
- 3.9 Does dim ystyriaeth wedi’i roi i’r sefyllfa o beidio buddsoddi h.y. peidio creu mynediad newydd i’r maes awyr ag ymyrryd i leihau’r allyriannau sydd eisoes yn cael eu creu (yn enwedig ym misoedd yr haf) wrth i filltiroedd o geir eistedd yn llonydd gyda’u hinjans yn rhedeg. Mae Cyngor Gwynedd yn cydweithio gydag Awdurdod Parc Cenedlaethol Eryri a Trafnidiaeth Cymru ar hyn o bryd i sefydlu cadwyn o hybiau trafndiaeth o amgylch ardal y Parc fydd yn gwella’r sefyllfa, ond ni fydd yn lleihau nifer ceir yn ddigonol i atal tagfeydd yn y pentref.
- 3.10 Mae Llanbedr yn bentref hynafol hardd, gyda ffordd gul heb balmant i alluogi preswylwyr gerdded neu feicio yn ddiogel. Nid oes hyd yn oed ofod o flaen rhai o’r tai i drigolion roi biniau allan i’w gwasanaethu. Mae nifer o strwythurau wedi eu rhestru yn y pentref gan gynnwys y bont hynafol sydd dan bwysau oherwydd ei lleoliad ar gyffordd i’r maes awyr. Bydd costau sylweddol i gynnal yr isadeiledd yma i’r dyfodol. Mi fyddai rhai o’r mesurau rheoli traffig sydd wedi’u hawgrymu gan awdur yr adroddiad hefo effaith negyddol ar y gymuned a’i hamgylchedd, ac ni fyddai’n cael digon o effaith i liniaru’r risgiau sydd wedi’u hadnabod.
- 3.11 Mae’r adroddiad i weld yn awgrymu y dylai’r cynllun gyd-fynd gyda chanllawiau a pholisïau newydd sydd wedi’u mabwysiadu ers i’r cynllun yma dderbyn cymeradwyaeth rheoleiddwyr ac arianwyr. Gan dderbyn dylai’r polisïau hyn fod yn berthnasol i gynlluniau newydd sydd heb fynd trwy’r prosesau, ni allwch ddisgwyl i gynllun o’r math yma gychwyn eto wedi derbyn cymeradwyaeth. Rhaid dilyn y broses gywir ar y pryd er mwyn cydymffurfio gyda phrosesau statudol a gwnaed hyn yn yr achos yma.
- 3.12 Cafodd y Profforma Adolygu Ffyrdd ei baratoi gan YGC yn Medi 2021 ac roedd yn cynnwys nifer o gwestiynau yn seiliedig ar Strategaeth Drafnidiaeth Cymru 2021. Mae’r adolygiad wedi methu rhannau o’r adroddiad oedd yn dangos gwelliant syfrdanol i ‘ansawdd aer’ a ‘sŵn’ yng nghanol y pentref. Cafodd rhain eu hamlygu yn ystod y cyfarfodydd rhanddeiliaid oedd yn cynnwys CADW, NRW, Parc Cenedlaethol Eryri a’r cyhoedd yn cyfnod WelTAG. Mae’n ymddangos fod y rhain wedi cael eu diystyru gan y Panel drwy ganolbwyntio ar ddau gwestiwn yn unig.

3.13 Mae'r Profforma Adolygu Ffyrdd wedi ei dorri lawr i'r categorïau yma:

- Blaenoriaeth 1: Dewch â gwasanaethau i bobl er mwyn lleihau'r angen i deithio
- Blaenoriaeth 2: Caniatáu i bobl a nwyddau symud yn hawdd o ddrws i ddrws, trwy wasanaethau a seilwaith trafndiaeth hygyrch, gynaliadwy ac effeithlon
- Blaenoriaeth 3: Annog pobl i newid i drafnidiaeth fwy cynaliadwy
- Yn dda i bobl a chymunedau
- Da i'r Amgylchedd
- Da i Leoedd a'r Economi
- Da i Ddiwylliant a'r Iaith Gymraeg
- Teithio Gweithredol
- Bws
- Rheilffordd
- Ffyrdd
- Cludo Nwyddau a Logisteg
- Adeiladu economi yn seiliedig ar egwyddorion gwaith teg, cynaliadwyedd a diwydiannau a gwasanaethau'r dyfodol
- Adeiladu economi gryfach a gwyrddach wrth i ni wneud y cynnydd mwyaf tuag at ddatgarboneiddio
- Mewnysod ein hymateb i'r argyfwng hinsawdd a natur ym mhopeth a wnawn
- Newid Hinsawdd

3.14 Atebwyd pob darn o'r profforma yn llawn gan Cyngor Gwynedd, gyda thystiolaeth, ond rhaid cwestiynu pam na ystyriodd Llywodraeth Cymru yr holl dystiolaeth a gyflwynwyd cyn gwneud eu penderfyniad. Nid oedd cyfeiriad at tystiolaeth allweddol bwysig yn yr adran Cyfeiriadau.

3.15 Dylid nodi na gafwyd unrhyw adborth gan y Llywodraeth ar y Profforma, na'r dystiolaeth a gyflwynwyd.

4. Safle Cyflogaeth

Rydym yn bryderus iawn o ran diffyg dealltwriaeth awdur yr adroddiad am yr angen i ddatblygiad Maes Awyr Llanbedr fod yn y lleoliad dan sylw. Mae Maes Awyr Llanbedr mewn lleoliad penodol iawn er mwyn galluogi i brofion awyr cael eu cynnal yno. Mae gan y safle nifer o nodweddion daearyddol penodol, sydd wedi derbyn nifer o ganiatadau gan yr Awdurdod Awyrennau Sifil i hedfan awyrennau mwy arbrolfol. Holl sail y caniatâd yw'r ffaith ei fod mewn ardal lai poblog. Hyd yn oed o fewn y maes awyrafod, mae rhai o nodweddion safle Llanbedr yn gwbl unigryw, a dyna pam y cafodd ei amlygu gan Lywodraeth DU fel lleoliad posibl ar gyfer Porth Gofod. Nid oedd cyfraniad datblygiad y maes awyr i leihad allyriadau carbon sylweddol trwy, e.e. datblygu awyrennau trydan yn rhan o sgôp yr adolygiad hwn, ond dwi'n bryderus iawn am rhai datganiadau gan y Cadeirydd sydd yn awgrymu na ddylem greu cyflogaeth mewn mannau llai poblog.

Mae'r cyfeiriadau cyson at ddefnydd "cyffredinol" o'r safle hefyd yn gamarweiniol. Safle Busnes ar gyfer busnesau awyrafod fydd hwn, yn cynnwys cwmnïau awyrafod ymchwil a datblygu, fyddai angen cael eu lleoli mewn safle lle gall profion awyr gael eu cynnal. Eto nid ydym o'r farn fod y Cadeirydd mewn lle i gynnig barn ar drefniadau busnes datblygwyr y safle, na chwaith tebygolrwydd ei ddatblygiad.

Mae'r adroddiad yn awgrymu nifer o atebion i fynd i'r afael â'r lefelau traffig presennol ym mhentref Llanbedr. Mae rhain yn dangos diffyg dealltwriaeth o'r math o gyflogaeth ac o dwristiaeth sydd yn yr ardal. Mae'n awgrymu, er enghraifft y dylid:

- rheoli'r galw am dwristiaeth - Mochras yw'r maes gweryslla mwyaf yn Ewrop gyda'r capasiti i gyfarch 200,000 o ymwelwyr gweryslla yno yn flynyddol. Tra byddwn yn cymryd camau rhagweithiol fel Cyngor i hyrwyddo teithio llesol a rheoli lefelau ymwelwyr i'r ardal, gyda dros 7500 o wlaŵ i ymwelwyr yn yr ardal yn barod, nid ydi'n rhesymol i feddwl fod modd lleihau'r galw am drafndiaeth i'r ardal dros nos.
- cyflwyno mesurau gostegu traffig a chyflymder is - nid cyflymder yw'r broblem - yn aml iawn nid ydi'r traffig yn symud o gwbl gyda cherbydau yn gwasanaethu'r pentref a rhwystrau yn y ffordd yn creu tagfeydd oherwydd llif traffig twristiaeth i'r ardal
- annog gwell ddefnydd o'r bws neu ddulliau teithio llesol - mae hyn yn fater sydd yn cael sylw, ond nid ydi yn mynd i gael digon o effaith i leihau tagfeydd yn y pentref. Mae'r Awdur yn dangos diffyg dealltwriaeth o'r math o dwristiaeth sy'n cael ei brofi yn Llanbedr, a graddfa'r her i alluogi i'r gwasanaethau argyfwng gweithredu'n effeithiol yn yr ardal.
- hyrwyddo gweithio o adre fel mesur amgen i godi ffordd osgoi - mewn gwirionedd canran fach iawn fyddai'n gallu gweithio o adref. Traffig ymwelwyr sydd yn creu'r tagfeydd yn bennaf, nid gweithwyr.
- Codi tâl bach ar ddefnyddwyr ffyrdd ("Tâl Carbon") - Dim ond un ffordd sy'n bodoli i basio trwy Llanbedr ac i deithio rhwng Harlech ac Abermaw. Byddai codi tal ar drigolion Gwynedd yn ategu'r rhwystredigaeth sydd eisoes yn bodoli yn yr ardal. Mae Cyngor Gwynedd yn awyddus i edrych ymhellach ar dreth twristiaeth, ond ni ystyrir y bydd hyn yn lleihau lefelau traffig yn Llanbedr.

5. Mewnbyn Cyrrff Ehangach

Rydym yn cwestiynu pam fod cyflwyniad ysgrifenedig wedi'i dderbyn gan un corff (Cymdeithas Eryri) pan na gwahoddir (neu wrthodwyd) cyflwyniad ysgrifenedig gan y pedwar corff statudol perthnasol sef Gyngor Gwynedd, Cyfoeth Naturiol Cymru, CADW a'r Parc Cenedlaethol. Mae pob un o'r rhain wedi bod yn rhan o asesu'r cynllun yma, ac wedi'i gymeradwyo. Rydym hefyd yn cwestiynu'r egwyddor o dderbyn cyflwyniad o unrhyw fath gan un corff heb roi'r cyfle i gyrff eraill cynnig barn mewn ffordd agored a thryloyw. Ni fu unrhyw gyswllt gyda datblygwyr Maes Awyr Llanbedr i ddeall eu dyheadau i'r dyfodol ac ni fu unrhyw gyswllt gyda chynrychiolwyr o'r gymuned leol. Lles trigolion Gwynedd a Chymru ddylai fod yn ganolog i'r adolygiad yma ac mae'r ffaith fod mwy o bwys wedi ei roi i lais ymwelwyr i'r ardal nag i lais trigolion lleol yn warth.

Arweinydd y Cyngor
Leader of the Council
Cynghorydd / Councillor Dyfrig Siencyn

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Ein Cyf / Our Ref: **DS/SEW**

Eich Cyf / Your Ref:



12 November 2021

Mark Drakeford MS,
First Minister of Wales

Dear First Minister,

Improving Access to Snowdonia Enterprise Zone Site, Llanbedr

I refer to the Welsh Government's decision not to fund a new access road to the Snowdonia Enterprise Zone Site.

I would like to state at the outset that Gwynedd Council is fully committed to the carbon reduction agenda. In 2019 Gwynedd Council declared a Climate Emergency and as a result we as a Local Authority are reviewing our policies and arrangements to make our contribution; to protect and enhance our environment for future generations. There is no time for complacency, we all need to be prepared to take difficult and unpopular decisions if developments are likely to be detrimental. But it was a huge disappointment for me, and for the communities of Meirionnydd, to hear you as a Government making a decision not to fund a scheme you commissioned through the Enterprise Zone Board, based on a biased and inaccurate report, without even checking the evidence nor considering the impact of the decision not to invest on the community in the future.

Gwynedd Council inevitably has to consider legal options regarding the validity of your decision to reverse your financial contractual commitment to the scheme.

I think the Welsh Government misled us through the Review. Gwynedd Council was given pledges and positive feedback at various meetings with civil servants and Ministers where it was agreed that it was appropriate to continue with financial and legal processes. On this basis, we have continued with compulsory purchase orders (based on discussions with landowners for a number of years) and tendering for contractors to design and construct the road. Some tenderers have shared with us the considerable scale of their investment to date in the process of preparing tenders.

With this understanding, Ministers were asked to consider the Llanbedr case in the Review as quickly as possible as the process of acquiring land and tendering the work had begun, and there was a risk of Wales losing nearly £ 4m of money that had been secured from Europe. However, we believe that the review process has been far too superficial to remove support for a scheme that was already in place and was so significant to the area; socially, economically and environmentally. Our reasons for disagreeing with the report's conclusions are listed in Appendix I.

In my role as Leader of Gwynedd Council, my priority is to benefit the communities of Gwynedd today and into the future. This includes considering the 7 objectives of our Future Generations Act in guiding decisions. The lack of full consideration of the objectives of the act is worrying and sets a precedent that has far-reaching implications for any attempt to create quality jobs in rural areas that would enable young people to live and work in our communities into the future.

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I think it is your responsibility to carefully consider the contents of this letter. There is a real opportunity here to do the right thing for the community and the environment. There is an opportunity to show how the Welsh Government can invest in a programme that creates quality work in a rural community whilst reducing carbon emissions. It is an opportunity to improve the environment for the benefit of future generations. I would like to arrange a meeting with you, Julie James MS Minister for Climate Change and Vaughan Gething MS, Minister for the Economy, as soon as possible to agree the next steps.

Yours sincerely,



Y Cyng/Cllr. Dyfrig Siencyn
Arweinydd Cyngor Gwynedd
Leader of Gwynedd Council

Gwynedd Council does not agree with the Review Panel's conclusions for the following reasons:

I. Terms of Reference for the Review

No information on the terms and reference for the Review was received prior to a meeting that had been arranged with the Panel Chair on the 4th of October 2021.

A proforma had been completed in advance of the meeting, with a number of questions relating to the scheme. Comments were made on Carbon emissions under the air quality and greenhouse gases section of the proforma. Gwynedd Council responded to these sections (and all other sections) with detailed information and references to further documentation. We see no reference to this information in the completed report. Indeed, we see no reference to much of the information given in the proforma, nor to the supporting documentation, and we question whether this information was considered at all by the Panel.

In understanding the two "questions" that were the subject of the Review during the meeting, Gwynedd Council proposed to prepare a written response to address the matters. The Chair rejected our proposal and stated that it was not necessary. It was explained that the decision would be a process of dialogue, so there would be further opportunities to respond to any recommendations made. It was a tremendous surprise, therefore, to receive the news that the scheme had been scrapped without any form of further dialogue.

Gwynedd Council was not involved in the site visit and did not have the opportunity to present the plans and actions being taken by the tendering companies to address issues that were key to the scope of the Review.

The report, therefore, is based on one conversation, which we consider to be very poorly reflected in the report, with some elements completely ignored, and others misinterpreted or misreported.

The scheme in question is essentially an access plan to overcome a constraint to development of a unique site of international significance. The need was identified by the Welsh Government Minister for the Economy. But given the intense traffic problems that also exist in the village of Llanbedr, an opportunity was seen to maximize access investment by taking the opportunity to bring the two elements together and develop a new access road to the airfield and a bypass to the village at the same time. It was an opportunity to solve a significant problem that has faced the residents of Llanbedr for decades as part of a wider programme to reduce traffic and carbon emissions for the village of Llanbedr and the wider area.

Although the terms of reference for the Review are not therefore consistent with the objectives of the investment in Llanbedr, we are confident that the plan satisfies the requirements. But having seen the report and its conclusions, we question whether the correct information had been considered by the Panel.

Neither of the Review questions formed part of the WeITAG process or the any other process this scheme has been through, such as the planning permission process. The plan has fully met the requirements of all relevant processes at the time, and this was the evidence that the Panel Chair reviewed. It is not reasonable to expect this documentation to be sufficient evidence to answer both new questions. Instead, we should have been given the opportunity to provide a written response to greet them and show how the scheme could contribute positively.

We feel that the two questions that underpin the Review only provide some insight into the value of the investment in infrastructure. The purpose of developing Llanbedr Airfield, is to develop technologies to enable low carbon use of air vehicles e.g. electric aircraft, thereby reducing the carbon footprint of the aerospace industries. Its positive contribution to climate change would be far more significant than any one road plan.

2. The Panel

We are not clear if there was a Panel in place to review the plan or just a Chair. If a Panel was not in place, we would like to challenge the reliance on one person's views.

3. Accuracy of Report

We are extremely disappointed with the quality of the report itself, which we think is consistently inaccurate in many of the key facts used to inform the conclusion that more CO₂ will be created as a result of the proposed plan.

As shown in the 'Road Review Proforma' issued to the Welsh Government in September 2021, the assessment states that there would be a 3.6% reduction in the level of traffic CO₂ in the area. This evidence was contained in the Environmental Statement which formed part of the successful planning application.

We thought there was a real opportunity here for a model of good practice, which would have responded positively to the challenge and led to a reduction, not an increase in traffic CO₂ emissions, and an improvement in regional air quality with the plan in place.

Primarily, we would like to raise the following key points:

- 3.1 During our meeting with the Chair of the Panel, the point was made that there is an opportunity to change the standard of the road to reduce its speed to 40mph. This commitment is not mentioned at all in the report, and therefore the assessment is based entirely on a 60mph speed. We consider this to be equivalent to withholding vital information for the Panel, and the Panel should reassess alleged carbon emissions on the basis of a 40mph road speed.
- 3.2 The active travel measures that would come as part of the new road scheme were also discussed. It was explained that these measures would have to be implemented by any successful contractor (a legal requirement), but that the exact interventions were subject to commercial tenders which were in the process of being assessed. The Chair accepted this at the meeting as an opportunity. But in the report itself, the likelihood of introducing active travel measures is described as "wishful thinking", stating that "pedestrian and cyclist facilities are not part of the design". This indicates either a lack of understanding of what was discussed, or that this information was withheld.
- 3.3 Active travel measures were formed in the plan as part of the scope, and also included in the planning permission application documents in 2019, which included:
 - Improvements to Mochras road, to connect to the railway
 - Improvements in Llanbedr village (A496)
 - Connections to NCR 8
- 3.4 As part of the submission for planning permission for the scheme, a specific document - "Environmental Statement: Air Quality Assessment" was produced. The document makes it clear that moving traffic out of the village centre would improve air quality. Traffic travelling to and from Llanbedr and Llanbedr Airfield/Mochras would now be redirected to west Llanbedr and away from local residential areas and facilities. NO_x, PM₁₀ and CO₂ are predicted to decrease with the plan in place. The effects of the proposed scheme are beneficial on air quality. There is no reference to this document in the report, although we submitted it to the Chair of the Panel. It must be assumed, therefore, that it was not read. Indeed, there is no reference to a large number of relevant documents presented as evidence to the Chair in the report to the Panel.
- 3.5 We have described measures for reducing construction CO₂ under the Greenhouse Gas emissions question in the review proforma and the Early Contractor Involvement format that has been selected for this tender provides Gwynedd the perfect opportunity to work with highly skilled teams on carbon management. Contractors tendering are confident that we can be innovative and contribute to carbon reduction, the Welsh Government Net Zero emissions target and Gwynedd Council's Carbon Management Plan.

- 3.6 A number of assumptions are made by the author of the report about the likelihood of different levels of development at Llanbedr Airfield, referring to it at one point as "hype". We consider that this was not part of the terms of reference of the Review and Dr Sloman does not have the expertise required to comment on economic issues.
- 3.7 The development of the Llanbedr site is subject to a number of the Welsh Government's own economic development strategies, including your 'Wales: A Sustainable Space Nation' strategy. I would suggest that the Welsh Government entrusts this assessment to the Minister for the Economy who has highlighted the Site's potential as a national economic asset. We cannot understand how the successful development of this key national economic site is being used as evidence against the implementation of the road scheme, rather than embracing the potential this would have to create well paid employment in a rural area, allowing future generations to remain in their communities and prosper.
- 3.8 The suggestions for transporting large shipments to the Site by sea or by rail again misrepresent what was discussed with the Chairman. Both of these options have been considered in detail within the WELTag review (pages 62-64), so it is not correct to suggest that no consideration has been given to them. These two points were discussed in detail with the Chair, agreeing that it would be unreasonable, given the nature of the airfield development, to justify the creation of a new port or to upgrade the railway all the way to Shrewsbury.
- 3.9 No consideration has been given to the possibility of not investing i.e. not creating new access to the airfield and intervening to reduce the emissions already created (especially in the summer months) as miles of cars sit still with their engines running. Gwynedd Council is currently working with Snowdonia National Park Authority and Transport for Wales to establish a network of transport hubs around the Park area which will improve the situation, but will not reduce the number of cars sufficiently to prevent congestion in the village .
- 3.10 Llanbedr is a beautiful ancient village, with a narrow paved road which does not enable residents to walk or cycle safely. There is not even space in front of the houses for residents to put out bins for service. There are a number of listed structures in the village including the ancient bridge which is under pressure due to its location at the airfield junction. There will be significant costs to maintain this infrastructure in the future. Some suggested alternative traffic management measures would have a detrimental impact on the community and its environment and would not have sufficient impact to mitigate the identified risks.
- 3.11 The report seems to suggest that the plan should be consistent with new guidelines and policies that have been adopted since this scheme was approved by regulators and funders. Whilst accepting that these policies should apply to new schemes that have not gone through the processes, you cannot expect a scheme of this kind to start again once approved. The correct process at the time must be followed in order to comply with statutory processes and this was done in this case.
- 3.12 The Roads Review Proforma was prepared by YGC in September 2021 and included a number of questions based on the Wales Transport Strategy 2021. The Review has missed parts of the report which showed dramatic improvement to 'air quality' and 'noise' in the village centre. These were highlighted during stakeholder meetings involving CADW, NRW, Snowdonia National Park and the Public during the WelTAG period. These appear to have been ruled out by the Panel by focusing on only two questions.
- 3.13 The Road Review Proforma has been broken down into these categories:
- Priority 1: Bring services to people to reduce the need to travel
 - Priority 2: Allow people and goods to move easily from door to door, through accessible, sustainable and efficient transport services and infrastructure
 - Priority 3: Encouraging people to switch to more sustainable transport
 - Good for people and communities
 - Good for the Environment
 - Good for Places and the Economy
 - Good for Culture and the Welsh Language
 - Active Travel
 - Bus

- Rail
- Roads
- Freight and Logistics
- Build an economy based on the principles of fair work, sustainability and future industries and services
- Build a stronger, greener economy as we make the most progress towards decarbonisation
- Embed our response to the climate and nature crisis into everything we do
- Climate Change

3.14 All parts of the proforma were fully answered by Gwynedd Council with evidence, but It must be questioned why the Welsh Government did not consider all of the evidence submitted before making its conclusions. Critical evidence was not listed in the Reference Section.

3.15 It should be noted that there has been no Government feedback on the Proforma or evidence submitted.

4. Employment Site

We are very concerned at the lack of understanding of the author of the report about the need for the development of Llanbedr Airfield to be at the location in question. Llanbedr Airfield is in a very specific location to enable air tests to be carried out there. The site has a number of specific geographical features, which have received numerous permissions from the Civil Aviation Authority to fly more experimental aircraft. The whole basis of the permission is that it is in a less populated area. Even within the Aerospace industry, some of the features of the Llanbedr site are completely unique, which is why it has been highlighted by the UK Government as a potential location for a Space Port. The contribution of the development of the airfield to large scale carbon reductions through e.g. electric aircraft development was not considered as part of this review, but I am very concerned about some statements from the Chair which suggest that we should not create employment in less populated areas.

The frequent references to the “general” use of the site are also misleading. This will be a Business Site for aerospace businesses, including research and development aerospace companies, which would need to be located at a location where air tests can be carried out. Again, we do not believe that the Chair is in a position to comment on the business arrangements of the site developers, or the likelihood of its development.

The report suggests a number of solutions to address the current traffic levels in the village of Llanbedr. These show a lack of understanding of the type of employment and tourism in the area. It suggests, for example:

- managing tourism demand - Mochras is the largest campsite in Europe with the capacity to greet 200,000 camping visitors annually. While we will be taking proactive steps as a Council to promote active travel and manage visitor levels to the area, with over 7500 visitor beds already in the area, it is not reasonable to think that the demand for transport can be reduced to the area overnight.
- introducing traffic calming and lower speed measures - speed is not the issue - often traffic is not moving at all with vehicles serving the village and obstructions in the road causing congestion due to the flow of tourist traffic to the village area
- encouraging better use of the bus or active travel modes - this is an issue that is being addressed, but it is not going to have enough impact to reduce congestion in the village. The Author demonstrates a lack of understanding of the type of tourism being experienced in Llanbedr and the scale of the challenge to enable emergency services to operate effectively in the area.
- promoting working from home as an alternative to building a bypass - in fact a very small percentage would be able to work from home. The congestion is mainly caused by visitor traffic, not workers.
- Small road user charges (“Carbon Charge”) - There is only one way to pass through Llanbedr to travel between Harlech and Barmouth. Charging Gwynedd residents would add to the frustration that already exists in the area. Gwynedd Council is keen to look further at tourism tax, but it is not considered that this will reduce traffic levels sufficiently in Llanbedr.

5. Input of Wider Bodies

We question why a written submission was received from one non-statutory body (Snowdonia Society) when the four relevant statutory bodies namely Gwynedd Council, Natural Resources Wales, CADW and the National Park were not invited to (or refused) a written submission. All of these have been involved in the assessment and approval of this scheme. We also question the principle of receiving a submission of any kind from one body without giving other bodies the opportunity to offer opinions in an open and transparent way. There has been no contact with the developers of Llanbedr Airfield to understand their future aspirations and there has been no contact with representatives from the local community. The welfare of the residents of Gwynedd and Wales should be at the heart of this review and the fact that the voice of visitors to the area is given more importance than the voice of local residents is a disgrace.