ISLE OF ANGLESEY COUNTY COUNCIL AND GWYNEDD COUNCIL JOINT LOCAL DEVELOPMENT PLAN

SESSION 2 (HOUSING PROVISION) HEARING STATEMENT

RESPONDENT: HORIZON NUCLEAR POWER WYLFA LIMITED (REF: 2919)

August 2016

Our Ref: Q60570

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This statement should be read in conjunction with the Respondents' separate submissions, as listed below:

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SESSION 5 HEARING STATEMENT: ECONOMY – EMPLOYMENT, RETAIL AND TOURISM

SESSION 6 HEARING STATEMENT: HISTORIC AND NATURAL ENVIRONMENT

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Appendix 1 – Definition of Temporary Construction Worker Accommodation

Appendix 2 – Policy TAI3: 'Accommodation for Temporary Construction Workers' and supporting text (as amended by JPPU and Horizon)

1 INTRODUCTION

a) The Respondent

1.1 The Respondent, Horizon Nuclear Power Wylfa Limited ("Horizon"), is advancing proposals for the construction and operation of a new nuclear power station at Wylfa and associated development ("Wylfa Newydd Project" or "Project"). This Hearing Statement (the "Statement") specifically deals with Session 2 – Housing Provision.

1.2 Horizon has continued to maintain a productive dialogue with the Isle of Anglesey County Council ("IACC") and Gwynedd Council (collectively, "the Councils") following the submission of its representations to the various consultation stages of the Joint Local Development Plan ("the Plan"). Horizon has worked with the Councils to reach agreement on matters where possible and this will be detailed in the Statement of Common Ground ("SoCG") to be filed on 23 August.

1.3 This Statement therefore addresses the remaining outstanding matters where agreement has either not been reached, or where discussions are on-going.

1.4 As explained within this Statement, Horizon considers that specific amendments are required to policy TAI3 to ensure the soundness of the Plan. Details of the proposed changes to this policy are set out in Section 2 and Appendix 2.

b) Structure of Hearing Statement

1.5 This Statement demonstrates that, in the context of (a) above as well as the information on the Project set out in Horizon's Hearing Statement for Session 1, the Plan is unsound in so far as it relates to the three matters set out in paragraph 1.6 below, when assessed against the soundness test set out in Planning Policy Wales (Edition 8, 2016) ("PPW"), and the ten criteria of soundness set out in the Plan[1].

[1] Paragraph 1.17, Composite Version of the JLDP Written Statement (April 2016)

1.6 This statement is confined to matters raised by the Inspector, in the Matters and Issues Agenda for Session 2, namely:

- *5.(c) Will policy TAI3 serve its intended purpose with regard to managing the effect of temporary construction workers on the future stock of housing?*

1.7 Horizon is also relying on its submissions in respect of Sessions 1 (Plan preparation, vision and strategy), 5 (Economy – employment, retail and tourism), 6 (Historic and natural environment), and 9 (Wylfa).

1.8 Section 2 of this Statement provides an analysis of the Plan and an assessment of its soundness against the criteria set out in both PPW[2] and the Plan itself[3], in relation to the identified matters raised by the Inspector.

1.9 Section 3 sets out Horizon's proposed changes it considers to be crucial to ensuring the soundness of the Plan.

[2] Paragraph 2.5.11, Planning Policy Wales (Edition 8, January 2016)
[3] Paragraph 1.17 in the Composite Version of the JLDP Written Statement (April 2016)

2 PLANNING ANALYSIS

2.1 The Plan does not currently provide a sufficiently clear policy framework to support and provide the necessary control for significant elements of the Wylfa Newydd Project. There is considerable uncertainty over which policies are relevant, and how they will be applied. Because Horizon needs the associated development to deliver Wylfa Newydd, this presents a very clear risk to the Project itself.

2.2 Horizon considers the most effective way to provide a clear planning policy framework, and therefore make the Plan sound, would be through the introduction of Wylfa specific policies. The Joint Planning Policy Unit ("JPPU") has however rejected Horizon's proposed Wylfa Newydd specific policies during the various stages of plan preparation.

2.3 The JPPU considers the Wylfa Newydd specific policies are not necessary and on that basis has declined Horizon's request to engage on the drafting of such policies.

2.4 Horizon accepts it is unlikely to achieve the Wylfa Newydd specific policies without JPPU engagement and support. In light of this, Horizon does not pursue the approach of Wylfa Newydd specific policies, but instead only pursues its alternative approach of specific amendments to current draft policies.

2.5 It is crucial that the Plan be refined and amended so that there is a clear distinction between those policies that relate to general application proposals and those that relate to the Wylfa Newydd Project (associated development in particular). Without this refinement, there is too much uncertainty over which policies will apply and how they will be applied.

2.6 Horizon in its hearing statement for session 1 set out in detail the importance which national policy gives to the Wylfa Newydd Project. Also set out in detail was the scale and range of requirements that the Project would have. The scale of the temporary workforce required (up to 10,720) relative to the existing population and employment figures in Anglesey was described, as was an analysis of the accommodation needs of this workforce relative to the supply (including in particular new temporary worker accommodation of at least 5,700 units: see Table 1 in the hearing statement for session 1). That information is relied upon and not repeated in this Hearing Statement. In light of the scale and range of those requirements, Horizon submit that the Plan must give detailed consideration

to associate development delivered in connection with the Wylfa Newydd Project, in particular through the amendments to policies which Horizon propose. To do otherwise would mean that this important and extensive associated development would not be plan-led.

2.7 These amendments are detailed in this Statement and the other hearing statements submitted by Horizon in relation to Sessions 1 (Plan Preparation, vision and strategy), 5 (Economy – employment, retail and tourism), 6 (Historic and natural environment), and 9 (Wylfa).

2.8 Horizon considers it essential that its amendments are made to specific policies to ensure that the Plan meets the various soundness tests set out in PPW.

a) ***Will policy TAI3 serve its intended purpose with regard to managing the effect of temporary construction workers on the future stock of housing?***

(Question 5(c), Hearing Session 2: Housing Provision - Matters & Issues Agenda)

2.9 A number of associated developments are required to support the construction and operation of the Wylfa Newydd Project, including (but not limited to) Temporary Construction Worker Accommodation ("TCWA").

2.10 TCWA can be broadly split into two sub-categories: Temporary Worker (Modular Facilities) and Temporary Worker (Permanent Housing). A description of both is provided at Appendix 1. Each type of construction worker accommodation has very different characteristics which means that it would be inappropriate for planning policies not to distinguish between them.

2.11 The intention of policy TAI3 is to control TCWA, but importantly it does not provide sufficient clarity regarding what policies are relevant to Temporary Worker (Modular Facilities) (as defined in Appendix 1). Without clarification that Temporary Worker (Modular Facilities) will not be required to comply with policies that are intended to relate to Temporary Worker (Permanent Housing), Horizon consider that the Plan fails soundness test 2 in PPW[4] and test CE1[5] in the Plan itself.

[4] Paragraph 2.5.11, Planning Policy Wales (Edition 8, January 2016)
[5] Paragraph 1.17 in the Composite Version of the JLDP Written Statement (April 2016)

2.12 Horizon considers there to be a fundamental lack of clarity in the Plan regarding which aspects of planning policies are to apply to each sub-category of TCWA. As explained below therefore, Horizon considers that amendments are required to policy TAI3 to clarify that it is not expected that Temporary Worker (Modular Facilities) should meet policies that would normally apply to permanent housing comprising policies PS12, PS15, ISA2, ISA5, TAI5, TAI8, TAI9, TAI14, TAI15, TAI16 and TAI17. The proposed wording is provided in Section 3 and Appendix 2 of this Statement.

2.13 Horizon considers that without further clarity, this could prejudice the delivery of Wylfa Newydd Project. A summary of Horizon's concerns with those additional policies, which justify Horizon's proposed changes to policy TAI3, are explained below:

(i) Policy PS12: Town centres and retail developments

2.14 Temporary Worker (Modular Facilities) may contain an element of complementary retail in developments that may be located beyond settlement boundaries. Horizon therefore considers that it would be inappropriate for Temporary Worker (Modular Facilities) to be subject to the same policy tests as those that would apply to more permanent proposals. Criterion 6 of policy PS12 restricts the expansion of out-of-centre retailing and leisure development. It is entirely reasonable that Temporary Worker (Modular Facilities) contain an element of small retail units to support its temporary residents. It may be necessary to increase the size of these ancillary facilities over time, according to the population of the Temporary Worker (Modular Facilities). However, this policy would prevent the future expansion of these ancillary leisure and retail facilities.

2.15 Should Horizon be unable to expand facilities at Temporary Worker (Modular Facilities) to serve the needs of their workers, this could result in workers travelling to adjoining areas, which is clearly unsustainable. Horizon therefore consider that the Plan does not contribute sufficiently to the achievement of sustainable development, and therefore fails soundness test 2 in PPW[6] and C2[7] in the Plan itself.

[6] Paragraph 2.5.11, Planning Policy Wales (Edition 8, January 2016)
[7] Paragraph 1.17 in the Composite Version of the JLDP Written Statement (April 2016)

(ii) TAI9: Affordable Housing Threshold and Distribution

2.16 Given the inherently temporary nature of the Temporary Worker (Modular Facilities), it is not reasonable that such development proposals would need to make a contribution to affordable housing. The provision of Temporary Worker (Modular Facilities) in itself seeks to eliminate pressures on the existing housing stock by providing purpose built accommodation. Without a clear exception applied to TAI3 however, this policy on the face of it would apply equally to Temporary Worker (Modular Facilities) and Temporary Worker (Permanent Housing). Horizon therefore considers that the Plan is not clear and focused, and therefore fails soundness test 2 in PPW[8].

(iii) Policy PS15: Settlement Strategy

2.17 This policy sets out a spatial strategy for the provision of permanent housing within the plan area. It is therefore considered inappropriate to apply this policy to proposals for Temporary Worker (Modular Facilities) as doing so would result in a departure from the Development Plan. Horizon therefore considers that the Plan is not clear and focused and therefore fails soundness test 2 in PPW[9].

(iv) Policy ISA2: Community Facilities

2.18 This policy is intended to secure the community facilities that will be required in association with new permanent housing developments within the plan area. Temporary Worker (Modular Facilities) would largely provide their own community facilities on site but the criteria of policy ISA2 could, potentially, prohibit this. The policy requires such facilities to be located within or adjoining development boundaries or, where located outside development boundaries, within 'clusters'. Some Temporary Worker (Modular Facilities) will likely need to be located outside of settlement

[8] Paragraph 2.5.11, Planning Policy Wales (Edition 8, January 2016)
[9] Paragraph 2.5.11, Planning Policy Wales (Edition 8, January 2016)

boundaries and 'clusters' (to, among other things, reduce impacts on communities and Welsh language and culture). As a result, it should be made clear within TAI3 that this policy should not apply to Temporary Worker (Modular Facilities).

(v) Policy ISA5: Provision of Open Spaces in New Housing Developments

2.19 Horizon recognises the need for an appropriate level of open space at Temporary Worker (Modular Facilities), but those requirements will be very different from normal housing developments.

2.20 For example, should the Rhosgoch site be utilised to provide Temporary Worker (Modular Facilities), this would accommodate circa 1,500 workers in single person modular units (i.e. no families). If applied, policy ISA5 would require the Rhosgoch site to provide 3.6 hectares of open space, including a proportion of play space. It is entirely inappropriate to require this type of Temporary Worker (Modular Facilities) to provide this amount of open space/play space; provide suitable off-site provision and/or contribute financially towards new facilities where the proposals do not increase demand or pressure on those facilities.

2.21 Whilst paragraph 7.1.24 in the Plan provides some indication that this could be relaxed, the exceptions set out are too narrowly defined and do not specifically extend to Temporary Worker (Modular Facilities). Neither do they form part of planning policy which would form the basis of planning decisions. A clear exclusion should be provided in TAI3.

(vi) Policy TAI5: Local Market Housing

2.22 Were any Temporary Worker (Modular Facilities) located within the settlement boundary, criterion 1 of policy TAI5 would require that the occupancy of the accommodation provided be restricted to either local market housing or affordable housing. This would preclude the Temporary Worker (Modular Facilities) being used to house temporary construction workers, and as such this policy should be clearly disapplied from such developments.

(vii) Policy TAI8: Residential Use of Caravans, Mobile Homes or other forms of Non-Permanent Accommodation

2.23 This policy states that the siting of non-permanent accommodation will be subject to the same locational considerations as permanent dwellings. It is considered that this does not provide sufficient flexibility to allow proposals for Temporary Worker (Modular Facilities) to be located beyond settlement boundaries, which is very likely to be required. Horizon therefore considers the Plan to be ineffective and inflexible, failing both soundness test 3 in PPW[10] and CE4[11] in the Plan itself.

(viii) *Policy TAI14: Housing in Sub-Regional Centre & Urban Service Centres; Policy TAI15: Housing in Local Service Centres; Policy TAI16: Housing in Service Villages; Policy TAI17: Housing in Local, Rural & Coastal Villages*

2.24 Policies TAI14 to TAI17 (inclusive) state that housing to meet the Plan's strategy will be met through allocated and windfall sites, within development boundaries. Whilst those policies set out specific allocations, Horizon is concerned that they also set a strategy that some Temporary Worker (Modular Facilities) would conflict with. As such, these policies should be disapplied from Temporary Worker (Modular Facilities) given that the JPPU are aware that such developments may well come forward beyond settlement boundaries, because of their unique characteristics and effects.

(viii) Summary

2.25 Horizon has significant concerns with the potential number of draft policies that it considers should not be applied to an assessment of Temporary Worker (Modular Facilities) (and which its proposals for Temporary Worker (Modular Facilities) would not meet) but for which no clear exception is provided.

2.26 A full explanation of Horizon's concerns in this regard is set out in Section 2 (b) in Horizon's hearing statement for Session 9 (Wylfa).

2.27 The Development Plan should plan properly for important anticipated development in its administrative area. Given the scale of associated development involved and the fact that it is fully anticipated to come forward, there is no justification for leaving such applications to be determined

[10] Paragraph 2.5.11, Planning Policy Wales (Edition 8, January 2016)
[11] Paragraph 1.17 in the Composite Version of the JLDP Written Statement (April 2016)

by reference to exceptional circumstances not specified in the Plan. That would be inconsistent with the purpose of the Plan and indeed the plan-led system.

2.28 Horizon therefore considers that the Plan does not properly address key issues within the Plan area and fails soundness test 2 in PPW[12]. Horizon contends therefore that policy TAI3 must be amended so as to ensure that it is not expected for Temporary Worker (Modular Facilities) to meet policies that would apply to permanent housing comprising policies PS12, PS15, ISA2, ISA5, TAI5, TAI8, TAI9, TAI14, TAI15, TAI16 and TAI17 in order to provide a clear and flexible policy framework to accommodate unique development proposals.

2.29 Horizon and the JPPU have agreed the principle of amended policy TAI3 to provide additional clarity as to what policies should apply to Temporary Worker (Modular Facilities). The revised wording of policy TAI3 which is sought by Horizon is provided in Appendix 2 of this document.

[12] Paragraph 2.5.11, Planning Policy Wales (Edition 8, January 2016)

3 CHANGES SOUGHT

3.1 Horizon consider that amendments are necessary to provide the certainty required, the absence of which could otherwise prejudice the delivery of the associated development and therefore the Wylfa Newydd Project. Several policies need to be amended to ensure that the Plan is sufficiently flexible and provides a clear mechanism for implementing policies in relation to the Project.

a) <u>Amendments to Policy TAI3</u>

3.2 Horizon proposes amendments to policy TAI3 to ensure clarity as to which policies apply to a determination of an application for Temporary Worker (Modular Facilities) and which do not apply (i.e. policies PS12, PS15, ISA2, TAI5, TAI8, TAI9, TAI14, TAI15, TAI16 and TAI17). It is accepted that the Temporary Worker (Permanent Housing) will need to comply with policies relating to permanent housing use once its use by construction workers is finished.

3.3 Horizon and the JPPU have agreed in principle to amend policy TAI3, as shown in Appendix 2, although the precise wording is subject to on-going discussions.

3.4 It is considered that Horizon's proposed changes to policy TAI3 address the ambiguity that currently as to what policies should apply to Temporary Worker (Modular Facilities) and Temporary Worker (Permanent Housing) developments.

APPENDIX 1 – DEFINITION OF TEMPORARY CONSTRUCTION WORKER ACCOMMODATION

Horizon notes that the JPPU has asked Horizon to be very clear as to the different types of temporary construction worker accommodation proposed. As such Horizon has proposed the below definition of temporary construction worker accommodation which distinguishes between:

- accommodation which is to be used by construction workers and then removed after use by those workers (such as at Rhosgoch);
- accommodation which is to be first used by construction workers and then retained as permanent housing (such as Madyn Farm).

Temporary Construction Worker Accommodation (TCWA)

This describes the sites outside the Wylfa Newydd Development Area on which temporary construction workers required for the construction of the Wylfa Newydd Project will be accommodated. These will include:

- Temporary Worker (Modular Facilities) - Campus style developments comprised of modular single bedroom units and associated shared facilities such as catering, healthcare and laundry services and which will be removed entirely after the end of the period of occupation by contraction workers; and
- Temporary Worker (Permanent Housing) – Development including smaller individual housing units that are to be converted after use by construction workers to permanent residential use.

APPENDIX 2 – POLICY TAI3: 'ACCOMMODATION FOR TEMPORARY CONSTRUCTION WORKERS' AND SUPPORTING TEXT (AS AMENDED BY JPPU AND HORIZON)

POLICY TAI3: 'ACCOMMODATION FOR TEMPORARY CONSTRUCTION WORKERS' AND SUPPORTING TEXT (AS UPDATED BY JPPU AND HORIZON)
Please note amendments to policy TAI3 in the Composite Version of the JLDP Written Statement (2016) are denoted as follows: Changes in ***red italics*** are those proposed by the JPPU on 4/8/16. Changes in **highlighted yellow** are further changes proposed by Horizon to the JPPU on 10/8/16 **"POLICY TAI3: TEMPORARY ACCOMMODATION FOR CONSTRUCTION WORKERS** **Proposals for campus style development temporary accommodation for construction workers will be permitted provided that it forms part of the overall solution to providing temporary construction worker accommodation and the following criteria are satisfied:** **1. The site is located within or adjacent to development boundaries of Centres or Service Villages identified within the Plan's Settlement Hierarchy, and** **2. It is proportionate in scale to the Centre or Service Village; and** **3. It will not prejudice the Councils' ability to sustain a continuous minimum 5 years supply of land for permanent homes; or** **4. In exceptional circumstances, the site is located elsewhere in Anglesey provided:** **i. the developer can demonstrate that there is an essential and proven need for the amount and type of accommodation that cannot be met within or adjacent to development boundaries of Centres or Service Villages in the locality through either existing accommodation or the re-use of an existing Building;** **ii. the accommodation is provided to meet the temporary accommodation needs of workers;** **iii. the site is accessible to public transport routes, workplaces, and key social infrastructure;** ***iv. the site integrates with the transport strategy for the Project, promoting sustainable travel options as appropriate;***

v. a satisfactory standard of accommodation and adequate communal leisure and recreational facilities are provided on site to meet the amenity needs of occupiers;

5. *The proposal should be informed by a consideration of legacy uses, so that investment in elements such as infrastructure, buildings, ecological and landscape works brings long term benefits* ~~; The accommodations is designed for permanent legacy use,~~ unless, in exceptional circumstances, the Council is satisfied that a legacy use is not feasible or appropriate;

6. The proposal will be assessed in accordance with this policy and with Policy PCYFF 1 and Policy ISA1, but will not be required to comply with policies relating to the development of permanent accomodation;

~~7. If provision of permanent self-contained homes is the intended legacy use of the accommodation building(s), the proposal should make a positive contribution to the long term affordable housing objectives of the Council in accordance with conforms to the requirements of Policy TAI9 and Policy TAI10;~~

8. Where the proposal would result in impacts or additional demands on existing community facilities (*including healthcare facilities)*, in accordance with Policy ISA1, either additional facilities or appropriate contributions for the development or improvement of existing facilities *off site* within Centres or Service Villages will be provided, unless it can be demonstrated that temporary *ancillary* facilities should be provided *on site* ~~elsewhere~~;

9. *That appropriate improvements to the transport network are provided to mitigate adverse impacts on local communities and tourism;*

10. The accommodationcontributes to creating a mixed, inclusive and sustainable community, and does not cause an over-concentration of such a use in the local area or harm to the residential amenity or the surrounding area;

11. If future or legacy use is not feasible the Council shall require that temporary buildings are removed and

    i. the serviced land is left in a neat and tidy condition following the removal of the structures, or

    ii. all waste disposal facilities, roads, parking areas and drainage facilities are permanently removed from the site and the land is reverted to its original state to the satisfaction of the Local Planning Authority.

Operators will be required to keep a register of all workers living in the accommodation and to make this register immediately available, on request, to the Council.

Explanation:

7.4.23 ~~Homes with shared facilities are often known as houses in multiple occupation (HMOs)/ shared homes. HMOs/ shared homes are flats or houses occupied by more than one household, where each household does not have exclusive use of all cooking, washing and toilet facilities. This Policy applies to the provision of new HMOs/ shared homes as~~

~~opposed to the conversion of existing buildings (which would fall under Policy TAI2).~~ This Policy applies to *temporary accommodation provided for construction workers* ~~new build purpose built accommodation~~ required in connection with large scale construction projects, e.g. Wylfa Newydd or any other work that requires a *large number of* temporary/ transient resident workforce. The accommodation will be required for 6 months or more. The duration will be restricted to a maximum period agreed to by the Council and will be conditioned for refurbishment of the building/ structure or reinstatement of the site at the end of the period. The Council encourages accommodation designed to allow transition to an alternative legacy use.

7.4.23A These would be specially provided, campus-style developments including modular single worker en-suite accommodation units, arranged in blocks that share communal facilities, such as a kitchen, dining space and lounge. The modular build would allow this type of accommodation to flexibility to meet changes in demand over time.

7.4.23B The Council favours sites located within or adjacent to the identified Centres or Services in order to promote sustainable development (including access to public transport linkages), integration with communities (unless the scale of the development would not be proportionate to the Centre or Service Village), and to facilitate beneficial long-term legacy uses. This could enable efficiency in terms of accessibility to welfare, leisure and recreation facilities in the nearest settlements. Where required and appropriate, the solution to ensure that the occupiers' requirements are addressed could involve investment to upgrade facilities in the nearest settlements. Alternatively, these sites could be more self- contained, providing on site welfare, sports, leisure and recreation facilities as well as bus pick up and drop off points for the occupiers. Other services, e.g. canteen, administrative services, would also form part of the development covered by this Policy.

7.4.23C While Policy TAI 3 (and PCYFF 1 and Policy ISA1) would be the relevant polices for this style of *temporary accommodation provided for construction workers, this Policy would not apply to a proposal for permanent housing, for example houses that would initially be sub-divided to allow use by construction workers, then adapted to become homes for families or other members of local communities. Policies TAI 14 to TAI 17 would apply to this type of provision, depending on the site's location, as well as other relevant Policies, e.g. Policy TAI 9 – Affordable housing threshold and distribution (for use following use by construction workers); Policy ISA 5 – Provision of open spaces in new housing development; Policy ISA 1 – Infrastructure provision.* Policy TAI 3 would not apply to any form of purpose built accommodation that has been designated as student housing or designated for use by older people or would be suitable for young adults with a limited income. Policy TAI 6 provides part of the framework to deal with proposals for new purpose build student accommodation.

7.4.24 This type of accommodation has the potential to mitigate pressure on the stock of private rented homes or open market housing, and tourist acomodation, in communities~~. Policy TAI 3 would not apply to any form of purpose built accommodation that has been designated as student housing or designated for use by older people or would be suitable~~

~~for young adults with a limited income. Policy TAI 6 provides part of the framework to deal with proposals for new purpose build student accommodation.~~

7.4.25 The aim of this Policy is to *contribute to* achieving the appropriate balance *of solutions to address the need to accommodate a large number of construction workers, thus* ~~by facilitating the development of HMOs/ shared housing and purpose built accommodation required for temporary construction workers and~~ protecting the supply of housing suitable for local communities during the Plan period.

7.4.26 The creation of mixed, sustainable and inclusive communities can be adversely affected where *a large scale temporary construction workers accommodation* ~~purpose built accommodation, HMOs or shared housing~~ is proposed. This *scale* ~~type~~ of accommodation creates a concentration of relatively short-term residents, and can be unwelcome in an established community. Specific concerns can include pressure on services and facilities that meet the needs of longer term residents, particularly key services and facilities such as doctors' surgery, dentist, leisure centres, libraries, schools. The Councils are committed to supporting residential communities in the Plan area. Each application for temporary ~~workers~~ accommodation *for construction workers* shall be accompanied by an assessment for the proposal, including:

i. A detailed assement of compliance with any relevant supplementary planning guidance;
ii. a detailed explanation of the need for the facility;
iii. how it accords with the *project promoter's published strategy to accommodate its construction workers;* ~~Construction Workers' Accommodation Strategy~~
iv. details of the extent to which the proposal places demands on physical and community infrastructure;
v. the extent to which the local community will benefit from the proposal; and
vi. a demonstrable solution for the end of the life of the structure or building, unless it can be clearly demonstrated that a legacy use isn't feasible.

7.4.27 Where proposals for *temporary accommodation* ~~purpose built accommodation, HMOs or housing with shared facilities~~ for construction workers are likely to impact adversely on the balance of the community because of their scale or because of an existing concentration, the Councils may seek mitigating measures in accordance with Policy ISA1. *In cases where the solution to addressing the requirements of the occupiers involve providing on site facilities, Policies that address the relevant land use would apply (e.g. Policy MAN 6 reatiling in the countryside; Policy ISA 2 Community facilities), unless the ancillary facilities are temporary buildings designed at the outset to be removed from the site.*

7.4.28 Where mitigation cannot be secured, the Councils will refuse proposals that would disrupt the balance of the community or prevent the local community's requirements from being met.

7.4.29 The Councils will expect that the developer will ensure that ~~purpose built~~ *the* accommodation and any facilities associated with the accommodation (e.g. recreational facilities) are developed on a sustainable basis, and that *consideration is given at the outset to* ~~proposals~~ identify the legacy opportunities / proposed after use ~~for consideration from the outset~~. Where an alternative policy compliant legacy use is not feasible, but the proposal is otherwise acceptable, the planning permission for the accommodation will be granted for a limited period and a mechanism, e.g. planning conditions or planning obligations/ Section 106 agreements, will ensure that all temporary buildings, works, uses of land or other development, are removed or discontinued and the land reinstated in accordance with a scheme previously approved, or serviced plots are retained and the land is landscaped in accordance with an approved landscaping scheme. The Council may require that a bond is provided to ensure that the landscaping is maintained."