### WELSH GOVERNMENT

**Examination Hearing Statement** 

### Anglesey and Gwynedd Joint Local Development Plan

Hearing Session 9: WYLFA

15<sup>th</sup> September 2016

# 3. Does the Plan make adequate provision to deal with the implications of the Wylfa Newydd development?

No, there is not adequate provision to deal with the implications of Wylfa Newydd. To improve clarity and provide certainty, the Council's should allocate the site using the indicative boundary in document DC0.27 and provide policies that will support its development over the plan period.

The Wylfa Newydd Project Update 2016 (DC0.27) identifies the nature and location of development associated with delivery of the power station, this includes highway improvements, park and ride facilities and the location of offsite temporary workers accommodation (page 10). The Welsh Government considers this essential information regarding the delivery of Wylfa Newydd should be contained in the policies of the statutory development plan itself and not the supporting evidence or Supplementary Planning Guidance (SPG). It is perfectly acceptable for SPG to expand upon policies contained in the plan, but there needs to be a policy in place in the first instance upon which to 'hang' SPG. This is crucial to achieve identified outcomes and support the delivery of Wylfa Newydd over the plan period.

a. Is the planned level of growth of housing and employment land aligned to the increase in demand anticipated to arise as a consequence of the Wylfa Newydd project? Does the Plan make provision for an increase in demand for other facilities, such as retailing and leisure?

This is a matter for the authorities.

The authorities should explain how the level of housing provision in the plan; particularly in relation to Anglesey, deviates from PPW (paragraph 9.2.2) as a result of the development at Wylfa Newydd. The magnitude of any 'ripple-effect' from Anglesey into Gwynedd should also be clarified.

In terms of employment land growth, the Welsh Government does not object to the principle of reserve sites within the employment land portfolio to support the nuclear build at Wylfa Newydd. However, clarification is required on the evidence that demonstrates the inclusion of the reserve sites in the plan and their allocation on the proposals map. The Employment Land Review 2012 highlights a lack of sufficient information to be *"categorical about their inclusion in the portfolio"* (paragraph 9.5.5). Conversely, it would be useful for the authorities to explain why sites identified for temporary workers accommodation in background paper DC0.27 have not been identified and included in the statutory plan?

### b. Does the Plan make adequate provision for associated infrastructure development to facilitate the project, including transportation?

No, there is not adequate provision for associated infrastructure relating to the Wylfa Newydd development. Whilst existing Policy PS4 and TRA1 both support the development of park and ride facilities and freight transfer facilities, the essential information on the location of highway improvements and travel measures directly associated with Wylfa Newydd should be contained in the statutory plan. To ensure delivery, the A5025 on-line and off-line road improvements, the park and ride facilities on the A55 and the marine off-loading facility at Porth-y-Pistyll (DC0.27) should be contained in plan policies and not the reasoned justification. The transport infrastructure associated with Wylfa Newydd should also be allocated and shown on the proposals map.

It is essential the plan is clear about the infrastructure required to deliver its strategic objectives, including SO8a on the development of Wylfa Newydd. The Council's should provide links to the timing, funding sources and costs to demonstrate that development of the nuclear station and its associated infrastructure is viable and deliverable. Without a CIL charge in place and pooling restrictions on future S106 agreements (up to 5 schemes post April 2010) the Council's should be certain that delivery of Wylfa Newydd and it's key infrastructure will not be inhibited so that construction can commence in 2020 with operation proposed from 2026 onwards (DC0.27).

To allow for site specific negotiations on development proposals, the authorities should amend Policy ISA1 to include reference to development viability and it's consideration on a 'site by site' basis to align with the requirements of Circular 13/19 and the CIL Regulations 2010 (as amended).

c. Does the Plan make adequate provision for construction workers housing and associated facilities, during the construction phase? Does the Plan deal effectively with these developments post-construction?

Please see our response to Hearing Session 2

With the Wylfa Newydd construction workforce set to generate between 8,000-10,000 workers, the accommodation need is proposed to be met as follows (DC0.27):

Existing Accommodation	Accommodation (Workers)
Existing tourist accommodation	820
Private rental	-
Purchase of existing properties	670
Re-use of empty homes	250
Total:	1,740
New Accommodation	Accommodation (Workers)
New houses	200
Temporary workers accommodation	9300
Total:	9,500
Combined Total:	11,240

#### Breakdown of Housing for Wylfa Newydd Construction Workers

Almost 85% of construction workers accommodation will be built through new housing stock, particularly temporary accommodation units at Wylfa Newydd, Rhosgoch, Kingsland and Cae Glas in Holyhead and land adjacent to Madyn Farm, Amlwch (DC0.27). The Council's should explain why these five sites have not been identified in the statutory plan and how they accord with the requirements of Policy TAI3.

The remaining 15% of construction workers accommodation will be provided through existing stock, particularly tourist accommodation and the purchase of residential properties. The authorities should explain how the utilisation of 820 beds will impact on the tourist industry and how the loss of 670 homes from the existing stock will affect local need, access to the market, pricing and supply.

d. Does the Plan take into account the potential effect on the local housing supply during and after the construction phase (e.g. increased competition for rental housing and tourist accommodation during construction, and increased supply of housing after construction)?

This is a matter for the authority. Please see our response to Question 3c.

e. Should the Plan contain a suite of specific policies to deal with the Wylfa Newydd project? Does Plan, supported by the proposed revised Wylfa NNB Supplementary Planning Guidance, provide an appropriate and effective framework for decision making on developments connected to the Wylfa Newydd project?

Please see our response to Question 3 on the use of SPG.

To improve clarity and delivery, the plan would benefit from a suite of specific policies that deal with the development at Wylfa Newydd. Existing policies are distributed throughout the plan and fail to reference their direct relationship to the development and its associated infrastructure. The plan should be clear on the development and contain separate policies for Wylfa Newydd.

## 4. Is the Plan sufficiently flexible to respond to a failure to undertake the Wylfa Newydd project in the envisaged timescale?

The 4-year statutory review would provide an opportunity to respond to the failure to develop Wylfa Newydd. A suite of policies specific to the development that is contained in a single chapter of the plan would assist in the review process.

#### a. What are the implications to the Plan's strategy of any such failure?

Please see our response to Question 4

#### b. What are the implications of the higher housing and employment land growth provided in the latter period of the Plan in the event that the Wylfa project does not materialise?

Please see our response to Question 4

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