



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

SESSION 5 (ECONOMY)  
HEARING STATEMENT

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

August 2016

Our Ref: Q60570

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## Documents

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

SESSION 1 HEARING STATEMENT: PLAN PREPARATION, VISION AND STRATEGY

SESSION 2 HEARING STATEMENT: HOUSING PROVISION

SESSION 6 HEARING STATEMENT: HISTORIC AND NATURAL ENVIRONMENT

SESSION 9 HEARING STATEMENT: WYLFA

## Appendices

Appendix 1 – Comments on Employment Land Allocation Note (July 2016)

Appendix 2 – Changes Sought to Policy

# 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 (“Wylfa Newydd”). This Hearing Statement (the “Statement”) specifically deals with Session 5 – Economy.
- 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 policies CYF1, CYF4, PS12, MAN6, TWR1 and TAI3 as well as supporting text paragraphs 7.3.25 and 7.3.55.

## b) Wylfa Newydd

- 1.5 The urgent need for new nuclear power stations and the importance of Wylfa Newydd in realising those requirements are set out in Hearing Statement 1.
- 1.6 In that context, it is crucial that planning policies provide a clear planning policy framework that does not frustrate or prejudice the determination of any applications for associated development. The failure to do so could prejudice the very urgent need for new nuclear power stations.

## c) Structure of Hearing Statement

- 1.7 This Statement demonstrates that, in the context of (b) above, Horizon contends that the Plan is unsound in so far as it relates to the three matters set out in paragraph 1.13 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<sup>1</sup>.

1.8 This statement is confined matters raised by the Inspector, in the Matters and Issues Agenda for Session 5, namely:

- 3. (a) Is the level of employment land provision fully justified and supported by robust evidence?
- 6. How does the employment land strategy relate to the Anglesey Energy Island programme? What would trigger the release of the land designated as ‘reserve sites’ for the Anglesey Energy Island programme and what mechanisms would be in place to resist these sites being developed early in the Plan period?
- 9. (b) Does Strategic Policy PS12 provide an appropriate hierarchy of retail centres? Will the Plan protect the respective roles of the centres within such a hierarchy?
- 13. Is Policy MAN6: Retailing in the Countryside appropriate and is it consistent with national Policy, including that set out in Planning Policy Wales and Technical Advice Note 4: Retail and the development strategy of the Plan?
- 16. Does the Plan, through Strategic Policy PS11 and Policies TWR1 and TWR2 provide an appropriate framework for the consideration of proposals for new or enhanced tourism and leisure facilities and accommodation?

1.9 Horizon is also relying on its submissions in respect of Sessions 1 (Plan preparation, vision and strategy), 2 (Housing provision), 6 (Historic and natural environment), and 9 (Wylfa).

1.10 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 and the Plan itself, in relation to the identified matters raised by the Inspector.

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<sup>1</sup> Paragraph 1.17, Composite Version of the JLDP Written Statement (April 2016)  
Session 5 (Economy – Employment, Retail and Tourism)  
Hearing Statement  
Isle of Anglesey County Council & Gwynedd Council Joint Local Development Plan  
August 2016



- 1.11 Section 3 sets out Horizon’s proposed changes it considers to be crucial in ensuring the soundness of the Plan.

## 2 PLANNING ANALYSIS

- 2.1 The Plan does not provide a sufficiently clear policy framework to support and provide the necessary control for significant elements of the Project. There is considerable uncertainty over which policies are relevant - Temporary Construction Worker Accommodation ("TCWA") - and how they will be applied. The Plan is therefore considered to be unclear and therefore fail soundness test 2 in PPW<sup>2</sup>.
- 2.2 Horizon considers that planning policies should allow for the potential for the Temporary Worker (Modular Facilities)<sup>3</sup> type of TCWA associated with the Wylfa Newydd Project to be delivered on reserve employment land where it can be shown that this would not prejudice the amount of employment land available for the Plan period. Paragraph 7.3.23 of the Composite Plan explains that some reserve sites are also required to ensure the necessary supply of land relating to NSIPs on Anglesey. As the particular function of these sites is to meet the demand from NSIPs, it is reasonable that the policy should also extend to other uses required in connection with the delivery of such important projects. Horizon considers that this should be supported in the principle, as retaining this flexibility would facilitate the delivery of the Energy Island Programme ("EIP") (see paragraph 2.5).
- 2.3 In the specific case of the proposed Temporary Worker (Modular Facilities) at Rhosgoch, this is considered particularly appropriate provided Horizon could demonstrate an absence of need for alternative uses. Horizon notes that the Employment Land Review ("ELR") (2012) (which was prepared on behalf of the Councils) recommends that each authority should provide a minimum of 6ha employment land each year. There is a total supply/capacity of 224.4ha of allocated employment land on the Isle of Anglesey (excluding reserve sites). This means that there is an oversupply of 140.4ha of employment land (i.e. an additional 23.4 years' worth) on the Isle of Anglesey over the plan period (14 years from the ELR), before Energy Island Programme Reserve Sites are even considered. An absolute restriction on the use of this land for Temporary Worker (Modular Facilities), where such use is line with the aims of the EIP, is not proportionate nor justified.

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<sup>2</sup> Paragraph 2.5.11, Planning Policy Wales (Edition 8, January 2016)

<sup>3</sup> Refer to hearing statement 2 for further information on this.

2.4 Horizon also contends that policies PS11, TWR1, TWR2 and MAN6 should not apply to some of its temporary worker accommodation as they are not, as currently worded, equipped to effectively address the very specific and unique requirements of the Wylfa Newydd Project and associated development.

**a) Is the overall figure of 638.7ha of safeguarded employment land, with an additional 60ha of allocated land and 144.1ha Reserve Sites (842.8ha total) appropriate to meet the needs of the Counties over the Plan period?**

*(Question 3 (a) is the level of employment land provision fully justified and supported by robust evidence?)*

**How does the employment land strategy relate to the Anglesey Energy Island Programme?**

**What would trigger the release of the land designated as ‘reserve sites’ for the Anglesey Energy Island programme and what mechanisms would be in place to resist these sites being developed early in the Plan period?**

*(Question 6, Hearing Session 5 Economy: Employment, Retail and Tourism - Matters & Issues Agenda) .*

2.5 The EIP is intended to be a premier location for energy research and development, including potential for tidal energy, nuclear decommissioning and smart grids. The ELR, which was published as a Background Paper alongside the Deposit Plan, highlights that there will be significant levels of investment over the next fifteen years and that it is essential that this is used to grow, attract and retain businesses and jobs. This is further detailed in response to the Inspector’s request for further information and explanation of the overprovision of employment land outlined in the ELS provided in the Councils *Employment Land Allocation in the Joint Local Development Plan note (July 2016)*, which reiterates the importance of the EIP, and in particular Wylfa Newydd, as a “*catalyst for inward investment which will require adequate employment land provision*” (p.1).

2.6 The ELR states that consultations with nuclear industry stakeholders concluded that there will be an additional need for employment sites to accommodate local companies taking advantage of opportunities arising from new energy investment, decommissioning of Wylfa A and the operation

of Wylfa Newydd<sup>4</sup>. However, paragraph 6.10.6 goes on to confirm that it is not currently possible to predict the amount of employment land that will be required to satisfy the demand from the Wylfa Newydd Project and other EIP potential projects.

2.7 There is a lack of sufficient evidence at this stage to allow the Councils to be categorical about which sites are appropriate for allocation as employment land. Accordingly, a tiered approach is proposed in the Plan, including the provision of ‘reserve employment sites’.

2.8 The Plan describes ‘reserve employment sites’ as, “Sites that have the potential to meet the demand resulting from Wylfa Newydd as well as the rest of the Anglesey Energy Island Programme/ Enterprise Island.<sup>5</sup>”

2.9 Paragraph 6.10.8 of the ELR describes ‘reserve sites’ as being:

*“Essentially those sites for which there is deemed insufficient evidence or justification to be included in the new portfolio of employment land but which are identified as potentially important to meet EIP [Energy Island Programme] objectives including the new nuclear build proposals are to be considered as reserve employment land supply (and not counted in the main supply). If in due course sufficient evidence or justification is achieved then these reserve sites can be promoted to sit within the main portfolio.”*

2.10 Policy CYF1 states that, before consideration can be given to releasing reserve sites for employment use, “need would have to be demonstrated, plus evidence that the proposed development on the site is directly related to realising the objectives of the Anglesey Energy Island Programme and that there was no suitable protected employment site to meet the need”.

2.11 However, Horizon considers it more appropriate that a feasibility study demonstrating the deliverability and viability of the site should be the trigger for promotion to a formal employment allocation, in accordance with paragraph 9.5.6 in the ELR.

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<sup>4</sup> Paragraph 6.10.5, Employment Land Review: Study for the Anglesey and Gwynedd (2012)

<sup>5</sup> Paragraph 7.3.25, Composite Version of the JLDP Written Statement (April 2016)



- 2.12 Specifically, the Plan identifies the former site of Shell at Rhosgoch as a reserve site (Composite Plan Map ref: C(wg)37)). Rhosgoch is a preferred site for development of a Temporary Worker (Modular Facilities), to support the Wylfa Newydd Project. The site has been identified as being capable of accommodating circa 1,500 workers in single person modular units.
- 2.13 Based on take up figures between 1996 and 2009, the average historic take up of employment land on the Isle of Anglesey is 3.87 ha each year<sup>6</sup>.
- 2.14 Econometric forecasts suggest that between 0.77 and 3.49 ha will be taken up each year up to 2025<sup>7</sup> - however the ELR recommends that as a minimum each authority should provide for 4 ha of employment land each year in accordance with an adopted spatial planning approach over the Plan period equating to 56 ha for the Plan period. It is further recommended that both Councils should in fact aim to build in a 50% additional target as a buffer measure to provide an enhanced offer, which equates to 6 ha each year (84ha in total).
- 2.15 Figure 8.1 of the ELR notes that there is a total supply of 224.4ha of allocated employment land on the Isle of Anglesey, across 11 Primary and Secondary sites. This does not include EIP Reserve Sites on Anglesey, which provide an additional 144.1ha, including Rhosgoch at 82.2ha<sup>8</sup>.
- 2.16 Given the demand/need forecast, which is based on (conservative scenario) 6 hectares per annum<sup>9</sup>, (i.e. 84 ha over the 14-year Plan period), the ELR has planned for an oversupply of 140.4<sup>10</sup> hectares of employment land (i.e. an additional 23.4 years' worth) on the Isle of Anglesey over the plan period, before EIP Reserve Sites are even considered (i.e. in Primary and Secondary sites only). If the Reserve Sites outlined in JLDP Strategic Policy CYF1 are taken into account, the oversupply is 284.5ha.
- 2.17 As such, the 'reserve sites' are highly unlikely to be required during the Plan period (up to 2026) even if 6ha per annum uptake is achieved. Additionally, without Rhosgoch, the Reserve Sites alone would account for 10 years of employment land supply required (6.19ha at 6ha per annum, based on figures in JLDP Strategic Policy CYF1). However, we support the JPPU's intent to ensure that the Plan is

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<sup>6</sup> Paragraph 6.8.1, Employment Land Review: Study for the Anglesey and Gwynedd (2012)

<sup>7</sup> Paragraph 6.9.4, Employment Land Review: Study for the Anglesey and Gwynedd (2012)

<sup>8</sup> JLDP, Strategic Policy CYF1 Safeguarding and Allocating Land and Units for Employment Use

<sup>9</sup> Paragraph 6.10.1, Employment Land Review: Study for the Anglesey and Gwynedd (2012)

<sup>10</sup> Figure 8 (Identified Supply), Employment Land Review: Study for the Anglesey and Gwynedd (2012)

sufficiently flexible to allow for development in connection with the EIP and therefore have suggested that the policy be extended to allow for non-employment uses in connection with the EIP also, given the significant over-supply of employment land. Our further comments on the *Employment Land Allocation in the Joint Local Development Plan note (July 2016)* are provided at Appendix 1.

2.18 Horizon therefore consider the proposed use as a temporary accommodation campus (for around 7-10 years) in connection with a significant energy project is an appropriate use of the land. This would still mean that the site can, after the temporary use has ceased, be used for more traditional employment purposes. Planning policies should not create a barrier or an impediment to the delivery of the use of those sites where that can be appropriately justified during the Plan period where use would facilitate the delivery of infrastructure projects of national significance.

**b) Does Strategic Policy PS12 provide an appropriate hierarchy of retail centres? Will the Plan protect the respective roles of the centres within such a hierarchy?**

*(Question 9. (b) in Hearing Session 5 - Economy: Employment, Retail and Tourism - Matters & Issues Agenda)*

2.19 Horizon do not object to the hierarchical approach taken by the Councils with regards to policy PS12 but consider that the policy should be clarified so as to state that small scale retail/leisure uses are acceptable uses as part of Temporary Worker (Modular Facilities) associated with the Wylfa Newydd Project which are located outside of settlement boundaries. This is particularly the case given their temporary small scale nature and where such uses/facilities are ancillary to the TWCA and/or other purposes of worker amenity/workforce management.

2.20 Horizon considers that the current wording of criterion 6 in policy PS12 could potentially be read to restrict the leisure and small scale retail uses which are known to be required to support Temporary Worker (Modular Facilities). The provision of retail and leisure facilities on the Temporary Worker (Modular Facilities) sites is key to the sustainability and function of such accommodation. For example, the Rhosgoch site would accommodate up to 1,500 workers. Without a shop or leisure facilities on this site, increased pressure would be exerted on existing infrastructure and facilities in the local area.

2.21 Draft policy PS12 is therefore considered to fail soundness test 2 in PPW<sup>11</sup> and test CE4<sup>12</sup> in the Plan.

**c) Is Policy MAN6: Retailing in the Countryside appropriate and is it consistent with national Policy, including that set out in Planning Policy Wales and Technical Advice Note 4: Retail and the development strategy of the Plan?**

*(Question 13. in Hearing Session 5 - Economy: Employment, Retail and Tourism - Matters & Issues Agenda)*

2.22 The current wording of policy MAN6 prevents the provision of ancillary retail and leisure uses at some Temporary Worker (Modular Facilities) sites.

2.23 Leisure and small scale retail uses are known to be required to support would be provided as small scale complementary facilities for Temporary Worker (Modular Facilities).

2.24 For reasons set out in (b) above, it is considered that Policy MAN6: Retailing in the Countryside to fail soundness test 2 in PPW<sup>13</sup> and test CE4<sup>14</sup> in the Plan.

**d) Does the Plan, through Strategic Policy PS11 and Policies TWR1 and TWR2 provide an appropriate framework for the consideration of proposals for new or enhanced tourism and leisure facilities and accommodation?**

*(Question 16. in Hearing Session 5 - Economy: Employment, Retail and Tourism - Matters & Issues Agenda)*

2.25 Draft policy TWR1 as it is currently worded does not allow sufficient flexibility, specifically with regards to the location of the Wylfa Newydd visitor centre. There is a clear locational requirement for the new visitor centre to be located close to the Wylfa Newydd site, outside of the development boundary. However, such a location would be contrary to draft policy TWR1 if adopted which currently only provides exceptions for visitor attractions and facilities outside of settlement

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<sup>11</sup> Paragraph 2.5.11, Planning Policy Wales (Edition 8, January 2016)

<sup>12</sup> Paragraph 1.17 in the Composite Version of the JLDP Written Statement (April 2016)

<sup>13</sup> Paragraph 2.5.11, Planning Policy Wales (Edition 8, January 2016)

<sup>14</sup> Paragraph 1.17 in the Composite Version of the JLDP Written Statement (April 2016)

boundaries where, *“an activity [is] restricted to a specific location due to its appropriate use of a historical or natural resource.”*

- 2.26 The determination of planning applications must be made in accordance with the Development Plan<sup>15</sup> unless there are material considerations that indicate otherwise. Horizon is concerned however that the inclusion of policies such as draft Policy TWR1 that do not include sufficient flexibility could result in a situation where a development proposals are considered to be a departure from the Development Plan when it is not the intended purpose. The scenario cited here is entirely foreseeable, such that the Plan should expressly plan for them.
- 2.27 Flexibility needs to be built in for these scenarios. Further, to the extent that the Plan preparation process cannot foresee every development scenario, it is similarly imperative that such policies include sufficient flexibility so as not to prejudice development proposals.
- 2.28 Horizon considers this to be unsound when assessed against soundness test 3 and 3 in PPW<sup>16</sup> and test CE4<sup>17</sup> in the Plan.
- 2.29 Amendments to TWR1 have been agreed with the Councils, see paragraph [3.10] below.
- 2.30 Horizon considers that policy TWR2 should not apply to Temporary Worker (Modular Facilities). The policy itself provides no specific exclusions for those types of development. The supporting text in paragraph 7.3.55 in the Plan states however that *“this policy is not relevant to proposals to establish new static holiday and touring caravans, holiday chalets or alternative luxury camping sites.”* Horizon consider that Temporary Worker (Modular Facilities) should be added to the list of exempt development in paragraph 7.3.55.
- 2.31 Horizon does not have any objection to the wording of policies TWR2 nor PS11.

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<sup>15</sup> Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004

<sup>16</sup> Paragraph 2.5.11, Planning Policy Wales (Edition 8, January 2016)

<sup>17</sup> Paragraph 1.17 in the Composite Version of the JLDP Written Statement (April 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 Wylfa Newydd project and associated development. 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.
- 3.2 The changes sought to policies CYF1, CYF4, TWR1, 7.3.55 and TAI3 are set out in appendix 2 of this report.

## APPENDIX 1: COMMENTS ON EMPLOYMENT LAND ALLOCATION NOTE (JULY 2016)

The *Employment Land Allocation in the Joint Local Development Plan note (July 2016)* leads to the following justification/reasons for the overprovision of employment land identified in the ELR:

- a) The Councils provide a summary of the estimated direct and indirect employment effects of the Project using construction sector multipliers to estimate that the direct and indirect effects would create an additional 1,600 jobs on Anglesey in B1, B2, B8, retail, hospitality and public services jobs alone (p.2). This is used as the rationale for increasing historically low figures for employment land uptake (c. 4ha p/a) to 6ha p/a required over the Plan period.
- b) The supply of employment land also reflects the uncertainties within the Project with regard to workforce and skills. It also builds in an (unspecified) consideration that uptake will be higher than previously seen over the construction and operational phase of the Project and the rest of the EIP. Prior to the EIP, the Plan had anticipated a period of decline, which now appears to be reversing. This is evidenced through *“market testing with local agents”* and *“direct market approaches to the Council”* (p.5).
- c) The note considers that the Project faces challenges with regards to maintaining sustainable transportation of goods, services and workforce to Site, and a flexible portfolio of sites on Anglesey will enable the Project to accommodate as much of its supply chain on Anglesey as possible, reducing potential effects on congestion (p.2).
- d) The supply of employment land outlined in the ELS will help HNP to deliver its Supply Chain Charter, offering space for Tier 1 and Tier 2 supply chain businesses (p.2) and its local workforce and skills initiatives.
- e) The approach is in-line with the requirements of PPW, which specifies that *“a Plan should set out an economic vision for the area including a broad assessment of anticipated employment change by broad sector and land use and so seek to provide the right amount of land and qualitative mix of sites to meet the market demand for economic development uses”* (p. 7). It is also in line with TAN 23 which states that *“targets may be higher than anticipated demand, to allow for the*



*chance that the assessments are too low and to ensure that no opportunities are missed. They should also allow for flexibility, competition and choice” (p.7).*

- f) The North Wales Regional Employment Land Study (2014) identifies priority sectors and sites to deliver them, including the EZs related to the EIP. The Study prioritises the needs of Wylfa Newydd and the need to retain sufficient flexibility and quantum of sites to accommodate its demands, including Reserve Sites.

This reiterates that the over-provision of employment land identified by the ELS is based on a flexible approach to delivery of the EIP and the needs of the Wylfa Newydd Project in particular. The Councils conclusion is that allocating demand (6ha per annum) at 50% higher than historic take-up is therefore reasonable given the nationally unique opportunities likely to present themselves during the Plan’s lifetime. As identified above, the ELR notes that (in 2012) there was an oversupply of 140.4ha of employment land on Anglesey, or 10ha per year up to 2026 (LER, Table 8.1).

## APPENDIX 2: CHANGES SOUGHT TO POLICY

### **Amendments to Policy CYF1 to confirm 'Reserve Sites' can be used for Temporary Worker (Modular Facilities)**

Horizon consider that the following new text is inserted at the end of Policy CYF1:

"Reserved sites will be permitted to be used for Temporary Worker (Modular Facilities) in connection with the Energy Island Programme where it can be demonstrated such a use would be acceptable, having regard to the availability of employment land and other relevant policies in the Plan including TAI3."

Horizon also consider that paragraph 7.3.25 should be amended to read as follows (proposed changes underlined):

"Reserve Sites - Sites that have the potential to meet the demand (including for Temporary Worker (Modular Facilities)/transport infrastructure) resulting from Wylfa Newydd as well as the rest of the Anglesey Energy Island Programme/ Enterprise Island."

Horizon considers it helpful to clarify that alternative uses may be possible for the reserve sites identified in CYF1, prior to them being required for employment purposes. This is to ensure that the Plan is effective and flexible in terms of the soundness tests in PPW.

### **Amendments to Policy CYF4**

Horizon have conditionally agreed with the Joint Planning Policy Unit (JPPU) to amend criterion 6 of Policy CYF4 to read (proposed changes underlined):

"...6. If the site is used in the short term (on a temporary basis), including Temporary Worker (Modular Facilities), it should be assured that there are appropriate restoration measures in place to the satisfaction of the Local Planning Authority."

In addition, Horizon proposed that "or" is added after criteria 1 to 5 (inclusive).



Horizon has is also seeking an exemption for Temporary Worker (Modular Facilities) from policies PS12 (retail and leisure facilities) and MAN6 (small scale retail units). These are covered in hearing statement 2 and would be addressed by the proposed amendments to TAI3.

### **Amendments to Policies TWR1**

Horizon have conditionally agreed with the JPPU to amend policy TWR1 to read (proposed amendments underlined):

*"3. An activity restricted to a specific location due to its appropriate use of a historical or natural resource or its proximity to the attraction to which it relates."*

This provides sufficient flexibility for Horizon to justify the location of the Wylfa visitor centre next to the Wylfa Newydd power station site.

### **Amendments to Paragraph 7.3.55 in the Plan**

Horizon have conditionally agreed with the JPPU to add the following text to paragraph 7.3.55, after the reference to 'luxury camping sites' (proposed amendments underlined):

*"...or Temporary Construction Worker Accommodation coming forward as part of the Wylfa Newydd Project."*

If paragraph 7.3.55 is not amended as set out above, then Horizon consider that this paragraph should be deleted. It is unclear why new static holiday and touring caravans, holiday chalets or alternative luxury camping sites are deserving of a specific exception but TCWA is not, especially given their importance to the delivery of the wider Wylfa Newydd Project.

### **Amendments to Policy TAI3**

Horizon consider that amendments are required to policy TAI3 to clarify that it is not expected for Temporary Worker (Modular Facilities) to 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 for the revised version of policy TAI3 is provided in the Horizon's hearing statement for Session 2 – Housing Provision.



The principle of amending policy TAI3 to recognise which elements apply to each category of TCWA has been agreed with the JPPU. This will enshrine in the Development Plan a clear framework of which policies should be applied to proposals for Temporary Worker (Modular Facilities), avoiding numerous departures from the Development Plan which would threaten the timely delivery of the Wylfa Newydd Project.