

# Hearing Session 9

## WYLFA

**2.00 pm, THURSDAY 15 September 2016**

**Anglesey and Gwynedd Joint Local  
Development Plan**



**CYNGOR SIR  
YNYS MÔN  
ISLE OF ANGLESEY  
COUNTY COUNCIL**

This Statement has been produced by the Isle of Anglesey County Council and Gwynedd Council to set out their response to the matters and issues raised by the Inspector for the Hearing relating to Wylfa Newydd in the submitted Anglesey and Gwynedd Joint Local Development Plan.

This Statement relates to the elements of the Plan that have been raised by the Inspector as matters to be discussed. Where appropriate the Statement draws on and cross-refers to the main sources of information used in the preparation of the Plan such as the outcomes of public consultation, the Sustainability Appraisal, the Background Documents and the supporting Topic Papers. Document reference numbers are given where appropriate.

For the purpose of clarity within this statement any Matters Arising Changes suggested to the Deposit Plan and/or a Focussed Change to the Plan, is shown in bold **Red** and underlined. Any Focussed Change text to the Deposit Plan is shown in **Bold** underlined text.

## Matters & Issues Agenda

<b>1</b>	<b>Introduction</b>
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<b>2</b>	<b>Procedural Matters</b>
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<b>3</b>	<b>Does the Plan make adequate provision to deal with the implications of the Wylfa Newydd development?</b>
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- 3.1 **Response** – Yes. The response to the detailed matters included on the agenda below (Questions 3a to 4b) will demonstrate how the Plan deals with the implications of the Wylfa Newydd development. To facilitate this it is considered useful to provide an overview of the known non-physical and physical implications of the new nuclear build project.
- 3.2 The Councils consider that the Wylfa Newydd Project provides a unique and unprecedented opportunity for Anglesey and project promoters to work together to contribute to the socio-economic transformation of Anglesey and the wider North Wales region, providing sustainable employment opportunities, improving quality of life for existing and future generations and enhancing local identity and distinctiveness, subject to delivery of appropriate mitigation and other measures.
- 3.3 On this basis, the Plan's vision in Chapter 5 of the Deposit Plan, as amended by Focus Change NF 5, clarifies how the Plan area is expected to change and the sort of place it should become during the Plan period. The Plan then presents a positive approach to managing the inevitable future growth and change that will occur within the Plan area. The policies and proposals set out in the Plan address the Plan area's need for new homes, jobs, infrastructure and community facilities to support economic growth and raise standards of living. The approach is aspirational. Trend based forecasts are used to provide a base case projection, but the proposed level of growth has been adjusted upwards to reflect the economic potential of the Plan area, and the ongoing and proposed initiatives and investments. The Councils' Statements in response to matters and issues raised in Hearing Statements 1 and 2 provide more details about the Plan's Growth and Spatial Strategies.

### The Wylfa Newydd project

- 3.4 Wylfa Newydd will have a huge influence on the local, regional and national economy. It is recognised by UK Government as a nationally significant infrastructure project and the economic opportunities it provides influenced the identification and adoption of the Energy Island Programme and from that the designation of the Anglesey Enterprise Zone.
- 3.5 The Isle of Anglesey County Council's aspirations for Wylfa Newydd are set out most clearly within the Wylfa Newydd Supplementary Planning Guidance, which it adopted in July 2014. It seeks to supplement and complement existing local and national planning policy and guidance. It was also future proofed in terms of ensuring that it aligned with the emerging Joint Local Development Plan. The Council is committed,

as set out in the “Scope of Supplementary Planning Guidance and draft timetable” (DA.010b), to refresh the SPG in order to reflect the latest information about the nuclear new build project, the Council’s latest position regarding elements of associated development, the current local and national planning policy context, as well as removing reference to the Ynys Môn Local Plan and stopped Unitary Development Plan. The aim is to seek adoption of the revised SPG alongside adoption of the Joint Local Development Plan, or as soon as possible afterwards.

- 3.6 The Isle of Anglesey County Council has invested significant time and resource in understanding the implications of the Wylfa Newydd project, including significant engagement with the local authorities directly involved in the most relevant recent nuclear development at Hinkley Point in North Somerset. In addition there has been substantial and continuing engagement with Horizon Nuclear Power to understand, and influence, the detail of the project as it has emerged. This understanding informed the Supplementary Planning Guidance and has informed the Joint Local Development Plan.
- 3.7 In January 2016 Horizon Nuclear Power published a series of documents that provided the Councils and the public with an update (Wylfa Newydd Project Update – January 2016 – DC.027). It and linked documents provided an update to the Project, i.e. the results of the planning work preparatory to a Development Consent Order and a series of Town and Country Planning Act applications. It described their proposals for the Power Station, off-site Power Station facilities and associated development.
- 3.8 Horizon intends to commence its Stage 2 Pre Application Consultation (PAC 2) on 31<sup>st</sup> August 2016, which will provide the updated position from the Project promoter’s position.
- 3.9 Horizon intends to apply for the DCO during February 2017 and construction in earnest is anticipated to start –following the Final Investment Decision (FID) by the Developer, expected in early 2019. Unit 1 is anticipated to be operational during the Plan period. The Plan period will also cover construction work relating to Unit 2.
- 3.10 Therefore, linked activities within the Plan area are anticipated to result in employment and supply chain expenditure during the Plan period. The construction of new facilities will bring a temporary workforce into the Plan area with its associated social needs and expenditure.
- 3.11 Construction works will be needed on the land around the Power Station and in the water near Porth-y-pistyll. This will include creation of a permanent landscaped setting for the Power Station as well as construction of our cooling water system, associated breakwaters and Marine Off-Loading Facility. Horizon will also have to develop some facilities that are geographically separate from but local to and part of the Power Station, comprising an alternate emergency control facility and environmental survey laboratory for the Power Station and a garage to store specialist vehicles and equipment. It is intended by Horizon Nuclear Power that these off site Power Station facilities would not require planning consent from the local planning authority as they would form part of the application for the Development Consent Order, which will be considered by the Planning Inspectorate, who will make recommendations to the Secretary of State.

3.12 Associated Development would also be required. The Associated Development is types of development that support the delivery and operation of the Power Station and will include:

- highway improvements, for example, along the A5025,
- site preparation and clearance of the power station site including considerable landscaping and diversion of public rights of way,
- accommodation that would be used during a specific period for temporary construction workers, including purpose built campus style accommodation and the re-use of existing buildings,
- permanent accommodation for higher skilled and professionals from consultancies, etc., that on balance are more likely to invest in a property within the Plan area including new build housing
- park and ride facility for up to 3,000 cars,
- logistics centre which could accommodate 100 HGVs,
- training facilities including a training and simulation centre,
- Off-site stores and
- a visitor and media reception centre.

3.13 Under current legislation, these developments cannot be included with a Development Consent Order within Wales and will require consent by the local planning authority. Applications will be made under the Town and Country Planning Act and determined in line with the development plan. Based on the January 2016 Update, it is anticipated that land required for Horizon off-site associated activity alone will amount to at least 197 ha of land. The Councils are aware of the precedent of Hinkley Point C that refers to 90 ha for associated development alone – off-site assembly and storage, vehicle handling (park and ride, lorry waiting, transhipment) and worker accommodation including training and conference facilities. Horizon have already made 2 applications for associated development. A total of 10 applications are expected to be required and the majority of those will be determined after the anticipated adoption of the Plan. The Councils have therefore had regard to the need to ensure that a suitable policy framework for these developments is in place in developing the Plan.

3.14 In terms of accommodation for workers, the impact on housing provision in the Plan area will be threefold:

- the power station will provide a major boost to the resident workforce in the Plan area and beyond (approximately 90 minute Daily Construction Commuting Zone – shown in Appendix 1);
- some workers will settle temporarily for varying periods of time in the Plan area, particularly Anglesey and north Gwynedd (i.e. within 60 minutes or the 'Key Socio-Economic Area' – shown in Appendix 1). They will use a variety of solutions ranging from using latent supply in existing residential properties, bed and breakfast, through to those who may settle here in the short term and buy or rent property;
- other workers will be accommodated in purpose built temporary workers accommodation .

- 3.15 The Project also has non-physical implications, which are its workforce requirements. In January 2016, it was anticipated that the Project will attract both permanent and temporary workers for an extended period:
- total peak construction workforce employment - approximately 8,500 -10,000
  - permanent operations workforce of circa 850 FTEs
  - temporary outage workforce of circa 1,000 FTEs every 18 months for each reactor during operations (typically lasting 25-30 days).
- 3.16 Strategic Policy PS 9 provides the overarching framework to address the related physical and non-physical impacts of the project. Housing needs for Wylfa Newydd are addressed under the suite of detailed housing policies included in Section 7.4 of the Plan (Supply and Quality of Housing), as the Councils consider that the use and needs of such accommodation align with general requirements for housing and are appropriately addressed by the detailed policies included in this Section of the Plan. The key policies are: Policy TAI 3, Policy TAI 8, Policy TAI 9 and Policies TAI 14 – TAI 16.
- 3.17 Horizon Nuclear Power informs the Councils that it is committed to supporting local supply chains, supporting targeted education from secondary school onwards and encouraging and retraining of those currently in the workforce. The Councils understand that HNP is committed to working to see that the local community and supply chain are appropriately informed of new opportunities and given fair opportunity to compete for suitable works. It has embedded these principles within its published Supply Chain Charter.
- 3.18 An example of the opportunities that are available is the joint venture Menter Newydd which has been formed between Hitachi, Bechtel and JGC to lead the award of tier 1 contracts on behalf of Horizon Nuclear Power. It is anticipated that these companies will create a demand for a range of business premises on the Island whilst further supply chain consortia (tier 2) contracts will be let which will also have a requirement for premises and flexible business space. Therefore employment land in excess of what would be required based on historical trends alone has been safeguarded and allocated in the Plan. Policy PS 10 safeguards and allocates a supply of land for employment uses, whilst Policy CYF 1 provides details of individual safeguarded and allocated sites. Policies CYF 3 provides flexibility in terms of facilitating large scale development that may not be able to find a suitable plot or premises on safeguarded or allocated sites, whilst Policy CYF 5 recognises that the Plan area includes rural communities where there may be opportunities for rural businesses to establish or expand. All in all, these Policies will encourage appropriate growth of business space in sustainable locations by focussing on suitable sites in accessible locations in accordance with the Plan's Spatial Strategy.
- 3.19 The infrastructure required in relation to the movement of people and freight is addressed by Policy PS 4, Policy TRA 1 and Policy TRA 4, which promote a range of transport modes in order to align with the Plan's Spatial Strategy.

#### Other investments and initiatives

- 3.20 Additionally, the Energy Island Programme includes for developments other than Wylfa Newydd, a number of which, in their own right, represent major inwards investments into the local economy. For example the consented Anglesey Eco Park

and Energy Centre (Orthios) alone represents an investment of circa £1 billion requiring between 800-1000 construction and 700 operation jobs. Similarly the consented Land and Lakes leisure village on land at Penhros is projected to require 400 construction jobs over an eight year period with 600 full time equivalent operational jobs in the long term. The map in Appendix 2 to this statement provides an overview of anticipated development in Anglesey. The Councils' response to matters and issues raised in Hearing Session 2 set out how the Plan's housing requirement has been informed by the need to maximise the Plan area's role in responding to evidenced need linked to the transformational economic opportunities arising from these and other investments in the Plan area.

**3a. 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?**

- 3.21 **Response** - Yes. Given the size, complexity and the influence of commercial decisions that may be taken in relation to Energy Island related projects, it is not possible to predict with absolute certainty the demand for land generated either from the projects themselves or from the significant supply chains that they will require. Similarly, opportunities identified by inward investors to the Plan area, establishing operations to support the many energy-related projects remain difficult to predict with a degree of accuracy.
- 3.22 Faced with these uncertainties, the Plan responds by ensuring that there is ample choice of employment land for a range of users with a range of requirements. Should sufficient land not be available, or be of the wrong type, or in the wrong location, then there is a danger that employment opportunities would be lost to the Island and, indeed the Plan area. Hence, the Plan allocates and safeguards land to ensure that:
- no opportunities are missed;
  - provision is made in the potentially most attractive, but also sustainable, locations;
  - opportunities are maintained for existing business to modernise and to expand and
  - that there is flexibility, competition and choice.
- 3.23 Within this context the evidence base includes a robust assessment of the likely additional employment that is anticipated in relation to the opportunity areas identified within the Wales Spatial Plan (PCC.017), and as referred to above, the Wylfa Newydd Project, as well as other opportunities linked to Anglesey Enterprise Zone and Snowdonia Enterprise Zone. This is set out in the Employment Land Review (DC.004), and in the post submission document Employment Justification (DA.016).
- 3.24 Before the introduction of the Wylfa Newydd Project and other major projects proposed on the Island, with the closure of a number of major employers on the Island, the Councils were preparing to manage a state of steady economic decline. The unprecedented development and economic activity now expected over this Plan period means that additional employment land allocation is required to ensure that

Anglesey and the wider region can fully capitalise on this once in a generation opportunity.

- 3.25 The evidence base also includes a robust assessment of the likely additional housing units required as a result of the anticipated improved economic prospects for the Plan area, particularly Anglesey. Based on the evidence the Plan includes for a quantum of housing which reflects the permanent economic benefits derived from the Anglesey Energy Island, Enterprise Zones etc., of which the Wylfa Newydd Project is an important part. This is set out in submission documents (PT.009, PT.010, DC.016). It is assumed that the enhanced job opportunities may encourage residents to stay in the Plan area, return to the Plan area, and new working age households to come and live in the Plan area. The Plan therefore, in essence, is looking at the cumulative effect of all of the known projects, the economic benefits that they bring and the implications for population growth and hence housing numbers.
- 3.26 The Councils' response to matters and issues raised in relation to Hearing Session 2 provide details of various scenarios considered to inform the decision about the Plan's housing requirement. The Statement refers to the Welsh Government 2011 based principal and 10 year average migration household projections, which anticipate a requirement for 64 and 123 new housing units per annum, respectively, during the Plan period (2011 – 2026) for Anglesey, and a requirement for 290 and 332 new housing units per annum for Gwynedd. The trend based approach is discounted in favour of a 'hybrid' approach that recognises an anticipated low level of growth during the first part of the Plan period, but then takes the employment- led projections, which takes account of the anticipated employment growth, to calculate a 'market uplift'. The anticipated 'market uplift' of an average of 235 housing units per annum above the base rate from 2018 – 19 onwards aligns with the anticipated improved economic prospects for the Plan area during the middle to latter part of the Plan period.
- 3.27 Therefore, the housing and employment growths are considered consistent and complementary to each other, both taking account of the Wylfa Newydd project.
- 3.28 Given the size, complexity and the influence of commercial decisions that may be taken in relation to Wylfa Newydd, it is not possible to predict with certainty the demand for other facilities, such as retail and leisure. Strategic Policy PS 9, as amended by Focus Change NF43 and proposed amendments set out in the Statement of Common Ground, sets the over-arching framework for dealing with development required to support the Project. Criterion 9 recognises that some facilities and services may be required to address the needs of construction workers: "Where community infrastructure is provided for construction workers, for example park and ride facilities, shops, healthcare and sports and leisure facilities, where feasible this should be sited and designed so that it can be made available for community use during the construction phase and ultimately, where appropriate, serve a community legacy use. Where there would be additional impacts or demands on existing **community** facilities the Council will **seek either** appropriate contributions for off-site facilities or **upgrading existing facilities. Legacy use of any additional facilities provided should be considered where that is appropriate;**" (underlined text represent amendments introduced via NF43). The decision about the final infrastructure requirements that may be required for development proposals will be determined on an individual basis through the development management system, based on an assessment of the information



available at the planning application stage. Therefore, the Plan, which will be supported by a refreshed Supplementary Planning Guidance relating to Wylfa Newydd, will, where feasible, seek to secure permanent forms of development that accord with Councils' objectives to support the vitality and regeneration of settlements.

- 3.29 Nonetheless, retail is an area of planning that requires regular review because it is hard to predict far into the future. The Plan's retail policies have been significantly shaped by the findings of the 2013 Retail Study (DC.006). Policy PS 12 sets out the forecasted retail floorspace capacity required to meet the needs of the Plan area up to 2026. It takes account of changing shopping and consumer patterns.
- 3.30 The quantum and distribution of retail growth aligns with the Plan's spatial strategy and the employment growth. The Sub-Regional and Urban Service Centres are also described as the Plan's higher order Retail Centres and assigned the majority of retail development in Policy PS 12. This sustainable approach to retail provision seeks to deliver retail to the communities where the most need will be generated and where the most opportunities exist. The Plan responds to the evidence at a point in time and the dynamic nature of the retail market in the Plan area. The Plan includes criteria based Policies that would support proposals for retail provision in line with the Spatial Strategy for the Plan area.
- 3.31 The leisure sector is dynamic, changing and operator-led. Thus, if an investor feels capable of attracting customers, such schemes will come forward. For this reason the Plan does not allocate sites for specific leisure development. The policy framework for leisure is set out in Policy PS 12, Policy TWR 1, and Policy ISA 2. These Policies encourage tourism, leisure and cultural uses in suitable locations the Plan area as well as facilities for the use of the general public or local community. The Plan does not seek to prevent additional development, provided such development meets the relevant policies in the Plan and are in suitable locations.
- 3.32 Therefore, the Councils consider that the Plan makes adequate provision for an increase in demand for retail and leisure.

<b>3b. Does the Plan make adequate provision for associated infrastructure development to facilitate the project, including transportation</b>
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- 3.33 Yes. It is useful to note that National Planning Statement EN-1 advises that the transport of materials, goods and personnel to and from a development during all project phases may result in economic, social and environmental impacts. In brief the NPS advises that:
- Possible demand management measures must be considered, before considering requirements for new provision of new inland transport infrastructure.
  - Water-borne or rail transport is preferred over road transport at all stages of the project, where cost-effective.
  - A travel plan should be provided, together with details of proposed measures to improve access by public transport, walking and cycling.

- 3.34 Horizon Nuclear Plan is planning to build a Marine Off- loading facility (MOLF) near the main site at Wylfa in order to reduce the number of construction freight vehicles on the roads and to address safety concerns along the route from Holyhead to the Power Station Site. The MOLF will form part of the application for the DCO. Other mitigation measures/ positive enhancement measures being examined include:
- the construction of new sections of road, highway improvements along the existing network, and additional footpaths and cycleways;
  - park and ride facility (ies);
  - logistics centre;
  - measures to encourage use of alternative forms of transport, e.g. shuttle buses from key locations, provision of cycle parking.
- 3.35 The Plan's Spatial Strategy aims to place homes, new jobs, new services and facilities or their retention where they are reasonably accessible by walking, cycling and public transport. Nonetheless, it is considered that specific policies are required that set out a high-level framework to assess how travel management strategies and development proposals support improvements to the existing transport network and encourage modal shift. It is considered that the sustainable travel objectives of the Plan are captured in Policies PS 9 Wylfa Newydd (criterion 3); PS 4 Sustainable transport, development and accessibility (as amended by Focus Change NF23); and TRA 1 Transport network developments (as amended by Focus Change NF24 and proposed amendments set out in the Statement of Common Ground) of the Deposit Plan and are considered to provide information on the types of measures that the Councils expect to be employed to mitigate transport impacts in relation to all relevant development, including Wylfa Newydd.
- 3.36 Therefore, the Councils consider that adequate provision is included in the Plan for associated transportation infrastructure development to facilitate the Project. Policies PS 9, PS 4 and TRA 1 will be supplemented by a 'refreshed' Wylfa Newydd Supplementary Planning Guidance. An extract from the current adopted Supplementary Planning Guidance, which is being reviewed, is included in Appendix 3 to this Statement to demonstrate the level of detailed guidance that will be available.

**3c. 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?**

Does the Plan make adequate provision for construction workers housing and associated facilities?

- 3.37 Yes. The Isle of Anglesey County Council published a Construction Workers Accommodation Position Statement in March 2011. The Statement was based upon information available to the Council at that time with regard to the type and numbers of construction workers considered necessary to build the proposed Nuclear New Build at Wylfa (i.e. 6,000 peak). On the basis that the nuclear new build has not taken place as anticipated a number of the assumptions and predictions contained within the Position Statement has been reviewed and updated. It is anticipated that a 'refreshed' Position Statement will be published by the Council in September 2016.

3.38 Whilst the total number of workers anticipated to be required at the construction stage has increased to a potential peak of 11,000 since the first Position Statement was prepared the basic assumptions remain the same. Firstly, it is still anticipated that some of the construction workforce will comprise of residents that already live within a distance to the main site (Daily Construction Commuting Zone) from which they would be expected to commute. It follows that the rest of the workforce will comprise of nonhome workers, i.e. workers not anticipated to already live within a distance to the site from which they would expect to commute. There continues to be five broad accommodation options available to house construction workers moving into the area in response to Wyfla and requiring a place to reside. The five options are:

- (i) Temporary workers accommodation, provided specifically to house part of the construction workforce;
- (ii) Tourist accommodation;
- (iii) Latent accommodation, i.e. the additional bedspace capacity within the existing used housing stock. The main source is households letting out spare bedrooms within their home to lodgers;
- (iv) Private rented accommodation;
- (v) Owner-occupied accommodation.

3.39 The demand for each accommodation type is dependent on the occupation group (and associated income), expected duration of stay and household profile of the construction workers. Within this context the private rented accommodation referred to in paragraph 3.38 above refers to accommodation for construction workers that will form part of a shared household, but only with other construction workers moving to the area, - this type of worker will result in an additional dwelling requirement, however, the dwelling provides more than one bedspace for the construction workers. The owner-occupied accommodation category referred to in paragraph 3.38 would cater for the requirements of construction workers accompanied by their families and/ or those whose income and contract enable them to invest in a property in the area. The private rented accommodation and the owner-occupied accommodation could include new build housing occupied initially by construction workers before being remodelled internally to provide family housing.

3.40 The Plan seeks to facilitate development that will provide sufficient good quality housing of the right types and mix, in the right places, which will be attractive to, and meet the identified needs of, different groups in society. Criterion 4 of Policy PS 9 provides the over-arching approach to addressing the requirement for accommodation for construction workers. A series of Policies in section 7.4 of the Plan provide the framework for addressing proposals for categories i, ii, iv and v of types of accommodation referred to in paragraph 3.38 above. The relevant Policies are as follows:

<b>Category of accommodation</b>	<b>Which policies?</b>
Temporary workers accommodation, provided specifically to house part of the construction workforce.	Policy TAI 3 Accommodation for temporary construction workers (as amended by Focus Change NF64 and proposed amendments set out in the Statement of Common Ground). This Policy would only apply to proposals for temporary prefabricated

	units occupied initially by construction workers with a potential agreed residential legacy use.
Tourist	Policy TAI 8 Residential use of caravans, mobile homes or other forms of non-permanent accommodation – makes specific reference to temporary accommodation required in association with an approved building project.
Private-rented accommodation	Policies TAI 14 to TAI 16, depending on the location of the land. These Policies provide an indicative growth level for the Centres and Service Villages that could be addressed via windfall/ infill sites and allocations. New build housing could be occupied initially by construction workers before being released to the open market.
Owner occupied accommodation	

Table 1: Policies applicable to categories of accommodation

- 3.41 Criterion 9 of the over-arching Policy PS 9 (as amended by Focus Change NF43 and proposed amendments set out in the Statement of Common Ground) recognises that community facilities may be required to address the needs of construction workers, stating that, where feasible they should “sited and designed so that it can be made available for community use during the construction phase and ultimately, where appropriate, serve a community legacy use. Where there would be additional impacts or demands on existing **community** facilities the Council will **seek either** appropriate contributions for off-site facilities or **upgrading existing facilities. Legacy use of any additional facilities provided should be considered where that is appropriate.**”
- 3.42 Policy TAI 3, which sets out the framework for addressing the need for purpose built accommodation, which could be a campus- style development. Criterion 4iv requires the provision of “adequate communal leisure and recreational facilities are provided on site to meet the amenity needs of occupiers.” Criteria 9 states **“Where the proposal would result in impacts or additional demands on existing community facilities, in accordance with Policy ISA1, either additional facilities or appropriate contributions for the development or improvement of existing facilities within Centres or Service Villages will be provided, unless it can be demonstrated that temporary facilities should be provided elsewhere.”**
- 3.43 The Councils therefore consider that the Plan makes adequate provision for construction workers housing and associated facilities, during the construction phase.
- Does the Plan deal effectively with these developments post-construction?
- 3.44 The Isle of Anglesey County Council seeks to ensure that development required to support the Wylfa Newydd Project provides, wherever possible, a positive legacy use. Criterion 5 of Policy TAI 3 (as amended) seeks to ensure that a legacy use is considered at the outset. However, in recognition that the number of construction workers required at the peak period should not equate to the number of permanent

bedspaces provided for in the Plan, as is set out above, the Solutions to providing accommodation for the nonhome based construction workers included in the Plan comprise of temporary accommodation. Criterion 11 of Policy TAI 3 states that:

“If an alternative 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.”

3.45 The temporary residential use of caravans or other forms of non-permanent accommodation provide another temporary solution to accommodating construction workers. Criterion 9 of Policy TAI 8 states that:

“The permission is for a time-limited period only and, after which time the need for the accommodation ceases, the caravan or other form of non-permanent accommodation shall be removed from the site and either (i) the land restored to its former condition within a specified period, or (ii) serviced plots are retained for a future policy conforming use.”

3.46 Where a legacy use is feasible it is required to conform to the policies that would apply to the alternative use. Depending on the site’s location and characteristics legacy uses could include residential, leisure, serviced plots. An appropriate planning mechanism will be used to secure it.

3.47 The Councils therefore consider that the Plan deals effectively with these developments.

**3d. 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)?**

3.48 **Response** – Yes. As referred to the Councils’ Statement for Hearing Statement 2 and in Topic Paper 4B (PT.010), which describe the factors considered before determining the Plan’s housing growth, the Isle of Anglesey County Council (IACC) prepared a Construction Workers Accommodation Position Statement in March 2011. The statement was based upon information available to the Council at that time with regard to the type and numbers of construction workers considered necessary to build the proposed Nuclear New Build (NNB) at Wylfa. The position statement was informed by an evidence base and by a process of optioneering, each stage being presented within a separate report.

3.49 As noted in response to question 3c above, an element of the workforce employed to construct the two new nuclear reactors will not be local to the Plan area. It is inevitable that workers need to be brought in from elsewhere. In planning for the needs of this ‘special population’ assumptions had to be made about the workers, e.g. that a proportion would be single persons. In 2011 accommodating construction workers across a range of tenure types split 1/3, 1/3, 1/3 represented the preferred

option that minimises negative effects on the local housing market, whilst aiming to maximise potential legacy benefits:

- 30% in purpose built temporary workers accommodation;
- 35% in the private rented sector, and;
- 35% in tourism accommodation.

3.50 Whilst the input assumptions represent estimates and evidenced observations at that point in time, the Position Statement provided an important steer to develop policies in the Deposit Plan. Based on the principles set out in the Position Statement, the Plan includes a series of Policies, described in response to question 3c, in order to promote the accommodation required to minimise the potential negative effects on the local housing market and to ensure that the area retains and attracts the required size of workforce.

3.51 The Council is aware that changes proposed by Horizon Nuclear Power with regard to construction worker numbers (increase from 6,000 to potentially 11,000 at peak-Horizon Nuclear Power Project Update January 2016 – DC.027), the method and phasing of construction, the date for commencement, the associated development and the potential for other development to be taking place on Anglesey at the same time require an updated Position Statement. It is anticipated that the refreshed Position Statement will continue to promote the same range of tenure types, but that the split would be different. Early assessment shows that the percentage of purpose built accommodation will need to be approximately 65% to minimise any adverse impacts on the existing private rented and tourism sectors. This level of provision in the ‘purpose build category’ can be accommodated in the Plan by applying Policy TAI 3, which provides a sequential search approach, starting with sites within or adjacent to Centres and Service Villages (as the most sustainable locations) before exploring sites in the countryside. The Plan seeks to provide the right balance between facilitating ‘purpose build’ workers accommodation (as a means of managing the effect on the local housing market) and the need to maintain a 5 years’ supply of housing and a sufficient supply of employment land during the Plan period. Table 1 (at paragraph 3.40 above) sets out the policies that would apply to other categories of accommodation that could address the remaining tenure types. The Isle of Anglesey County Council and Horizon are working together to create a Construction Workers Accommodation Portal as a facility to manage the impacts.

3.52 As set out in response to question 3a, it is considered that the Plan’s policies facilitate the provision of a level of permanent housing that aligns with the anticipated economic prospects for the Plan area during the Plan period.

3.53 The Plan will require careful monitoring – see response to question 4.

<p><b>3e. 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?</b></p>
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3.50 **Response** – The Deposit Plan includes Policy PS 9 and a portfolio of strategic and detailed policies that relate to specific types of development. The Deposit Plan is

amended by Focus Changes and proposed Matters Arising Changes suggested by the Councils in response to representations about Focus Changes. The Councils consider that the Deposit Plan, as amended, provides an appropriate and effective policy framework for decision making. Additionally, the Plan will be supported by a 'refreshed' Wylfa Newydd Supplementary Planning Guidance, which like the Plan, will provide guidance in a themed manner. The Councils consider that this approach ensures that development required to support Wylfa Newydd is assessed in an integrated manner.

3.51 The following table provides a schedule of key Policies that would apply to types of development required to support the construction of Wylfa Newydd:

<b>Types of associated development</b>	<b>Which policies?</b>	
Highway improvements, park and ride facilities and logistics centres	Policy PS 4, Policy TRA 1 and Policy TRA 4 – which promote good sustainable transport links, requiring relevant proposals to demonstrate how the amount of trips will be accommodated and how accessibility will be improved, as well as safeguarding new transport schemes.	
Construction workers accommodation	Temporary workers accommodation, provided specifically to house part of the construction workforce.	Policy TAI 3 Accommodation for temporary construction workers (as amended by Focus Change NF64). This Policy would only apply to proposals for temporary prefabricated units occupied initially by construction workers with a potential agreed residential legacy use.
	Tourist	Policy TAI 8 Residential use of caravans, mobile homes or other forms of non-permanent accommodation – makes specific reference to temporary accommodation required in association with an approved building project.
	Private-rented accommodation	Policies TAI 14 to TAI 16, depending on the location of the land. These Policies provide an indicative growth level for the Centres and Service Villages that could be addressed via windfall/ infill sites and allocations. New build housing could be occupied initially by construction workers before being released to the open market.
	Owner occupied accommodation	

Visitor and media reception	Policy TWR 1 – which promotes new visitor attractions and facilities, promoting a sequential approach to site selection.
Training facilities	Policy ISA 3 – which promotes new facilities or expansion to existing facilities at further or higher education sites or in close proximity to them.

Table 2: Relevant policies

- 3.52 In contrast to the nuclear power station development itself, which clearly has specific and unusual requirements, the associated development connected to the project is of general character and can be appropriately addressed by the strategic or detailed policies for the type of development concerned. As demonstrated in Table 2 above, the Plan already covers highway improvements, housing and other uses in detail, providing appropriate criteria to ensure the suitability, sustainability and amenity of such developments. The issues for each type of development are generally only different in scale not principle. For example, temporary workers' accommodation will require to comply with policies on access, sustainability, community facilities, design, built environment, landscape and nature conservation in the same manner as any other accommodation proposals and justify departures where they may be sought in any particular case. Integration will allow the Isle of Anglesey County Council to make decisions effectively in line with all of the applicable policy considerations. There is no utility in creating a bespoke set of policies which apply only to part of the Plan area. This approach would effectively duplicate the requirements of the general policy and which would be relevant only one developer as this is not justified by the needs of the type of development.
- 3.53 The Councils consider that some minor changes to broaden the scope of the following Policies may be beneficial:
- (i) Policy ISA 3 on education and training to take better account of the needs of businesses including Wylfa Newydd to provide training facilities which are not part of an existing higher education facility;
  - (ii) Policy TWR 1 on visitor attractions and facilities to take better account of the need for some existing businesses including Wylfa Newydd to provide visitor facilities.
- 3.54 The Councils consider that some minor changes to clarify the scope of the following Policies may be beneficial:
- (i) Policy TAI 3 on construction workers' accommodation to set out more clearly that the Policy applies to temporary 'purpose built' accommodation for workers, not to permanent housing;
  - (ii) Policy PS 16 on the natural environment to ensure that it better reflects national planning policy and legislation.
- 3.55 The Councils consider that inclusion of an additional criterion to Policy PS 9 to facilitate site preparation works and off site early works related to Wylfa Newydd may be beneficial.



- 3.56 The above mentioned suggested amendments and others are set out in the Statement of Common Ground between the Isle of Anglesey County Council and Horizon Nuclear Power. If deemed acceptable and appropriate by the Inspector, the Councils would therefore like to propose the aforementioned amendments to be addressed via Matters Arising Changes

<b>4</b>	<b>Is the Plan sufficiently flexible to respond to a failure to undertake the Wylfa Newydd project in the envisaged timescale?</b>
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<b>4a</b>	<b>What are the implications to the Plan's strategy of any such failure?</b>
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- 4.1 **Response** - The assumptions behind the Plan have been founded on a robust evidence base, and on this basis, the Councils are confident they are both realistic and deliverable. Horizon Nuclear Power continues to aim to submit an application for its Development Consent Order in February 2017 and therefore obtain a decision in 2018.
- 4.2 It would be inconsistent for the Plan not to provide a framework to enable the Councils to be in a position to respond positively to anticipated changing economic and social circumstances.
- 4.3 The housing growth level over the Plan period equates to an average 479 housing units per annum. It is accepted that recent annual completion rates, particularly the past 5 years, are lower than those set out in the Plan. However the anticipated overall average annual completion rate is only slightly higher than the average annual completion rate (416) in the Plan area during the decade prior to the start of the Plan period, which includes both the recession and pre-recession periods. Policy PS 13 recognises the actual completion rate in early years of the Plan period and that the growth level will be relatively low until 2018 – 2019, i.e. an anticipated growth level is set out for the period between 2011 – 2018. The housing trajectory demonstrates when individual sites will be able to cater for the identified housing requirement. A significant number of housing units are already in the planning system; at 1st April 2015 there were 3,526 housing units either with consent and not implemented, granted subject to completion of a legal agreement, or under construction. Additionally, the Plan's strategy does not propose a level of growth to Centres or Villages in a manner that would disproportionately increase the size of a particular settlement as set out in the Settlement Hierarchy.
- 4.4 As set out in response to question 3a above and in the Councils' statement for Hearing 5 Employment, Tourism and Retail, the Plan ensures that there is ample choice of employment land for a range of users with a range of requirements. Should sufficient land not be available, or be of the wrong type, or in the wrong location, then the Councils consider that there is a danger that employment opportunities would be lost to Anglesey and, indeed the Plan area.
- 4.5 The Plan is considered to be sufficiently flexible to respond to changing conditions. The amount of housing and employment land required will be kept under review in the Annual Monitoring Report (AMR). The AMR forms the basis on which to assess the effectiveness of the Plan's policies and proposals. Key indicators will be closely monitored throughout the Plan period to ensure the strategy is meeting its intended

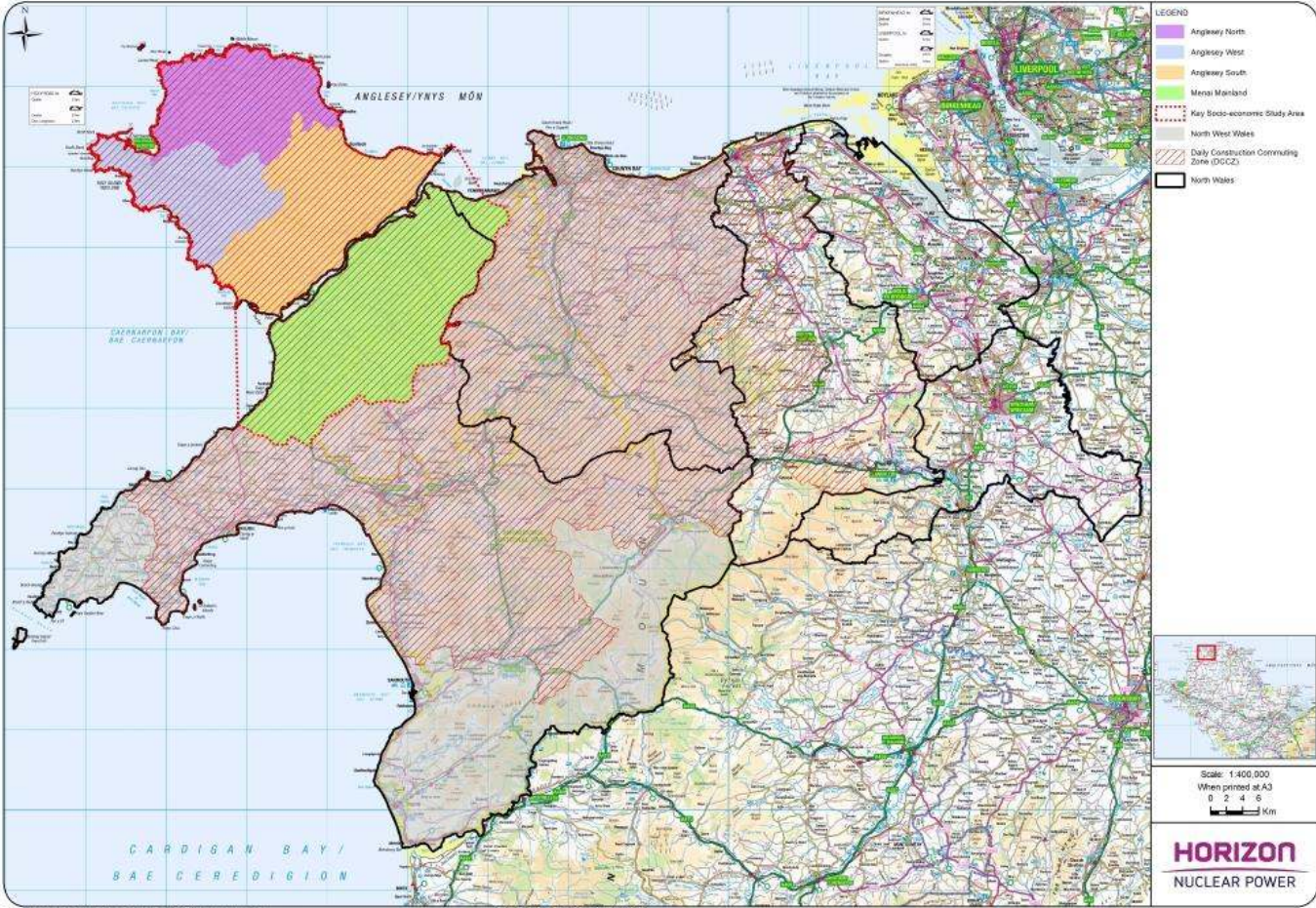
targets and its proposals are delivered within the anticipated timeframes. The AMR process will use data captured through the Joint Housing Land Availability Studies, and the proposed employment land availability studies as suggested in TAN 23, allowing future reviews to address the need for change. The AMR will also analyse the effectiveness and continued relevance of the Plan's policies in the light of circumstantial changes. Monitoring will enable the Councils to not only record behind any deviation from anticipated rates. If it appears that the targets are not being reached, or that there is a significant circumstantial change, it will be necessary to deal with this through a partial or full review.

- 4.6 Chapter 8 of the Plan includes a Monitoring Framework, which was subject to Focus Changes. In response to the Inspector's preliminary note to the Councils in May 2016 (DA.002), the Monitoring Framework's presentation was refined. The Councils are prepared to make necessary changes to the Framework to ensure it is always a forward looking process to monitor the Plan's effectiveness, incorporating a commitment to take action if critical economic development does not come forward as expected and identify measures to be undertaken if housing falls behind the projected target.

<p><b>4b. 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?</b></p>
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- 4.7 The Annual Monitoring Report forms the basis on which to assess the effectiveness of the Plan's policies and proposals. Key indicators will be closely monitored throughout the Plan period to ensure the strategy is meeting its intended targets and its proposals are delivered within the anticipated timeframes. If it appears that these targets are not being reached, it will be necessary to deal with this through a partial or full review. Chapter 8 of the Plan includes a Monitoring Framework, which was subject to Focus Changes. In response to the Inspector's preliminary note to the Councils in May 2016 (DA.002), the Monitoring Framework's presentation was refined. The Councils are prepared to make necessary changes to the Framework to ensure it is always a forward looking process to monitor the Plan's effectiveness, incorporating a commitment to take action if critical economic development does not come forward as expected and identify measures to be undertaken if housing falls behind the projected target.

# Appendix 1: Daily Construction Commuting Zone & Key Socio-Economic Area



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HORIZON COMMERCIAL

FIGURE B1.2 | SOCIO-ECONOMIC STUDY AREAS / RDP/0806\_PP19\_S\_1\_2/Rev.00

## Appendix 2: An overview of anticipated development in Anglesey



## Appendix 3: Contents page from the 2014 Wylfa Newydd SPG

### Contents

<b>Foreword</b>	<b>4</b>
<b>1 Introduction</b>	<b>5</b>
1.1 The Wylfa New Nuclear Build Project	6
1.2 Purpose of this Supplementary Planning Guidance	9
1.3 Preparation of this Supplementary Planning Guidance	11
1.4 Structure of this SPG	16
<b>2 Policy Framework</b>	<b>18</b>
2.1 National Policy Statements	18
2.2 National Policy	19
2.3 Local Policy	19
<b>3 Vision and Objectives</b>	<b>25</b>
3.1 Vision	25
3.2 Objectives	27
<b>4 Project-Wide Guidance</b>	<b>40</b>
4.1 Economic Development	42
4.2 Tourism	51
4.3 Population and Community	55
4.4 Construction Worker Accommodation and Anglesey's Housing Market	63
4.5 Welsh Language and Culture	71
4.6 Transport	73
4.7 Utilities	77
4.8 Waste	79
4.9 Climate Change	83
4.10 Natural Environment	87
4.11 Historic Environment	93
4.12 Facilitating Development	95
4.13 Implementation and Monitoring	101

<b>5</b>	<b>Locational Guidance</b>	<b>102</b>
5.1	Main Wylfa NNB Site	105
5.2	Holyhead and Environs	110
5.3	Llangefni and Environs	119
5.4	Amlwch and Environs	126
5.5	A55/A5 Corridor	133
5.6	A5025 Corridor	141
5.7	Cemaes and Environs	146
5.8	Rest of Anglesey	153
	<b>List of Abbreviations</b>	<b>160</b>
	<b>Appendix A</b>	<b>162</b>