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## Sylwadau Dros y We / Representations via the Internet

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Rhif Sylw / Rep Id: **396**

Enw / Name: **Welsh Highland Railway (Mr Graham Farr) [254]**

Rhan: **POLISI TWR1**

Section: **POLICY TWR1**

Math / Type: **Cefnogi / Support**

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**Crynodeb o'r Sylw:**

Cefnogi

**Representation Summary:**

Support.

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**Sylw Llawn / Full Representation:**

Support.

**Newid(iadau) i'r Cynllun**

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**Change(s) to the Plan**

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**Profion Cadernid / Soundness Tests:** None

# Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **186**

Enw / Name: **Ellesmere Sand & Gravel Company Limited [2686]**

Rhan: **POLISI TWR1**

Section: **POLICY TWR1**

Math / Type: **Gwrthwynebu / Object**

## Crynodeb o'r Sylw:

Mae defnyddiau hamdden a thwristiaeth yn ddefnyddiau hyfw o dir sydd eisoes wedi'i ddefnyddio ar safleoedd cloddio mwynau y mae modd iddynt, unwaith y byddant wedi'u hadfer, ddarparu cyfleusterau megis cyfleusterau addysgol, llynnoedd pysgota, canolfannau chwaraeon dŵr, traciau beicio mynydd, beicio cwad, cyfleusterau gwifren uchel, cyfleoedd dringo creigiau, amffitheatr ar gyfer cyngherddau, cyfleoedd llety, gwersyllfeydd, cabanau coed a meysydd carafanau lle bo'n briodol. Bydd yr holl gyfleusterau uchod yn creu cyflogaeth ac yn cefnogi economïau gwledig a dylid eu cefnogi ar dir sydd eisoes wedi'i ddefnyddio yn yr ardal wledig. Diddymu cyfeiriad tuag at ffin datblygu. Caniatáu hyblygrwydd yn y policy ar gyfer defnyddiau terfynol amgen a hyfw o safleoedd mwynau.

## Representation Summary:

Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as educational facilities, fishing lakes, water sports centres, mountain biking tracks, quad biking, high wire facilities, rock climbing opportunities, amphitheatre for concerts, hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate. All the abovementioned facilities will create employment and support rural economies and should be supported on previously used land in the rural area.

Remove reference to development boundary. Allow scope and flexibility in the policy for alternative and viable end uses of mineral sites where appropriate

## Sylw Llawn / Full Representation:

Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as educational facilities, fishing lakes, water sports centres, mountain biking tracks, quad biking, high wire facilities, rock climbing opportunities, amphitheatre for concerts, hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate. All the abovementioned facilities will create employment and support rural economies and should be supported on previously used land in the rural area

## Newid(iadau) i'r Cynllun

Diddymu cyfeiriad tuag at ffin datblygu. Caniatáu hyblygrwydd yn y policy ar gyfer defnyddiau terfynol amge

## Change(s) to the Plan

Remove reference to development boundary. Allow scope and flexibility in the policy for alternative and viable end uses of mineral sites where appropriate

Profion Cadernid / Soundness Tests: x, viii

# Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **187**

Enw / Name: **Lafarge Tarmac Trading Limited [2735]**

Rhan: **POLISI TWR1**

Section: **POLICY TWR1**

Math / Type: **Gwrthwynebu / Object**

## Crynodeb o'r Sylw:

Mae defnyddiau hamdden a thwristiaeth yn ddefnyddiau hyfyw o dir sydd eisoes wedi'i ddefnyddio ar safleoedd cloddio mwynau y mae modd iddynt, unwaith y byddant wedi'u hadfer, ddarparu cyfleusterau megis cyfleusterau addysgol, llynnoedd pysgota, canolfannau chwaraeon dŵr, traciau beicio mynydd, beicio cwad, cyfleusterau gwifren uchel, cyfleoedd dringo creigiau, amffitheatr ar gyfer cyngherddau, cyfleoedd llety, gwersyllfeydd, cabanau coed a meysydd carafanau lle bo'n briodol. Bydd yr holl gyfleusterau uchod yn creu cyflogaeth ac yn cefnogi economïau gwledig a dylid eu cefnogi ar dir sydd eisoes wedi'i ddefnyddio yn yr ardal wledig. Diddymu cyfeiriad tuag at ffin datblygu. Caniatáu hyblygrwydd yn y policy ar gyfer defnyddiau terfynol amgen a hyfyw o safleoedd mwynau.

## Representation Summary:

Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as educational facilities, fishing lakes, water sports centres, mountain biking tracks, quad biking, high wire facilities, rock climbing opportunities, amphitheatre for concerts, hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate. All the abovementioned facilities will create employment and support rural economies and should be supported on previously used land in the rural area.

Remove reference to development boundary. Allow scope and flexibility in the policy for alternative and viable end uses of mineral sites where appropriate

## Sylw Llawn / Full Representation:

Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as educational facilities, fishing lakes, water sports centres, mountain biking tracks, quad biking, high wire facilities, rock climbing opportunities, amphitheatre for concerts, hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate. All the abovementioned facilities will create employment and support rural economies and should be supported on previously used land in the rural area

## Newid(iadau) i'r Cynllun

Diddymu cyfeiriad tuag at ffin datblygu. Caniatáu hyblygrwydd yn y policy ar gyfer defnyddiau terfynol amge

## Change(s) to the Plan

Remove reference to development boundary. Allow scope and flexibility in the policy for alternative and viable end uses of mineral sites where appropriate

### **Policy TWR1: Visitor Attractions and Facilities**

Bourne Leisure objects to Policy TWR1 as it does not provide sufficient flexibility to improve and extend the standard of existing facilities that are located outside the development boundary. Policy TWR1 should not be applicable to visitor attractions and facilities that are already located outside the development boundary.

The policy does not acknowledge that a considerable amount of existing visitor attractions and facilities, such as Hafan y Môr and Greenacres holiday parks are already located outside the development boundary. Continued redevelopment / reconfiguration of holiday accommodation is required in order maintain a product that meets visitors' expectations. Significant investment is required to maintain and enhance the viability and attractiveness of existing operations as a destination, to improve their "offer" and to respond to changing markets, including the improvement of guest facilities and sport and leisure areas.

Policy TWR1 as currently drafted does not provide a positive policy basis for the sustainable redevelopment/reconfiguration of existing tourist accommodation/facilities. Bourne Leisure would like to stress that not all development has the potential to negatively impact on key landscape, public views and open spaces. For example, a number of Bourne Leisure's recent developments and current proposals have rationalised caravan plots and / or reconfigured site layouts, resulting in improved public views, positive impacts on the landscape and the provision of enhanced planting and open space.

Bourne Leisure objects to point 4 of Policy TWR1 as it does not take into account that some tourism sites are located in rural areas where no public transport exists. Bourne Leisure considers that TWR1 as currently drafted is unsound as it is not in accordance with national policy. TAN18: Transport (March 2007) specifically acknowledges that some tourist developments rely on car-based travel and advises:

*"...in rural areas a lack of public transport access needs to be balanced against the contribution tourism makes to the rural economy in the specific area..." (paragraph 3.15)*

Policy TWR1 should therefore be redrafted to allow for the sensitive redevelopment/reconfiguration/expansion of tourist accommodation that fall outside the settlement boundary, providing that commensurate mitigation measures (for example, the inclusion of a buffer zone and appropriate landscaping) can be implemented to mitigate both direct and indirect impacts.

## Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **457**

Enw / Name: **Bourne Leisure Ltd [2768]**

Rhan: **POLISI TWR1**

Section: **POLICY TWR1**

Math / Type: **Gwrthwynebu / Object**

### Crynodeb o'r Sylw:

Dylid ail ysgrifennu Polisi TWR1 i ganiatau ailddatblygiad/ailwampio/ estyniad i lety ymwelwyr sydd tu allan i ffiniau datblygu, cyn belled y gellir gweithredu mesurau lliniaru cyfatebol (er enghraifft cynnwys parth rhagod a thirweddu addas) er mwyn lleihau ardrawiadau uniongyrchol ac anuniongyrchol.

### Representation Summary:

Policy TWR1 should therefore be redrafted to allow for the sensitive redevelopment/reconfiguration/expansion of tourist accommodation that fall outside the settlement boundary, providing that commensurate mitigation measures (for example, the inclusion of a buffer zone and appropriate landscaping) can be implemented to mitigate both direct and indirect impacts.

### Sylw Llawn / Full Representation:

Bourne Leisure objects to Policy TWR1 as it does not provide sufficient flexibility to improve and extend the standard of existing facilities that are located outside the development boundary. Policy TWR1 should not be applicable to visitor attractions and facilities that are already located outside the development boundary.

The policy does not acknowledge that a considerable amount of existing visitor attractions and facilities, such as Hafan y Môr and Greenacres holiday parks are already located outside the development boundary. Continued redevelopment / reconfiguration of holiday accommodation is required in order maintain a product that meets visitors' expectations. Significant investment is required to maintain and enhance the viability and attractiveness of existing operations as a destination, to improve their "offer" and to respond to changing markets, including the improvement of guest facilities and sport and leisure areas.

Policy TWR1 as currently drafted does not provide a positive policy basis for the sustainable redevelopment/reconfiguration of existing tourist accommodation/facilities. Bourne Leisure would like to stress that not all development has the potential to negatively impact on key landscape, public views and open spaces. For example, a number of Bourne Leisure's recent developments and current proposals have rationalised caravan plots and / or reconfigured site layouts, resulting in improved public views, positive impacts on the landscape and the provision of enhanced planting and open space.

Bourne Leisure objects to point 4 of Policy TWR1 as it does not take into account that some tourism sites are located in rural areas where no public transport exists. Bourne Leisure considers that TWR1 as currently drafted is unsound as it is not in accordance with national policy. TAN18: Transport (March 2007) specifically acknowledges that some tourist developments rely on car-based travel and advises: "...in rural areas a lack of public transport access needs to be balanced against the contribution tourism makes to the rural economy in the specific area..." (paragraph 3.15)

Policy TWR1 should therefore be redrafted to allow for the sensitive redevelopment/reconfiguration/expansion of tourist accommodation that fall outside the settlement boundary, providing that commensurate mitigation measures (for example, the inclusion of a buffer zone and appropriate landscaping) can be implemented to mitigate both direct and indirect impacts.

### Newid(iadau) i'r Cynllun

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### Change(s) to the Plan

Policy TWR1 should therefore be redrafted to allow for the sensitive

## Sylwadau Dros y We / Representations via the Internet

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redevelopment/reconfiguration/expansion of tourist accommodation that fall outside the settlement boundary, providing that commensurate mitigation measures (for example, the inclusion of a buffer zone and appropriate landscaping) can be implemented to mitigate both direct and indirect impacts.

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**Profion Cadernid / Soundness Tests:** iv, viii



For office use only:

Representor No.

Date received:

Date acknowledged:

**Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026  
Representation Form**

**Data Protection**

How your representation and the information that you give us will be used. All information submitted will be seen in full by the Joint Planning Policy Unit staff dealing with the Joint Local Development Plan (Joint LDP). Your name and comments as set out in your representation form will be published together with the Councils' response. This helps to show that the consultation was carried out properly. Please note that this form may also be made available to any Public Examination on the Joint LDP.

We would prefer that you submit your representations directly online. Alternatively, an electronic version of this form can be completed online at [www.gwynedd.gov.uk/ldp](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp) Separate forms should be completed for each comment that you wish to make.

Additional representation forms can be obtained from the Joint Planning Policy Unit on 01286 685003 or may be downloaded from the Council's web site at: [www.gwynedd.gov.uk/ldp](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp) or you may photocopy this form. When making comments please use additional sheets as required clearly numbering each consecutive sheet.

**PART 1: Contact details**

	Your details/ Your client's details	Agent's details (if relevant)
Name	Sarah Fox	
Address	Harizon Nuclear Power [REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	
Email address	[REDACTED]	

### Guidance Note.

Please set out your comments in Part 2 of this form. Use additional sheets of paper where necessary. **Separate forms should be completed for each comment** that you wish to make.

**Question 2dd and 2e** seeks your views on the soundness of the Joint Deposit Plan. The tests of soundness and additional information on how they are applied are detailed on the last page of this form.

If you want changes made to the Deposit Plan, please be as specific as you can. For example, if you want new text added, please set out the new text and explain where you would like it to go in the Deposit Plan and why. Similarly, if you want to add a new or amend a policy or a paragraph, please set out clearly the new text and explain where you think it should go in the Deposit Plan and why.

If you wish to delete a site that is allocated in the Deposit Plan or suggest amendments to it or you wish to propose a new site, please attach a 1:1250 or 1:2500 scale plan that clearly identifies the site boundaries. If you are proposing a new site (one that is not included within the Deposit Plan) the comment form must be accompanied by a detailed site assessment in accordance with the Council's Candidate Site assessment methodology and the Sustainability Appraisal framework. The Candidate Site assessment methodology and the Sustainability Appraisal framework can be found on the Council's website at: [www.gwynedd.gov.uk/ldp](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp)

Further information about this matter can be obtained from the Joint Planning Policy Unit on **01286 685003** or on the Council's web site at: [www.gwynedd.gov.uk/ldp](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp) in the leaflet 'Guidance about alternative sites'.

Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant Sustainability Appraisal information. This information must be consistent with the scope and level of detail of the Sustainability Appraisal conducted by the Authority. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site.

You should include all your comments on the Deposit Plan and set out your full case on the official form, using accompanying documents where necessary. If you seek more than one change and consider that the Deposit Plan fails to meet more than one test of soundness **separate forms should be completed for each representation**. Similarly, if your representation is in support of the Deposit Plan or individual elements of the Deposit Plan it would be helpful if separate representations were made. Please indicate if you are submitting other material to support your comments.

You will only be able to submit further information to the Examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you have made in response to previous consultations. If you do not consider the Deposit Plan to be sound and that it should be changed, please explain clearly why you think the changes are needed. If you think a change is needed for the Deposit Plan to meet one or more of the tests of soundness, please tell us which one(s).

**Where a group shares a common view on how it wishes the Deposit Plan to be changed, the Councils will accept a signed petition.** In submitting a representation form on behalf of a group, the representation form should include the contact details of a lead individual at Section 1 and the comments should be clearly set out on the representation form. The signed petition should state clearly how many people are being represented and how the representation has been authorised. Signing a petition does not prevent the submission of individual forms.



**PART 2: Your Comments and Suggested Changes.** (Please use one Part 2 section for each comment that you wish to make)

<b>2a. Which part of the Deposit Plan are you commenting on?</b>	
Policy number (please specify)	Please see attached table of representations
Paragraph number (please specify)	" "
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	

<b>2b. Are you objecting or supporting the Deposit Plan?</b>			
Objecting	<input checked="" type="checkbox"/>	Supporting	<input type="checkbox"/>

<b>2c. Please provide details of your representation on the Deposit Plan.</b>
<p>Please see attached table of representations.</p> <p style="text-align: right; margin-top: 200px;">Please use additional sheet if necessary. Please state how many additional sheets have been used.....</p>

2ch. If your response to 2c above exceeds 100 words, please provide a summary (no more than 100 words).

2d. Please detail the changes you wish to see made to the Deposit Plan.

Please see attached table of representations.

2dd. Is the Deposit Plan sound?

Yes  No

2e. If you think that the Deposit Plan is unsound which test of soundness do you think that it fails? (Please tick below). More details are provided at the back of this form.

Procedural				Consistency				Coherence & Effectiveness											
P1	<input type="checkbox"/>	P2	<input type="checkbox"/>	C1	<input checked="" type="checkbox"/>	C2	<input checked="" type="checkbox"/>	C3	<input type="checkbox"/>	C4	<input type="checkbox"/>	CE 1	<input checked="" type="checkbox"/>	CE 2	<input checked="" type="checkbox"/>	CE 3	<input type="checkbox"/>	CE 4	<input checked="" type="checkbox"/>

**Part 3: What Happens Next?**

At this stage of the Joint LDP process, you can only make comments in writing (these are called 'written representations'). However, the Inspector may call on those who want to change the Plan to appear and speak to the Inspector at a 'hearing session' during the Public Examination. You should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session.

**3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick one of the following)**

I do not want to speak at a hearing session and am happy for my written comments to be considered by the Inspector.



I want to speak at a hearing session.



**3b. If you wish to speak, please confirm which part of your representation you wish to speak to the Inspector about and why you consider it to be necessary to speak at the Hearing.**

All in particular PSS PS9 and proposed new sub policies in PS9. The JLDP needs to enable a coherent decision making framework to support and control significant elements of the Wylfa Newydd Project.

**3c. Would you like to be informed about the following (Please tick the relevant boxes)**

Submission of documents and evidence to the examination



Publish Inspector's report



Plan's adoption



**If additional documents have been provided to support your representations, please list below:**

Covering letter

Representation form

Table of Representations

Proposed Wylfa Newydd Project policy framework

Signed:



Dated:

31-03-15

**THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN**

*Please do not forget to enclose any relevant documentation (e.g. a Sustainability Appraisal) with this form.*

Completed representation forms should be returned to the Joint Planning Policy Unit at:

**ONLINE** – By completing the electronic form at [www.gwynedd.gov.uk/ldp](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp)

**BY EMAIL** – [planningpolicy@gwynedd.gov.uk](mailto:planningpolicy@gwynedd.gov.uk)

**BY POST** – By sending to: Joint Planning Policy Unit, 1<sup>st</sup> Floor, Bangor City Council Offices, Ffordd Gwynedd, Bangor, Gwynedd LL57 1DT

**REPRESENTATION FORMS SHOULD BE RETURNED BY NO LATER THAN 5.00pm on the 31<sup>st</sup> March 2015  
REPRESENTATIONS RECEIVED AFTER THIS TIME WILL NOT BE CONSIDERED**

## Test of Soundness

Test	Procedural Tests
P1	It has not been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme.
P2	The plan and its policies have not been subjected to Sustainability Appraisal including Strategic Environmental Assessment.
	<b>Consistency Tests</b>
C1	It is a land use plan which does not have regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
C2	It does not have regard to national policy.
C3	It does not have regard to the Wales Spatial Plan.
C4	It does not have regard to the relevant community strategy.
	<b>Coherence and Effectiveness Tests</b>
CE1	The plan does not set out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is not compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are not realistic and appropriate having considered the relevant alternatives and/or are not founded on a robust and credible evidence base.
CE3	There are no clear mechanisms for implementation and monitoring.
CE4	It is not reasonably flexible to enable it to deal with changing circumstances.

The Planning and Compulsory Purchase Act 2004 states that the purpose of the examination of a Local Development Plan (the Plan) is to consider whether it is "sound". This means that anyone who wants to comment on or object to the Deposit Plan should seek to say how it is unsound and what is needed to make it sound. Sound may be considered in this context within its ordinary meaning of "*showing good judgement*" and "*able to be trusted*". To assess the Deposit Plan we use 10 tests as set out above. The Deposit Plan will be examined by an independent Inspector appointed by the Welsh Government and it will be the Inspector's job to consider whether the Plan is sound.

Where you propose a change to the Deposit Plan you should therefore make clear which test(s) of soundness you believe the Deposit Plan fails. The tests are in 3 groups - 'Procedural' (2 tests); 'Conformity' (4 tests); and 'Coherence and Effectiveness' (4 tests). If you wish to comment on the way in which the Councils have prepared the Deposit Plan, it is likely that your comments or objections would fall under one of the procedural tests. If you wish to comment on or object to the content of the Deposit Plan, it may help to look at the 'consistency' and the 'coherence and effectiveness' tests.

# HORIZON

NUCLEAR POWER

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## **Joint Local Development Plan Anglesey & Gwynedd (2011-2026) Deposit Plan (2015)**

*Horizon Nuclear Power - Proposed Wylfa Newydd Project Policy  
Framework*

DCRM Ref Number: HNP-S5-PAC-REP-00037

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Horizon Nuclear Power – Table of Representations – JLDP	HNP-S5-PAC-REP-00037	Issue date: 31.03.15

## **Proposed Wylfa Newydd Project Policy Framework**

### **1. New Strategic Objective**

SO[x] support and capitalise on the development of the Wylfa Newydd Project and associated development to maximise socio-economic opportunities for local business and sustainable employment opportunities for local people including providing for a suitable network of Wylfa Newydd Project-related associated development sites while ensuring that adverse effects of the Wylfa Newydd Project on the local communities are appropriately avoided, or mitigated and where appropriate legacy benefits are provided.

### **2. Amendments to PS9**

#### **STRATEGIC POLICY PS9: WYLFA NEWYDD PROJECT ASSOCIATED DEVELOPMENT**

In their role either as determining authorities for associated development, or as consultees for the DCO application and applications to other bodies, and within the provisions of national policy, when assessing and responding to emerging proposals for Wylfa Newydd and its associated development, the Councils will seek to ensure compliance, where appropriate or relevant, with the following criteria:

1. Policies WNP1, WNP2, WNP3 and WNP4, and any relevant supplementary planning guidance should shape the approach to the development of the nuclear power station and any associated development; and any other relevant policies included in the Plan should also be taken into consideration except to the extent they contradict or are otherwise inconsistent with Policies WNP1, WNP2, WNP3 and WNP4
2. In order to minimise impact and maximize re-use of existing facilities and materials, opportunities have been taken where feasible to integrate the requirements of the Wylfa Newydd Project with the proposed decommissioning of the existing power station; and
3. Highways and transport proposals for the Wylfa Newydd Project form part of the integrated traffic and transport strategy that has regard to Strategic Policy PS4 and any relevant detailed Policies in the Plan and minimizes adverse transport impacts to an acceptable level, including those arising during the construction, and operation stages. Proposals should where feasible make a positive contribution to transportation policy objectives in the locality, and should where practicable include multi-modal solutions and investment that encourages travel by public transport, walking and cycling; and
4. The accommodation requirements of construction workers should be met in a way that minimizes impact on the local housing market, including the ability of those on low incomes to access the private rented sector, affordable housing and other housing services, or not result in unacceptable adverse economic, social, linguistic or environmental impacts. Proposals should form part of a robust construction workers accommodation strategy that conforms to the detailed provisions of policies WNP2 - *Large Scale Temporary Construction Worker*

Horizon Nuclear Power – Table of Representations – JLDP	HNP-S5-PAC-REP-00037	Issue date: 31.03.15

*Accommodation and WNP3 - Temporary Construction Worker Accommodation; and*

5. The siting and design of associated development should conform to the detailed provisions of Policies WNP1 - *Siting for Associated Development*, WNP2 - *Large Scale Temporary Construction Worker Accommodation* and WNP3 - *Temporary Construction Worker Accommodation*, as appropriate and 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,. Where appropriate, delivery plans should be agreed for legacy uses during the pre-application process that will inform the approach to the design and layout of the associated development sites, as well as the framing of a S106 and/or other agreements and CIL payments (if applicable); and
6. The scheme layout and design and the scale of green infrastructure proposed should avoid, minimise mitigate or compensate for visual, landscape and ecological impacts on the local and wider area, as well as on cultural and historic aspects of the landscape, both in the short and longer term. Proposals will be expected to be commensurate with the scale of the development, and the extent of its impact; and
7. Any proposal for development including all associated development, must be screened in accordance with the Conservation of Habitat and Species Regulations (2010) as amended and where required be accompanied by an appropriate assessment; and
8. The promoter's procurement, employment, education, training and recruitment strategies and delivery plans should be agreed with the Council at an early stage of project development, with an objective to maximize employment, business and training opportunities for the local communities both in the short and longer term; and
9. Where there would be additional impacts or demands on existing community facilities the Council will seek either provision of additional facilities or appropriate contributions for development or upgrading of existing facilities. Legacy use of any additional facilities provided should be considered where that is appropriate; and
10. Proposals should include appropriate measures for promoting social cohesion and community safety;

### **3. New Sub-Policy to PS9**

#### **WNP1: SITING FOR ASSOCIATED DEVELOPMENT**

In general, non residential associated development proposals (such as employment, logistics, transport, visitor facilities, education and training) relating to the Wylfa Newydd Project and its supply chain will be supported in principle where they comply with national and local policy on flood risk, employment and transport, including site allocations and conversions of existing buildings within Policy CYF1. Where development is proposed outside designated employment and transport sites, the proposals should be supported by an assessment of options that robustly demonstrates the suitability of the proposed site, covering:

- The appropriate level of flood risk assessment

Horizon Nuclear Power – Table of Representations – JLDP	HNP-S5-PAC-REP-00037	Issue date: 31.03.15

- Details of how the site meets operational requirements and integrates with the transport strategy for the Wylfa Newydd Project, promoting sustainable travel options as appropriate
- An overview of environmental considerations relating to the site options that have been considered, with the aim of illustrating how adverse environmental effects have sought to be avoided
- The degree of integration with the closest communities, taking account of the potential for beneficial long-term uses or, if temporary development is proposed, legacy uses

In responding to proposals for the siting of non-residential development associated with, ancillary or related to the Wylfa Newydd Project, where the Councils are decision makers, the degree to which the planning application achieves the outcomes set out at (a) to (e) below will be taken into consideration:

- Delivery of education, training and indirect employment opportunities related to the Project that are well connected to both the nuclear power station and the local community, offering access by public transport, walking and/or cycling, as appropriate
- The avoidance, minimisation and, if appropriate, mitigation of adverse impacts on the transport network arising from the movement of people, goods and services, including multi-modal transport solutions and measures to encourage travel by public transport, walking and cycling. Highway safety for all users should be maintained and, where necessary, improved
- The avoidance, minimisation and, if appropriate, mitigation of any adverse impact on the natural and historic environment assets including sites of international, national, regional and local importance and their setting in line with national policy
- High quality design that demonstrably seeks to minimise any adverse visual and landscape character impact of the proposals on the surrounding area and in views from nearby settlements; as well as protecting and, where practicable, enhancing biodiversity through networks of green/blue infrastructure
- The avoidance, minimisation, and if appropriate, mitigation of any adverse impact on local community cohesion, health and Welsh language and culture

#### **4. New Sub-Policy to PS9**

##### **WNP2 - LARGE SCALE TEMPORARY CONSTRUCTION WORKER ACCOMMODATION**

In general, proposals for new large-scale temporary construction worker accommodation for the Wylfa Newydd Project will be supported in principle as one aspect of a comprehensive worker accommodation strategy. This type of accommodation should form only one part of the overall solution to meeting the requirements of the construction workforce.

Development proposals of this scale will be considered acceptable in principle within the employment land allocations of the Plan (Policy CYF1).

Where development is proposed outside designated employment sites, the proposals should be supported by an assessment of options that robustly demonstrates the suitability of the proposed site, covering:



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- The appropriate level of flood risk assessment
- Details of how the site integrates with the transport strategy for the Wylfa Newydd Project, promoting sustainable travel options as appropriate
- An overview of environmental considerations relating to the site options that have been considered, with the aim of illustrating how adverse environmental effects have sought to be avoided
- Degree of integration with the closest communities, taking account of the potential for beneficial long-term legacy uses

In responding to proposals for the siting of new large-scale temporary construction worker accommodation for the Wylfa Newydd Project, where the Councils are decision makers, the degree to which the planning application achieves the outcomes set out at (a) to (h) below will be taken into consideration:

- (a) The proposals include the delivery of sufficient communal leisure and recreational facilities to meet the needs of the proposed occupants
- (b) Where the proposal would result in impacts or additional demands on existing community facilities, including retail outlets and healthcare provision, either additional facilities or appropriate contributions for the development or improvement of off-site facilities, will be provided
- (c) Ensuring access to sustainable transport linkages between temporary construction worker accommodation locations and key destinations, including the Power Station Site, retail, leisure and healthcare facilities
- (d) Provision of necessary improvements to the transport network to mitigate against any adverse impacts on the community and visitors related to congestion, air quality and road safety
- (e) The avoidance, minimisation and, if appropriate, mitigation of adverse impact on the natural and historic environment assets, including sites of international, national, regional and local importance and their setting in line with national policy
- (f) High quality design that demonstrably seeks to minimise any adverse visual and landscape character impact of the proposals on the surrounding area and in views from nearby settlements; as well as protecting and, where practicable, enhancing biodiversity through networks of green/blue infrastructure
- (g) The avoidance, minimisation, and if appropriate, mitigation of any adverse impact on local community cohesion, health and Welsh language and culture
- (h) The buildings and facilities can be adapted for future legacy use or where not feasible or appropriate the buildings and facilities will be removed either leaving the land serviced and in a neat and tidy condition or returned to its original state as agreed with the Council

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## 5. New Sub-Policy to PS9

### WNP3 - TEMPORARY CONSTRUCTION WORKER ACCOMMODATION

In general, proposals for new build accommodation or converting existing vacant or under-used premises and buildings into accommodation suitable for the temporary construction workforce for the Wylfa Newydd Project will be supported in principle. This type of accommodation should form only one part of the overall solution to meeting the requirements of the transient element of the construction workforce. Development proposals of this type will be considered acceptable in principle in the settlement boundaries defined within the Plan, provided that the scale of development proposed takes account of the hierarchy of settlements within the Plan area.

In responding to proposals for the provision of accommodation for the transient construction workforce associated with the Wylfa Newydd Project, where the Councils are decision makers, the degree to which the planning application achieves the outcomes set out at (a) to (k) below will be taken into consideration:

- (a) Enabling accommodation proposals in a range of locations, principally related to the Centres and Service Villages identified within the Plan's Settlement Hierarchy, where there is greater access to services and public transport and the greatest potential for integration as part of the Plan's Spatial Strategy
- (b) It is proportionate in scale to the Centres and Service Villages
- (c) Ensuring access to sustainable transport linkages between accommodation locations and the nuclear power station construction areas
- (d) Offering access by public transport, walking or cycling to sufficient community facilities, including retail outlets, healthcare, sports and leisure facilities. Where the proposal would result in impacts or additional demands on existing community facilities, either additional facilities or appropriate contributions for the development or improvement of off-site facilities will be provided
- (e) Avoiding a significant adverse effect on the housing market, including the ability of those on low incomes to access the private rented sector, affordable housing and other housing services. Proposals to provide for temporary construction workforce accommodation should, wherever possible, make a positive contribution to the long term affordable housing objectives of the Councils
- (f) Avoiding an unreasonable adverse effect on the tourism market, including the ability of accommodation providers to meet peak tourist demand. Proposals to provide for construction workforce accommodation should, in appropriate locations supported by the tourism strategy for the Plan area, be designed to enable conversion to tourism accommodation once no longer required for the workforce
- (g) Accommodation should contribute to creating a mixed, inclusive and sustainable community and does not result in a disproportionate concentration of this type of use in the local area, or harm to the residential amenity of the surrounding area

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- (h) The avoidance, minimisation and, if appropriate, mitigation of adverse impact on the natural and historic environment assets, including sites of international, national, regional and local importance and their setting in line with national policy
- (i) High quality design that demonstrably seeks to minimise any adverse visual and landscape character impact of the proposals on the surrounding area and in views from nearby settlements; as well as protecting and, where practicable, enhancing biodiversity through networks of green/blue infrastructure
- (j) The avoidance, minimisation and, if appropriate, mitigation of any adverse impact on local community cohesion, health and Welsh language and culture
- (k) The buildings and facilities can be adapted for future legacy use or where not feasible or appropriate the buildings and facilities will be removed either leaving the land serviced and in a neat and tidy condition or returned to its original state as agreed with the Council

## 6. New Sub-Policy to PS9

### WNP4 - EARLY WORKS

The urgent national need set out in national policy for new nuclear generation is recognised and site preparation works and offsite early works to enable the provision of the Wylfa Newydd Project as soon as possible will be supported in principle. Any such proposals will need to demonstrate:

- they are either necessary to enable the timely delivery, of the Wylfa Newydd Project or are measures to provide mitigation to potentially adverse effects; and
- if the Wylfa Newydd Project does not come forward, the sites can be restored or reinstated or will provide a beneficial legacy

**HORIZON**

NUCLEAR POWER

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**Joint Local Development Plan Anglesey & Gwynedd  
(2011-2026) Deposit Plan (2015)**

*Horizon Nuclear Power – Table of Representations*

DCRM Ref Number: HNP-S5-PAC-REP-00036

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**Horizon**  
**Representations on the JLDP – 31 March 2015**

**1. INTRODUCTION**

- 1.1 Horizon Nuclear Power Wylfa Limited ("**Horizon**") appreciates the opportunity to comment on the Isle of Anglesey and Gwynedd councils ("**Councils**") Joint Local Development Plan ("**JLDP**" or "**Plan**") proposals.
- 1.2 Horizon is intending to construct and operate a new nuclear power station ("**Wylfa Newydd**") at Wylfa, to the west of Cemaes, and immediately south of the existing Magnox power station on Anglesey. Other development (termed "associated development"<sup>1</sup>) to support the power station will be located on a number of additional sites on Anglesey (and possibly in Gwynedd).
- 1.3 Wylfa Newydd and the associated development ("**Wylfa Newydd Project**" or "**the Project**") represents a multi-billion pound investment and it will not only provide secure low carbon electricity for many decades, but will create significant long-term employment opportunities and economic benefits for Anglesey, Gwynedd and North Wales. Horizon has recently closed its first round of pre-application public consultation ("**PAC1**") on the Wylfa Newydd Project; and a further round of pre-application public consultation ("**PAC2**") will be held as the Wylfa Newydd Project develops. PAC1, among other things, asked for feedback on site selection for much of its associated development.
- 1.4 Horizon is therefore fully invested in the future of Anglesey and wants to work with the Councils to ensure the JLDP proposals appropriately balance recognition and support for the Wylfa Newydd Project with the communities' needs.
- 1.5 Horizon has agreed with the Councils that given the nature of its responses these have been provided in a tabular form rather than entirely within the designated responses form. This executive summary addresses a number of overarching points and key comments in addition to the detailed written representations and also signposts the areas where Horizon has the most concern.

**2. LACK OF SUPPORT FOR THE WYLFA NEWYDD PROJECT AND INCONSISTENCY WITH THE WYLFA SPG**

- 2.1 Horizon's overriding concern is the lack of overt support in the JLDP for the Wylfa Newydd Project.
- 2.2 The Horizon PAC1 documents summarised and demonstrated the significance of the Wylfa Newydd Project both nationally and for Anglesey. The Wylfa Newydd Project is a £10 billion pound investment. Horizon expects this is one of the biggest – if not the biggest - energy investment in Wales.

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<sup>1</sup> Section 115(2) of the Planning Act 2008 gives the term "associated development" a very narrow and specific meaning in Wales. Horizon recognises this, however in its pre-application materials, and the Councils in the JLDP have chosen to use the term with a wider meaning akin to how it is used in England.

- 2.3 This lack of clear statement in support of the Wylfa Newydd Project is not consistent with the Isle of Anglesey County Council's ("**IACC**") recently introduced *New Nuclear Build at Wylfa: Supplementary Planning Guidance - Adopted July 2014* ("**Wylfa SPG**"). The Wylfa SPG recognises in numerous places the potential for the Wylfa Newydd Project to transform the Anglesey and North Wales economy and notes that the Project will be a fundamental driver for economic growth.
- 2.4 The JLDP does not contain corresponding statements expressing such support.
- 2.5 Inconsistencies between the JLDP and the Wylfa SPG need to be avoided as while the Wylfa SPG was produced first, the SPG cannot create new policy.

### 3. **INSUFFICIENT REGARD HAD TO THE NPS**

- 3.1 Horizon is concerned that the JLDP does not give due regard to the Overarching National Policy Statement for Energy ("**NPS EN-1**") and National Policy Statement for Nuclear Power Generation ("**NPS EN-6**"). Discussion of this is limited to four paragraphs in chapter 3 (Policy Context) of the JLDP.<sup>2</sup>
- 3.2 The new single consent regime for Nationally Significant Infrastructure Projects ("**NSIPs**") will operate alongside the town and country planning regime. Although the two regimes are legally distinct, there are close interactions between them. This is recognised to a degree in the JLDP paragraph 3.9 which states that:

3.9 Although the main objective of National Policy Statement is to provide guidance to the Planning Inspectorate to make decisions on relevant major projects, the process of preparing the Plan must address these fully and interpret them when preparing any relevant policies.

- 3.3 Horizon considers however that the JLDP does not go on to give effect to this; the JLDP does not fully reflect the importance of the National Policy Statements ("**NPSs**") in plan making and decision taking. Horizon notes that the Planning Inspectorate ("**PINS**") has recently released an updated Advice Note 2 which Horizon now draws to the Councils' attention (recognising that the Councils would not have had an opportunity consider this given the timing of this JLDP consultation).
- 3.4 Advice note 2 provides direction on how local planning authorities should engage with NSIPs coming forward in their areas. In respect of plan making it provides:

3.4 For very large NSIP projects that are likely to have wide-ranging impacts, some local authorities have prepared a Supplementary Planning Document (SPD). It is for a local authority to decide whether this would be a good use of their resources. If so, **the local authority will need to ensure that any SPD is in accordance with any relevant National Policy Statement(s) (NPS)**. If

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<sup>2</sup> Paragraphs 3.7 to 3.10. There are a number of mentions of the NPSs in paragraph 7.3 "Managing Growth and Development - Economy and Regeneration" but limited additional analysis. National Policy Statements (but not NPS EN-6) are referred to in strategic policies PS8 and PS9 but again the framework is only referred to rather than considered.

there is any conflict between a designated NPS and any local planning document, the policies in the NPS will prevail.

(Our emphasis)

- 3.5 This Advice Note builds on earlier direction by Department for Communities and Local Government ("**DCLG**") that local planning authorities must have regard to NPSs when preparing their plans.<sup>3</sup>
- 3.6 Horizon notes that:
- 3.6.1 NPS EN-1 details the challenges facing the UK energy sector in relation to energy security and the Government's carbon reduction objectives<sup>4</sup>.
- 3.6.2 A key issue identified in NPS EN-1 is the anticipated closure of existing generation capacity on environmental grounds and as a result of ageing power stations. NPS EN-1 states that at least 22GW (about a quarter) of existing electricity generating capacity will need to be replaced in the coming years<sup>5</sup>. This makes the need for investment in new generating capacity urgent<sup>6</sup>.
- 3.6.3 NPS EN-1 identifies that the UK needs secure, diverse and reliable supplies of electricity in the context of the need to reduce its greenhouse gas emissions by at least 80% by 2050 (under the Climate Change Act 2008). This means that much of the new electricity generating capacity within the UK must be low-carbon. Consequently, substantial investments in new, low-carbon generating technologies will be required.
- 3.6.4 NPS EN-6<sup>7</sup> states that the decision-maker should "*assess applications for new nuclear power stations on the basis that the need for such infrastructure has been demonstrated*". For these reasons, consultation on the Wylfa Newydd Project proceeds on the basis that the need for the Wylfa Newydd Project is settled.
- 3.6.5 NPS EN-6 identifies the Wylfa NPS Site as a location that is potentially suitable for the deployment of a new nuclear power station by the end of 2025<sup>8</sup>. This was the result of a comprehensive Strategic Siting Assessment undertaken by DECC to assess the suitability of the Wylfa NPS Site (and other sites) for a nuclear power station development.
- 3.6.6 In addition, Wylfa is identified within the National Infrastructure Plan 2013 as a 'Top 40 priority infrastructure investments' energy project<sup>9</sup>. Each of the priority investments has been selected because it makes a crucial

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<sup>3</sup> Refer to the DCLG Letter to Chief Planning Officers dated 9 November 2009.

<sup>4</sup> Paragraphs 3.3.2 – 3.3.34, EN-1.

<sup>5</sup> Paragraph 3.3.7, EN-1.

<sup>6</sup> Paragraph 3.3.15, EN-1.

<sup>7</sup> Paragraph 2.2.1.

<sup>8</sup> Paragraph 2.3.2, EN-6.

<sup>9</sup> Table 5D, page 80, National Infrastructure Plan 2013.

contribution to the achievement of the government's strategic objectives for that sector<sup>10</sup>. The Wylfa Newydd Project is recognised as one of the two most advanced nuclear projects in the UK, which therefore has the ability to 'set the path' for other projects in the Government's civil nuclear strategy<sup>11</sup>.

3.6.7 Essentially, NPS EN-1 and NPS EN-6 conclude that the urgent need for new nuclear power generation has already been settled and that the Wylfa NPS Site is potentially suitable as a location for a new nuclear power station.

3.7 It is within this framework that Horizon considers that the JLDP has insufficient regard to the NPS.

#### 4. **JLDP OVERLY RESTRICTIVE IN RELATING TO ASSOCIATED DEVELOPMENT**

4.1 Horizon is concerned that the JLDP does not create a coherent policy regime to support and control significant elements of the Wylfa Newydd Project; while the power station itself is an NSIP and will be consented under the Planning Act 2008, a lot of development will need to come forward under the Town and Country Planning Act 1990 ("**TCPA**") regime as it comprises associated development.

4.2 Horizon is concerned that the policy framework proposed in the JLDP does not coherently manage this associated development and does not provide sufficient flexibility to support the Wylfa Newydd Project. (Specific issues are identified in the detailed representations.)

4.3 Again Advice Note 2 is clear in terms of PINS's expectations, stating at paragraph 3.4:<sup>12</sup>

3.4 [...] Local authorities should also be careful not to undermine the purpose and effectiveness of the developer's pre-application consultation by being too prescriptive in any emerging SPD or local planning policy. For example, by severely curtailing the choice of options for the location of associated development so as to undermine the purpose of the pre-application consultation. Local authorities should engage early with developers of NSIPs before and during the drafting stage of any SPD that is likely to affect an NSIP that the SoS has been notified about.

4.4 The JLDP in its current form is too prescriptive and does not accord with the options and areas of search Horizon has consulted on in PAC1. Horizon's detailed representations provide further specific examples and issues.

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<sup>10</sup> Paragraph 5.17, National Infrastructure Plan 2013.

<sup>11</sup> Page 54, National Infrastructure Plan 2013.

<sup>12</sup> While this refers specifically to Supplementary Planning Documents it is clearly highly relevant to the preparation of the JLDP.



## 5. WYLFA POLICY - FRAMEWORK

- 5.1 Horizon considers that the size, timing (in term of project length), and national context of the Project justify a clear suite of Wylfa specific policies which constitute the primary policies for the Project. This will reduce uncertainty for all parties – the Councils, Horizon and the local community – as to what policies the Councils will apply in responding to the Development Consent Order ("**DCO**") application and when determining planning applications for associated development.
- 5.2 Such policies can build in appropriate flexibility for Horizon while ensuring the Councils retain a clear policy framework against which associated development applications can be assessed. It would need to be made clear in the JLDP were the Wylfa policy had greater weight or created exceptions to other JLDP policies.
- 5.3 Horizon has proposed drafting to address these matters in its detailed written representations being new policies WNP1, WNP2, WNP3, and WNP4 ("**the Wylfa Newydd specific policies**") which sit below PS9. This drafting creates a robust policy framework for the Wylfa Newydd Project which is structured with:
- 5.3.1 A proposed new Strategic Objective which supports the Wylfa Newydd Project.
- 5.3.2 An amended PS9 which provides a broad framework for the Councils to make decisions in relation to the Wylfa Newydd Project.
- 5.3.3 Subordinate to PS9, four new Wylfa Newydd specific policies which establish specific policy controlling the associated development which will need to come forward with the Wylfa Newydd Project. This includes:
- (a) New policy WNP1: Siting for Associated Development.
  - (b) New policy WNP2: Large Scale Temporary Construction Worker Accommodation.
  - (c) New policy WNP3: Temporary Construction Worker Accommodation.
  - (d) New policy WNP4: Support for Early Works (pre-DCO application). Additional commentary on this proposed policy is set out below.
- 5.4 Horizon's representations on the JLDP are based on these new Wylfa Newydd policies coming forward. Horizon has been able to take a lighter touch approach to commenting on the remainder of the Plan policies on the basis that Wylfa Newydd specific policies will establish that they are the primary relevant policies for the Project. It is on this basis that Horizon's representations do not comment in any detail (nor seek specific amendments) to a number of other policies including ISA2, ISA3, ISA5, ARNA1, PS10, CYF1 – CYF4, PS12, MAN6, Chapter 7.4, TAI2, TAI3, PS14, PS16, AMG1-5, PS17, and MWYN9 which, in the absence of the Wylfa Newydd specific policies would have been commented on.

### **Early works policy**

- 5.5 As stated above Horizon is seeking for a policy to, in certain circumstances, support pre-DCO works early works. Given the urgent need for the Wylfa Newydd Project,

Horizon has always made it clear that it may be necessary to submit TCPA applications for enabling works or pre-DCO works.

5.6 We understand that this was accepted and supported by IACC. There is however no policy in the draft JLDP recognising and supporting this. Horizon believes it is necessary that this policy framework should explicitly deal with the Councils' support (and criteria in relation thereto) for early works to come forward before the application for the DCO.

5.7 TCPA applications for early works or pre-DCO works have long been recognised as acceptable by DCLG as set out in their letter to Chief Planning Officers dated 6 July 2009; in 2009 DCLG issued guidance on "Preliminary works" that:

Some local authorities have asked about the scope they have to consider applications from developers for planning permission to undertake preliminary works on potential new nuclear sites, in advance of an application to the Infrastructure Planning Commission (IPC).

As explained below, Government policy on new nuclear may be a material factor for local authorities to consider in exercising any role they may have in relation to nuclear new build. Where appropriate, this may include considering applications for planning permission for preliminary or preparatory works on site ahead of the main application to the IPC. Subject to the legal framework, local authorities should have confidence in considering such applications on their merits, including consideration of the need for an environmental impact assessment for the works in question and whether to grant consent. Local authorities may decide that such consent should potentially be granted on the basis that any preliminary works carried out will be removed if the subsequent application to the IPC is turned down or if, within a specified time, no application is made. Guidance on planning obligations is available in CLG Circular 05/2005.

Appropriate pre-application advice from local planning authorities, or consent for preliminary works, should not fetter the discretion of councils to represent the views of their area on any subsequent application to the IPC.

5.8 Horizon anticipates the need for TCPA applications for associated development to be consented early will become increasingly necessary as DCO examining authorities for Welsh DCOs continue to put increasing pressure on applications to have their TCPA applications (and marine licences) in place by the time of examination.

5.9 For these reasons Horizon has proposed in its detailed representation the fourth Wylfa Newydd specific policy - WNP4 - to address this matter.

## 6. OTHER MATTERS

6.1 Horizon has also proposed amendments to the following key policy areas:

6.1.1 **Community benefits:** there is a lack of clarity in the current drafting regarding what the JLDP means by "community benefits" particularly as

regards PS8 and PS9. Horizon considers that the policies need to be very clear where the JLDP is referring to s106 obligations and conditions which are required to make the development acceptable in planning terms and where it is referring what are commonly termed "community benefits" in the sense that they are purely voluntary extras which may be offered by a developer. It is not appropriate for the JLDP to impose policy requiring the latter.

- 6.1.2 **Community Infrastructure Levy (or "CIL"):** Horizon is concerned that the explanatory text does not deal with the upcoming changes to the s106 regime as a result of CIL sufficiently clearly.
  - 6.1.3 **PS8 and PS9:** there appears to be a significant degree of overlap between PS8 and PS9; the two policies are similar but not identical and Horizon considers there would be difficulty in determining the proper and relevant application of these policies to the Wylfa Newydd Project.
- 6.2 In each case, amendments to clarify the position for these matters have been proposed in the detailed representations.
- 6.3 Horizon also seeks the following amendments to maintain internal consistency within the Plan, and consistency with other relevant Horizon produced documents:
- 6.3.1 The Wylfa Newydd Project is referenced in multiple different ways within the Plan. Horizon's preference is that it is called the Wylfa Newydd Project in each instance for consistency within the Plan and with Horizon's documentation including the stage one pre-application material. The Wylfa Newydd Project is the generating station and its associated development.
  - 6.3.2 Associated development should always be "associated development" and not called "ancillary development", "supporting development" or "induced development". Particularly "ancillary development" is confusing given the Planning Act 2008 concept of ancillary matters (which are outside of the scope of the Plan). Also, the Plan should clearly define what is meant by associated development (per footnote 1 above), and thereafter use that term consistently to avoid confusion. Amendments have been made in the representations in this regard.
  - 6.3.3 Reference to construction worker accommodation associated with the Wylfa Newydd Project should always be to "temporary construction worker accommodation" (not transient worker accommodation). This is to ensure consistency with the *New Nuclear Build at Wylfa: Supplementary Planning Guidance - Adopted July 2014 ("Wylfa SPG")* and Horizon's pre application consultation documentation and to minimise the risk that they will be perceived as two different concepts.

## 7. TESTS OF SOUNDNESS

- 7.1 The Councils' consultation of the JLDP specifically requires from consultees an assessment of the soundness of the plan as it stands by reference to 10 tests of soundness.

- 7.2 In its current form and for the reasons set out above and in its written representations Horizon does not consider that the JLDP meets the soundness tests. In particular it does not:
- 7.2.1 have regard to national policy (soundness tests C1 and C2 in the JLDP);
  - 7.2.2 create a coherent framework of policies in respect of associated development (soundness test CE1 in the JLDP);
  - 7.2.3 create a realistic set of allocations; the site allocations are inconsistent with Horizon's PAC process and are unduly restrictive and do not represent an efficient allocation policy for the associated development (soundness test CE2 in the JLDP); and
  - 7.2.4 Horizon considers that the JLDP is insufficiently flexible to appropriately provide for the associated development (soundness test CE4 in the JLDP).

### Additional Specific Representations

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
1.	Chapter 1 Executive Summary	Table 3 Snapshot of development management policies  Heading: Sustainable living  Sub-heading: Supporting the energy sector	Horizon considers the snapshot of the section on "Supporting the energy sector" is unduly restrictive.  It is not credible that in each case for energy development effects will be able to be avoided. Support for development of energy projects should be supported where any significant adverse effects have been appropriately avoided, remedied or mitigated to acceptable levels.	<b><u>Amend to read:</u></b>  <b>Supporting the energy sector</b> - by supporting development (e.g. nuclear, biomass, solar power and wind development) where any significant adverse impacts (e.g. noise, air quality, traffic and visual impact) have been avoided <u>or mitigated to acceptable levels.</u>
2.	Chapter 3 Policy Context	3.7 – 3.9	Horizon considers the clarity of these paragraphs could be improved, particularly the legal distinction in the Planning Act 2008 of the term "associated development" as it applies to Wales.  The list of bullets illustrating types of associated development should be made consistent with the Wylfa SPG content.  Minor errors in the description of the Wylfa Site NSIP regime should also	<b><u>Amend 3.7 -3.10 to read:</u></b>  3.7 A site near the Wylfa nuclear power station in the north of the island of Anglesey has been identified by the UK Government in the National Policy Statement as a <del>possible</del> <u>potentially suitable</u> site for a new nuclear power station <u>by 2025</u> . <u>Because of its importance to the UK</u> <del>Constructing</del> the new nuclear power station is a Nationally Significant Infrastructure Project under the Planning Act 2008. <del>Because of its importance to the UK,</del> <u>As a Nationally Significant Infrastructure Project</u> the development of a <u>nuclear power station on this site</u> will be the subject of a different approval process to the one that a local planning authority usually goes through. Under the <del>new</del> <u>Nationally Significant Infrastructure Project consenting procedure in the Planning Act 2008</u> , an application for a Development Consent Order will

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
			be corrected.	<p>be submitted to the <del>National Infrastructure Department</del> within the Planning Inspectorate. <u>The Planning Inspectorate will consider the application and make a recommendation to the Secretary of State for Energy as to whether the and they will decide whether the application should be approved or not. The Secretary of State will then decide to grant the Development Consent Order or not.</u></p> <p><u>3.8 In Wales the Development Consent Order cannot except in very limited circumstances also consent development which is classed as "associated development". Instead in Wales such associated development is consented under the Town and Country Planning Act 1990 by the <del>In</del> contrast to the procedure in England, it will be the local planning authority. Although not strictly associated development in terms of how it is defined under the Planning Act this Plan uses the term for such development which supports the Nationally Significant Infrastructure Project. <del>that determines applications for developments associated with the main site.</del> Associated developments <u>for the Wylfa Newydd Project</u> may include:</u></p> <ul style="list-style-type: none"> <li><del>Facilitating work on the main site</del></li> <li>• <u>Route and improvements along the A5025 on or from the existing route</u></li> <li>• <u>Transport and freight <del>Logistical infrastructure and park and travel</del></u></li> <li>• <u>Temporary Construction worker <del>Accommodation for construction workers</del></u></li> </ul> <p><u>3.89 In July 2011, six National Policy Statements were approved for Energy. These National Policy Statements provides the national policy that is used to assess proposals for major energy projects and decisions on them are made by the <del>National Infrastructure Department</del> Secretary of State. National Policy Statements EN1 (Overarching National Policy</u></p>

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
				<p><u>Statement for Energy</u>), EN-3 (<u>National Policy Statement for Renewable Energy Infrastructure</u>), EN-5 (<u>National Policy Statement for Electricity Networks Infrastructure</u>) and EN-6 (<u>National Policy Statement for Nuclear Power Generation</u>) are those which are likely to be related to the Plan area because of the likely development of major infrastructure projects with land use implications, e.g. construction of a new nuclear power station at Wylfa; improvements to the National Grid electricity transmission network. Volume II of National Policy Statement EN-6 identifies the <u>indicative</u> boundary of the site for the new nuclear power station on Anglesey; <u>EN-6 does however recognise that such boundaries shown in the NPS may vary from the site boundary which is ultimately is proposed for development consent to account for changes required by detailed layout, additional construction land, etc.</u></p> <p><del>3.910 Although the main objective of The Planning Act 2008 and National Policy Statements create a framework within which the Secretary of State must assess and determine nationally significant infrastructure projects. Local plans are expected to be prepared in accordance with the national policy statements and is to provide guidance to the Planning Inspectorate to make decisions on relevant major projects, as such the process of preparing the Plan must address these National Policy Statements fully and interpret them when preparing any relevant policies.</del></p>
3.	Chapter 5 Vision and strategic Objectives	5.4	There is a lack of overt support in the JLDP for the Wylfa Newydd Project. Whilst the consideration for a Wylfa Newydd related development policy is recognised (in the form of PS9) it is not clear enough and does not in its current form alone enable a coherent decision making framework for	<p><b><u>Amend 5.4 to read:</u></b></p> <p>5.4 In Anglesey, the Anglesey Energy Island Programme has identified the following vision in the New Nuclear Build at Wylfa Supplementary Planning Guidance (2014) in order to set the Council's aspirations for Wylfa Newydd, which is essential to transform the Island's economy in the future and provide a long term and sustainable quality of life for Anglesey's residents:</p> <p>"The New Nuclear Station at Wylfa is a positive driver for the transformation</p>

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
			<p>associated development.</p> <p>Horizon's stage one pre application consultation documents summarised and demonstrated the significance of the Project both nationally and for Anglesey. That is summarised in Horizon's cover letter and is not repeated here.</p> <p>Additionally the lack of clear statements in support of the Wylfa Newydd Project is not consistent with Wylfa SPG.</p> <p>The Wylfa SPG recognises in numerous places the potential for the Wylfa Newydd Project to transform the Anglesey and North Wales economy and notes that the Project will be a fundamental driver for economic growth.</p> <p>The JLDP does not contain corresponding statements expressing such support.</p> <p>This also creates something of an inconsistency with the Wylfa SPG. Such inconsistencies need to be avoided as while the Wylfa SPG was produced first, it must be consistent with the JLDP policies; it is guidance</p>	<p>of the economy and communities on Anglesey, providing sustainable employment opportunities, improving the quality of life for the existing and future generations and enhancing local identity and distinctiveness.”</p> <p><u>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.</u></p>



	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
			on the JLDP policies and cannot create new or different policy.	
4.	Chapter 5 Vision and strategic Objectives	5.6	Related to the above, to give due prominence of the Wylfa Newydd Project Horizon considers the Project should be reflected in the Vision.	<p><b><u>Amend bullet point 5 of the Vision as follows:</u></b></p> <ul style="list-style-type: none"> <li>• which is recognized as a leading location for a variety of renewable and low carbon energy sectors and knowledge based industries, which will have contributed to transforming the local economy <u>including hosting a new generation nuclear power station, generating low carbon energy and catalysing regeneration of the Plan area</u></li> </ul>
5.	Chapter 5 Vision and strategic Objectives	Theme 1 Support and create safe, healthy, distinctive and vibrant communities	Horizon has not commented in detail on Theme One and the associated strategic objectives but has noted in its representations below specific comments on the Strategic Policies which flow from these strategic objectives, for example on Strategic Policy PS1 as regards Welsh language.	-
6.	Chapter 5 Vision and strategic Objectives	Theme 2 Sustainable Living	Horizon has not commented in detail on Theme Two and the associated strategic objectives but has noted in its representations below specific comments on the Strategic Policies which flow from these strategic objectives, for example on Strategic Policy PS5 as regards sustainability.	-
7.	Chapter 5	Theme 3	Horizon considers that it would be	<u>SO[x] support and capitalise on the development of the Wylfa Newydd</u>

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
	Vision and strategic Objectives	Support growth and regeneration	<p>appropriate to include a new strategic objective under Theme 3 which supports the development of the Wylfa Newydd Project to ensure the JLDP contains a coherent policy framework for managing the Wylfa Newydd Project.</p> <p>Please also see the accompanying "Proposed Wylfa Newydd policy framework" which has been prepared to show the Wylfa Newydd specific policy framework as a whole.</p>	<p><u>Project and associated development to maximise socio-economic opportunities for local business and sustainable employment opportunities for local people including providing for a suitable network of Wylfa Newydd Project-related associated development sites while ensuring that adverse effects of the Wylfa Newydd Project on the local communities are appropriately avoided, or mitigated and where appropriate legacy benefits are provided.</u></p>
8.	Chapter 5 Vision and strategic Objectives	Theme 5 - Protect and enhance the natural and built environment	<p>It is stated to be a key output that "no development given planning permissions will have resulted in a loss of a site of international or national nature conservation value".</p> <p>This wording is unduly rigid. For example the Tre'r Gof SSSI is located within the Wylfa NPS Site boundary and IACC is aware of the potential for the construction of the Wylfa Newydd Project to adversely affect it. The output sought does not allow sufficient flexibility for changes in circumstance and does not acknowledge that there is a process whereby SSSIs can be denotified.</p>	<p><b><u>Amend this key output to read:</u></b></p> <p><u>Except in exceptional circumstances</u>, no development given planning permission will have resulted in a loss of a site of international or national nature conservation value.</p> <p><b><u>Alternative amendment:</u></b></p> <p>Alternatively apply the "Except in exceptional circumstance" to all of the key outputs sought.</p>

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
9.	Chapter 6 The Strategy	6.19	<p>Refers to "Habitats Regulation Appraisal" which is a typographical error and should refer to "Habitats Regulation Assessment" ("HRA").</p> <p>In any event this text should be clear as to what steps of HRA have been undertaken (i.e. screening, appropriate assessment etc).</p>	-
10.	Chapter 6 The Strategy	6.26 - 6.28 (Heading: Economic Strategy)	<p>As stated in the representations above there is insufficient support for the Wylfa Newydd Project in the Plan.</p> <p>As per the above representations, support for the Wylfa Newydd Project, as the biggest driver of the economic transformation sought, should be included within these paragraphs.</p>	<p><b><u>Amend the paragraphs to read:</u></b></p> <p>6.26 The anticipated transformational economic change arising from the unique scale of major infrastructure projects on the Isle of Anglesey and the Island's Enterprise Zone status will be the biggest driver of spatial and social change over the Plan period. It is important that the Plan acts as a facilitator of economic development. This will be achieved through a policy framework that supports the principles of each Authority's Strategic Plans, the Anglesey and Gwynedd Single integrated Plan, Employment Plans and the Anglesey Energy Island Programme. <u>Specifically the Plan will facilitate the timely development of the Wylfa Newydd Project in accordance with the National Policy Statements.</u></p> <p>6.28 [...] The Plan has an important role in facilitating the sustainable development of these projects whilst protecting the unique culture, heritage and natural environment of the area. The Councils in partnership with Welsh Government, <u>project promoters</u>, and business organisations will promote and support sustainable economic development.[...]</p>
11.	Chapter 7 Managing growth and	Strategic Policy PS1 para. 2	Horizon considers that in the absence of the SPG (cited as forthcoming in paragraph 7.1.4), it is unclear how this	<p><b><u>Amend the policy as follows:</u></b></p> <p>STRATEGIC POLICY PS1: WELSH LANGUAGE AND CULTURE</p>

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
	Development – Safe, healthy, Distinctive and vibrant communities		<p>policy test will be applied. As currently drafted, this element of the Strategic Policy may risk becoming a barrier to economic growth and other aspirations in the Plan.</p> <p>Horizon submits that the paragraph needs to be amended to build in further flexibility and clarify, among other things, what is meant by "significant harm", the factors relevant to assessing potential harm, and how other policy objectives in the Plan will be weighed against this policy objective.</p>	<p>The Councils will promote and support the use of the Welsh Language in the Plan area. This will be achieved by:</p> <ol style="list-style-type: none"> <li><u>Ensuring that in applications that may have an effect on the future of the Welsh language and culture within communities, applicants will normally be expected to submit a:</u> <ol style="list-style-type: none"> <li><u>Language impact statement to accompany a planning application for smaller developments.</u></li> <li><u>More detailed assessment in the form of a "Language Impact Assessment" to accompany a planning application where developments are on a larger scale or for large scale infrastructure projects with potential long term impacts.</u></li> </ol> </li> <li><del>Refusing proposals that due to its size, scale or its location, would cause significant harm to the character and language balance of a community</del> <u>Using appropriate mechanisms to ensure that suitable measures that mitigate negative impacts on Welsh language are provided or a contribution is made towards them;</u></li> <li><u>Encouraging, where appropriate, all signage by public bodies and by commercial and business companies to be bilingual;</u></li> <li><u>Encouraging the use of Welsh place names for new developments, house and street names.</u></li> </ol> <p><u>In appropriate circumstances, mitigation against any adverse effects will be secured through requiring a financial contribution by a section 106 agreement.</u></p>
12.	Chapter 7 Managing growth and	7.1.7 –7.1.9	<p>Horizon considers the clarity of these paragraphs should be improved.</p> <p>The Councils' position on how it will</p>	<p><b><u>Amend the paragraphs to read:</u></b></p> <p>7.1.7 A new planning charge came into force on 6 April 2010 through the Community Infrastructure Levy Regulations 2010. These Regulations allow</p>

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
	Development – Safe, healthy, Distinctive and vibrant communities		<p>manage pooling restrictions going forward after 6 April 2015 should be set out in full as this is critical for developers including Horizon to understand.</p> <p>Horizon makes further representations on the terminology surrounding and use of CIL receipts, section 106 agreements and community benefits below.</p>	<p>local authorities in England and Wales to raise funds from developers undertaking new building projects in their area. The money can be used to fund a wide range of infrastructure that is needed as a result of development. This includes transport schemes, flood defences, schools, hospitals and other health and social care facilities, parks, green spaces and leisure centres.</p> <p><del>7.1.8 After the 6th April 2015 only 5 contributions from section 106 agreements, since 6th April 2010, can be included within a fund for sharing resources, for example contribution towards play areas from a number of developments within a settlement.</del></p> <p><u>7.1.9 The Community Infrastructure Levy (CIL) regime was introduced in an effort to create a more standardised tariff regime in respect of indentified infrastructure for developers and councils to work from and therefore to reduce the time taken to negotiate individual planning obligation agreements for developments is a voluntary mechanism. It was therefore designed to supersede the present section 106 system. Introduction of a CIL regime however is not compulsory - it is a voluntary mechanism and requires. However, evidence is required to show that the market is viable to allow for this.</u></p> <p><u>7.1.9 However the CIL Regulations do limit the use of section 106 agreements from 6th April 2015. From this date the Councils may only pool contributions from up to five section 106 agreements (entered into from 6th April 2010) to a fund or to provide infrastructure. Previously unlimited contributions, could be included within a fund for sharing resources, for example contribution towards play areas from a number of developments within a settlement could be pooled.</u></p> <p><u>7.1.10 The Plan intends to allow contributions through Section 106 Agreements where they meet the statutory tests of: being necessary to make the development acceptable in planning terms; directly related to the</u></p>

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
				<p><del>development; fairly and reasonably related in scale and kind to the development; and they are within the pooling restrictions the Regulations continue to allow this</del> (see paragraph above). The Councils are investigating the possibility of introducing a CIL, by having regard to the impact upon viability of development. The CIL will be subject to a separate process and documents to the Plan. Information will be gathered upon the costs of preparing strategic infrastructure, the different sources to pay for the infrastructure and viability of sites. Discussions will also be held with other developers and stakeholders who have an interest and information about the area.</p>
13.	Chapter 7 Managing growth and Development – Safe, healthy, Distinctive and vibrant communities	Strategic Policy PS2 and policy ISA 1	<p>The Councils' intention with regard to the extent of these policies is not clear. The amendments made make it clear that s106 obligations sought must be levied in accordance with the regulatory tests i.e. contributions must meet the Community Infrastructure Regulations 2010 regulation 122 tests:</p> <ul style="list-style-type: none"> <li>• necessary to make the development acceptable in planning terms;</li> <li>• directly related to the development; and,</li> <li>• fairly and reasonably related in scale and kind to the development.</li> </ul> <p>These policies should be reconsidered to make this clear.</p>	<p><b><u>Amend PS2 as follows:</u></b></p> <p>STRATEGIC POLICY PS2: INFRASTRUCTURE AND DEVELOPER CONTRIBUTIONS</p> <p>The Councils will expect new development to ensure sufficient provision of essential infrastructure (either on-site or to service the site) is either already available or provided in a timely manner to make the proposal acceptable, by means of a planning condition or obligation. <u>Subject to meeting the statutory tests, maintenance payments may be required pursuant to section 106 agreements.</u> <del>It may happen that planning obligations are required for maintenance payments</del> in order to meet the initial costs of running services and facilities and to compensate communities for loss or damage caused by development.</p>

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
14.	Chapter 7 Managing growth and Development – Safe, healthy, Distinctive and vibrant communities	7.1.10 –7.1.14	<p>Horizon considers the clarity of these paragraphs should be improved.</p> <p>There is little consistency in the terminology used such that the Plan is not clear as to expectations in terms of what the Councils are proposing when referring to "community benefits".</p> <p>There appears to be overlap in the use of this term to cover a number of concepts :</p> <ul style="list-style-type: none"> <li>• Section 106 obligations (as referred to in PS2).</li> <li>• "community infrastructure contributions" (7.1.10) and "infrastructure provision" (7.1.11)</li> <li>• Planning obligations (7.1.10 and 7.1.11)</li> <li>• CIL levy receipts (7.1.10)</li> <li>• Voluntary "community benefits" offered by developers.</li> </ul> <p>Horizon proposes that the following terms are used with the following definitions (the amendments proposed are made on this basis):</p>	<p><b><u>Amend the paragraphs to read:</u></b></p> <p>7.1.10 New development will often require new or rely on existing infrastructure, services and facilities to make proposals acceptable in land use planning terms. <u>Statutory community benefits</u>, related to proposed development and necessary for the grant of planning permission, can be sought from developers providing they <u>meet the tests in the Community Infrastructure Levy Regulations 2010 as set out in paragraph 7.1.6</u> <del>are fairly and reasonably related in scale and in kind to the proposal.</del> It is important that the provision of infrastructure for a development site is located and designed in such a way as to minimise the impact on the natural and built environment. The amenities of local residents should also be protected. <del>Statutory Bbenefits community infrastructure contributions will be secured either through planning Section 106 obligations as set out in</del> <u>under the Town and Country Planning Act 1990, as planning permission conditions or, in the event a CIL charging regime is introduced by the Councils, through levy CIL receipts under the Community Infrastructure Levy Regulations 2010.</u></p> <p>7.1.11 <u>Statutory Benefits</u> <del>A planning obligation is a legally binding agreement entered into between a local authority and a developer. Planning obligations are a means by which financial and non financial contributions can be secured to enhance the quality of a development, provide community benefits and infrastructure, and mitigate any negative impacts that may arise as a consequence of development. The type and value of Statutory Benefits planning obligations sought in connection with a development planning permission will be considered on a case by case basis. Particularly the Councils will look to use Statutory Benefits to secure appropriate contributions from developers where existing</del> <u>Where</u> <del>infrastructure provision is not available or is inadequate, the Council will look to the developer to make an appropriate contribution.</del></p>

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
			<ul style="list-style-type: none"> <li>• "Statutory Benefits" means "Section 106 Obligations", "CIL receipts" and "planning permission conditions"; in each case these may only be imposed in accordance with regulation 122 of the CIL Regulations.</li> <li>• "section 106 obligations" or "planning obligations" means monies or provision of infrastructure secured pursuant to a section agreement or section 106 unilateral undertaking in accordance with s106 of the Town and Country planning Act 1990.</li> <li>• "CIL receipts" means monies paid to the collecting authority Councils pursuant to a CIL charging regime which may in the future be implemented by the Councils.</li> <li>• "planning permission conditions" means conditions to a planning permission which may require the development of infrastructure or provision of mitigation works as a condition of the development.</li> <li>• "Voluntary community benefits" means benefits which a developer may choose to provide on a purely voluntary basis for example to ensure a positive relationship</li> </ul>	<p>7.1.12 The tests set out in Circular 13/97 and the Community Infrastructure Levy Regulations 2010 will be used to determine when it would be appropriate to seek <u>Statutory Benefits</u> <del>planning obligation</del>. Supplementary Planning Guidance will be published to provide further advice on the matter.</p>



	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
			<p>between developers and host communities and where such benefits are negotiated directly with the host communities.</p> <p>Horizon is cognisant that ongoing discussions are underway with IACC regarding the wider scheme of "Project Benefits", being inherent benefits, planning benefits, government led community benefits and developer led community benefits. At this stage the JLDP representation has been based on standardised terminology for benefits expected to be delivered under the planning regime however Horizon notes this is not intended to cut across the wider discussions. Horizon continues to agree with IACCs comments that there needs to be common understanding and agreement (between it, IACC and the local community) of the different types of community benefits that could be derived through the Wylfa Newydd Project.</p>	
15.	Chapter 7 Managing growth and	ISA2	While Horizon generally supports the policies in ISA2, it needs to be recognised that any facilities which	

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
	Development – Safe, healthy, Distinctive and vibrant communities		<p>could be classed as community facilities which may come forward within worker accommodation campuses as part of its Worker Accommodation Strategy should not be subject to these policies.</p> <p>Rather than seek for specific amendments to policy ISA2 however, Horizon is to relying on the Wylfa Newydd specific policies proposed below which will be the relevant policies against which to determine its associated development applications. For this reason Horizon is not proposing specific exclusion of its associated development (i.e. temporary worker accommodation) from these policies.</p>	
16.	Chapter 7 Managing growth and Development – Safe, healthy, Distinctive and vibrant communities	Policy ISA3 and paragraphs 7.1.18 and 7.1.19	<p>Horizon notes that these site selection limitations are potentially too restrictive if applied to its associated development.</p> <p>Rather than seek for specific amendments to policy ISA3 Horizon proposes to rely on the Wylfa Newydd specific policies proposed below which would be the relevant policies against which to determine associated development applications. For this</p>	

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
			reason Horizon is not proposing specific exclusion of its associated development (i.e. simulator building) from these policies.	
17.	Chapter 7 Managing growth and Development – Safe, healthy, Distinctive and vibrant communities	Policy ISA5	<p>Horizon notes that these criteria in this policy are not appropriate for its temporary construction worker accommodation. For example it would be an inappropriate standard for typical occupiers e.g. construction workers, students in temporary single person accommodation, to require children's play space.</p> <p>Rather than seek for specific amendments to policy ISA5 which seek to exclude application of this policy from the worker accommodation, Horizon proposes to rely on the Wylfa Newydd specific policies proposed below which would be the relevant policies against which to determine associated development applications. For this reason Horizon is not proposing specific exclusion of its associated development from these policies.</p>	
18.	Chapter 7 Managing	Policy PS4	Horizon welcomes the policy requirement that development will be	<b><u>Amend the policy to read:</u></b> STRATEGIC POLICY PS4: SUSTAINABLE TRANSPORT,

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
	<p>growth and Development – Safe, healthy, Distinctive and vibrant communities</p>		<p>located so as to minimise the need to travel. This supports Horizon's stage one pre-application consultation which has based site selection for accommodation on (among other factors) its proximity to the Wylfa site.</p> <p>Provision of on-site facilities and services further supports this approach, with connection to other existing settlements forming a secondary consideration.</p> <p>Horizon's amendment seeks to remove linking rail upgrades with its project to the policy specifically on rail infrastructure.</p> <p>Horizon has clarified that infrastructure improvements required must be required in accordance with the CIL Regulations.</p>	<p><b>DEVELOPMENT AND ACCESSIBILITY</b></p> <p>Development will be located so as to minimise the need to travel. The Councils will support transport improvements that maximize accessibility for all modes of transport, but particularly by foot, cycle and public transport. This will be achieved by securing convenient access via footways, cycle infrastructure and public transport where appropriate, thereby encouraging the use of these modes of travel for local journeys and reducing the need to travel by private car.</p> <p>The Council will endeavour to improve accessibility and seek to change travel behaviour. This will be achieved by working with our partners to:</p> <ol style="list-style-type: none"> <li>1. Maintain an appropriate public transport service, recognising alternative ways of maintaining travel opportunities;</li> <li>2. Maintain and improve stations, infrastructure and services on the main Railway Lines including access to disabled people <u>and other rail-related improvement</u>;</li> <li>3. Improve and enhance the public footpath and cycleway network to improve safety, accessibility (including disabled people) by these modes of travel;</li> <li>4. Support schemes that will improve transport including park and ride/ share facilities for areas of employment and new development; <u>and freight transfer facilities and other rail-related improvements</u>;</li> <li>5. Allocating or safeguarding land where appropriate to facilitate the key strategic transport schemes set out in policy TRA1.</li> </ol> <p>The Councils will also require <u>key appropriate</u> transport infrastructure elements to be delivered as part of major infrastructure development schemes <u>either in kind or through section 106 obligations and where such provision meets the tests established in regulation 122 of the Community</u></p>

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought																						
				<p>infrastructure levy regulations 2010:</p> <p><del>Planning obligations or other appropriate mechanisms for development on all major development sites will be sought to mitigate their impact on the Plan area's transportation system in accordance with Strategic Policy PS2 in addition to promoting an integrated transport system.</del></p>																						
19.	Chapter 7 Managing growth and Development – Safe, healthy, Distinctive and vibrant communities	Policy TRA1	<p>Horizon has a number of comments on TRA4 as follows:</p> <ul style="list-style-type: none"> <li>• There is a typographical error in 2. (ii) and (iii) where in each case "facilitates" should be amended to read "facilities". (Not shown in the specific amendments sought.)</li> <li>• Amends to 3(i) have been proposed for clarity including bring the table into the policy so it is clear what development is affected.</li> <li>• New 3(ii) then arises from the second limb of the existing text (after the table).</li> <li>• Amends are sought to 4(iii) to ensure there is no suggestion that the Plan is pre-empting the environmental impact assessments which Horizon is undertaking and from which the need for transport infrastructure upgrades should derive from.</li> </ul>	<p><b><u>Amend the policy to read:</u></b></p> <p>3. Transport Assessments</p> <p><u>(i) The following types of development must be accompanied by a Transport Assessment in line with Policy PCYFF1.</u></p> <table border="1"> <thead> <tr> <th colspan="2"><b><u>Use Threshold</u></b></th> </tr> </thead> <tbody> <tr> <td><u>Food retail</u></td> <td><u>&gt;1,000m2 gross floor area</u></td> </tr> <tr> <td><u>Non-food retail</u></td> <td><u>&gt;1,000m2 gross floor area</u></td> </tr> <tr> <td><u>Cinemas and conference facilities</u></td> <td><u>&gt;1,000m2 gross floor area</u></td> </tr> <tr> <td><u>Leisure facilities</u></td> <td><u>&gt;1,000m2 gross floor area</u></td> </tr> <tr> <td><u>Business</u></td> <td><u>&gt;2,500m2 gross floor area</u></td> </tr> <tr> <td><u>Industry</u></td> <td><u>&gt;5,000m2 gross floor area</u></td> </tr> <tr> <td><u>Distribution and warehousing</u></td> <td><u>&gt;10,000m2 gross floor area</u></td> </tr> <tr> <td><u>Hospitals</u></td> <td><u>&gt;2,500m2 gross floor area</u></td> </tr> <tr> <td><u>Higher and further education</u></td> <td><u>&gt;2,500m2 gross floor area</u></td> </tr> <tr> <td><u>Schools</u></td> <td><u>All new schools</u></td> </tr> </tbody> </table>	<b><u>Use Threshold</u></b>		<u>Food retail</u>	<u>&gt;1,000m2 gross floor area</u>	<u>Non-food retail</u>	<u>&gt;1,000m2 gross floor area</u>	<u>Cinemas and conference facilities</u>	<u>&gt;1,000m2 gross floor area</u>	<u>Leisure facilities</u>	<u>&gt;1,000m2 gross floor area</u>	<u>Business</u>	<u>&gt;2,500m2 gross floor area</u>	<u>Industry</u>	<u>&gt;5,000m2 gross floor area</u>	<u>Distribution and warehousing</u>	<u>&gt;10,000m2 gross floor area</u>	<u>Hospitals</u>	<u>&gt;2,500m2 gross floor area</u>	<u>Higher and further education</u>	<u>&gt;2,500m2 gross floor area</u>	<u>Schools</u>	<u>All new schools</u>
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				<u>Stadia</u>	<u>&gt;1,500 seats</u>
				<u>Housing</u>	<u>&gt;100 dwellings</u>
				<u>Hotels</u>	<u>&gt;1,000m2 gross floor area</u>
				<p><u>(ii)</u> Where the Transport Assessment reveals the need for a Transport Implementation Strategy this will need to be secured through a planning obligation.</p> <p>4. Transport Schemes</p> <p>Improvements to the strategic transportation network in the plan area will be secured through safeguarding and provision of land. Schemes include:</p> <p>[...]</p> <p>iii. <u>Highways upgrades to stretches of the road from A5025 Valley to Wylfa Newydd necessitated by major infrastructure development schemes and other such road upgrades which may be demonstrated and agreed as necessary following further design and assessment and development of an Integrated Traffic and Transport Strategy (ITTS) for the Project including from Amlwch to Wylfa Newydd.</u></p>	
20.	Chapter 7 Managing growth and Development – Safe, healthy, Distinctive and vibrant	paragraphs 7.1.30 – 7.1.44	Related to the representations on TRA1, new wording to replace existing paragraph 7.1.44 has been provided to avoid pre-emption and to refer to the development of Horizon's Integrated Traffic and Transport Strategy ("ITTS"). Horizon supports the inclusion of a suitably worded	<p><b><u>Amend the heading above para 7.1.41 to read:</u></b></p> <p>A5025 Valley to Wylfa Newydd / Amlwch to Wylfa Newydd and other transport <del>infrastructure</del> improvements <del>associated with new nuclear development at Wylfa Newydd including a corporate hub necessitated by</del> <u>major infrastructure schemes</u></p> <p><b><u>Replace para 7.1.44 with:</u></b></p> <p><u>Councils with work with the promoter of the Wylfa Newydd Project to</u></p>	

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
	communities		<p>statement in support of it working in partnership with the Councils to develop an agreed ITTS for the Project, to be supported through policy TRA1.</p> <p>Generally, Horizon also considers that references in paragraphs 7.1.30 and 7.1.32 regarding "Travel Plans" should be considered; the policy requires Transport Assessments and Transport Implementation Strategies, but does not mention travel plans. How do travel plans fit with these other two concepts?</p>	<p><u>develop an appropriate scheme of transport solutions to mitigate the effects of the construction and operation of the new power station. In addition to the road upgrades referred to above such solutions are likely to include development of park and ride schemes and construction logistics centres to control the numbers and timing of traffic movements to the power station site. The promoter and the Councils will work together in partnership to develop an appropriate Integrated Traffic and Transport Strategy (ITTS) in respect of the Wylfa Newydd Project.</u></p>
21.	Chapter 7 Managing growth and Development – Sustainable Living	Policy PS5 and Explanation	<p>Horizon considers that it would be beneficial to remove some of the repetition, circularity and potential inconsistencies arising from references to other policies. For example, criteria 5, 6, 16, 10, 11, 12, 13, 14 simply cross refer to other policies which will apply to and control these matters.</p>	
22.	Chapter 7 Managing growth and Development – Sustainable	Policy PCYFF1	<p>Horizon has proposed amendments to the policy to ensure that it is meaningful and achievable.</p> <p>Horizon has the following additional</p>	<p><b><u>Amend Policy PCYFF1 as follows:</u></b></p> <p>POLICY PCYFF1: DEVELOPMENT CRITERIA</p> <p>A proposal <u>should demonstrate its compliance with:</u></p>

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
	Living		<p>comments:</p> <ul style="list-style-type: none"> <li>Although it has not proposed amendments or deletions, Horizon has residual concerns that criterion 3 is more restrictive in terms development sitting than the Executive Summary (Settlement Hierarchy – para. 1.26 ff) and paragraph 6.22; the former indicates a number of circumstances in which development in open countryside will be permitted. Horizon also notes that Policy PS15 relates exclusively to housing whereas the wording of PCYFF1 implies that it relates to all forms of development, which risks creating confusion.</li> <li>The drafting and specificity of criterion 4 which Horizon considers is inconsistent with the drafting of the other criteria.</li> <li>The criteria 9 and 10 requirements dealt with elsewhere in the Plan and could be deleted here.</li> <li>Criterion 14 is not sufficiently clear. If by "other uses" the council means existing established uses or something that has status in a plan as an allocation, this should be made clear. If not, the policy is too open-ended for it to be</li> </ul>	<p>1. <del>must comply with all</del> relevant policies in the Plan;</p> <p>2. <del>must comply with</del> national planning policy and guidance.</p> <p><u>A proposal:</u></p> <p>3. Will be approved within defined development boundaries or the built form of identified clusters listed in the settlement framework set out in Strategic Policy PS15, subject to detailed material planning considerations;</p> <p>4. Should make the most efficient use of land, <del>including achieving densities of a minimum of 30 housing units per hectare for residential development (unless there are local circumstances that dictate a lower density);</del></p> <p>5. Must provide appropriate amenity space to serve existing and future occupants;</p> <p>6. Should have regard to the generation, treatment and disposal of waste;</p> <p>7. Includes, where applicable, provision for the appropriate management and eradication of invasive species;</p> <p>Additionally, planning permission will be refused where the proposed development would have an unacceptable adverse impact on:</p> <p>8. Prominent public views into, out of, or across any settlement or area of open countryside;</p> <p>9. Vehicular access to and from the highway network and public transport, cycling and pedestrian infrastructure (in line with Policy TRA4);</p> <p>10. The highway network as a result of the volume and type of traffic generated from a proposal (in line with Policy TRA4);</p> <p>11. The health, safety or amenity of occupiers of local residences, other land and property uses or characteristics of the locality due to increased activity, disturbance, vibration, noise, dust, fumes, litter, drainage, light</p>



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			<p>understood and applied effectively by a developer.</p> <p>More broadly, it is not clear how "acceptability" and "unacceptability" is to be assessed in the Plan.</p>	<p>pollution, or other forms of pollution or nuisance;</p> <p>12. The quality of ground or surface water;</p> <p>13. The best and most versatile agricultural land;</p> <p><del>14. Land safeguarded for other uses, or impairs the development and use of adjoining land.</del></p>
23.	Chapter 7 Managing growth and Development – Sustainable Living	Policy PCYFF4	<p>It is not clear what requirement this policy imposes on developers in relation to the "Potential Options". For example, do all options need to be considered and at least one implemented or is it permissible for no options to be implemented if evidence is presented showing that none of the options is feasible? It would be beneficial to reword this policy so that the particular obligation(s) are identified more clearly.</p>	
24.	Chapter 7 Managing growth and Development – Sustainable Living	Policy ARNA1	<p>Rather than seek for specific amendments to policy ARNA1 which seek to exclude application of this policy from the marine located associated development, Horizon proposes to rely on the Wylfa Newydd specific policies proposed below which would be the relevant policies against which to determine associated development applications. For this</p>	

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			reason Horizon is not proposing specific exclusion to its associated development from these policies.	
25.	Chapter 7 Managing growth and Development – Economy and regeneration	7.3.1-7.3.17	<p>Horizon considers that the clarity of these paragraphs could be improved, particularly what is meant by the distinction between "major infrastructure projects" and nationally significant infrastructure projects as defined by the Planning Act 2008.</p> <p>The chapter varies between being written for general application to "major infrastructure projects"; and being written specifically about the Wylfa Newydd Project. This:</p> <ul style="list-style-type: none"> <li>• creates confusion as to the relevant policies for the Project ; and</li> <li>• constrains the flexibility of the Plan to adapt to changes in the number and type of major infrastructure projects in the area.</li> </ul> <p>Finally Horizon notes there are inconsistencies in the drafting of this chapter compared with other chapters; some Explanatory text and policy includes clauses drafted exclusively for pre-adoption (i.e. deposit) version of the Plan (and which will therefore</p>	<p><b><u>Amend paragraphs to read:</u></b></p> <p><b>7.3.1 Context</b></p> <ul style="list-style-type: none"> <li>• The UK has a legally binding target to cut emissions by 80% by 2050, with an interim target of at least 34% below base year levels by 2020 (Climate Change Act 2008)</li> <li>• A key aim of national policy is to improve the country's energy security</li> <li>• National Policy Statements establish the need for particular Nationally Significant Infrastructure Projects <u>(NSIP), including specifically for power generation</u></li> <li>• A site adjacent to Wylfa has been selected by the UK Government <u>as a potentially suitable site</u> for construction of a new nuclear power station. <u>This forms an NSIP, as does the separate national grid NSIP to provide transmission lines from the new nuclear power station.</u></li> <li>• These <del>known</del> nationally significant infrastructure projects <u>could have major infrastructure implications for the Plan</u> <del>area in the form of new electricity transmission lines and associated development</del></li> </ul> <p><b>Introduction</b></p> <p><del>7.3.2 Major Infrastructure Projects</del> <u>NSIPs</u> are large-scale projects of national importance such as new trunk roads, airports, ports, power stations (including nuclear), electricity transmission lines, waste water treatment works and chemical works-</p> <p><del>7.3.3 For the purpose of the Plan, Major Infrastructure Projects include these</del> <u>as defined as Nationally Significant Infrastructure Projects</u> in the</p>

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			<p>expire on adoption) and others include clauses for pre-adoption, application and post-construction. This needs to be reviewed and standardised to avoid confusion in interpretation.</p> <p>Additionally:</p> <ul style="list-style-type: none"> <li>• General: minor errors in the description of the NSIP regime in these paragraphs should also be corrected.</li> <li>• General: As noted in representations above, these paragraphs too must accurately refer "associated development" rather than the number of other terms used (i.e. "ancillary development", "related development", "induced development").</li> </ul>	<p>Planning Act 2008.</p> <p><u>7.3.4 The approval process for a development consent order (being the form of consent for an NSIP) is set out in paragraphs 3.7 – 3.10. As noted in those paragraphs while the decision maker for a development consent order is the relevant Applications for Development Consent Orders for Nationally Significant Infrastructure Projects are examined by the Planning Inspectorate with the final decision to grant or refuse permission being made by Secretary of State (following examination and recommendation by the Planning Inspectorate) for Energy and Climate Change, Local authorities or other statutory bodies (such as the MMO) would be remain the decision maker for associated or related development not included within the main Development Consent Orders application, and national policy will be a material consideration as appropriate. Where a Associated or ancillary development is related to the construction or operation of a Nationally Significant Infrastructure Project, these proposals in respect of the Wylfa Newydd Project (for example, offsite construction workers accommodation, logistic centres, and park and ride facilities) will be considered under Strategic Policies PS8 and PS9 and WNP1, WNP2, WNP3 and WNP4, as well as other relevant policies in the Plan. Associated development in relation to NSIPs other than the Wylfa Newydd Project or other major infrastructure projects to be determined by the Councils will be considered under Strategic Policy PS8.</u></p> <p>7.3.5 The Planning Inspectorate will examine applications for new Nationally Significant Infrastructure Projects development, using the criteria on national need, benefits and impacts as set out in relevant policy. For energy infrastructure this will include the relevant National Policy Statements for Energy Infrastructure (EN-1- 6). In accordance with the National Policy Statements, the Planning Inspectorate may also consider other matters that are important and relevant to its decisions, including <u>this Plan as the existing land use development plan, this Plan when it carries</u></p>

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				<p>sufficient weight as a material planning consideration or the Plan is adopted, the Anglesey Energy Island Programme, <del>Destination Management Plans</del>, Single Integrated Plan, New Nuclear Build Supplementary Planning Guidance and other relevant documents. In terms of a Development Consent Order application, a local authority's role is largely discretionary under the <u>Planning Act 2008</u>; however they will be invited to assess the adequacy of consultation and local impacts and report on these to the Planning Inspectorate in a Local Impact Report. <u>The Local Authority is also a statutory consultee where</u>. <del>Similarly</del> applications may be made to other <u>organisations statutory bodies</u> such as for a jetty the Marine Management Organisation, where the Local Authority is also a statutory consultee. In Wales the local planning authorities are the determining authorities for any development associated with the Development Consent Order application, for example, construction workers accommodation, logistic centres, and park and ride facilities.</p> <p>7.3.6 Through the Anglesey Energy Island Programme, the Councils' Strategic/ Corporate Plans and the Anglesey and Gwynedd Single Integrated Plan, the Councils and their partners acknowledge the likely significant economic opportunities deriving from the Wylfa Newydd Project. Chapter 3 of the Plan provides a link to the New Nuclear Build at Wylfa Supplementary Planning Guidance, which sets out the Isle of Anglesey County Council's vision in relation to this Project. This section of the Plan deals with <u>associated developments to the Wylfa Newydd Project (PS9) and associated development for other NSIPS and other</u> <del>that are associated with Major Projects (PS8)</del> where either the Isle of Anglesey County Council or Gwynedd Council <u>or another statutory bodies</u> is the determining <u>planning authority on planning for the associated development</u> applications. It is also applicable to <u>Nationally Significant Infrastructure Projects (such as the proposed Wylfa Newydd)</u>, where the Secretary of State makes the decision as well as other applications to other agencies</p>

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				<p><del>(such as to the Marine Management Organisation for a wharf), where the Council is a statutory consultee.</del></p> <p>7.3.7 Although the Councils are not the consenting authorities for <del>Major Infrastructure Projects</del> NSIPs, it is considered important to explain their approach as a planning authority when consulted upon with a Development Consent Order application. They will also ensure that <del>related</del> <u>associated</u> development conforms with the relevant policies and strategies included in this Plan, <del>when it is adopted. In the period before the Plan is adopted or before weight can be given to the policies as material planning</del> consideration the Isle of Anglesey County Council will ensure that <del>development associated with Wylfa Newydd reflects policies included in the current Development Plan, the Stopped Unitary Development Plan, national planning policies and the New Nuclear Build at Wylfa Supplementary Planning Guidance.</del> Whether in their role as decision makers, or as consultees for applications to other bodies the Councils will seek to secure delivery on their key priorities as set out in their Single Integrated Plan, Strategic Plans and any other relevant plan or programme.</p> <p>7.3.8 There are currently two proposed Nationally Significant Infrastructure Projects at the pre-application stage which are located within the Plan area:</p> <ul style="list-style-type: none"> <li>i. A new nuclear power station near to Wylfa, Wylfa Newydd, proposed by Horizon Nuclear Power, as identified in the National Policy Statement for Nuclear Power Generation (EN-6);</li> <li>ii. Improvements/ new National Grid Transmission Lines connecting the proposed Wylfa Newydd with Pentir and beyond proposed by National Grid.</li> </ul> <p>7.3.9 On the basis of the information currently available it is clear that these Projects will be significant developments with numerous significant impacts, some positive whilst others could be negative. It is <u>currently</u> anticipated that the Wylfa Newydd construction period will be <u>around</u> 12 years, with around</p>

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				<p>8,500 construction workers during the peak construction periods (<u>although it is recognised that the Project is still undergoing detailed design</u>). There will be significant HGV movement during the construction period, especially along the A55 and A5025. After construction it is foreseen that Wylfa Newydd will employ a workforce of around 1,000. The requirement for construction workers' accommodation is a matter that the Isle of Anglesey County Council has given detailed consideration. <del>An sudden</del> influx of workers is expected during the construction period. It is considered important that <u>the Plan anticipated and provides an appropriate policy framework within which to provide this accommodation is consistent with the general objectives of the Plan and that it won't prejudice the spatial strategy</u>. It is anticipated that the workforce will be accommodated via various means, private housing units to buy or rent, holiday accommodation and purpose built holiday accommodation provided by Horizon or through a third party. Further information regarding this viewpoint is given in <a href="http://www.anglesey.gov.uk/business/energy-island/energy-island-news/wylfa-nuclear-new-build-construction-workers-accomodation-position-statement/114494.article?redirect=false">http://www.anglesey.gov.uk/business/energy-island/energy-island-news/wylfa-nuclear-new-build-construction-workers-accomodation-position-statement/114494.article?redirect=false</a> and in the New Nuclear Build at Wylfa Supplementary Planning Guidance <a href="http://www.anglesey.gov.uk/Journals/2014/08/11/q/k/h/Wylfa-NNB-SPG-Adopted-July-2014.pdf">http://www.anglesey.gov.uk/Journals/2014/08/11/q/k/h/Wylfa-NNB-SPG-Adopted-July-2014.pdf</a></p> <p>7.3.10 It is important that the emerging Plan sets out a policy framework to assist the Councils to assess and respond to <del>NSIP Major Infrastructure Projects</del> proposals coming forward, including for example:</p> <ul style="list-style-type: none"> <li>i. providing advice to inform project promoters during the development of their proposals for consultation and project development;</li> <li>ii. responding to formal consultations during project development and on applications to other determining bodies <del>such as Planning Inspectorate and the Marine Management Organisation (MMO);</del></li> </ul>

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				<p>iii. suggesting appropriate requirements for inclusion in the Development Consent Order, <del>and section 106 obligations and CIL receipts (such as Section 106 and Community Infrastructure Levy—if adopted);</del></p> <p>iv. determining applications for associated, <del>ancillary or related</del> development outside the Development Consent Order;</p> <p><del>v. assessing the adequacy of consultation,</del></p> <p>vi. assessing the impacts of the project both positive and negative in the Local Impact Report that Planning Inspectorate will invite the Council(s) to submit after the application for any Development Consent Order is submitted,</p> <p>vii. making representations as part of the formal examination of the Development Consent Order by the Planning Inspectorate,</p> <p>viii. in determining any approvals subsequent to consent (including planning <u>permission 'conditions'</u>), and in discharging functions as the enforcing authority.</p> <p>7.3.11 It is anticipated that accommodation will be required for a substantial number of construction workers employed during the construction period of Wylfa Newydd. It is also anticipated that land will be required in relation to the Wylfa Newydd Pproject, e.g. site(s) for offices, short stay accommodation and other purposes related to logistics, storage and off-site fabrication. <del>Mitigation of the impacts of the project would be optimised if such development were located in accordance with the Plan's Spatial Strategy as set out in Chapter 6 and other relevant policies included in the Plan, depending on the type of use, in order to be consistent with the principle of sustainable development. Locating this development will be done in accordance with policies WNP1, WNP2, and WNP3.</del></p> <p>7.3.12 The Councils' position is that accommodation for the transient</p>

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				<p><u>temporary</u> construction workers should as far as possible be provided within or adjacent to the development boundaries of the Centres identified in the Plan's Settlement Hierarchy, in locations that relate well to the main transport routes and transport modes, especially the railway. They should also contribute towards sustainable regeneration programmes and support the vitality and viability of town centres. Project promoters should consider re-using existing buildings where feasible. The Councils also consider that the potential for after use of sites used initially for construction workers accommodation or any other temporary use of land should be considered at the planning and design stage, e.g. laying out of sites at the outset so that they are capable of beneficial after use, construction of permanent buildings capable of being adapted for future community or commercial use. <del>All</del> <u>Appropriate</u> proposed legacy uses <del>must</del> <u>will be assessed for their compliance with relevant policies in the</u> <del>comply with this</del> Plan. Potential legacy uses include serviced plots for affordable housing, elderly or special needs accommodation, student accommodation, offices or hotels, or buildings that can be refurbished for similar uses. If the project promoter and the Council agree that an after use is not feasible, structures or buildings should be removed and the land reinstated to the satisfaction of the Local Planning Authority within a specific period of time which would be controlled by planning condition.</p> <p>7.3.13 <del>The scale and impact of Major Infrastructure Projects</del> <u>NSIPs will be mitigated through</u> <del>may require an appropriate and comprehensive package of planning permission conditions, section 106 agreements and CIL receipts (if a CIL charging schedule is implemented)</del> <u>developer contributions to mitigate and compensate for any new and increased levels of impact and harm. This package</u> <del>These contributions will be negotiated as part of the planning process, including through section 106 agreements and the Community Infrastructure Levy if this is implemented.</del></p> <p>7.3.14 In addition the Councils <u>will encourage developers to consider a</u></p>



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				<p><del>community benefits proposal for host communities to recognise may require packages of community benefits to be provided by the developer to offset and compensate the community for the burden imposed by hosting a project. The Councils would like to see a</del>Any such fund <del>will be used to offset the burden on the locality, and would identifying potential legacy uses, including transport, social, economic and community infrastructure which would benefit the community in the long term.</del></p> <p>7.3.15 <del>The Councils note such voluntary c</del>Community benefits <del>may be sought could be provided</del> through the provisions of the Local Government Acts, the Planning Acts, or other legislation, or alternatively through voluntary agreement with the project provider, or in accordance with an industry protocol.</p> <p>7.3.16 <del>The Councils recognise that c</del>Community benefits <del>contributions are monetary payments from a developer for the benefit of communities hosting a development. Community benefits contributions are separate and distinct from the planning process. They are not a material consideration which can be taken into account in determining whether to grant consent or to respond positively or otherwise to a consultation request. Any payment made is not designed to cover the direct effects of the development and they cannot properly be judged to be necessary to make a development acceptable in planning terms</del></p> <p>7.3.17 <del>Strategic Policy PS8 is an overarching policy relating to all associated development in relation to NSIPs other than the Wylfa Newydd Project or other major infrastructure projects to be determined by the Councils. Major Infrastructure Projects whether determined by the Secretary of State, the Isle of Anglesey County Council, Gwynedd Council or any other agency. Strategic Policy PS9 applies to the proposed Wylfa Newydd Project new nuclear power station including development associated with it. The project level HRA should be informed by the findings and conclusions</del></p>

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				of the HRA: Site Report for Wylfa as well as the HRA process for the joint LDP
26.	Chapter 7 Managing growth and Development – Economy and regeneration	PS8	Horizon's representations seek to clarify that it is PS9 which applies to the Wylfa Newydd Project rather than a mix of PS8 and PS9. Having excluded PS 8 from the policy framework for the Wylfa Newydd Project Horizon does not therefore comment specifically on PS8 except to note that any changes made to PS9 (in accordance with its representations below) may be usefully carried through to PS8 for consistency.	
27.	Chapter 7 Managing growth and Development – Economy and regeneration	PS9	Horizon supports a specific strategic policy for the Wylfa Newydd Project. It is important however that the unique opportunity to transform the economy and communities of Anglesey is recognised by the Plan. In this regard Horizon specific Wylfa Newydd Project policies should be developed that along with PS9 should shape the approach to the Wylfa Newydd Project and in particular the proposals for associated development. Recognising the unique status of the development whilst the other policies in the Plan should be properly	<b><u>Amend PS9 to read:</u></b> <b>STRATEGIC POLICY PS9: WYLFA NEWYDD <u>PROJECT RELATED ASSOCIATED DEVELOPMENT</u></b>  In their role either as determining authorities for associated development, or as consultees for <u>the DCO application and</u> applications to other bodies, and within the provisions of national policy, when assessing and responding to emerging proposals for <del>nuclear related Wylfa Newydd and its associated</del> <u>development including that associated with or ancillary to the existing or proposed Wylfa Newydd</u> , the Councils will seek to ensure compliance, where appropriate or relevant, with the following criteria:  <u>Policies WNP1, WNP2, WNP3 and WNP4</u> <del>Any relevant policies included in the Plan</del> , and any relevant supplementary planning

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			<p>considered the PS9 and proposed Wylfa Newydd specific policies should take precedence where there is an inconsistency or conflict between them and the other policies. Horizon has proposed specific amendments to PS9 for the following reasons:</p> <ul style="list-style-type: none"> <li>• The term 'associated development' should be used to refer to any development this is part of the Wylfa Newydd Project but will not be in the DCO application.</li> <li>• Item 3: The Wylfa Newydd Project does not include decommissioning which will be subject to a separate assessment in accordance with the NPS. Decommissioning of the Project would not arise for approximately 100 years this is well outside the lifetime of the Plan.</li> <li>• Item 7: It is not clear what a project level HRA is; Horizon has presented its modular approach to screening and appropriate assessment and HRA to the Council previously.</li> <li>• Item 9 as drafted is not consistent with other policies in the Plan</li> </ul>	<p>guidance should shape the approach to the development of <u>the nuclear power station and proposals for nuclear related development and any associated development or infrastructure</u>; and <u>any other relevant policies included in the Plan should also be taken into consideration except to the extent they contradict or are otherwise inconsistent with Policies WNP1, WNP2, WNP3 and WNP4</u></p> <p>In order to minimise impact and maximize re-use of existing facilities and materials, opportunities have been taken where feasible to integrate the requirements of <u>the Wylfa Newydd Project</u> with the proposed decommissioning of the existing power station; and</p> <p>Highways and transport proposals for <u>the Wylfa Newydd Project</u> form part of a <u>robust transport and logistics plan the integrated traffic and transport strategy</u> that has regard to Strategic Policy PS4 and any relevant detailed Policies in the Plan and minimizes adverse transport impacts to an acceptable level, including those arising during the construction, <u>and operation and decommissioning and restoration</u> stages. Proposals should where feasible make a positive contribution to transportation policy objectives in the locality, and should <u>where practicable</u> include multi-modal solutions and investment that encourages travel by public transport, walking and cycling; and</p> <p>The accommodation requirements of construction workers should be met in a way that minimizes impact on the local housing market, including the ability of those on low incomes to access the private rented sector, affordable housing and other housing services, or not result in unacceptable adverse economic, social, linguistic or environmental impacts. Proposals should form part of a robust construction workers accommodation strategy <u>that conforms to the detailed provisions of policies WNP2 - Large Scale Temporary Construction Worker Accommodation and WNP3 - Temporary</u></p>

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			<p>which seek to protect existing community facilities. The requirement that the facilities should be made available for community use needs to be linked to an assessment of capacity as there is no value in Wylfa Newydd provision introducing competition to the existing market – this could threaten viability and present a tension with other plan policies about maintaining community vitality and viability/retaining community facilities.</p> <ul style="list-style-type: none"> <li>Item 11: It is inappropriate to seek to impose policy making voluntary community benefits a compulsory feature of development. Legally these cannot be taken into account in assessing the development as is noted in the explanatory text so it is not appropriate for them to be specified as planning policy. Horizon also considers that inclusion of this criterion is not consistent with IACC's CBC strategy in it is clear that voluntary benefits will be negotiated separately from land use planning contributions.</li> <li>Item 12: All radioactive waste will</li> </ul>	<p><del><u>Construction Worker Accommodation</u> that has regard to the Plan's Spatial Strategy and any relevant policies in the Plan;</del> and</p> <p>The siting and design of associated development <u>and conform to the detailed provisions of Policies WNP1 - <i>Siting for Associated Development</i>, WNP2 - <i>Large Scale Temporary Construction Worker Accommodation</i> and WNP3 - <i>Temporary Construction Worker Accommodation</i>, as appropriate</u> 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. Where appropriate, delivery plans should be agreed for legacy uses during the pre-application process that will inform the approach to the design and layout of the associated development sites, as well as the framing of a S106 and/or other agreements and CIL payments (if applicable); and</p> <p>The scheme layout and design and the scale of green infrastructure proposed should avoid, minimise mitigate or compensate for visual, landscape and ecological impacts on the local and wider area, as well as on cultural and historic aspects of the landscape, both in the short and longer term. Proposals will be expected to be commensurate with the scale of the development, and the extent of its impact; and</p> <p>Any proposal for development including all <del>ancillary and induced associated</del> development, must be <u>accompanied by a project level Habitat Regulations Assessment, which meets the requirements of screened in accordance with</u> the Conservation of Habitat and Species Regulations (2010) as amended <u>and where required be accompanied by an appropriate assessment</u>; and</p> <p>The <del>provision of promoter's</del> procurement, employment, education, training and recruitment strategies and delivery plans should be agreed <u>by with</u> the Council at an early stage of project development, with an</p>

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			<p>be covered in the DCO.</p> <p>It is a fundamental principle of planning that the acceptability of a development is considered at the time of application for permission. There is no provision in planning law enabling the decision to be reviewed by the decision maker at some later stage.</p>	<p>objective to maximize employment, business and training opportunities for the local communities both in the short and longer term; and</p> <p><del>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.</del> Where there would be additional impacts or demands on existing <u>community</u> facilities the Council will seek <u>either provision of additional facilities or appropriate contributions for development or upgrading of existing off site facilities. Legacy use of any additional facilities provided should be considered where that is appropriate;</u> and</p> <p>Proposals should include appropriate measures for promoting social cohesion and community safety; <del>and</del></p> <p><del>The burden and disturbance borne by the community in hosting a major national or regional nuclear related infrastructure project should be recognised; and appropriate packages of voluntary community benefits provided by the developer will be sought to offset and compensate the community for the burden and disturbance imposed by hosting the project; and</del></p> <p><del>Any proposal (outside a DCO) to treat, store or dispose of Very Low level, Low Level or Intermediate Level Waste or to treat or to store spent fuel arising from the existing nuclear power station or any future nuclear development within or outside the Plan area, in an existing or proposed facility on or off the nuclear site would need to:</del></p> <p><b>Be strongly justified;</b></p>

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
				<p>Demonstrate that the planning impacts are acceptable; and</p> <p><del>Demonstrate that the environmental, social and economic benefits outweigh any negative impacts.</del></p> <p><del>It is possible that as the project develops, due to unforeseen consequences resulting from the construction and operation of the Wylfa Newydd, the Councils may require additional information from, or works to be carried out by the developer and may, as a result, seek to re-negotiate any mitigation or compensation package in order to off-set any additional impacts or burdens borne by the community affected. The developer should build in review mechanisms to monitor the full range of impacts, and to review the adequacy of mitigation or compensation measures and to make adjustments as necessary.</del></p>
28.	Chapter 7 Managing growth and Development – Economy and regeneration	New policy sought - WNP1	Horizon has proposed WNP1 which is specifically related to the siting of new non-residential associated development related to the Wylfa Newydd Project.	<p><b><u>New Policy WNP1 to read:</u></b></p> <p><b><u>WNP1: Siting for Associated Development</u></b></p> <p><u>In general, non residential associated development proposals (such as employment, logistics, transport, visitor facilities, education and training) relating to the Wylfa Newydd Project and its supply chain will be supported in principle where they comply with national and local policy on flood risk, employment and transport, including site allocations and conversions of existing buildings within Policy CYF1. Where development is proposed outside designated employment and transport sites, the proposals should be supported by an assessment of options that robustly demonstrates the suitability of the proposed site, covering:</u></p> <ul style="list-style-type: none"> <li>• <u>The appropriate level of flood risk assessment</u></li> <li>• <u>Details of how the site meets operational requirements and integrates with the transport strategy for the Wylfa Newydd Project, promoting</u></li> </ul>

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
				<p><u>sustainable travel options as appropriate</u></p> <ul style="list-style-type: none"> <li>• <u>An overview of environmental considerations relating to the site options that have been considered, with the aim of illustrating how adverse environmental effects have sought to be avoided</u></li> <li>• <u>The degree of integration with the closest communities, taking account of the potential for beneficial long-term uses or, if temporary development is proposed, legacy uses</u></li> </ul> <p><u>In responding to proposals for the siting of non-residential development associated with, ancillary or related to the Wylfa Newydd Project, where the Councils are decision makers, the degree to which the planning application achieves the outcomes set out at (a) to (e) below will be taken into consideration:</u></p> <p><u>(a) Delivery of education, training and indirect employment opportunities related to the Project that are well connected to both the nuclear power station and the local community, offering access by public transport, walking and/or cycling, as appropriate</u></p> <p><u>(b) The avoidance, minimisation and, if appropriate, mitigation of adverse impacts on the transport network arising from the movement of people, goods and services, including multi-modal transport solutions and measures to encourage travel by public transport, walking and cycling. Highway safety for all users should be maintained and, where necessary, improved</u></p> <p><u>(c) The avoidance, minimisation and, if appropriate, mitigation of any adverse impact on the natural and historic environment assets including sites of international, national, regional and local importance</u></p>

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
				<p>and their setting in line with national policy</p> <p><u>(d) High quality design that demonstrably seeks to minimise any adverse visual and landscape character impact of the proposals on the surrounding area and in views from nearby settlements; as well as protecting and, where practicable, enhancing biodiversity through networks of green/blue infrastructure</u></p> <p><u>(e) The avoidance, minimisation, and if appropriate, mitigation of any adverse impact on local community cohesion, health and Welsh language and culture</u></p>
29.	Chapter 7 Managing growth and Development – Economy and regeneration	New policy sought - WNP2	Horizon has proposed WNP2 which is specifically related to the large scale temporary worker accommodation associated development related to the Wylfa Newydd Project.	<p><b><u>New Policy WNP2 to read:</u></b></p> <p><b><u>WNP2: large scale temporary construction worker accommodation</u></b></p> <p><u>In general, proposals for new large-scale temporary construction worker accommodation for the Wylfa Newydd Project will be supported in principle as one aspect of a comprehensive worker accommodation strategy. This type of accommodation should form only one part of the overall solution to meeting the requirements of the construction workforce. Development proposals of this scale will be considered acceptable in principle within the employment land allocations of the Plan (Policy CYF1).</u></p> <p><u>Where development is proposed outside designated employment sites, the proposals should be supported by an assessment of options that robustly demonstrates the suitability of the proposed site, covering:</u></p> <ul style="list-style-type: none"> <li>• <u>The appropriate level of flood risk assessment</u></li> <li>• <u>Details of how the site integrates with the transport strategy for the Wylfa Newydd Project, promoting sustainable travel options as appropriate</u></li> <li>• <u>An overview of environmental considerations relating to the site</u></li> </ul>



	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
				<p><u>options that have been considered, with the aim of illustrating how adverse environmental effects have sought to be avoided</u></p> <ul style="list-style-type: none"> <li>• <u>Degree of integration with the closest communities, taking account of the potential for beneficial long-term legacy uses</u></li> </ul> <p><u>In responding to proposals for the siting of new large-scale temporary construction worker accommodation for the Wylfa Newydd Project, where the Councils are decision makers, the degree to which the planning application achieves the outcomes set out at (a) to (h) below will be taken into consideration:</u></p> <p><u>(a) The proposals include the delivery of sufficient communal leisure and recreational facilities to meet the needs of the proposed occupants</u></p> <p><u>(b) Where the proposal would result in impacts or additional demands on existing community facilities, including retail outlets and healthcare provision, either additional facilities or appropriate contributions for the development or improvement of off-site facilities, will be provided</u></p> <p><u>(c) Ensuring access to sustainable transport linkages between temporary construction worker accommodation locations and key destinations, including the Power Station Site, retail, leisure and healthcare facilities</u></p> <p><u>(d) Provision of necessary improvements to the transport network to mitigate against any adverse impacts on the community and visitors related to congestion, air quality and road safety</u></p> <p><u>(e) The avoidance, minimisation and, if appropriate, mitigation of adverse impact on the natural and historic environment assets, including sites of international, national, regional and local importance and their setting in line with national policy</u></p> <p><u>(f) High quality design that demonstrably seeks to minimise any adverse</u></p>

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
				<p><u>visual and landscape character impact of the proposals on the surrounding area and in views from nearby settlements; as well as protecting and, where practicable, enhancing biodiversity through networks of green/blue infrastructure</u></p> <p>(g) <u>The avoidance, minimisation, and if appropriate, mitigation of any adverse impact on local community cohesion, health and Welsh language and culture</u></p> <p>(h) <u>The buildings and facilities can be adapted for future legacy use or, where not feasible or appropriate, the buildings and facilities will be removed either leaving the land serviced and in a neat and tidy condition, or returned to its original state as agreed with the Council</u></p>
30.	Chapter 7 Managing growth and Development – Economy and regeneration	New policy sought - WNP3	Horizon has proposed WNP3 which is specifically related to the temporary construction workforce for the Wylfa Newydd Project.	<p><b><u>New Policy WNP3 to read:</u></b></p> <p><b><u>WNP3 temporary construction worker accommodation</u></b></p> <p><u>In general, proposals for new build accommodation or converting existing vacant or under-used premises and buildings into accommodation suitable for the temporary construction workforce for the Wylfa Newydd Project will be supported in principle. This type of accommodation should form only one part of the overall solution to meeting the requirements of the transient element of the construction workforce. Development proposals of this type will be considered acceptable in principle in the settlement boundaries defined within the Plan, provided that the scale of development proposed takes account of the hierarchy of settlements within the Plan area.</u></p> <p><u>In responding to proposals for the provision of accommodation for the transient construction workforce associated with the Wylfa Newydd Project, where the Councils are decision makers, the degree to which the planning application achieves the outcomes set out at (a) to (k) below will be taken into consideration:</u></p>

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
				<p>(a) <u>Enabling accommodation proposals in a range of locations, principally related to the Centres and Service Villages identified within the Plan's Settlement Hierarchy, where there is greater access to services and public transport and the greatest potential for integration as part of the Plan's Spatial Strategy</u></p> <p>(b) <u>It is proportionate in scale to the Centres and Service Villages</u></p> <p>(c) <u>Ensuring access to sustainable transport linkages between accommodation locations and the nuclear power station construction areas</u></p> <p>(d) <u>Offering access by public transport, walking or cycling to sufficient community facilities, including retail outlets, healthcare, sports and leisure facilities. Where the proposal would result in impacts or additional demands on existing community facilities, either additional facilities or appropriate contributions for the development or improvement of off-site facilities will be provided</u></p> <p>(e) <u>Avoiding a significant adverse effect on the housing market, including the ability of those on low incomes to access the private rented sector, affordable housing and other housing services. Proposals to provide for temporary construction workforce accommodation should, wherever possible, make a positive contribution to the long term affordable housing objectives of the Councils</u></p> <p>(f) <u>Avoiding an unreasonable adverse effect on the tourism market, including the ability of accommodation providers to meet peak tourist demand. Proposals to provide for construction workforce accommodation should, in appropriate locations supported by the tourism strategy for the Plan area, be designed to enable conversion to tourism accommodation once no longer required for the workforce</u></p>

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
				<p><u>(g) Accommodation should contribute to creating a mixed, inclusive and sustainable community and should not result in a disproportionate concentration of this type of use in the local area, or harm to the residential amenity of the surrounding area</u></p> <p><u>(h) The avoidance, minimisation and, if appropriate, mitigation of adverse impact on the natural and historic environment assets, including sites of international, national, regional and local importance and their setting in line with national policy</u></p> <p><u>(i) High quality design that demonstrably seeks to minimise any adverse visual and landscape character impact of the proposals on the surrounding area and in views from nearby settlements; as well as protecting and, where practicable, enhancing biodiversity through networks of green/blue infrastructure</u></p> <p><u>(j) The avoidance, minimisation and, if appropriate, mitigation of any adverse impact on local community cohesion, health and Welsh language and culture</u></p> <p><u>(k) The buildings and facilities can be adapted for future legacy use or, where not feasible or appropriate, the buildings and facilities will be removed either leaving the land serviced and in a neat and tidy condition or returned to its original state as agreed with the Council</u></p>
31.	Chapter 7 Managing growth and Development – Economy and regeneration	New policy sought - WNP4	Horizon has proposed WNP4 which is specifically related to early works related to the Wylfa Newydd Project.	<p><b><u>New Policy WNP4 to read:</u></b></p> <p><u>The urgent national need set out in national policy for new nuclear generation is recognised and site preparation works and offsite early works to enable the provision of the Wylfa Newydd Project as soon as possible will be supported in principle. Any such proposals will need to demonstrate:</u></p> <ul style="list-style-type: none"> <li><u>they are either necessary to enable the timely delivery, of the Wylfa</u></li> </ul>

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
				<p><u>Newydd Project or are measures to provide mitigation to potentially adverse effects; and</u></p> <ul style="list-style-type: none"> <li>• <u>if the Wylfa Newydd Project does not come forward, the sites can be restored or reinstated or will provide a beneficial legacy</u></li> </ul>
32.	Chapter 7 Managing growth and Development – Economy and regeneration	Strategic Policy PS10, CYF1 and CYF2	<p>Horizon has concerns about the lack of flexibility for the sites in these policies regarding the sites to be uses for non-employment related development (B1, B2 and B8), particularly in relation to a change of use for legacy (e.g. to tourism) as this would reduce the overall availability of B1, B2 and B8 sites and therefore run counter to the intention for these to be employment sites.</p> <p>However, rather than seek for specific amendments to policies PS10, CYF1 and CYF2 however, Horizon proposes to rely on the Wylfa Newydd specific policies proposed below which will be the relevant policies against which to determine its associated development applications. For this reason Horizon is not proposing specific exclusion of its associated development from these policies.</p>	
33.	Chapter 7	Policy CYF4	Horizon considers it is not clear how	

	<b>JLDP Policy</b>	<b>Para ref</b>	<b>Consultation responses</b>	<b>Specific amendments sought</b>
	Managing growth and Development – Economy and regeneration		<p>the criteria of this policy would need to be met in order for land to be released and notes that it is not clear what evidence will be acceptable to the Councils in proving conformity to the policy.</p> <p>However, rather than seek for specific amendments to policy CYF4, Horizon proposes to rely on the Wylfa Newydd specific policies proposed below which will be the relevant policies against which to determine its associated development applications. For this reason Horizon is not proposing specific exclusion of its associated development from these policies.</p>	
34.	Chapter 7 Managing growth and Development – Economy and regeneration	TWR1	<p>Clarification is required as to what is meant by "development boundary".</p> <p>Rather than seek for specific amendments to policy TWR1, Horizon proposes to rely on the Wylfa Newydd specific policies proposed below which will be the relevant policies against which to determine its associated development applications. For this reason Horizon is not proposing specific exclusion of its associated development from these</p>	

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
			policies.	
35.	Chapter 7 Managing growth and Development – Economy and regeneration	7.3.55 – 7.3.80	<p>Horizon is concerned to ensure that these paragraphs do not impact the construction worker accommodation.</p> <p>Rather than seek for specific amendments to these paragraphs, Horizon proposes to rely on the Wylfa Newydd specific policies proposed above which would be the relevant policies against which to determine associated development applications. For this reason Horizon is not proposing specific exclusion to its associated development from these paragraphs.</p>	
36.	Chapter 7 Managing growth and Development – Economy and regeneration	Strategic Policy PS12	<p>Horizon is concerned that Criterion 6 "restricting the expansion of out-of-centre retailing and leisure development" could unduly restrict the development of leisure facilities at temporary worker accommodation sites.</p> <p>Rather than seek for specific amendments to this policy, Horizon proposes to rely on the Wylfa Newydd specific policies proposed above which would be the relevant policies against which to determine associated</p>	

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
			development applications. For this reason Horizon is not proposing specific exclusion to its associated development from this policy.	
37.	Chapter 7 Managing growth and Development – Economy and regeneration	Policy MAN6	<p>It is not clear whether this policy would apply to any retail development included within temporary worker accommodation sites.</p> <p>Rather than seek for specific amendments to this policy, Horizon proposes to rely on the Wylfa Newydd specific policies proposed above which would be the relevant policies against which to determine associated development applications. For this reason Horizon is not proposing specific exclusion to its associated development from this policy.</p>	
38.	Chapter 7 Managing growth and Development – Supply and Quality of housing	Whole of chapter 7.4	<p>Horizon requests that clarification be provided as to which of the policies in Chapter 7.4 are intended to apply to the Wylfa Newydd worker accommodation strategy and, more specifically, which aspects of the worker accommodation.</p> <p>Rather than seek for specific amendments to the policies within this chapter, Horizon proposes to rely on</p>	



	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
			the Wylfa Newydd specific policies proposed above which would be the relevant policies against which to make consultation responses to the DCO application and to determine associated development applications. For this reason Horizon is not proposing specific exclusion to its associated development from this policy.	
39.	Chapter 7 Managing growth and Development – Supply and Quality of Housing	Policy TAI2	Rather than seek for specific amendments to this policy, Horizon proposes to rely on the Wylfa Newydd specific policies proposed above which would be the relevant policies against which to make consultation responses to the DCO application and to determine associated development applications. For this reason Horizon is not proposing specific exclusion to its associated development from this policy.	
40.	Chapter 7 Managing growth and Development – Supply and Quality of	Policy TAI3	On the basis of the Wylfa Newydd specific policies proposed above, references in this policy to "transient construction workers" should be deleted; the policies in this respect should be replaced by the Wylfa	

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
	Housing		<p>Newydd specific policies.</p> <p>As to the rest of policy TAI3 too, rather than seek for specific amendments to the policy, which is too prescriptive to enable the facilities Horizon will require, Horizon proposes to rely on the Wylfa Newydd specific policies proposed above which would be the relevant policies against which to make consultation responses to the DCO application and to determine associated development applications. For this reason Horizon is not proposing specific exclusion to its associated development from this policy.</p>	
41.	Chapter 7 Managing growth and Development – Supply and Quality of Housing	Policy PS14 – Affordable housing	<p>Rather than seek for specific amendments to this policy, Horizon proposes to rely on the Wylfa Newydd specific policies proposed above which would be the relevant policies against which to make consultation responses to the DCO application and to determine associated development applications. For this reason Horizon is not proposing specific exclusion to its associated development from this policy.</p>	

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
42.	Chapter 7 Managing growth and Development – Natural and Built Environment	Policy PS16 – Conserving and Enhancing the Natural Environment and Policies AMG1-5	<p>There is a typographical error in the introduction: It should be "effect", not "affect".</p> <p>Horizon submits that greater flexibility needs to be included in these policies so that proposals predicted to have an adverse effect will be permissible subject to the identification and implementation of sufficient mitigation measures, supported by an appropriate implementation plan.</p> <p>Rather than seek specific amendments to these policies Horizon proposes to rely on the Wylfa Newydd specific policies proposed above which would be the relevant policies against which to make consultation responses to the DCO application and to determine its associated development applications.</p>	
43.	Chapter 7 Managing growth and Development – Natural and Built Environment	Policy PS17	<p>Horizon submits that greater flexibility needs to be included in these policies so that proposals predicted to have an adverse effect will be permissible subject to the identification and implementation of sufficient mitigation measures, supported by an appropriate implementation plan.</p>	

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
			Rather than seek specific amendments to these policies Horizon proposes to rely on the Wylfa Newydd specific policies proposed above which would be the relevant policies against which to make consultation responses to the DCO application and to determine its associated development applications.	
44.	Chapter 7 Managing growth and Development – Natural and Built Environment	Policy MWYN9: Borrow Pits	Horizon supports a policy on borrow pits.  However, rather than seek for specific amendments to policy MWYN9, Horizon proposes to rely on the Wylfa Newydd specific policies proposed below which will be the relevant policies against which to determine its associated development applications. For this reason Horizon is not proposing specific exclusion of its associated development from these policies.	