

HORIZON COMMERCIAL

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NUCLEAR POWER

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ENERGY WORKING FOR BRITAIN

Joint Planning Policy Unit
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 Bangor City Council Offices
 Ffordd Gwynedd
 Bangor
 Gwynedd
 LL57 1DT

12th April 2016

FAO Nia Haf Davies

DCRM Ref. No: HNP-S2-RI-LET-00031

Unique Number: HNP9060N

By e-mail: planningpolicy@gwynedd.gov.uk

Dear Nia

ANGLESEY AND GWYNEDD JOINT LOCAL DEVELOPMENT PLAN 2011-2026
HORIZON NUCLEAR POWER WYLFA LIMITED REPRESENTATIONS ON FOCUSED CHANGES
(FEBRUARY 2016)

Horizon Nuclear Power Wylfa Limited ("Horizon") welcomes the opportunity to comment on the Isle of Anglesey County Council and Gwynedd Council ("Councils") Joint Local Development Plan ("JLDP") Focussed Changes (February 2016) and to continue dialogue with the Councils as part of the latest JLDP consultation.

The publication of the Focussed Changes follows earlier consultation on the Deposit Draft JLDP in March 2015 where Horizon made representations that included a number of important and fundamental proposed changes to the JLDP. Horizon is also aware that the Councils have submitted the JLDP to the Welsh Government and Planning Inspectorate for Public Examination.

As you know, Wylfa Newydd and the associated development 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.

We are therefore fully invested in the future of Anglesey and is committed to continued working with the Councils to ensure that the JLDP provides an appropriate balance to recognition and support for the Wylfa Newydd with the communities' needs.

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We are pleased that a number of our proposed changes to the Deposit JLDP have been incorporated into the 'Focussed Changes' which serves to strengthen support in the JLDP for the Wylfa Newydd. However, we are concerned that a number of our fundamental proposed changes to the Deposit Draft JLDP have not been supported.

Our primary concern is the absence of a clear suite of Wylfa Newydd specific policies, which has not been addressed by the Focussed Changes. It is currently for the reader to wade through a significant number of policies to 'pick out' and appropriately balance those elements that are appropriate for assessing development at Wylfa Newydd. This significantly affects the ability of the policies to be easily interpreted, particularly by members of the public, and so undermines their effectiveness.

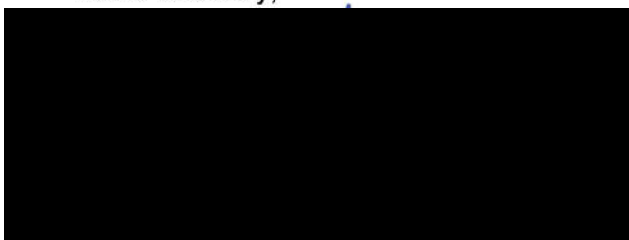
Accordingly, please find enclosed the following in support of our representations:

1. A summary note explaining the nature of Horizon's further representations; and
2. A schedule setting out additional specific representations as a result of the Focussed Changes. Horizon has agreed with the Councils that given the format of the 'Focussed Changes', its representations can be provided in tabular form for ease of reference against Horizon's representations on the Deposit Draft JLDP.

We would also like to confirm our desire to appear at the hearing sessions relevant to the representations set out in our enclosed responses.

We would stress again that these concerns are raised in a constructive manner and with a continued desire to work alongside your Councils to successfully advance the Wylfa Newydd. With this in mind, we would welcome an early opportunity to meet to discuss the contents of our latest representations with you and your officers.

Yours sincerely,



Kieran Somers
Head of Planning

Enc.

Signed Focussed Changes Representation Form 12.04.16

Horizon Focussed Changes Summary Notes 11.04.16



JLDP Additional Specific Representations Final V4 12.04.16

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**Cynllun Datblygu Lleol ar y Cyd Adnau Ynys Môn a Gwynedd 2011-2026
FFURFLEN SYLWADAU NEWIDIADAU Â FFOCWS/
Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026
FOCUSED CHANGES COMMENTS FORM**

25/2/16.

Yn dilyn ymgynghoriad ar y Cynllun Datblygu Lleol ar y Cyd ar Adnau, mae Cyngorhau Gwynedd a Môn yn cynnig rhai 'Newidiadau â Ffocws.' Hoffem glywed eich barn ar y rhain.

Dylid defnyddio'r ffurflen hon ar gyfer yr holl sylwadau (h.y. sylwadau neu wrthwynebiadau). Mae fersiynau Uniongyrchol Ar-lein/Electronic a nodiadau cyfarwyddyd ar gael ar www.gwynedd.llyw.cymru/cdll neu www.anglesey.gov.uk/cdll. Os ydych yn cyflwyno copi ar bapur, dylech atodi tudalennau ychwanegol lle bod angen. Dylech lenwi ffurflenni ar wahân ar gyfer pob sylw yr hoffech ei wneud.

Sylwer bod RHAID i sylwadau fod yn ymwneud â'r Newidiadau â Ffocws yn unig, ac nid i agweddau eraill ar y Cynllun Datblygu Lleol ar y Cyd ar Adnau. Ni fydd sylwadau eraill yn derbyn sylw.

Mae'n rhaid derbyn eich sylwadau ddim hwyrach na 4.30yh ar yr 13 Ebrill 2016. NI FYDD SYLWADAU A DDERBYNNIR WEDI'R DYDDIAD YMA YN CAEL EU HYSTYRIED

Dychwelwch y ffurflenni at: **Uned Polisi Cynllunio ar y Cyd, Swyddfa Cyngor Dinas Bangor, Ffordd Gwynedd, Bangor, Gwynedd, LL57 1DT neu polisicynllunio@gwynedd.gov.uk**

Diogelu Data - Mae gan y ffurflen hon ddwy ran: Rhan A (Manylion Personol) a Rhan B (Eich sylw). Sylwer mai Rhan B yn unig fydd ar gael i'r cyhoedd a chaiff ei hanfon at yr Arolygiaeth Gynllunio.

Mae'n bosib derbyn ffurflenni sylwadau ychwanegol gan yr Uned Polisi Cynllunio ar y Cyd drwy ffonio 01286 685003 neu gellir eu llawr lwytho o wefan y Cyngor yn: www.gwynedd.llyw.cymru/cdll neu

Following consultation on the Deposit Joint Local Development Plan (LDP), Anglesey and Gwynedd Councils are proposing some 'Focussed Changes'. We would like your views on these.

This form should be used for all representations (i.e. comments or objections). Direct Online/Electronic versions and guidance notes are available at www.gwynedd.llyw.cymru/ldp or www.anglesey.gov.uk/ldp. If you are submitting a paper copy, attach additional sheets as necessary. **Separate forms should be completed for each comment that you wish to make.**

Please note that representations MUST relate only to the Focussed Changes, and not to other aspects of the Deposit Joint Local Development Plan. Other representations will be disregarded.

Your representations must be received by no later than 4.30pm on the 13 April 2016. REPRESENTATIONS RECEIVED AFTER THIS TIME WILL NOT BE CONSIDERED



Please return forms to: **Joint Planning Policy Unit, Bangor City Council Offices, Ffordd Gwynedd, Bangor, Gwynedd, LL57 1DT or planningpolicy@gwynedd.gov.uk**

Data Protection - This form has two parts: Part A (Personal details) and Part B (Your representation). Please note that only Part B will be made publicly available and will be forwarded to the Planning Inspectorate.

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.llyw.cymru/ldp or

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Cynllun Datblygu Lleol ar y Cyd Adnau Ynys Môn a Gwynedd 2011-2026
FFURFLEN SYLWADAU NEWIDIADAU Â FFOCWS/
Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026
FOCUSSED CHANGES COMMENTS FORM
25/2/16.

RHAN B: Eich Sylwadau a Newidiadau a Awgrymir PART B: Your Comments and Suggested Changes	
Eich enw/Sefydliad: Your name/Organisation:	Horizon Nuclear Power Wylfa Limited

1. Ar ba Newid â Ffocws yr ydych chi'n gwneud sylwadau? (Cofiwch defnyddio un ffurflen ar gyfer pob cynrychiolaeth)
1. Which Focussed Change are you commenting on? (Remember to use one form for each representation)

Rhif y Newid â Ffocws (NF) Focussed Change Number (NF)	All	Cefnogi/ Support	<input type="checkbox"/>	Gwrthwynebu/ Object	<input type="checkbox"/>
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2. Cyn i chi esbonio eich sylwadau'n fanwl, byddai'n dda gwybod os ydych yn credu fod y Cynllun yn gadarn a'i pheidio, o ganlyniad i'r Newidiadau â Ffocws, neu a ydych o'r farn bod rhannau ohono neu bob rhan ohono ddim yn gadarn a bod angen ei newid.
 I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd. Os ydych yn ansicr, gadewch y rhan yma yn wag.

2. Before you set out your comments in detail, it would be helpful to know whether you think that, as a result of the Focussed Changes, the Plan is sound or that all or parts of it are unsound.
 For more information on soundness and procedural requirements, see the guidance notes. If you are unsure, leave this section blank.

Cadarn/Sound	<input type="checkbox"/>	Dim yn gadarn ac dylid ei newid/Unsound and should be changed	<input checked="" type="checkbox"/>
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3. Rhowch fanylion eich sylwadau ar y Newid â Ffocws yn y blwch nesaf.
 Esboniwch pam rydych yn gwrthwynebu neu'n cefnogi'r Newid â Ffocws a nodir a pha newidiadau sydd eu hangen i'r Newid â Ffocws i wneud y Cynllun yn gadarn. Dylech gynnwys yr holl wybodaeth, tystiolaeth a gwybodaeth ategol sy'n angenrheidiol i gefnogi eich sylw. Bydd hyn yn helpu'r Awdurdod a'r Arolygydd i ddeall y materion y byddwch yn eu codi. Ni fyddwch yn gallu cyflwyno rhagor o wybodaeth i'r Archwiliad

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dim ond os bydd yr Arolygydd yn eich gwahodd i wneud hynny.

3. Please provide details of your representation on the Focussed Change in the next box.

Explain why you object to or support the identified Focussed Change and outline what changes are needed to the Focussed Change to make the Plan sound. Include all the information, evidence and supporting information necessary to support your representation. This will help the Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the Examination if the Inspector invites you to do so.

Please refer to the attached schedule of "Additional Specific Representations to Focussed Changes"

Defnyddiwch dudalennau ychwanegol os bydd angen.
Nodwch faint o dudalennau ychwanegol rydych wedi'u defnyddio.....
*Please use additional sheet if necessary.
Please state how many additional sheets have been used.....*

4. Os yw eich sylw yn 3 yn fwy na 100 o eiriau, darparwch grynodeb os gwelwch yn dda (dim mwy na 100 o eiriau).

4. If your response to 3 above exceeds 100 words, please provide a summary (no more than 100 words).

Please refer to the attached schedule of "Additional Specific Representations to Focussed Changes"

5. A ydych am i'ch sylwadau gael eu hystyried fel 'sylwadau ysgrifenedig' neu a hoffech siarad mewn sesiwn gwrandawriad yn yr Archwiliad Cyhoeddus? (Ticiwch un o'r isod)

Ar y cam hwn, gallwch wneud sylwadau'n ysgrifenedig yn unig (gelwir y rhain yn 'sylwadau ysgrifenedig'). Fodd bynnag, gall pawb sydd am newid y Cynllun ymddangos gerbron yr Arolygydd a siarad mewn 'sesiwn gwrandawriad' yn ystod yr Archwiliad Cyhoeddus. Ond dylech gofio y bydd yr Arolygydd yn rhoi'r un pwysau ar eich sylwadau ysgrifenedig ar y ffurflen hon â'r rheiny a wneir ar lafar mewn sesiwn gwrandawriad. Sylwer, bydd yr Arolygydd yn dewis y weithdrefn fwyaf priodol er mwyn darparu ar gyfer y rhai sydd eisiau rhoi tystiolaeth lafar.

5. 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)

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the Public Examination. But 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. Please note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

Nid wyf am siarad mewn sesiwn gwrandawriad ac rwyf yn fodlon i'm sylwadau

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ysgrifenedig gael eu hystyried gan yr Arolygydd. <i>I do not want to speak at a hearing session and am happy for my written comments to be considered by the Inspector.</i>	
Hoffwn siarad mewn sesiwn gwrandawriad. <i>I want to speak at a hearing session.</i>	<input checked="" type="checkbox"/>

<p>6. Os hoffech siarad, cadarnhewch pam rydych yn ystyried ei bod hi'n angenrheidiol i chi siarad yn y Gwrandawriad.</p> <p><i>6. 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.</i></p>
<p>Please refer to the attached schedule of "Additional Specific Representations to Focussed Changes". In particular, the JDLP needs to provide sufficiently clear policies to support and provide the necessary control for significant elements of the Wylfa Newydd Project.</p>

<p>7. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith hoffech chi gael eich clywed? (Ticiwch un o'r isod)</p> <p><i>6. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard. (Please tick one of the following boxes)</i></p>				
<table border="1" style="width: 100%;"> <tr> <td>Hoffwn i gael fy nghlywed yn Gymraeg <i>I wish to be heard in Welsh</i></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>Hoffwn i gael fy nghlywed yn Saesneg <i>I wish to be heard in English</i></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> </tr> </table>	Hoffwn i gael fy nghlywed yn Gymraeg <i>I wish to be heard in Welsh</i>	<input type="checkbox"/>	Hoffwn i gael fy nghlywed yn Saesneg <i>I wish to be heard in English</i>	<input checked="" type="checkbox"/>
Hoffwn i gael fy nghlywed yn Gymraeg <i>I wish to be heard in Welsh</i>	<input type="checkbox"/>			
Hoffwn i gael fy nghlywed yn Saesneg <i>I wish to be heard in English</i>	<input checked="" type="checkbox"/>			

DIOLCH AM EICH SYLWADAU AM Y NEWIDIADAU Â FFOCWS/ THANK YOU FOR YOUR COMMENTS ON THE FOCUSED CHANGES

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Nodiadau cyfarwyddyd	Guidance notes
<p>Bydd Cynllun Datblygu Lleol Gwynedd a Môn ar y Cyd yn cael ei archwilio gan Arolygydd annibynnol a benodir gan Lywodraeth Cymru. Gwaith yr Arolygydd yw ystyried a yw'r Cynllun yn bodloni gofynion gweithdrefnol ac a yw'n gadarn.</p> <p>Gellir ystyried 'Cadarn' yn y cyd-destun hwn o fewn ei ystyr arferol o 'dangos barnu da' a 'gellir ymddiried ynddo'. Y cwestiynau neu'r 'profion' y bydd yr Arolygydd yn eu hystyried wrth benderfynu a yw'r Cynllun yn gadarn yw:</p> <ol style="list-style-type: none"> 1. A yw'r cynllun yn ffitio? (h.y. a yw'n gyson â chynlluniau eraill?) 2. A yw'r cynllun yn briodol? (h.y. a yw'n briodol ar gyfer yr ardal yng ngoleuni'r dystiolaeth?) 3. A fydd y cynllun yn cyflawni? (h.y. a yw'n debygol o fod yn effeithiol?) <p>Darperir rhagor o wybodaeth am y profion cadernid a'r gofynion gweithdrefnol yn Arweiniad Gweithdrefnol ar Archwiliadau Cynllun Datblygu Lleol yr Arolygiaeth Gynllunio.</p> <p>Wedi ymgynghori ar fersiwn adneuo'r Cynllun Datblygu Lleol, mae Cynghorau Gwynedd a Môn yn gwneud nifer gyfyngedig o Newidiadau â Ffocws er mwyn gwneud y Cynllun yn gadarn cyn iddo gael ei archwilio. Ymgynghorir ar y newidiadau rwan. Caiff unrhyw ymatebon eu hanfon ymlaen yn uniongyrchol at yr Arolygydd Cynllunio.</p> <p>Os ydych yn gwrthwynebu Newid â Ffocws, dylech ddweud pam nad yw'n gwneud y Cynllun yn gadarn a sut dylid newid y Newid â Ffocws er mwyn gwneud y Cynllun yn gadarn.</p> <p>Lle rydych yn cynnig newid i'r Newid â Ffocws byddai'n ddefnyddiol egluro pa brawf (profion) cadernid rydych yn credu ei fod yn methu. Fydd methu adnabod prawf ddim yn golygu na chaiff eich sylw ystyriaeth, cyn belled â'i fod yn ymwneud a'r Newidiadau â Ffocws. Dylech gynnwys eich holl sylwadau ar y ffurflen, gan ddefnyddio dogfennau ychwanegol a thystiolaeth ategol lle bod angen.</p>	<p><i>The Joint Anglesey and Gwynedd Local Development Plan (LDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound.</i></p> <p><i>'Sound' may be considered in this context within its ordinary meaning of 'showing good judgement' and 'able to be trusted'. The questions or 'tests' which the Inspector will consider in deciding whether the Plan is sound are:</i></p> <ol style="list-style-type: none"> <i>1. Does the plan fit? (i.e. is it consistent with other plans?)</i> <i>2. Is the plan appropriate? (i.e. is it appropriate for the area in the light of the evidence?)</i> <i>3. Will the plan deliver? (i.e. is it likely to be effective?)</i> <p><i>More information on the soundness tests and procedural requirements is provided in the Planning Inspectorate's Local Development Plan Examinations Procedural Guidance.</i></p> <p><i>Having consulted on the Deposit version of the Local Development Plan, Anglesey and Gwynedd Councils are making a limited number of 'Focussed Changes' to make the Plan sound before it is examined. These changes are being consulted upon now. Any responses will be forwarded directly to the Planning Inspector.</i></p> <p><i>If you are objecting to a Focussed Change, you should say why you think it makes the Plan unsound, and how the Focussed Change should be amended to make the Plan sound.</i></p> <p><i>Where you propose an amendment to a Focussed Change it would be helpful to make clear which test(s) of soundness you believe it fails. Failing to identify a test will not mean that your comment will not be considered, providing it relates to the Focussed Changes. You should include all your comments on the form, using accompanying documents and supporting evidence where necessary.</i></p>

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Dychwelwch y ffurflen i: **Uned Polisi Cynllunio ar y Cyd, Swyddfa Cyngor Dinas Bangor, Ffordd Gwynedd, Bangor, Gwynedd, LL57 1DT** neu polisicynllunio@gwynedd.gov.uk erbyn 4.30yh ar 13/4/16

Please return the form to: **Joint Planning Policy Unit, Bangor City Council Offices, Ffordd Gwynedd, Bangor, Gwynedd, LL57 1DT** or planningpolicy@gwynedd.gov.uk by 4.30pm on 13/4/16

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CYNLLUN DATBLYGU LLEOL AR Y CYD ADNAU YNYS MÔN A GWYNEDD 2011-2026 ANGLESEY AND GWYNEDD DEPOSIT JOINT LOCAL DEVELOPMENT PLAN 2011-2026

HORIZON NUCLEAR POWER WYLFA LIMITED REPRESENTATIONS TO FOCUSED CHANGES (APRIL 2016)

a) Introduction

- 1.1 Horizon Nuclear Power Wylfa Limited (“Horizon”) welcomes the opportunity to comment on the Isle of Anglesey County Council and Gwynedd Council (“Councils”) Joint Local Development Plan (“JLDP”) Focussed Changes (February 2016).
- 1.2 The publication of the Focussed Changes follows earlier consultation on the Deposit Draft JLDP in March 2015 where Horizon made representations that included a number of important and fundamental proposed changes to the JLDP.
- 1.3 Horizon is also aware that the Councils have submitted the JLDP to the Welsh Government and Planning Inspectorate for Public Examination.
- 1.4 Horizon is advancing proposals for the construction and operation of a new nuclear power station at Wylfa (“Wylfa Newydd”). As outlined in Horizon’s representations to the Deposit Draft JLDP, Wylfa Newydd and the associated development (“Wylfa Newydd Project” or “Project”) is likely to be one of the biggest, if not the biggest, energy investment in Wales. Horizon is therefore fully invested in the future of Anglesey and welcomes continued dialogue with the Councils as part of the latest JLDP consultation.
- 1.5 Accordingly, please find enclosed a table of representations entitled ‘Additional Specific Representations to Focussed Changes’ setting out Horizon’s detailed comments to the Focussed Changes.
- 1.6 Horizon has agreed with the Councils that given the format of the Focussed Changes, its representations are provided in tabular form for ease of reference against Horizon’s representations on the Deposit Draft JLDP.
- 1.7 Horizon’s representations have particular regard to the Government’s requirements relating to soundness and legal compliance, further emphasised in national planning policy as set out in Planning Policy Wales (Edition 8, 2016) (“PPW”). The accompanying table provides Horizon’s detailed comments, sets out whether Horizon considers that the Focussed Changes meet the soundness tests, and makes recommendations including, where appropriate, proposed changes to the JLDP.

b) Representations to the JLDP Focussed Changes

- 1.8 Horizon is pleased that a number of its proposed changes to the Deposit Draft JLDP have been incorporated into the Focussed Changes which seeks to strengthen support in the JLDP for the Wylfa Newydd Project. Horizon considers this to be a positive move, particularly as Wylfa is identified within the National Infrastructure Plan 2014 (published December 2014) as a ‘Top 40 priority infrastructure investments’ energy project in the UK. It is crucial therefore that the JLDP recognises and reinforces the importance of the Wylfa Newydd Project.

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- 1.8 Horizon is concerned however that the Wylfa Newydd specific policies it proposed to the Deposit Draft JLDP have been rejected by the Councils and have not been incorporated as part of the Focussed Changes. A copy of the proposed Wylfa Newydd specific policies, which are proposed to sit beneath draft Policy PS9, are provided at Appendix of this note for ease of reference.
- 1.9 Horizon considers that the magnitude, timing (the duration of the Project) and national context of the Wylfa Newydd Project justifies the need for a clear suite of Wylfa Newydd specific policies enshrined in the Development Plan, rather than any Wylfa specific Supplementary Planning Guidance alone, to recognise the unique status of the Project.
- 1.10 Horizon considers that the emerging JLDP (as amended by the Focussed Changes) does not provide a sufficiently clear policy framework to support and provide the necessary control for significant elements of the Wylfa Newydd Project. It is critical that there is a clear suite of policies against which the Councils can determine applications where they are the decision maker and make representations where they are a consultee, i.e. for the DCO. It is particularly important that the policies perform this joint role given the emerging changes in the draft Wales Bill, which are now likely to include the option to combine the consenting process for associated development for major electricity generating projects (over 350MW) in Wales within the DCO regime.
- 1.11 As Horizon explained in its original representations to the Deposit Draft JLDP, in Wales the consent regime for Nationally Significant Infrastructure Projects (“NSIP’s”) operates alongside the town and country planning regime. While Wylfa Newydd itself will therefore be determined under the Planning Act 2008, a significant amount of development will need to come forward under the Town and Country Planning Act 1990 (as amended) (“TCPA”) as associated development in connection with the Project (or through the DCO if the changes currently proposed through the draft Wales Bill come into effect).
- 1.12 Crucially, Horizon anticipates the need for TCPA applications for associated development to be consented early will become increasingly necessary. This is because examining authorities for Welsh DCO’s continue to put increasing pressure on developers to have their TCPA applications approved by the time of DCO examination to provide certainty and to ensure that there is no impediment for bringing forward such important and significant infrastructure projects. It is critical therefore that the JLDP provides the appropriate planning policy framework so as not to create a barrier or unnecessary hurdles for applications for associated development proposed in connection with the Project.
- 1.11 For those reasons, Horizon strongly urges the Councils to reconsider incorporating the proposed Wylfa Newydd specific policies as part of the JLDP. Incorporating the proposed Wylfa Newydd specific policies provides an opportunity for those policies to clarify, where appropriate, where the Wylfa Newydd specific policies carry greater weight or create exceptions to other policies in the JLDP while still providing a robust assessment framework.
- 1.12 As currently drafted however, Horizon considers the draft JLDP policies to be insufficiently flexible and lacking the clarity required by planning policies to appropriately assess planning application proposals for associated development. As currently drafted it is for the reader to wade through a significant number of policies to ‘pick out’ and appropriately balance those elements that are appropriate for assessing development at Wylfa Newydd. This significantly affects the ability of the policies to be easily interpreted, particularly by members of the public, and undermines their effectiveness.

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- 1.13 Horizon made it clear that its representations to the Deposit Draft JLDP were based on those Wylfa Newydd site specific policies being incorporated into the future JLDP. It therefore reserved its right to make further representations/comments to any future consultation such as these Focussed Changes if that was not accepted. This meant that it was able to take a lighter touch approach to commenting on the remainder of the Deposit Draft JLDP on the basis that the Wylfa Newydd specific policies would establish the primary relevant policies for the Project.
- 1.14 It was for those reason that Horizon’s representations for the JLDP did not comment in any detail (nor seek specific amendments) on a number of other policies, which would in the absence of Wylfa Newydd site specific policies, form the policy context for the Project.
- 1.15 As the Focussed Changes do not incorporate the Wylfa Newydd site specific policies proposed in Horizon’s representations to the Deposit Draft JLDP, the enclosed table now proposes specific and fundamental changes to a number of policies including: ISA2, ISA3, ISA5, ARNA1, CYF1, CYF2, CYF4, PS12, MAN6, Chapter 7.4, TAI2, TIA3, PS14, PS16 and MWYN9. While Horizon remains of the view that the inclusion of Wylfa Newydd site specific policies is the most robust way forward, in the event the Councils do not do so it is crucial that the JLDP is further amended so that there is a clear distinction between those policies that relate to general application proposals and those that relate to the Wylfa Newydd Project (associated development in particular) to ensure that the JLDP is sufficiently flexible and that there is a clear mechanism for implementing JLDP policies in relation to the Project. To that end, Horizon now makes representations that some policies should specifically exclude the Wylfa Newydd Project where they are potentially too restrictive if applied to associated development proposed in connection with the Project. In these cases, Horizon have proposed alternative wording which would be more appropriate to apply to the primarily temporary and bespoke associated development uses proposed as part of the Project.

c) Soundness Test

- 1.16 PPW stresses the need for Local Development Plans (LDP’s) to meet the three soundness tests which comprise:
- Does the plan fit? (i.e. is it clear that the LDP is consistent with the other plans?)
 - Is the plan appropriate? (i.e. is the plan appropriate for the area in the light of the evidence?)
 - Will the plan deliver? (i.e. is it likely to be effective?)
- 1.17 The Deposit Draft JLDP set out ten criteria for assessing soundness, which Horizon assumes also apply to the Focussed Changes. These are referred to, in summary and where relevant, in the accompanying table of representations.
- 1.18 In its current form, Horizon does not consider that the JLDP meets the soundness tests because:
- The policies do not create a coherent framework of policies in respect of associated development that will be promoted in connection with the Wylfa Newydd Project and is at odds with the Planning and Compulsory Purchase Act 2004. The JLDP does not therefore meet the “Does the plan fit?” soundness test (soundness test CE1 of the Deposit Draft JLDP).

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- The policies are not realistic or appropriate having considered relevant alternatives and could constrain the ability of the plan to adapt to changes in the number and type of major infrastructure projects associated with the Wylfa Newydd Project. The JLDP therefore fails to meet the “Is the Plan appropriate?” soundness test (soundness test CE2 in the Deposit Draft JLDP).
- The JLDP is insufficiently flexible to appropriately provide for associated development. In order for the JLDP to be effective, Horizon considers it fundamental that the JLDP include Wylfa Newydd specific policies as proposed at the Deposit stage. In the absence of such specific policies, further focussed changes are required to other relevant policies to ensure that they are fit for purpose for determining applications for associated development proposed in connection with the Project and for providing consultation responses in relation to the DCO application.

1.19 As currently drafted, Horizon considers that the draft JLDP does not meet the three soundness tests and does not therefore provide the appropriate and necessary planning policy framework for the Wylfa Newydd Project.

1.20 Horizon urges the Councils to incorporate the Wylfa Newydd site specific policies and proposed changes to ensure that there is a clear planning policy framework so as to help realise (and not create a barrier to) the very urgent need for new nuclear power generation in the UK.

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	JLDP Policy	Paragraph ref	Consultation responses	Specific amendments sought	Previous Representation Addressed by Focused Changes? and Further Specific Amendments Sought
	Development – Sustainable Living		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.		imposes on developers in relation to the "Potential Options" and suggest that it would be beneficial for this policy to be reworded so that the particular obligation(s) are identified more clearly. This change is required to make the Plan clear and effective in terms of the soundness tests in PPW.
26.	Chapter 7 Managing growth and Development – Sustainable Living	Policy ARNA1: 'Costal Change Management Area'	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 reason Horizon is not proposing specific exclusion to its associated development from these policies.	-	No – Horizon still considers it fundamental that the Plan include specific policies for the Wylfa Newydd Project in order for the Plan to be effective and appropriate and meet the soundness tests in PPW. As the Focussed Changes do not include specific policies for the Wylfa Newydd Project (see representations in the table below), further focussed changes are required to the other relevant policies to make sure that they are fit for purpose for determining applications for associated development coming forward as part of the Project and for providing consultation responses in relation to the DCO application. If these Wylfa Newydd specific policies are not to be incorporated then Horizon considers it imperative that Policy ARNA1 be reworded in order to specifically exclude the application of this policy from the Wylfa Newydd marine located associated development. If a Wylfa Newydd specific policy is not supported, Horizon therefore proposes the following amendments in order to make the Plan sound: Horizon suggests that Policy ARNA1 is amended to add essential infrastructure associated with the Wylfa Newydd Project to the list of development that will be permitted in the CChMA, subject to a TAN 15 compliant Flood Consequences Assessment. <u>Add a new bullet paragraph 11 under existing paragraph 10:</u> <u>“Essential infrastructure, including marine located associated development, delivered in connection with the Wylfa Newydd Project, provided that there are clear plans to manage the impact of coastal change on it, and that it will not have an adverse impact on rates of coastal change elsewhere, taking into account mitigation.”</u>
27.	Chapter 7 Managing growth and Development – Economy and regeneration	Paragraphs 7.3.1-7.3.17	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. The chapter varies between being written for general application to "major infrastructure projects"; and being written specifically about the Wylfa Newydd Project. This: <ul style="list-style-type: none"> creates confusion as to the relevant policies for the Project ; and 	<u>Amend paragraphs to read:</u> 7.3.1 Context <ul style="list-style-type: none"> 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) A key aim of national policy is to improve the country's energy security National Policy Statements establish the need for particular Nationally Significant Infrastructure Projects <u>(NSIP), including specifically for power generation</u> 	No – Whilst some amendments have been made to the wording of these paragraphs (Focused Change Ref: NF 40 and NF 42), it is still considered that all the proposed changes suggested in Horizon’s previous representations, as shown in the cell to the left, need to be incorporated. The chapter still varies between being written for general application to "major infrastructure projects"; and being written specifically about the Wylfa Newydd Project. It is still considered that this: <ul style="list-style-type: none"> creates confusion as to the relevant policies for the Project ; and constrains the flexibility of the Plan to adapt to changes in the number and type of major infrastructure projects in the area.

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JLDP Policy	Paragraph ref	Consultation responses	Specific amendments sought	Previous Representation Addressed by Focused Changes? and Further Specific Amendments Sought
		<ul style="list-style-type: none"> constrains the flexibility of the Plan to adapt to changes in the number and type of major infrastructure projects in the area. <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 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"> General: minor errors in the description of the NSIP regime in these paragraphs should also be corrected. 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"). 	<ul style="list-style-type: none"> A site adjacent to Wylfa has been selected by the UK Government as a potentially suitable site 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> These known nationally significant infrastructure projects could have major infrastructure implications for the Plan area in the form of new electricity transmission lines and associated development <p>Introduction</p> <p>7.3.2 Major Infrastructure Projects NSIPs 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>7.3.3 For the purpose of the Plan, Major Infrastructure Projects include those as defined as Nationally Significant Infrastructure Projects in the Planning Act 2008.</p> <p>7.3.4 <u>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 sufficient weight as a material planning consideration or the Plan is adopted, the Anglesey Energy Island Programme, Destination Management Plans, Single Integrated Plan, New Nuclear Build Supplementary Planning</u></p>	<p>Horizon notes there are still some references to the “existing land use development plan” and “this plan”. Once the Joint Local Development Plan is adopted it will replace the Gwynedd Structure Plan (1993) and Anglesey Local Plan (1996). It is therefore considered that references to the “existing land use development plan” could give rise to confusion.</p> <p>If it is not accepted that specific Wylfa Newydd policies should be included in the Plan, then references in our proposed text to policies WNP1, WNP2, WNP3 and WNP4 should be removed accordingly and reference will need to be made to the other policies in the Plan which are relevant to the Wylfa Newydd Project.</p> <p>It is considered that these changes are required to make the Plan appropriate and effective in terms of the soundness tests in PPW.</p> <p>Focused Change Ref: NF 40 relates to paragraphs 7.3.1 - 7.3.9 and has incorporated several of Horizon’s previous recommendations, clarifying which authorities will determine the DCO application for NSIPs and “associated development” and under existing legislation. However, given the progression of the Wales Bill, it is considered that paragraphs 7.3.3 and 7.3.4 should be amended to explain the likely impact this Bill will have upon the Planning Act 2008 regime and the determination of “associated development” as part of DCO applications.</p> <p>Focused Change Ref: NF 42 concerns paragraphs 7.3.10 - 7.3.19. Horizon consider that a number of changes are required to the new wording for clarity and in order to make the plan fit and to be appropriate and effective. Both the wording “linked to the Project” and “fully realised” could be misinterpreted and the proposed wording is considered to be much clearer. It is also considered that the wording of paragraph 7.3.11 should be amended to clarify the likely impact the Wales Bill will have upon the Planning Act 2008 regime and the determination of “associated development”.</p> <p><u>Amend wording of paragraphs 7.3.1 – 7.3.18 (as numbered in Focused Changes) as follows:</u></p> <p><i>“7.3.1 Context</i></p> <ul style="list-style-type: none"> <i>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)</i> <i>A key aim of national policy is to improve the country’s energy security</i> <i>National Policy Statements establish the need for particular Nationally Significant Infrastructure Projects (NSIPs – as defined by the Planning Act 2008), including specifically for power generation.</i> <i>A site adjacent to Wylfa has been selected by the UK Government as a potentially suitable site for construction of a new nuclear power station. Such a project would be an NSIP, as would be the separate</i>

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JLDP Policy	Paragraph ref	Consultation responses	Specific amendments sought	Previous Representation Addressed by Focused Changes? and Further Specific Amendments Sought
			<p>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>. Similarly applications may be made to other organisations <u>statutory bodies</u> such as for a jetty the <u>Marine Management Organisation</u>, where the <u>Local Authority is also a statutory consultee</u>. 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> that are associated with <u>Major Projects (PS8) where either the Isle of Anglesey County Council or Gwynedd Council or another statutory bodies</u> is the determining <u>planning authority on planning</u> for the associated development applications. It is also applicable to <u>Nationally Significant Infrastructure Projects</u> (such as the proposed Wylfa Newydd), where the Secretary of State makes the decision as well as other applications to other agencies (such as to the Marine Management Organisation for a wharf), where the Council is a <u>statutory consultee</u>.</p> <p>7.3.7 Although the Councils are not the consenting authorities for Major Infrastructure Projects 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 <u>related associated</u> development conforms with the relevant policies and strategies included in this Plan, when it is adopted. In the period before the Plan is adopted or before weight can be given to the policies as material planning consideration the Isle of Anglesey County Council will ensure that 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. 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>	<p><i>National Grid proposal to provide transmission lines from the new nuclear station.</i></p> <ul style="list-style-type: none"> <i>• These NSIPs could have major infrastructure implications for the Plan. area in the form of new electricity transmission lines and associated development</i> <p><i>Introduction</i> 7.3.2 NSIPs 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 <u>as defined in the Planning Act 2008</u>.</p> <p>7.3.3 <i>The approval process for a development consent order (being the form of consent for NSIP) is set out in paragraphs 3.7 – 3.10. As noted in those paragraphs while the decision maker for development consent order is the relevant Secretary of State (following examination and recommendation by the Planning Inspectorate) local authorities or other statutory bodies (such as the MMO) are 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 <u>associated or ancillary development</u> is related to the construction or operation of a NSIP, these proposals <u>in respect of the Wylfa Newydd Project (for example, Temporary Construction Workers Accommodation, logistic centres, and park and ride facilities) will be considered under Strategic Policies PS8 and Policy PS9, 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></i></p> <p>7.3.4 <i>The Planning Inspectorate will examine applications for new Nationally Significant Infrastructure Projects development, using the criteria of 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). The energy NPSs set out national policy against which proposals for major energy projects will be assessed and examined by the Planning Inspectorate. 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</u> as the existing land use development plan, this Plan when it carries sufficient weight as a material planning consideration or the Plan is adopted, the Anglesey Energy Island Programme, Destination Management Plans, 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 set out in the Planning Act 2008; 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. The Local Authority is also a statutory consultee where <u>Similarly</u> applications may be made to other statutory bodies. In Wales the local planning authorities are the determining authorities for any development associated with</i></p>

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JLDP Policy	Paragraph ref	Consultation responses	Specific amendments sought	Previous Representation Addressed by Focused Changes? and Further Specific Amendments Sought
			<p>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);</p> <p>ii. Improvements/ new National Grid Transmission Lines connecting the proposed Wylfa Newydd with Pentir and beyond proposed by National Grid.</p> <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 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. An sudden influx of workers is expected during the construction period. It is considered important that <u>the Plan anticipated and provides and 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 http://www.anglesey.gov.uk/business/energy-island/energy-island-news/wylfa-nuclear-new-build-construction-workers-accommodation-position-statement/114494.article?redirect=false and in the New Nuclear Build at Wylfa Supplementary Planning Guidance http://www.anglesey.gov.uk/Journals/2014/08/11/q/k/h/Wylfa-NNB-SPG-Adopted-July-2014.pdf</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 NSIP Major Infrastructure Projects proposals coming forward, including for example:</p> <p>i. providing advice to inform project promoters during the development of their proposals for consultation and project development;</p> <p>ii. responding to formal consultations during project development and on applications to other determining bodies such as Planning Inspectorate and the Marine Management Organisation (MMO);</p> <p>iii. suggesting appropriate requirements for inclusion in the Development Consent Order, and section 106 obligations and CIL receipts (such as Section 106 and Community Infrastructure Levy – if adopted);</p>	<p>the Development Consent Order application, for example, construction workers accommodation, logistic centres, and park and ride facilities.</p> <p>7.3.5 <i>The scale and impact of NSIPs will be mitigated through an appropriate package of planning permission conditions, section 106 agreements, highway agreements and CIL receipts (if a CIL charging schedule is implemented). This package will be negotiated as part of the planning process.</i></p> <p>7.3.6 <i>In addition the Councils will encourage developers to consider a 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 any such fund will be used to off-set the burden on the locality, and would identify identifying potential legacy uses, including transport, social, economic and community infrastructure which would benefit the community in the long term.</i></p> <p>7.3.7 <i>The Councils note such voluntary Ccommunity benefits may be sought could be provided 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.</i></p> <p>7.3.8 <i>The Councils recognise that Ccommunity benefits 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.</i></p> <p>7.3.9 <i>There are currently two proposed NSIPs at the pre-application stage which are located within the Plan area:</i></p> <p>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);</p> <p>ii. Improvements/ new National Grid Transmission Lines connecting the proposed Wylfa Newydd with Pentir and beyond proposed by National Grid.</p> <p>7.3.10 7.3.9 <i>It is important that the Plan sets out a policy framework to assist the Councils to assess and respond to NSIPs proposals coming forward, including for example:</i></p> <p>i. providing advice to inform project promoters during the development of their proposals for consultation and project development;</p>

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JLDP Policy	Paragraph ref	Consultation responses	Specific amendments sought	Previous Representation Addressed by Focused Changes? and Further Specific Amendments Sought
			<p>iv. determining applications for associated, ancillary or related development outside the Development Consent Order;</p> <p>v. assessing the adequacy of consultation;</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</u> 'conditions'), 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. 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.</p> <p>7.3.12 The Councils' position is that accommodation for the transient <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. All <u>Appropriate</u> proposed legacy uses must will be assessed for their compliance with relevant <u>policies in the Plan</u>. 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>ii. responding to formal consultations during project development and on applications to other determining bodies <u>such as the Planning Inspectorate and the Marine Management Organisation (MMO);</u></p> <p>iii. suggesting appropriate requirements for inclusion in the Development Consent Order and obligations (such as Section 106 and Community Infrastructure Levy – if adopted);</p> <p>iv. determining applications for associated, ancillary or related development outside the Development Consent Order;</p> <p>v. commenting on the adequacy of consultation;</p> <p>v. 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>vi. making representations as part of the formal examination of the Development Consent Order by the Planning Inspectorate,</p> <p>vii. in determining any approvals subsequent to consent (including planning permission 'conditions'), and in discharging functions as the enforcing authority.</p> <p><u>7.3.11 7.3.10 Strategic Policy PS8 is an overarching policy relating to any associated development in relation to NSIPs other than the Wylfa Newydd Project or other major infrastructure projects to be determined by the Councils. applications for a NSIP (other than Wylfa Newydd) or for development proposals associated with or ancillary to such an NSIP application – whether determined by the Secretary of State, the Isle of Anglesey County Council, Gwynedd Council or any other agency. Strategic Policy PS8 does not relate to any NSIP application for development at Wylfa Newydd, or development proposals associated with or ancillary to that application. Strategic Policy PS9 applies to the proposed Wylfa Newydd Project including development associated with it.</u></p> <p><u>7.3.12 7.3.14 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 supplementary advice on important local direct or indirect matters in relation to this Project and its response to national and local policy and strategies in the context of the vision in relation to this Project. This section of the Plan deals with associated the proposed Wylfa Newydd Project including developments to the Wylfa Newydd Project (PS9) and associated development for other NSIPs and other Major Projects (PS8) that are associated with it where either the Isle of Anglesey County Council or Gwynedd Council is the determining planning authority on planning for the associated development applications. Currently it is the Planning Act 2008 regime in Wales requires that "associated development" be determined under the Town and Country Planning Act 1990 by the local planning authority.</u></p>

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			<p>7.3.13 The scale and impact of Major Infrastructure Projects NSIPs will be mitigated through may require an appropriate and comprehensive package of planning permission conditions, section 106 agreements and CIL receipts (if a CIL charging schedule is implemented) developer contributions to mitigate and compensate for any new and increased levels of impact and harm. This package 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.</p> <p>7.3.14 In addition the Councils will encourage developers to consider a 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 Any such fund will be used to off-set 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.</p> <p>7.3.15 The Councils note such voluntary cCommunity benefits may be sought could be provided 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 The Councils recognise that cCommunity benefits 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</p> <p>7.3.17 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 of the HRA: Site Report for Wylfa as well as the HRA process for the joint LDP</p>	<p>However the Wales Bill is anticipated to allow “associated development” to be included in DCO applications and therefore be consented by the Secretary of State, along with the relevant NSIP”.</p> <p>7.3.13 7.3.12 Although the Councils are not the consenting authorities for the Wylfa Newydd Project Development Consent Order Major Infrastructure Projects 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 associated development not included in a DCO application conforms with the relevant policies and strategies included in this Plan. 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>7.3.13 In the period before the Plan is adopted or before weight can be given to the policies as material planning consideration the Isle of Anglesey County Council will ensure that 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. 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>7.3.14 The New Nuclear Build at Wylfa Supplementary Planning Guidance (SPG), sets out the Isle of Anglesey County Council’s supplementary advice on important local direct or indirect matters in relation to this Project and its response to national and local policy and strategies in the context of the Project and is an important material consideration in assessing planning applications for associated development proposed in connection with the Wylfa Newydd Project, to be determined by the Councils. linked to the Project.</p> <p>7.3.15 The New Nuclear Build at Wylfa SPG document will help the County Council to:</p> <ul style="list-style-type: none"> • make robust decisions on all enabling works and associated development planning applications, under the Town and Country Planning Act 1990 • ensure that the potential impacts of the New Nuclear Build and its associated developments are identified and mitigated where possible • ensure that the socio-economic benefits linked with the construction and operation of the power station are maximised fully realised. <p>7.3.16 On the basis of the information currently available it is clear that this Project will be a significant development with numerous significant impacts, some potentially positive and others potentially negative. It is currently anticipated that the Wylfa Newydd construction period will be around 12 years, with around 8,500</p>

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	JLDP Policy	Paragraph ref	Consultation responses	Specific amendments sought	Previous Representation Addressed by Focused Changes? and Further Specific Amendments Sought
					<p>construction workers during the peak construction periods (although it is recognised that the Project is still undergoing detailed design). 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. An influx of workers is expected during the construction period. It is considered important that <u>the Plan anticipates and provides an appropriate policy framework within which to provide this</u> accommodation is consistent with the general objectives of the Plan and that it won't prejudice the spatial strategy. It is anticipated that the workforce will be accommodated via various means, including private housing units to buy or rent, holiday accommodation and purpose built accommodation provided by Horizon or through a third party. Further information regarding this is given in http://www.anglesey.gov.uk/business/energy-island/energy-island-news/wylfanuclear-new-build-construction-workers-accommodation-positionstatement/114494.article?redirect=false and in the New Nuclear Build at Wylfa Supplementary Planning Guidance http://www.anglesey.gov.uk/Journals/2014/08/11/q/k/h/Wylfa-NNB-SPG-Adopted-July-2014.pdf [SR4]</p> <p>7.3.17 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 Project, e.g. site(s) for offices, short stay accommodation and other purposes related to logistics, storage and off-site fabrication. 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. <u>Locating this development will be done in accordance with policies WNP1, WNP2, and WNP3.</u></p> <p>7.3.18 The Councils' position is that Temporary Construction Workers Accommodation (TCPA) should as far as possible be provided within or adjacent to the development boundaries of the Centres identified in the Plan's Settlement Hierarchy, or 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. Appropriate proposed legacy uses must <u>will be assessed for their compliance with relevant policies in the</u> comply with the relevant policies within this Plan. Potential legacy uses include serviced plots for affordable housing, elderly or special needs accommodation, student accommodation, offices or hotels, or</p>

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					<i>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 will be controlled by planning condition."</i>
28.	Chapter 7 Managing growth and Development – Economy and regeneration	Policy PS8: 'Nationally Significant Infrastructure Projects and Associated Developments'	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 PS8 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.	-	Yes – Focused Change Ref: NF40 clarifies that Policy PS8 does not apply to the Wylfa Newydd Project.