



CYNGOR SIR
YNYS MÔN
ISLE OF ANGLESEY
COUNTY COUNCIL



Observations about Matters Arising Changes representations

**Anglesey and Gwynedd Joint Local Development
2011—2026**

**March
2017**

OBSERVATIONS ABOUT REPRESENTATIONS SUBMITTED ABOUT MATTERS ARISING CHANGES

Introduction

1. Gwynedd Council and the Isle of Anglesey County Council formally consulted about a Schedule of Matters Arising Changes (see document DA.039 & DA.040) from 26th January to 9th March 2017. A total of 193 representations were submitted during the consultation period from 43 different individuals and organisations.

Representations about the Matters Arising Changes – an overview

2. The following table provides an overview of the number of representations that were submitted by Matter Arising Change.

Matters Arising Change	Total representations	Objection	Support	Comment
General	3	0	0	3
Chapter 3: Policy Context				
NMC22	1	1	0	0
Chapter 5: Vision and Strategic Objectives				
NMC28	1	1	0	0
Chapter 6: Strategy				
NMC49	1	0	1	0
NMC50	1	0	1	0
Chapter 7.1: Managing Growth and Development – Safe, Healthy, Distinctive and Active Communities				
NMC55	3	2	1	0
NMC56	13	12	1	0
NMC58	1	1	0	0
NMC68	1	1	0	0
NMC70	1	1	0	0
NMC71	1	0	1	0
NMC72	1	1	0	0
Chapter 7.2: Managing Growth and Development – Living Sustainably				
NMC83	2	2	0	0
NMC87	1	1	0	0
NMC89	1	0	1	0
NMC90	2	2	0	0
NMC93	1	1	0	0
NMC94	1	1	0	0
NMC95	1	1	0	0
NMC96	1	1	0	0
NMC100	1	1	0	0
NMC101	4	3	1	0
NMC110	3	3	0	0
NMC115	2	1	1	0
NMC124	1	0	1	0
Chapter 7.3: Managing Growth and Development – Economy and Regeneration				
NMC125	2	0	2	0

Matters Arising Change	Total representations	Objection	Support	Comment
NMC126	2	1	1	0
NMC127	2	1	1	0
NMC128	2	1	1	0
NMC129	2	1	1	0
NMC130	2	1	1	0
NMC131	2	2	0	0
NMC132	1	1	0	0
NMC133	2	2	0	0
NMC134	2	2	0	0
NMC135	2	2	0	0
NMC136	3	3	0	0
NMC137	3	3	0	0
NMC138	3	3	0	0
NMC139	3	3	0	0
NMC140	2	2	0	0
NMC141	3	3	1	0
NMC142	1	1	0	0
NMC143	5	5	0	0
NMC144	3	3	0	0
NMC147	1	1	0	0
NMC148	3	3	0	0
NMC149	1	1	0	0
NMC154	1	0	1	0
NMC156	1	1	0	0
NMC164	2	2	0	0
Chapter 7.4: Managing Growth and Development – Supply and Quality of Housing				
NMC176	1	0	1	0
NMC177	1	0	1	0
NMC178	2	1	1	0
NMC179	1	0	1	0
NMC180	1	0	1	0
NMC181	1	0	1	0
NMC182	1	1	0	0
NMC183	1	1	0	0
NMC184	1	1	0	0
NMC185	1	1	0	0
NMC186	1	1	0	0
NMC187	1	1	0	0
NMC188	3	3	0	0
NMC189	1	1	0	0
NMC190	1	1	0	0
NMC191	1	1	0	0
NMC192	1	1	0	0
NMC193	1	1	0	0
NMC194	1	1	0	0
NMC195	1	1	0	0
NMC196	1	1	0	0

Matters Arising Change	Total representations	Objection	Support	Comment
NMC197	1	1	0	0
NMC198	4	4	0	0
NMC199	1	1	0	0
NMC211	1	1	0	0
NMC214	5	5	0	0
NMC217	1	1	0	0
NMC221	1	1	0	0
NMC240	1	1	0	0
NMC245	1	1	0	0
NMC249	2	1	1	0
NMC259	2	2	0	0
NMC260	1	1	0	0
NMC261	1	1	0	0
NMC262	2	2	0	0
NMC263	1	1	0	0
NMC266	1	1	0	0
NMC268	5	5	0	0
Chapter 7.5: Managing Growth and Development – Natural and Built Environment				
NMC271	3	2	1	0
NMC275	1	1	0	0
NMC290	2	1	1	0
NMC292	1	1	0	0
NMC294	1	1	0	0
NMC295	1	1	0	0
NMC296	1	0	1	0
NMC297	1	1	0	0
NMC298	1	0	1	0
NMC299	1	0	1	0
NMC300	2	1	1	0
NMC308	1	1	0	0
NMC311	2	1	1	0
NMC315	1	0	1	0
NMC322	1	1	0	0
NMC323	1	1	0	0
NMC326	1	1	0	0
NMC327	1	0	1	0
NMC340	1	1	0	0
NMC344	1	1	0	0
Representations about Maps				
NMC362	1	0	1	0
NMC363	1	1	0	0
NMC364	1	0	1	0
NMC267	3	2	1	0
NMC398	1	1	0	0
Total	193	153	37	3

Observations about the submitted comments relating to the Matters Arising Changes

3. The Inspector has received a copy of the duly made comments for consideration before finalising his report. The next table provides a summary of each individual representation and presents views on them, drawing attention to cases where it is believed that there could be further changes needed. This report has been submitted to the Inspector to enable him to consider the issues raised before the completing his report.
4. The potential additional changes to wording are shown in the table as follows:

[Example of new wording](#)

[Example of deleted text](#)

Sustainability of the Plan

5. Any potential changes suggested in the table below have been evaluated to determine if they are significant in terms of the Sustainability Appraisal (SA) and the Habitat Regulations Assessment (HRA). Appendix 1 to this report sets out how the screening was undertaken and its conclusions. At this stage, the initial screening has come to the conclusion that the proposed changes are small and do not have a significant impact on the findings of the SA and the HRA.

Representations that weren't duly made

6. Comments that have already been made at the Deposit and Focus Changes stages are already receiving consideration by the Inspector as part of the Examination. Only comments on the Matters Arising Changes Schedule were the subject of public consultation.
7. This consultation was not therefore an opportunity to add to previous comments or to make new comments on parts of the original Deposit Plan that are not subject to Matters Arising Changes. This type of comment was not registered because it should have been made during earlier stages of the Plan preparation process. Appendix 2 of this report provides information about the comments that have not been duly made.

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
Cyffredinol / General	SNMC136	Comment	Noel Davey (1169)	CPRW Caernarfonshire Branch	We support the majority of changes which are clearly intended to improve the clarity and intelligibility of the Plan by means of simpler and more concise text.	Note the comment
Cyffredinol / General	SNMC52	Comment	Rhys Evans (3430)	Dŵr Cymru Welsh Water	We do not have any comments to make on the proposed Matters Arising Changes but would like to thank you for allowing Dwr Cymru Welsh Water the opportunity to respond.	Note the comment
Cyffredinol / General	SNMC53	Comment	Cyng R H Wyn Williams (367)		A brief word to confirm my support to the new Unitary Plan; I do not wish to see any changes in the context of Abersoch ward and policies which confirm the need to protect the area's communities and language, and thank you for all the work.	Note the comment
NMC022	SNMC66	Gwrthwynebu/ Object	Kieran Somers (3441)	Horizon Nuclear Power Wylfa Limited	The NPS text in paragraphs 3.7-3.9 has been deleted on the basis that this information is provided in Chapter 7.3. The information is tailored to highlight the importance of Wylfa Newydd and is contextual. Horizon suggests that some text should be re-inserted and additional text included clarifying the current legislative context.	<p>Chapter 3 of the Plan was revised in order to respond to Action Point S16/ PG42. Discussion in Hearing 16 and previous Hearings drew attention to the need to try to ensure that the Plan is appropriate and deliverable. This section of the Plan has changed over time to reflect the various stages of the Plan's preparation. It was agreed during the Hearing that the adopted Plan should be as streamline as possible in order to try to ensure that it is as focused as possible.</p> <p>The level of detail sought by the objector is not required. Nonetheless, it may be appropriate to include a reference to the Wales Act 2017 in order to ensure that the Plan's context is as up-to-date as possible, particularly as this Act does have an impact on the way some policies in the Plan could be applied. The following text is presented for the Inspector's consideration at new</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						<p>paragraph 3.6c: <u>“Wales Act 2017</u></p> <p><u>The Wales Act 2017, which received Royal Assent on 31 January 2017, introduced changes to the application of Planning Act 2008 in Wales. Planning Act 2008 provides that projects defined as Nationally Significant Infrastructure Projects, e.g. Wylfa Newydd Nuclear Power Station, are of such potential importance to the UK that a different consenting process has been established. Under the Nationally Significant Infrastructure Project consenting procedure in Planning Act 2008, an application for a Development Consent Order (DCO) is examined by the Planning Inspectorate, who will then make a recommendation to the Secretary of State for Business, Energy and Industrial Strategy. Section 43 of the Wales Act permits the inclusion of development commonly referred to as “associated development” within the application for DCO. Associated development can be described as, for example, development that supports the delivery and operation of Wylfa Newydd and could include such works as highway improvements, temporary accommodation for construction workers, park and ride facility, logistics centre, etc. It means that developers may choose whether to include these types of developments within a DCO</u></p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						<u>application or make separate planning applications to the Local Planning Authorities.</u>
NMC028	SNMC67	Gwrthw ynebu/ Object	Kieran Somers (3441)	Horizon Nuclear Power Wylfa Limited	Further clarification is sought as to the timescale for preparing the Wylfa Newydd SPG. The text within the policy doesn't align with the schedule in Appendix 9. The Council's should also confirm that any draft will be subject to a formal consultation period providing Horizon with an opportunity to comment before it is formally adopted.	In order to be given weight as material planning consideration each SPG will be subject to public consultation. As in the case of the adopted SPG, Horizon will be given an opportunity to present comments on a draft version of the SPG. The Plan's Monitoring Framework at Chapter 8 sets a target to adopt the SPG within 6 months of the Plan's adoption.
NMC049	SNMC142	Cefnogi/ Support	Mark Harris (1470)	Home Builders Federation	-	Note the supporting comment
NMC050	SNMC143	Cefnogi/ Support	Mark Harris (1470)	Home Builders Federation	-	Note the supporting comment
NMC052	SNMC144	Gwrthw ynebu/ Object	Mark Harris (1470)	Home Builders Federation	Although supportive of the change we note that the 2015 JHLAS was only carried out for Gwynedd area this needs to be made clear in text.	Accept that the wording of this paragraph could be amended in order to make it clearer that in 2015 a Joint Housing Land Availability Study was only prepared for the Gwynedd Local Planning Authority area. Since Anglesey did not have an adopted Unitary Development Plan, a formal JHLAS study could not be undertaken. As such a Housing Land Monitoring Statement was prepared for Anglesey in 2015. 6.43 <u>Based on the information available, including the 2015 Gwynedd Joint Housing Land Availability Studies and the 2015 Anglesey Housing Land Monitoring Statement,</u> approximately half of the overall housing land requirement is being <u>could be</u> met from

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						housing built since 2011 , sites that already benefit from planning consent given under the previous existing development plans or previous Interim Planning Policies under other material planning considerations . Appendix 5 provides more details about this. The shortfall will be met by windfall sites, existing buildings and new sites that have been selected to provide flexibility and choice. Chapter 7 provides more detail about this.
NMC055	SNMC102	Cefnogi/ Support	Iwan Edgar (3050)	Grŵp Ffocws Cynllun Datblygu Lleol	In 7.1.3a it is proposed that a sentence is added to the end [NMC 55]. It stresses the need to have assessment guidelines in terms of impact on the Welsh language. I wish to support this change. Shortcomings to this end have been obvious on many occasions.	Note the supporting comment
NMC055	SNMC28	Gwrthw ynebu/ Object	Catherine Blyth (WYG) (3424)	Morbaine Ltd	It is considered that there is conflict between the proposed amended wording of Paragraph 7.1.3 (as set out within NMC 55) and Policy PS1 itself. The amended wording of Paragraph 7.1.3 implies that an assessment “will be required” at planning application stage – however, Policy PS1 (as amended by MNC 56) does not make clear the exact level of development that will trigger the requirement for either a Welsh Language Statement and / or Impact Assessment.	The purpose of adding the last sentence to paragraph 7.1.3a is to highlight the fact that the SPG will provide more guidance than can be included in a policy or its explanatory text in terms of the type of information expected to see in a statement or impact assessment. It is not considered necessary to amend the text.
NMC055	SNMC96	Gwrthw ynebu/ Object	Marian E Roberts (2973)		I notice that a request for a “Welsh Language Statement which notes how a proposed development will protect, promote and strengthen the language” can only be made when the development is on an enormous scale (e.g. Retail Development which employs more than 50 employees) or residential developments which have to be higher than the target set by the Council (Policy Tai 14-18) which is already an unreasonably high target and destructive to the	Note the comment, The proposed Supplementary Planning Guidance will provide the relevant wording to support the language.

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
					language as a strategy has not been created of basing housing numbers which would be most likely to promote the language in every area.	
NMC056	SNMC035 SNMC034 SNMC099 SNMC100 SMNC117 SNMC094 SNMC056 SNMC98	Gwrthy wnebu/ Object		Cyngor Cymuned Llanrug Cyngor Cymuned Llanddeiniolen Llyr Gruffydd (AC) Sian Gwenllian (AC) Cyng. Aled Evans Cyngor Cymuned Llanystumdwy Cyngor Tref Pwllheli Pwyllgor Ymgyrch Tai a Chynllunio Gwynedd a Môn (Cylch yr Iaith, Cymdeithas yr Iaith Gymraeg, Dyfodol i'r	<p>Oppose getting rid of either criterion 3 or 4 or both from Policy PS 1 based on:</p> <ul style="list-style-type: none"> because of the importance to sustain communities, which will enable us to promote the language. The objectors are of the view that it is essential that development that is going to impair our culture and our society is rejected. The original criterion is strong and aims to ensure that the Welsh language will not be harmed. Further to this we note that the Welsh language Commissioner has stated that the original criterion is consistent with the Planning Act (Wales) 2015. The proposed new criterion is a cause for concern. The wording would acknowledge that there will be damage to the Welsh by identifying the need for an appropriate mechanism to mitigate any detrimental impact-which is of course to reduce the harm. But it is equally damaging. The original criterion i.e. 4 is stronger than 3a Gwynedd and Anglesey is the Welsh language's stronghold and this revisionism is unacceptable. Provision for the language in Planning Act (Wales) 2015 that came into force on the 4 January 2016, which introduces changes to section 70 of the Town and Country Planning Act 1990. The change means that it is appropriate to consider the effects on the use of Welsh, where appropriate to the application, when deciding a planning application. The application can be granted or refused. The clauses state that the changes to the legislation 	<p>Policy needs to be read in its entirety. The Councils were asked to produce a change that would clarify the need to evaluate material considerations.</p> <p>Note that no objections were submitted by the objectors to the 2 original criteria.</p> <p>To illustrate how the Council intends to comply with the action point the criteria were struck through and replaced with one alternative, namely 3a.</p> <p>If the Inspector recommends keeping the NMC in the final Plan, the policy would continue to declare that the decision maker on a planning application could refuse it after considering all material planning considerations.</p> <p>The process of assessing planning applications entails ensuring that the proposal includes adequate measures to address relevant issues. This process includes using a mitigation hierarchy: assessing to see if impact is avoided; where it isn't possible to avoid it, can the impact be reduced through design or additional measures; only as a last resort where impacts can't be avoided or reduced will compensatory measures be considered. Mechanisms such as planning conditions or 106 agreements are used to</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
				Iaith, Canolfan Hanes Uwchgwyrfai)	do not mean that more weight can be afforded to the Welsh language than any other material consideration. The legislation shows that the criterion that is subject to the proposal to remove it from Policy PS 1 is legally legitimate.	<p>secure the required measures to avoid, reduce or compensate. Planning applications will need to be refused if the mitigation hierarchy can't be satisfied, and therefore combining the criteria does not weaken the Council's position, but rather provides greater clarity.</p> <p>The criterion is consistent with national planning policy and legislation.</p> <p>No additional change in response to the objections here but see response below to the comments about content of criterion 3a</p>
NMC056	SNMC39	Gwrthw ynebu/ Object	Helen Ashby- Ridgeway, Lichfields (3427)	Bourne Leisure Limited	<p>New criterion 3a is unclear and could indicate that proposals which would cause significant harm to the character and language balance of a community are likely to be refused even where they cannot be avoided or suitably mitigated. There may be some instances where this is unavoidable. Bourne Leisure suggests that the criteria should be assessed on a case by case basis.</p> <p>Amended wording has been suggested.</p> <p>The wording of criterion 5 is also too onerous, as it will not be appropriate for companies to provide signage in both Welsh and English. it is also unclear from the draft policy which signage would be classed as "operational". Amended wording has been suggested.</p>	<p>It is agreed that the response to the action point to combine the two criteria could be expressed in different ways. Having considered the comments received for NMC 56 this is an alternative form of wording that could ensure that the criterion is more concise/easier to read and interpret:</p> <p><u>“Refusing proposals which would cause significant harm to the character and language balance of a community that cannot be avoided or suitably mitigated by the use of appropriate planning mechanisms to ensure that suitable mitigating measures are provided or contribution is made towards mitigating those impacts.”</u></p>
NMC056	SNMC5	Gwrthw	Candice	Llywodraeth	Criterion 3a - The proposed changes to this criterion are	

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
		ynebu/ Object	Myers (1561)	Cymru	'clunky' and confusing. A suggested alternative phrase to provide clarity is, "permit development that would not cause significant harm to the character and language balance of a community and ensure suitable mitigation measures, or contributions, are provided to minimise adverse impacts."	
NMC056	SNMC84	Gwrthw ynebu/ Object	Iwan Edgar (3050)	Grŵp Ffocws Cynllun Datblygu Lleol	It is not entirely clear to me what the intention is of replacing points 3 and 4 with 3a. However, amending 3a a little would be acceptable, to read as follows: "Refuse proposals which would harm the Welsh language. Any measures used within proposals to mitigate any negative impact on the language would have to show that they would completely undo any harm." With Gwynedd and Anglesey being the last stronghold of the language, this would have to be ensured. Note that protecting Welsh-speaking communities and promoting the language is a Welsh Government policy and is a part of the latest planning act.	
NMC056	SNMC97	Gwrthw ynebu/ Object	Dafydd Iwan (Cadeirydd) (997)	Grŵp Strategol Hunaniaith	In the first instance, though I support the original wording, as the proposed changes are in response to action points from the Hearings, combining Criteria 3 and 4 is unavoidable. Considering the changes to Policy PS 1 which is relevant to the Welsh language, I wish to note that the following amended wording is ambiguous and possibly unclear: Criterion 3a: refuse proposals which would cause significant harm to the character and language balance of a community that cannot be avoided or mitigated satisfactorily by using an appropriate mechanism to ensure suitable mitigation measures or making a contribution to	

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
					<p>minimize that.</p> <p>If amending the wording of the Criterion is unavoidable, I suggest that it should read as follows:</p> <p>3a Refuse proposals which would cause significant harm to the character and language balance of a community that cannot be avoided or mitigated satisfactorily by using an appropriate mechanism to ensure suitable mitigation measures.</p> <p>With such a sensitive matter, it is crucial to ensure that the meaning of these criteria is entirely clear.</p>	
NMC056	SNMC98	Gwrthw ynebu/ Object	Ieuan Wyn (3128)	Pwyllgor Ymgyrch Tai a Chynllunio Gwynedd a Môn	<p>New criterion 3a – We ask you to reconsider the reference to mitigation measures in this clause, and we present the following evidence for your attention:</p> <p>The section of the clause which refers to mitigation measures is unacceptable. As it is, it states that a negative effect on the Welsh language would be acceptable if the mitigation measures are ‘satisfactory’ or if ‘a contribution is made to minimize the effects’. What are the meanings of these ‘satisfactory’ and ‘minimize’ methods of measuring? Referring to ‘satisfactory’ mitigation measures and to ‘contribution to minimize the effects’ leaves the door wide open and makes the Welsh language vulnerable. The meaning of ‘mitigating’ is not to ‘restore’, ‘correct’, ‘undo’, ‘reconcile’, ‘integrate’ or ‘redress’, rather it ‘reduces the effect’. Therefore, referring to mitigation measures anticipates and acknowledges that harm would be caused, and their intention is not to undo the harm and restore the situation but to try to minimize inevitable harm.</p>	<p>See response to objection numbers SNMC034, 035, 056, 094, 099, 100, and 117 above that refers to the mitigation hierarchy. Additionally Technical Advice Note 20 Planning and the Welsh language (2013) refers to the identification of mitigation measures when preparing local development plans and at the planning applications stage. Supplementary Planning Guidance and discussion with the Mentrau Iaith will provide information for developers, case officers and those who make decisions about planning applications relating to mitigation measures that are appropriate for the type of development concerned and its location. It is emphasised again that combining the criteria does not weaken the Council’s position, which would still be able to refuse developments if there is evidence that there is significant effect on the Welsh language/ communities.</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
NMC056	SNMC84	Cefnogi	Iwan Edgar (3050)	Grŵp Ffocws Cynllun Datblygu Lleol	In relation to 7.1.3b [NMC 56] I wish to support the change in 1.c. and 2.	Note the supporting comment
NMC056	SNMC84	Gwrthw ynebu/ Object	Iwan Edgar (3050)	Grŵp Ffocws Cynllun Datblygu Lleol	In relation to 7.1.3b (NMC56) I would like to support the change in 1c and 2	Note the supporting comment
NMC056	SNMC29	Gwrthw ynebu/ Object	Catherine Blyth (WYG) (3424)	Morbaine Ltd	<p>The proposed amended wording of Criteria 1 (c) of Policy PS1 (as set out within NMC 56) remains unclear – the current phrasing of Criteria 1 (c) is protracted and confusing, and it is not considered that Criteria 1 (c) provides certainty for potential applicants as to circumstances when a Welsh Language Statement will be required on residential development.</p> <p>Criterion 2 is also unclear as it refers to “an unexpected” windfall site and “large scale housing”. It is considered that windfall sites are by their nature largely unexpected. Therefore this needs to be clarified as well as what is considered to be large scale windfall sites. Criterion 2 also does not refer to development boundaries.</p>	<p>The Plan’s Strategy and policies have been assessed for their suitability and have been considered appropriate on the basis of the language, subject to mitigation measures, e.g. that housing on housing allocations or windfall sites inside of the boundaries yield an appropriate mix of units after considering information from various sources.</p> <p>PPW 4.3.15 refers to the appropriateness of conducting assessments in the case of proposals for ' major ' developments which have not been allocated or anticipated in a development plan. The usual definition of major residential development is sites with 10 or more units of housing. However, in this case, it is believed that the threshold is the combination of unexpected windfall sites and major development, and the risk will depend on facts and circumstances. The SPG will provide further information on the matter. The change to criterion 2 is included to reflect the discussion at the Hearing, which in turn lead to action point S1/PG4. On the basis of the action point and the discussion it is not thought that it was appropriate to limit the</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						<p>reference to sites inside or outside the boundaries of the development, because, e.g. a large site within or outside the development boundary could become available for development in unexpectedly.</p> <p>Paragraph 7.1.4 refers to the possibility of obtaining advice before submitting a planning application if there is uncertainty. In addition, Supplementary Planning Guidance is being prepared.</p> <p>A proposal to build houses outside the boundaries of the development (if it complies with the relevant policies in the Plan and national planning policy) would provide affordable housing to meet local need or houses associated with rural enterprises. These policies are compatible with the sustainability objectives of the Plan.</p>
NMC056	NMC145	Gwrth ynebiad	Mark Harris (1470)	Home Builders Federation	<p>Although we support the changes with regard to the amendment to criterion 2 'to clarify when a Welsh Language Impact Assessment is required', we suggest that the words 'large scale housing development' need to be quantified.</p> <p>Also all windfalls by their definition are unexpected so unnecessary extra wording.</p>	
NMC056	SNMC40	Gwrth ynebu	Helen Ashby-Ridgeway, Lichfields	Bourne Leisure Limited	The wording of criterion 5 is also too onerous, as it will not be appropriate for companies to provide signage in both Welsh and English. It is also unclear from the draft	The <u>requirement</u> that <u>operational</u> signs were bilingual was included in the Policy at the Focus Change stage and the issue

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
			(3427)		<p>policy which signage would be classed as "operational".</p> <p>Suggested amendment: “<u>Encouraging</u> a bilingual Signage Scheme to deal with all operational signage in the public domain that are proposed in a planning application by public bodies and by commercial and business companies.”</p>	<p>was discussed at a public hearing. The NMC which refers to bilingual Signage Scheme is offered in response to an action point S1/PG4. Therefore, the change to the criteria referred to by the objector is the subject of public consultation. Having a bilingual sign is a mitigation measure that is recognised in Technical Advice Note 20. Paragraph 7.1.4a notes that more guidance is proposed in supplementary planning guidance.</p>
NMC056	SNMC5	Gwrthw ynebu/ Object	Candice Myers (1561)	Llywodraeth Cymru	<p>Criterion 6 - The criterion referring to Welsh Names appears to go beyond the scope of the planning system and should be deleted. However, reference could be made to the Council’s policy of achieving this goal through other strategies in the supporting text.</p>	<p>The criterion does not impose a requirement that development uses Welsh place names. Rather it expresses the support of the Councils and their expectation of new developments in the use of Welsh place names to assist its integration into the local community. The principle of including this criterion has already been considered in the examination. The Council decided to change the criterion from “Encourage” to “Requiring” at the Focus Change stage in order to support other policies/ strategies that the Councils have regarding place names.</p>
NMC058	SNMC40	Gwrthw ynebu	Helen Ashby- Ridgeway, Lichfields (3427)	Bourne Leisure Limited	<p>Consultation and engagement requirement should reflect the type and scale of the proposed development and should be proportionate to the proposal.</p> <p>It is appropriate that the SPGs provide guidance on the types of considerations that applicants need to take into account in relation to the Welsh language. However, any requirements published in the Joint LDP</p>	<p>Comment noted. The SPG will provide guidance about the issues referred to.</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
					<p>should be based on robust evidence and should be proportionate and flexible enough to cover a wide range of development types.</p> <p>TAN20 supports the contribution of the planning system to the Welsh language but recognises that it is not "feasible" or relevant to do so in every case.</p>	
NMC068	SNMC68	Gwrthw ynebu/ Object	Kieran Somers (3441)	Horizon Nuclear Power Wylfa Limited	<p>Reinstatement of reference to A5025 - Wylfa is sought. The policy wording assumes that improvements are required from Amlwch to Wylfa Newydd. Whilst an ITTS is being prepared determination of specific improvement works will only be made through a technical assessment of the extent of the A5025 in that location rather than the ITTS.</p> <p>Proposed amended wording has been attached alongside the representation.</p>	<p>The Councils agree that to provide greater clarity within the Plan it would be better to refer to a highway impact assessment rather than an Integrated Traffic and Transport Strategy in the Policy.</p> <p>However, the Councils do not agree with the objectors suggested text in relation to 'that extent of the A5025', it is felt that this repeats what is already within the criterion.</p> <p>The Inspector's attention is drawn to the following suggested amendment to MAC 68 outlined in red, which could clarify part 4 (iii) of Policy TRA 1:</p> <p><u>(iii) A5025 Valley to Wylfa and other transport infrastructure improvements associated with the new nuclear development at Wylfa Newydd, including improvements from Amlwch to Wylfa Newydd where need for improvement on that section is demonstrated following a highway impact assessment of development of an Integrated Traffic and Transport Strategy for the Wylfa Newydd Project on the</u></p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						<u>A5025.</u>
NMC070	SNMC69	Gwrthw ynebu/ Object	Kieran Somers (3441)	Horizon Nuclear Power Wylfa Limited	Reinstatement of reference to A5025 - Wylfa is sought. The policy wording assumes that improvements are required from Amlwch to Wylfa Newydd. Whilst an ITTS is being prepared determination of specific improvement works will only be made through a technical assessment of the extent of the A5025 in that location rather than the ITTS. Proposed amended wording has been attached alongside the representation.	See the response to objection SNMC68 regarding reference to 'Highway Impact Assessment' and 'that extent of the A5025'. The Inspector's attention is drawn to the following suggested amendment to MAC 70 outlined in red, which could clarify paragraph 7.1.40: <u>A5025 Valley to Wylfa Newydd / Amlwch to Wylfa Newydd</u> and other transport infrastructure improvements associated with new nuclear development at Wylfa Newydd including improvements from Amlwch to Wylfa Newydd where need for improvement on that section is demonstrated following a highway impact assessment of development of an Integrated Traffic and Transport Strategy for the Wylfa Newydd Project on the A5025. a Corporate Hub necessitated by major infrastructure schemes
NMC071	SNMC70	Cefnogi/ Support	Kieran Somers (3441)	Horizon Nuclear Power Wylfa Limited	Support the updated proposals map.	Note the supporting comment
NMC072	SNMC71	Gwrthw ynebu/ Object	Kieran Somers (3441)	Horizon Nuclear Power Wylfa Limited	Horizon considers that paragraph 7.1.44 should be amended to clarify that the Councils' will take into account the degree to which proposals for the proposed park and ride facilities and logistics centres have been informed by and achieve the outcomes set Policies PS9B and PS9C in the preparation of a Local Impact Report (LIR) or form the policy basis in assessing	Matters Arising Change NMC 72 merely draws attention to Policies PS9B and PS9C as being relevant to park and ride facilities and logistics centres. The Councils in response to other objections by Horizon draws the Inspector's attention to suggested amendments to

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
					<p>planning applications where the Councils' are the decision makers.</p> <p>Without this change, Horizon considers that the JLDP is unsound on the basis that as worded, the paragraph assumes that Policies PS9B and PS9C has a status above that accorded by the Planning Act 2008 and the relevant NPSs. See also Appendices 2 and 3.</p>	both Policies in order to clarify the Councils' roles in the relevant decision making process.
NMC083	SNMC41	Gwrthw ynebu	Helen Ashby-Ridgeway, Lichfields (3427)	Bourne Leisure Limited	<p>The statement that the location for a development is "essential" could be overly and unnecessarily restrictive. It is important that greater flexibility is provided within the policy to respond to case-by-case development proposals.</p> <p>For holiday parks, there is a need to consider their future development in relation to factors such as the needs of the business, visitor demand and wider changes in the tourism industry. Their location in the countryside is a significant attribute that draws tourists to the area and encourages them to return.</p> <p>The Councils should replace the term, "essential" with the previously used "specific locational requirement".</p>	In accordance with national planning policy, the Policy continues to seek to strictly manage development in the countryside. Nonetheless, the Policy recognises that some development may require a location outside development boundaries. The second clause in the Policy aligns with other policies in the Plan, which includes Policies TWR 1 – TWR 3 & TWR 5. These named Policies recognise that visitor facilities and accommodation may require locations outside development boundaries. See response to SNMC2.
NMC083	SNMC2	Gwrthw ynebu/ Object	Candice Myers (1561)	Llywodraeth Cymru	The Welsh Government supports the additional clarity that this new policy and its reasoned justification it is trying to achieve, however; it is not clear what is meant by the phrase "specific support within them"? It is not considered that this would represent a valid planning reason when considering planning applications.	<p>The wording refers to other policies in the Plan that promotes sites outside development boundaries as potentially suitable for new development. It also sought to consider that there may be developments that require a location in the countryside not covered by specific policies. Having considered the objection the Council suggests an alternative form of wording which may improve the second part of the Policy's clarity:</p> <p>"Proposals on sites outside Development</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						<p>Boundaries must conform to this Plan's Policies and national planning policies and, unless there is specific support within them for the proposed development located in the countryside, the proposal must demonstrate that its location in the countryside is essential for the development."</p> <p><u>Outside development boundaries proposals will be resisted unless it is in accordance with specific policies in this Plan and national planning policies.</u></p>
NMC087	SNMC139	Gwrthw ynebu/ Object	Noel Davey (1169)	CPRW Caernarfonshire Branch	<p>PCYFF 1: Development Criteria</p> <p>a. Streamline text grammar of former items 3-9. Proposals should:</p> <ul style="list-style-type: none"> i. 'Make the most efficient...' ii. 'Provide appropriate..' iii. ' Have regard to ...' iv. 'Include...' <p>Delete 'Additionally... adverse impact on'</p> <p>PCYFF 2</p> <ul style="list-style-type: none"> v. 'Include, where practical,...' vi. 'Encourage active frontages...' vii. 'Help create healthy..' <p>b. Former item 8 – we object to the deletion of the statement that 'Planning permission will be refused where the proposed development would have an unacceptable adverse impact on.. Prominent public views into, out of, or across any settlement or area of open countryside'. We think this is a desirable and</p>	<p>The criteria referred to by the objector in part a) are not MACs. However the comments regarding the grammatical correctness of wording in the criteria are noted.</p> <p>b) Criterion 8 was removed in response to Action Point S16/ PG42. It was noted that some policies repeat criteria. The issues included in criterion 8 are addressed in Policy PCYFF2. Re-instating the criterion in the Policy would add unnecessary detail to the Plan.</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
					important principle. Its proposed deletion suggests it is no longer considered explicitly necessary.	
NMC089	SNMC42	Cefnogi	Helen Ashby-Ridgeway, Lichfields (3427)	Bourne Leisure Limited	Bourne Leisure supports this MAC, which states that there should be “due consideration to”, rather than a requirement to “conform with”, the Landscape Character Area Assessment or Seascape Character Area Assessment. This change should help to enable a case-by-case assessment of each proposal in relation to its impact on landscape or seascape character. The Company considers that this NMC 89 meets the second test of soundness (is the plan appropriate?) because it takes a logical and balanced approach to the issue of assessment of each proposal in relation to its impact on landscape and seascape character.	Note the supporting comment
NMC090	SNMC43	Gwrthwynebu	Helen Ashby-Ridgeway, Lichfields (3427)	Bourne Leisure Limited	<p>As it is currently worded, this draft policy provides a “one-size-fits-all” approach, which would be onerous for smaller development proposals.</p> <p>The threshold of 100 sq.m for non-residential development for the requirement for an Energy Assessment is too low and would apply to very small developments. Furthermore, the requirement for a “comprehensive assessment” would be disproportionate to the scale of many smaller developments.</p> <p>This threshold should be increased to at least 1,000 sq. m (to accord with the definition of major development) but provide flexibility to take into account the nature of the proposed non-residential development.</p>	<p>It is considered that the objectors make a valid point about the threshold that would trigger the need for an assessment. Having considered the definition of major development and the approach undertaken by other local planning authorities, 1,000 sq. m would be a more reasonable threshold. The Councils therefore draw the Inspector’s attention to a minor amendment that would address these objections :</p> <p><u>“Residential development on sites for 100 housing units or more, and non-residential development of 100-1,000-sq. metres or more...”</u></p>
NMC090	SNMC146	Gwrthwynebu/ Object	Mark Harris (1470)	Home Builders Federation	Object as it is not clear where the figure of 100 has come from, what evidence supports the need for such a detailed assessment on site of this size and over? The Impact will be dependent on the scale of the development in relation to the settlement in which it is	

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
					planned to take place, although setting a threshold is helpful to developers as they can factor in the requirement.	
NMC093, NMC094, NMC095, NMC096	SNMC54, SNMC55, SNMC56, SNMC57	Gwrthw ynebu/ Object	Mairede Thomas (318)	Anglesey Branch CPRW	<p>We object to the Matters Arising Change as a basis for assuming that there should be a target of 50% of local electricity and heat provided by renewables by 2021 rising to 100% by 2026.</p> <p>The Plan needs to better address "the most efficient and effective use of land in the public interest" and "ensure necessary services and facilities are built where they are most needed". This should be done by focussing on "low environmental impact developments" and by placing solar pv and solar thermal installations within the built environment and close to the place where the energy generated will be most effectively used. The Plan should also address other means of achieving energy efficiently and cheaper power for business and communities.</p> <p>The Plan should also recognise that under the new devolution settlement, the Welsh Government is about to gain control of energy generation opportunities up to 300MW. There is no mention of Small Modular Nuclear Reactors (SMR) in the Plan, despite this being a low carbon land based power option, which has local support.</p> <p>The objector has included references to numerous external websites in an attempt to support their objections.</p>	<p>The Matters Arising Change provides an update of recent work undertaken by ARUP on the Potential Renewable Energy Study – towards renewable energy targets. This updated report was included as an appendix to the Council’s response to Action Point 2 from Hearing Session 8 on Renewable Energy matters.</p> <p>This Action Point required the Councils to:</p> <p>“Introduce a Matters Arising Change to describe the figure for the area’s heat and energy demands, and identify what percentage could be set as a target to be met by renewable energy technologies under the Plan’s policies.”</p> <p>This Potential Renewable Energy Study was based upon the Welsh Government Practice Guidance: Planning for Renewable and Low Carbon Energy – A Toolkit for Planners as updated in 2015. This Toolkit included a new section to assess the potential for solar farm developments, which wasn’t covered in the original toolkit of 2010.</p> <p>The Potential Renewable Energy Study provides the reasoning over the potential for renewable energy from different energy technologies.</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						<p>The potential from tidal power has been included within Table 12A for Renewable Electricity Potential for 2026.</p> <p>Policy ADN1A does not preclude the use of solar PV and solar thermal installations within the built environment.</p> <p>Small Modular Nuclear Reactors (SMRs) as a technology is not currently included within the Welsh Government 2015 toolkit. Therefore it does not form part of the technologies assessed for the potential renewable electricity and heat for the Plan area.</p> <p>See the Council's response to NMC 323 for the specific objection to the Policy Targets for D21 contained within the monitoring framework.</p>
NMC100	SNMC44	Gwrthw ynebu	Helen Ashby-Ridgeway, Lichfields (3427)	Bourne Leisure Limited	<p>All holiday accommodation, and caravans and tents, in particular, should be recognised as highly sensitive to any negative impacts of renewable energy schemes, given the lower level of noise insulation that these structures provide. Without such measures there is a risk that tourists may be deterred from visiting or returning to the area, thereby impacting on the local economy.</p> <p>Protection should be provided for amenity of holiday accommodation from any unacceptable impact, rather than only "significant demonstrable" harm from renewable energy installations located outside designated</p>	<p>The Matters Arising Change (MAC) to criteria (iii) within Policy PS7 does replace reference to 'amenity of housing used by visitors on holiday' with a reference to 'holiday accommodation'.</p> <p>This will allow consideration to be given to the potential significant demonstrable harm to different types of holiday accommodation.</p> <p>In relation to the objection made to the term 'significant demonstrable harm' this term was not subject to change under</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
					landscape areas.	<p>MAC NMC100.</p> <p>Paragraph 2.4 of the Councils' guidance to the Matters Arising Change Schedule (Jan 2017) states:</p> <p>"2.4 This consultation is not therefore an opportunity to add to previous comments or to make new comments on parts of the original Deposit Plan not subject to a Matters Arising Changes. Any such comments will be disregarded as they should have been made during earlier stages of Plan preparation."</p>
NMC101	SNMC20	Cefnogi/ Support	Angharad Wyn Crump (1521)	Cyfoeth Naturiol Cymru	We note the amendments to criteria i) and ii). As identified in the document we consider that the amendment ensures that the policy reflects the higher level of protection afforded to national and international biodiversity and landscape designations.	Note the supporting comment
NMC101	SNMC45	Gwrthw ynebu	Helen Ashby- Ridgeway, Lichfields (3427)	Bourne Leisure Limited	<p>Draft Policy ADN 1 should protect visual amenity and landscape character from potential adverse impacts of renewable energy development. Otherwise, there is a risk that tourists may be deterred by these issues from visiting or returning to the area, thereby impacting on the local economy.</p> <p>Bourne Leisure supports the requirement at draft Policy ADN 1 (ii) (NMC 101) for adequate mitigation for on-shore wind energy facilities in relation to landscape character.</p> <p>Draft Policy ADN 1 (vii) is not sufficient to ensure that sites are restored at the end of the operation of an on-shore wind facility.</p>	<p>The proposed reinstatement of criterion (i) with additional text regarding the 'visual amenity of sensitive receptors' is not deemed to be required by the Councils.</p> <p>It is the Councils' opinion that the amended criterion (ii) addresses the landscape character with criterion (iii) protecting the amenity of sensitive receptors.</p> <p>Note the comment regarding the support for the amended criterion (ii).</p> <p>The suggested revised wording of</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						<p>criterion (vii) draws attention to the need for schemes to be agreed with the Local Planning Authority. This minor change to NMC101 is considered reasonable and is set out below:</p> <p>(vii) turbines and associated infrastructure will, at the end of the operational life of the facility, be removed <u>in accordance with a restoration and aftercare scheme submitted and agreed by the Local Planning Authority</u> and an appropriate land restoration and aftercare scheme agreed.</p>
NMC101	SNMC137	Gwrthwynebu/ Object	Noel Davey (1698)	CPRW Caernarfonshire Branch	<p>ADN1 On-Shore Wind Energy: deletion of criterion (i) and amendment of criterion (ii)</p> <p>a. The proposed text removes separate reference to impact on landscape character in (i) and combines this with reference to impact on heritage assets and natural resources, including biodiversity, in (ii). This dilutes the previous separate emphasis on visual issues relating to impact on landscape and heritage assets and brackets them with impact on biodiversity assets which are of a different character. This changes the emphasis and clarity of the original text. The deletion of reference to visual amenity is acceptable as this is separately identified in criterion (iii) and (iv).</p> <p>b. The amended (ii) text suggests that only designated landscapes are to be considered, whereas the original (i) text correctly allows for impact on all landscapes, whether or not designated.</p>	<p>The Councils are of the opinion that the amended criterion (ii) provides sufficient protection against impacts on landscape character and heritage assets.</p> <p>The reference to designated landscapes ensures that the policy is consistent with Planning Policy Wales (PPW). Paragraphs 12.8.7 to 12.8.9 of PPW refer to the Welsh Government's commitment to using the planning system to optimise renewable and low carbon energy generation whilst protecting designated areas is referred to within paragraph 12.8.10.</p> <p>The Case Officer with each individual application will consider the need for any mitigation required and whether this is adequate or not through the analysis of</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
					<p>c. We maintain that the visual impact of wind turbines on landscape, by virtue of their intrinsic height, scale and prominence of their required siting, which are the essence of their satisfactory function, cannot be 'adequately mitigated' as stipulated by (ii); vegetative screening is impractical, while turbine colouring can have at best a marginal effect. We think it unrealistic to imply that adequate mitigation can be a normal expectation in the case of wind turbines. The previous reference to avoiding 'unacceptable impact' was more meaningful.</p>	<p>the relevant evidence on a case by case basis.</p> <p>The statement that wind turbines cannot be adequately mitigated is a matter of personal opinion.</p>
NMC101	SNMC6	Gwrthw ynebu/ Object	Candice Myers (1561)	Llywodraeth Cymru	<p>Special Landscape Areas (SLAs) are still referred to in Policy ADN 1. This should be deleted from the policy, for the rationale as set out in our statement for Session 8, (Q2a) in that SLAs are non-statutory designations which should not unduly restrict acceptable development (PPW, 5.3.11) such as facilitating renewable energy opportunities.</p>	<p>The Councils have noted the rationale set out by the Welsh Government within Q2a of their statement for Session 8 in relation that SLAs are non-statutory designations that should not unduly restrict unacceptable development.</p> <p>As set out within the Councils statement for Session 8 (Q4a) the SLAs identified were based upon the Special Landscape Areas Review Gwynedd and Anglesey (2013) (DC.008). This was based upon a robust methodology making the best use of available local evidence. The purpose of this SLA designation is to ensure that the character of these areas is not altered by inappropriate forms of development and that features which contribute to local distinctiveness are conserved.</p> <p>The identified SLAs formed part of the criteria for assessing landscape and visual sensitivity to wind energy development. The evidence over the capacity of the landscape to accommodate wind energy</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						<p>opportunities is contained within the Landscape Sensitivity and Capacity Study (DC.020).</p> <p>In light of this it is considered that the Councils have produced robust methodology to identify and justify specific SLAs in the Plan area. These have been subject to a detailed Landscape Sensitivity and Capacity Study to justify the typology of wind turbines that could be accommodated within these SLAs. This concludes that only Domestic-Scale wind turbine proposals will be granted (subject to such proposals satisfying the relevant criteria within the policy) within the SLAs. Therefore, the Policy does not preclude development from the SLAs but seeks to manage development.</p> <p>The Councils have proposed, through NMC 101, to take out the reference to the setting of SLAs from the policy in line with the Objection made by the Welsh Government at the Focussed Changes stage of the Plan.</p>
NMC110	SNMC46	Gwrthw ynebu	Helen Ashby-Ridgeway, Lichfields (3427)	Bourne Leisure Limited	<p>Bourne Leisure supports the recognition that sensitive receptors should be protected from significant harm from glint and glare of solar PV farms.</p> <p>Emerging Policy ADN 1A (3) and its supporting text should specifically provide protection for holiday accommodation from any potential adverse impacts of renewable energy development. Otherwise, there is a risk that tourists may be deterred by these issues from visiting or returning to the area, thereby impacting on</p>	<p>The reference within criterion (3) to the residential visual amenities of nearby residents is consistent with a similar criterion within policy ADN1.</p> <p>With any application regard will also be given to Strategic Policy PS7. Criterion (i) within this policy refers to visual impact within designated areas and criterion (iii) refers to not causing significant</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
					<p>the local economy.</p> <p>Sensitive receptors should be protected from any unacceptable impact, rather than the proposed threshold of “significant demonstrable” harm from renewable energy installations located outside designated landscape areas.</p>	<p>demonstrable harm to amenity of holiday accommodation.</p> <p>The reference to residential visual amenity within criterion (3) of Policy ADN1A is based on the definition within ‘Wind Turbines & Pylons - Guidance on the Application of Separation Distances from Residential Properties’ (DC.019). This defines residential visual amenity as:</p> <p>“Residential visual amenity refers to the visual amenity experienced by residential properties including their gardens. It is a subset of residential amenity which also includes aspects such as noise, light and vibration. In making judgements about residential visual amenity, it is important to note that a potential significant adverse change to an outlook from a property does not in itself result in material harm to living conditions – there needs to be a degree of harm over and above this, for example undue obtrusiveness or overbearing effect, to warrant a refusal or recommendation for refusal of a planning application.”</p> <p>The reference within criterion (3) of Policy ADN1A therefore seeks to ensure that any development does not lead to undue obtrusiveness or overbearing effect on the residential visual amenity of a property in the vicinity of an application.</p> <p>This reflects the difference between any</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						<p>possible significant harm upon the residential visual amenity of a residents home against a tourism location whereby the visitors are there for a limited time on their holiday. It is felt that the protection within criteria (i) and (iii) of Policy PS7 affords sufficient protection to the amenity of holiday accommodation.</p> <p>Action Point 2 from Hearing Session 8 in reference to policy ADN1 required the Councils to clarify what type of harm is unacceptable. Action Point 5 from the same Hearing Session which referred to Draft Policy ADN1A stated that both policies should include similar criteria.</p> <p>In light of these Action Points the Councils have proposed the term 'significant harm' to provide consistency with other criterion in the Renewable Energy policies.</p> <p>The preparation of a Supplementary Planning Guidance (SPG) on Locating Stand-alone renewable energy developments will allow for further clarification in terms of significant harm and sensitive receptors rather than through incorporating additional text within the Explanation to the Policy.</p>
NMC110	SNMC138	Gwrthw ynebu/ Object	Noel Davey (1169)	CPRW Caernarfonshire Branch	ADN1A PV Solar Energy a. We welcome the inclusion of an explicit policy for PV Solar Energy.	The Councils are of the opinion that the amended criterion (ii) provides sufficient protection against impacts on landscape character and heritage assets.

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
					<p>b. The proposed text removes separate reference to impact on landscape character in (i) and combines this with reference to impact on heritage assets and natural resources, including biodiversity, in (ii). This dilutes the previous separate emphasis on visual issues relating to impact on landscape and heritage assets and brackets them with impact on biodiversity assets which are of a different character. This changes the emphasis and clarity of the original text. The deletion of reference to visual amenity is acceptable as this is separately identified in criterion (iii) and (iv).</p> <p>c. The amended (ii) text suggests that only designated landscapes are to be considered, whereas the original (i) text correctly allows for impact on all landscapes, whether or not designated.</p> <p>d. In the case of solar farms we acknowledge that mitigation of landscape impact through careful siting and screening is often a practical option. We still consider the previous reference to avoiding 'unacceptable impact' was more meaningful than the term 'adequately mitigated'.</p> <p>e. Punctuation: criterion (4), comma after 'permission', as ADN1 (vi); text after table 14A, line 1, 'applicants' (plural).</p>	<p>The reference to designated landscapes ensures that the policy is consistent with Planning Policy Wales (PPW). Paragraphs 12.8.7 to 12.8.9 of PPW refer to the Welsh Government's commitment to using the planning system to optimise renewable and low carbon energy generation whilst protecting designated areas is referred to within paragraph 12.8.10.</p> <p>The term 'adequately mitigated' provides greater consistency with National Policy which outlines the Government's commitment to optimise renewable and low carbon energy generation. In relation to the punctuation errors raised by the Objectors, these are minor grammatical changes, which the Councils agree would improve the Plan.</p>
NMC110	SNMC21	Gwrthw ynebu/ Object	Angharad Crump (1521)	Cyfoeth Naturiol Cymru	<p>We note and welcome the inclusion of new policy ADN1A to provide a framework to address proposals for PV solar energy.</p> <p>We are satisfied with the wording of the policy but would suggest that the policy criteria 1) also refers to the need for proposals to demonstrate how the mitigation measures incorporated into the scheme will be managed for the life of the development.</p>	It is considered that the matter raised by the objector would be considered at a planning application stage in consultation with relevant consultees. It is considered that the criterion is sufficiently robust.
NMC115	SNMC22	Cefnogi/ Support	Angharad Crump (1521)	Cyfoeth Naturiol Cymru	We note and welcome the amendments to Policy ADN2 to better align with Policy PS7.	Note the supporting comment

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
NMC115	SNMC47	Gwrthw ynebu	Helen Ashby- Ridgeway, Lichfields (3427)	Bourne Leisure Limited	<p>Sensitive receptors should be specifically protected against adverse impacts of renewable and low carbon energy development. Given the importance of the tourism industry to the local economy, the justification text for draft Policy ADN 2 should list holiday accommodation as a sensitive receptor.</p> <p>Bourne Leisure supports the Councils' approach in requiring mitigation for impacts on sensitive uses. Protection should be provided against any unacceptable impact to visual amenity, rather than "significant unacceptable" harm.</p> <p>Draft Policy ADN 2 (7) is not sufficient to ensure that sites are restored at the end of the operation of an energy facility.</p>	<p>It is not felt necessary to list holiday accommodation as a sensitive receptor within the Explanation to the Policy.</p> <p>The preparation of a Supplementary Planning Guidance (SPG) on Locating Stand-alone renewable energy developments will allow for further clarification in terms of sensitive receptors rather than through incorporating additional text within the Explanation to the Policy.</p> <p>The term 'significant' is used consistently within the Policies on Renewable Energy. This is to ensure consistency with the Welsh Government's commitment to using the planning system to optimise renewable and low carbon energy generation but also ensuring that the development does not have a significant unacceptable effect.</p> <p>The suggested revised wording of criterion (7) draws attention to the need for schemes to be agreed with the Local Planning Authority. This minor change to NMC101 is considered reasonable and is set out</p> <p><u>(7)where required, the equipment and associated infrastructure are removed from the site in accordance with a restoration and aftercare scheme submitted and agreed by the Local Planning Authority.</u></p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
NMC124	SNMC23	Cefnogi/ Support	Angharad Crump (1521)	Cyfoeth Naturiol Cymru	We note and welcome the amendments to the Policy to improve clarity.	Note the supporting comment
NMC125 – 130	SNMC73	Gwrthw ynebu/ Object	Kieran Somers (3441)	Horizon Nuclear Power Wylfa Limited	Object to various changes to the wording on NSIP and associated development.	No amendments to paragraphs 7.3.3 – 7.3.8 or Policy PS 8 required to address the effect of Wales Act 2017.
NMC126	SNMC74	Gwrthw ynebu/ Object	Kieran Somers (3441)	Horizon Nuclear Power Wylfa Limited	SPG should not be referred to as ‘revised’ in this current moment in time and it should not be referred to as a “current” document. The text needs updating to reflect the Wales Act 2017.	The Plan includes references to several proposed SPGs required to support the Plan. The Council is committed to revising the existing adopted SPG. The Plan’s Monitoring Framework at Chapter 8 sets a target to adopt the SPG within 6 months of the Plan’s adoption.
NMC127	SNMC119	Gwrthw ynebu/ Object		National Grid	The overarching National Policy Statement for Energy (EN-1) sets out when planning obligations may be used for energy infrastructure. National Grid requests that reference to EN-1 is included within the LDP in the context of NSIPs and planning obligations. Accordance with the EN-1 tests is necessary for the LDP to be made consistent with the policy context against which NSIP developments are determined.	It is considered that paragraph 7.3.4 as amended by NMC 126 provides the relevant national policy context.
NMC128	SNMC120	Gwrthw ynebu/ Object	Chris Palmer. Principal Planning and Consenting (3429)	National Grid	The overarching National Policy Statement for Energy (EN-1) sets out when planning obligations may be used for energy infrastructure. National Grid requests that reference to EN-1 is included with the LDP in the context of NSIPs and planning obligations. Accordance with the EN-1 tests is necessary for the LDP to be made consistent with the policy context against which NSIP developments are determined.	
NMC129	SNMC104	Gwrthw ynebu/ Object	Chris Palmer. Principal Planning and Consenting	National Grid	The overarching National Policy Statement for Energy (EN-1) sets out when planning obligations may be used for energy infrastructure. National Grid requests that reference to EN-1 is included with the LDP in the context of NSIPs and planning obligations. Accordance	

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
			(3429)		with the EN-1 tests is necessary for the LDP to be made consistent with the policy context against which NSIP developments are determined.	
NMC130	SNMC75	Cefnogi/ Support	Kieran Somers (3441)	Horizon Nuclear Power Wylfa Limited	This change bring PS8 in line with changes previously made to PS9. Although not the subject of a specific NMC, all changes to PS9 that also affect PS8 (i.e. which identify the consenting relationship between the Secretary of State and local planning authority post-Wales Act 2017 must also be reflected in PS8/Chapter 7. These representations only provide specific drafting for PS9 and related policies to Wylfa Newydd	Comment noted
NMC131 – 140	SNMC76	Gwrthw ynebu/ Object	Kieran Somers (3441)	Horizon Nuclear Power Wylfa Limited	The text in paragraph 7.3.12 to 7.3.19 needs updating to reflect the Wales Act 2017. Proposed amended wording has been attached alongside the representation.	See response set out in Appendix 3 to this report.
NMC136 – 139	SNMC77	Gwrthw ynebu/ Object	Kieran Somers (3441)	Horizon Nuclear Power Wylfa Limited	The text does not reflect the proposed delivery to Horizon’s temporary worker accommodation.	See response set out in Appendix 3 to this report.
NMC137	SNMC58	Gwrthw ynebu/ Object	Jon Suckley, How Planning (1447)	Land & Lakes Ltd	The paragraph as drafted does not give sufficient weight to the requirement for permanent accommodation solutions which will deliver important future or legacy benefits. The paragraph as drafted provides too much flexibility by including the word 'or' and 'where appropriate'. Amended wording has been suggested.	The paragraph provides an indication of the various types of accommodation that could be used to accommodate construction workers. It reflects the detailed work undertaken by the IACC to understand the implications of hosting the Project. No additional changes are considered to be required.
NMC138	SNMC59	Gwrthw ynebu/ Object	Jon Suckley, How Planning (1447)	Land & Lakes Ltd	The reference to "close to" is not precise and is open to interpretation which could lead to development in locations which are not sustainable or accessible. Alternative wording has been included.	If the Inspector considers that explanatory text should be refined in order to provide a clearer description of the Councils’ position, the Inspector’s attention is drawn to minor amendments to paragraph 7.3.18 (in Appendix 3 to this report.) The suggested amendments comprise of replacing “close to” with

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						“well related” and additional explanatory text to describe this term.
NMC141	SNMC109	Cefnogi/ Support	Ben Lewis, GVA (3418)	Nuclear Decommission ing Authority & Magnox Ltd	The NDA and Magnox would like to confirm their support for the following modifications, which are consistent with the representations made by the GVA (on behalf of the NDA and Magnox.	Note the supporting comment
NMC141	SNMC60	Gwrthw ynebu/ Object	Jon Suckley, How Planning (1447)	Land & Lakes Ltd	In light of the changes proposed to paragraph 7.3.18 which requires a consideration of re-using existing buildings and / or the provision of permanent buildings for future and legacy uses before proposing temporary buildings is not carried through into the policy wording. To ensure clarity and consistency Land and Lakes requests that Policy PS9 is amended to include and additional criterion which would be inserted between 5 and 6. This is necessary because the policy as drafted does not reflect the requirements of para 7.3.18. The wording for the new criteria has been suggested.	The Councils note the comments, which are similar to Welsh Government’s comments relating to Policy PS 9A. If an additional amendment is required to provide a clear and consistent framework the Councils draw the Inspector’s attention to a minor amendment to Policy PS 9A to include an additional criterion relating to the Councils’ preferred sequential approach to selection of accommodation types, - see Appendix 3.
NMC141	SNMC7	Gwrthw ynebu/ Object	Candice Myers (1561)	Llywodraeth Cymru	Criterion 7 - There appears to be no rationale/justification for the 500 unit threshold. (See comment on NMC 143 & 188). Criterion 10: The phrase “...will be required to be approved by...” is too strong and unreasonable, particularly linking it to the gaining of a planning permission. The Council are in effect looking to approve a third party strategy (that of the promoter) on the premise that is necessary to achieve a planning permission. What happens if the Council do not approve the strategy? Is it reasonable to link the gaining of a planning permission to an external third party strategy over which the Council has no control?	Criterion 7 - See the Councils’ response to set out in Appendix 3 Criterion 10 – it is agreed that the criterion should be modified to clarify the Council’s role – see Appendix 3
NMC141 – 144	SNMC78	Gwrthw ynebu/ Object	Kieran Somers	Horizon Nuclear Power	Proposed amendment to this section has been proposed. Changes should be made to the wording in	See response set out in Appendix 3

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
		Object	(3441)	Wylfa Limited	criterion 5 Policy PS 9 as in its current form it is likely to breach data protection laws.	
NMC143	SNMC61	Gwrthw ynebu/ Object	Jon Suckley, How Planning (1447)	Land & Lakes Ltd	Minor amendments are suggested to the policy to ensure that it reflects the wording of para 7.3.18 and Policy PS9. Amended wording has been included.	Paragraph 7.3.18 refers to the location of several types of accommodation for construction workers. Policy PS 9A provides a framework for campus style accommodation. Given the anticipated scale of development the Councils maintain that these should be located adjacent or well related to the development boundaries of Centres, as opposed to Centres and Service Villages.
NMC143	SNMC8	Gwrthw ynebu/ Object	Candice Myers (1561)	Llywodraeth Cymru	<p>The policy threshold proposed by Horizon and included by the Council as part of their MACs is at odds with the Councils response to S7/PG15, in which the 500 bed space level is considered to have “no planning basis with little evidence to demonstrate this threshold reflects a tipping point” (paragraph 2.4). It is essential that plan policies are supported by robust evidence and the Welsh Government would welcome clarification on evidence that underpins the differential between large and small TCWA.</p> <p>Criterion 1 - The policy refers to the settlement hierarchy which is appropriate, but it is not clear if all tiers have equal status? Presumably it is not the intention for Clusters to accommodate the largest proportion? How close is “...in close proximity..”?</p> <p>Criterion 2 - This criterion does not have to relate to proximity to the main highway network, why?</p> <p>The approach of directing large scale TCWA to the open countryside is considered by the Council as “contrary to the approach of the Plan and its sustainability objectives” (S7/PG15 paragraph 2.7). However, both new Policy PS9A (Criteria 2) and amended Policy TAI3 (Criteria 4) permit</p>	<p>See response set out in Appendix 3</p> <p>Criterion 1 refers to ‘Centres’ in the Settlement Hierarchy, i.e. Urban Service Centres and Local Service Centres. Therefore, campus style development would not be supported within Villages and Clusters. In order to further clarify the Councils’ position an amendment is put forward, which identifies specific Centres: Holyhead, Llangefni, Amlwch, Y Fali, and Gaerwen.</p> <p>The comment regarding criterion 2 is noted. The Councils’ response to other comments suggests the removal of this criterion in order to clarify the Councils’ priority to direct development to sites adjacent to development boundaries or well related to them. On this basis, locating temporary construction workers accommodation at Rhosgoch would not be supported by Policy PS 9A and Policy</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
					<p>large and small scale TCWA in the open countryside. The Council should explain how new TCWA in rural areas will follow the principles of sustainable development and promote a community legacy use after the construction phase of Wylfa Newydd? Indeed, it would be useful to understand the location of sites promoted for TCWA, particularly in relation to the reserve employment site at Rhosgoch, and how such sites align to policies in the plan, including Policy PS9B and Policy PS9C.</p> <p>Criterion 3 - Why do you need to apply the Welsh Language policy for this type of development, i.e. temporary workers who the majority of which will presumably from outside of the local area? Presumably this type of development is necessary to support the delivery of the Wylfa project and would not be refused? What mitigation is necessary if such a proposal was self contained?</p> <p>Criterion 5 - Is it appropriate to require a list of workers operating from the site, for what purpose, to achieve what? Is this within the scope of the planning system?</p>	<p>CYF 1 (as it is a reserve employment site for B1, B2 and B8 uses). Provision of a logistics facility at Rhosgoch would not accord with Policy PS 9B as it isn't an existing safeguarded site or an allocated site identified in Policy CYF 1, nor is it within or adjacent to a development boundary of a Centre.</p> <p>The Councils maintain that retaining Criterion 3 is required in order to clarify that impact on the language should be a consideration. The Project Promoter may totally restrict the movement of construction workers therefore reduce interaction with local communities. However, this is not guaranteed at this point. The campus will also provide employment for residents of local communities. Circumstances that promotes the Welsh language amongst the employees must be created. Strengthening or mitigation measures will be required to ensure alignment with the Plan's sustainability objectives, which include maintaining and strengthening the language.</p> <p>Criterion 5 – the Councils maintain that it is reasonable to require access to a register of information about the occupancy of accommodation to ensure that they are occupied in accordance with the Policy. It is required to monitor the development's impact and provide information as to when more or less</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						provision is required. See suggested amendment set out in Appendix 3 to clarify the type of information required.
NMC143	SNMC9	Gwrthw ynebu/ Object	Candice Myers (1561)	Llywodraeth Cymru	The detailed criterion in Policy TAI3 Small Scale TCWA appears at odds with The Council's should also consider including the following justification text as they are considered necessary by the authorities to inform the outcome of any future planning application: ·Paragraph 7.4.26 requiring assessments to accompany proposals for TCWA; ·Paragraph 7.3.18 outlining the search sequence required before proposing modular accommodation, and ·Paragraph 7.3.18B requiring alignment of the LHMA to any proposals for a permanent residential legacy.	See response to set out in Appendix 3, which includes an additional criterion in Policy PS 9A and a reference to the LHMA in Policy PS9.
NMC144	SNMC11	Gwrthw ynebu/ Object	Candice Myers (1561)	Llywodraeth Cymru	Policies PS 9B & PS 9C effectively means that logistic centres/park and ride facilities could occur anywhere along the A5/A55 corridor. Is this correct and appropriate? How wide is the corridor? Would this include Llangefni?	Criterion iii of Policy PS 9B requires sites for logistics facilities to be located adjacent to the development boundary of "Centres" located on or close to the A5/ A55. Therefore, sites in open countryside along this corridor would not be supported. In terms of park and ride facilities, the Councils' priority is to locate such facilities at Centres located along or close to A5/ A55, e.g. Holyhead, Y Fali, Gaerwen, Llangefni. Criterion ii permits other sites along the A5/ A55 provided it can be demonstrated that sites closer to the Centres are not available, suitable, etc. In order to improve clarity it is suggested that the reference to 'corridor' is removed.
NMC147 &	SNMC13 &	Gwrthw	Candice	Llywodraeth	Policy PS10 has been amended to identify that 55.1ha	The total amount employment land

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
NMC148	SNMC14	ynebu/ Object	Myers (1561)	Cymru	of land has been allocated for employment purposes with 643.8ha of existing land safeguarded. However, the safeguarded sites listed in corresponding Policy CYF1 (as amended through NMC148) total 633.3ha, 10.5ha less than identified in Policy PS10. The Councils should ensure employment totals align in both Policy PS 10 and Policy CYF 1.	<p>which is safeguarded in Policy PS10 is 643.8ha which includes Adwy'r Hafan, Pwllheli (10.5ha) which is safeguarded in accordance with Policy CYF1B. If the Inspector considers that this should be clarified the explanatory text that accompanies Policy CYF1B could be amended to include reference to the total amount of land which is safeguarded in accordance with the Policy:</p> <p><u>Adwy'r Hafan is a well established employment site (10.5ha) in Pwllheli, providing an important supply of units for local businesses. Safeguarding of existing employment areas will encourage market activity to maintain a supply of employment floorspace. However, this Industrial Estate is vulnerable to flooding, being located within a C1 C2 Flood risk area.</u></p>
NMC148	SNMC38	Gwrthw ynebu/ Object	Arthur Owen (3426)		<p>Rhosgoch is considered a reserve industrial site within CYF1 which should only be released if needed for either the New Nuclear Build or other Energy Island proposals but only for B1, B2 or B8 use.</p> <p>The existing wording needs to be improved to ensure clarity on this point. Horizon Nuclear Power, the wylfa Newydd developer has already indicated, within their PAC2 consultation, their desire to use the land for residential purposes to accommodate their workforce.</p> <p>A Reserved Employment Site identified in CYF 1 is neither a Safeguarded or Allocated site.</p>	It is considered that the wording of the policy in its current form is clear in terms of the purpose of the reserve employment site and the consideration relating to the release of these sites.

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
NMC148	SNMC63	Gwrthw ynebu/ Object	Jon Suckley, How Planning (1447)	Land & Lakes Ltd	It is Land and Lakes view that the policy as drafted does not reflect the Council's intention. The reserve site policy would allow a wide ranging interpretation allowing an initial phase of uses specifically for the needs of Wylfa Newydd or other Energy Island development. Amended wording has been suggested.	It is considered that the wording of the policy in its current form is clear in terms of the purpose of the reserve employment site and the consideration relating to the release of these sites.
NMC149	SNMC64	Gwrthw ynebu/ Object	Jon Suckley, How Planning (1447)	Land & Lakes Ltd	To relate more closely with what we understand are the Councils' intentions for reserve sites the following changes to the wording of the reserve site explanation has been proposed.	It is considered that the wording of the policy in its current form is clear in terms of the purpose of the reserve employment site and the consideration relating to the release of these sites.
NMC154	SNMC24	Cefnogi/ Support	Angharad Crump (1521)	Cyfoeth Naturiol Cymru	We note and welcome the inclusion of new policy CYF 1B. We have already agreed the policy wording during discussions with the Authority and confirm that the inclusion of Policy CYF 1B removes CNC objection which related to the conflict between developing this land for employment uses and compliance with TAN15 guidance.	Note the supporting comment <u>Update:</u> since the Matters Arising Changes were published the flood risk maps have been updated. Natural Resources Wales has confirmed that Adwy'r Hafan is now located in a C2 flood zone not C1. It has been suggested that the explanatory text is amended to reflect this change. If the Inspector is in agreement Policy CYF 1B's explanatory text could be amended accordingly. <u>Adwy'r Hafan is a well established employment site (10.5ha) in Pwllheli, providing an important supply of units for local businesses. Safeguarding of existing employment areas will encourage market activity to maintain a supply of employment floorspace. However, this Industrial Estate is vulnerable to flooding, being located within a C1 C2 Flood risk area.</u>
NMC156	SNMC65	Gwrthw ynebu/ Object	Jon Suckley How	Land & Lakes Ltd	Further clarity is sought relating to when Policy CYF4 is applied in relation to the release of land for an	It is considered that the wording of Policy CYF 4 is sufficiently clear in stating

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
		Object	Planning (1447)		alternative use, especially in relation to the amended wording "existing uses". Does this relate to the reserve sites or the safeguarded employment site only as recognised in Policy CYF1.	that the policy is relevant to current employment sites only and therefore it isn't considered necessary to amend the policy wording in accordance with the objection.
NMC164	SNMC103	Gwrthw ynebu/ Object	SE Edwards (751) David Middleton, Savills (UK) Ltd (2733)	Cadnant Planning Ltd BH&HPA	<p>Whilst it is acknowledged that the Councils have inserted a reference to 'landscape and environmental' improvements they have failed to acknowledge that such improvements will reduce landscape and environmental effects. The wording should be amended to read: "...that the proposal offers significant landscape or environmental improvements to the site, reducing its landscape and environmental impacts".</p> <p>The amended wording also fails to acknowledge that improvements to existing sites can be in the form of improvements to park facilities which have in the past made significant overall improvements to existing sites. Para 7.3.66 should acknowledge these improvements not just landscape and environmental improvements.</p>	<p>Add the word "environment" to the sentence to mirror the wording included in the MAC "... that the proposal offers significant landscape or environmental improvements to the site, reducing its landscape and environmental impact".</p> <p>Paragraph 7.3.65 records the support to improvements and upgrades to existing facilities. There is no need to repeat this principle in paragraph 7.3.66</p>
NMC176	SNMC147	Cefnogi/ Support	Mark Harris (1470)	Home Builders Federation	-	Note the supporting comment
NMC177	SNMC148	Cefnogi/ Support	Mark Harris (1470)	Home Builders Federation	-	Note the supporting comment
NMC178	SNMC122	Cefnogi/ Support	Mark Harris (1470)	Home Builders Federation	-	Note the supporting comment
NMC178	SNMC115	Gwrthw ynebu/ Object	Richard J Roberts (868)	Cyngor Cymuned Llanystumdwy	We object to the deletion of this Policy, as we feel that it is essential for it to be included in order to safeguard the character of the settlements where housing developments will occur. This happened in the village of Chwillog when Stad Tŷ'n Rhos was built in the village and this allowed the newcomers to be assimilated in the area. We believe that this principle should remain, if the counties are to accommodate nearly 8,000 new dwellings.	<p>Action Point 6 from hearing session 2 required the Councils to introduce a Matters Arising Change in order to remove Policy TAI X.</p> <p>The intention of Policy TAI X was to submit a framework to identify various mechanisms that the Councils could use to manage development on sites so as</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						not to overwhelm communities or to ensure that developments happen in a timely way. It was submitted as a Focus Change (NF 62). This approach was discussed in detail during the Hearing. Deletion of this Policy does not prevent the Councils from using conditions or obligations to manage development, if doing so accords with the relevant Regulations. Therefore, the Councils consider that the Policy and its explanatory text need to be disposed of through a Matters Arising Change.
NMC179	SNMC123	Cefnogi/ Support	Mark Harris (1470)	Home Builders Federation	-	Note the supporting comment
NMC180	SNMC124	Cefnogi/ Support	Mark Harris (1470)	Home Builders Federation	-	Note the supporting comment
NMC181	SNMC125	Cefnogi/ Support	Mark Harris (1470)	Home Builders Federation	-	Note the supporting comment
NMC188	SNMC10	Gwrthw ynebu/ Object	Candice Myers (1561)	Llywodraeth Cymru	<p>The detailed criterion in Policy TAI 3 Small Scale TCWA appears at odds with Policy PS9A Large Scale TCWA.</p> <p>The Council's should also consider including the following justification text in relevant Policies TAI3 and PS9 as they are considered necessary by the authorities to inform the outcome of any future planning application:</p> <ul style="list-style-type: none"> ·Paragraph 7.4.26 requiring assessments to accompany proposals for TCWA; ·Paragraph 7.3.18 outlining the search sequence required before proposing modular accommodation, and ·Paragraph 7.3.18B requiring alignment of the LHMA to any proposals for a permanent residential legacy. 	See response set out in Appendix 3, which shows amendments to confirm Policy TAI 3's role as a result of amendments to Policy PS 9A in order to make it specific to any scale campus style construction workers' accommodation.
NMC188	SNMC62	Gwrthw	Jon Suckley	Land & Lakes	Amended wording is suggested to Policy TAI3 to ensure	See response set out in Appendix 3,

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
		ynebu/ Object	How Planning (1447)	Ltd	that it complies with the amendments proposed to Policy PS9, PS9A and TAI 3.	which confirms the role of Policy TAI 3
NMC188 – 197	SNMC79	Gwrthw ynebu/ Object	Kieran Somers (3441)	Horizon Nuclear Power Wylfa Limited	Object to the redrafted working of Policy TAI3. None of the proposed TWA sites are for less than 500 workers.	See response set out in Appendix 3, which confirms the role of Policy TAI 3
NMC198	SNMC126	Gwrthw ynebu/ Object	Mark Harris (1470)	Home Builders Federation	We consider that it's not clear whether or not the identified allocation in Beaumaris which has planning consent is subject to this policy or not, this needs to be clarified.	Note the request for clarification. If the 'Casita' housing allocation site in Beaumaris is developed in accordance with the extant planning permission, this policy would not be applicable. A planning consent has been renewed in the past. Should the extant planning consent expire during the Plan period any alternative proposal on the site would have to conform to the requirements of Policy TAI 5 and TAI 9 (should the proposal exceed the relevant affordable housing threshold).
NMC198	SNMC135	Gwrthw ynebu/ Object	S.V. Owen (3233)		It is noted that site T32 has been identified for housing allocation in Beaumaris under NMC 198. Given the inclusion of housing allocation in Beaumaris within policy TAI 5 it is considered that land within other settlements such as Trearddur Bay should be identified for housing allocation. The site at Old Cricket Ground in Trearddur Bay (Deposit Plan Rep ID: 1042), has planning consent for the erection of 17 dwellings, all issues in terms of flood risk have now been resolved and therefore the site as identified representations at the Deposit stage is deliverable and should be identified as a specific housing allocation within Policy TAI 5.	Site T32 in Beaumaris was allocated for housing in the deposit JLDP. The MAC comprises of moving reference to the site to Policy TAI 5 from TAI 15. This is to reflect the fact that Beaumaris is one of the settlements where Policy TAI 5 would apply. This site contributes to the indicative provision of housing land in the settlement. Moving reference to the site from one policy to another ensures clarity as to which policies would apply and therefore ensures the internal consistency of the Plan. An objection was made during the public consultation period for the deposit JLDP

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						<p>to the fact that the Old Cricket Ground site in Trearddur was not allocated for housing nor included within the development boundary. Matters relating to the Plan's housing requirement and settlement strategy were considered in detail during the Hearing Sessions as were the omission of sites from the Plan. No Action Points were set that required the Councils to reconsider these matters. Whilst the Councils have not amended the Plan to include this site, either as a Focused Change or a Matter Arising Change, the original objection remains duly made for consideration by the Inspectors.</p>
NMC198	SNMC3	Gwrthw ynebu/ Object	Candice Myers (1561)	Llywodraeth Cymru	<p>Welsh Government is still unclear about what type of affordable housing will be secured through this policy, and how it would relate to the thresholds and targets under Policy TAI 9: Affordable Housing Threshold and Distribution. The phrase 'except' in this policy adds confusion. The Welsh Government considers that the following points require clarification.</p> <ul style="list-style-type: none"> ·Do the thresholds within Policy TAI 9 relate to this policy? ·Under the specified thresholds in TAI 9, would only local market housing be permitted? ·For example a 10 unit scheme in Beaumaris would be expected to provide 30% affordable housing (3 affordable units). What type of affordable homes would be provided here? TAN 2 compliant? Or local affordable homes? What type of market housing would this be? Open market or local market homes? <p>It is essential that the delivery of this policy is monitored effectively given the challenges in terms of</p>	<p>The objector has sought clarification in relation to specific matters within the Policy. The Councils have provided clarification in relation to these matters as follows:</p> <ul style="list-style-type: none"> • The type of affordable housing that will be delivered through this policy would be consistent to that promoted through Policy TAI9 (as will be supported by an SPG). TAI9 will also be the starting point in terms of the percentage of affordable housing sought from a scheme. These affordable units will be TAN 2 compliant. • The thresholds included in Policy TAI9 in terms of when affordable housing will be sought are applicable to this

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
					<p>viability and finance raised in our hearing statements. Why is the threshold set at 10 in the framework? The monitoring framework needs to be more robust in order to effectively monitor the success of the policy. A reference to monitoring of overturned S016 agreements at appeal could aid in this respect in order to test the success of the occupancy restriction criteria.</p>	<p>policy i.e. a proposal for 2 or more units.</p> <ul style="list-style-type: none"> • In accordance with this policy, a proposal that falls under the specified threshold (i.e. a single unit) and also the non-affordable provision within a scheme would have to be local market housing as defined within the policy and the Glossary of Terms. • As such, for the example given, the affordable housing provision in Beaumaris would be TAN 2 compliant in accordance with the requirements of Policy TAI 9. The remaining dwellings would have to be local market housing. No open market housing would be permitted in the specified settlements. • Agree that the delivery of this policy should be monitored effectively. However disagree with the suggested amendment to the monitoring framework in terms of considering the number of section 106 agreements that have been overturned. This is a negative indicator that assumes the failure of the policy. Also, it is not possible to apply to modify or discharge a section 106 agreement for a period of 5 years. In the initial 5 years post consent an obligation could be modified or discharged when both parties are in agreement. However, it is unlikely that this would be the case as the obligation would be based on a

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						<p>newly adopted policy. The aim will be to ensure that the consent should not need to be subject to discussion about modifying or discharging the obligation.</p> <ul style="list-style-type: none"> • As such it is proposed that indicator D52, as noted by Matter Arising Change NMC 332, is appropriate with respect to monitoring Policy TAI5 and should be maintained. • A figure of 10 units is noted in the monitoring framework because this reflects the average annual requirement in these settlements based on the information provided in Appendix 5 of the Plan, as is highlighted in paragraphs 2.31 and 2.32 of the Councils' response to Action Point S2/PG8 that derived from the examination hearing sessions. Of the 384 units that form the indicative housing figure for the settlements that are subject to Policy TAI5, 278 of these units have either already been completed since the Plan's base date (up to April 2015) or had extant planning permission in April 2015. By dividing the remaining 106 units with the 11 years remaining in the Plan period, a figure of 10 units per annum is derived. • To ensure consistency with Policies TAI 14 to TAI 16 and provide greater clarity within the Policy, the removal of reference to affordable housing is recommended from the opening

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						<p>sentence within Policy TAI 5. In addition the word 'Only' is also recommended for removal from the start of the Policy. Paragraph 7.4.37 in the Explanation to the Policy clarifies that Open Market provision will not be permitted in these settlements.</p> <ul style="list-style-type: none"> In addition to ensure consistency between this Policy and Policy TAI 9 the title 'Villages' in part (ii) of the Policy is amended to 'Local, Rural / Coastal Villages'. These amendments are outlined in red below: <p><u>Only Local market housing (as defined in the Glossary of Terms) will be permitted within the development boundaries of the settlements named below, except where the proposal contributes towards providing affordable housing in accordance with Policy TAI 9, and on the condition that the proposal complies with the following criteria</u> New residential development within the development boundaries of the specific settlements noted below will be permitted provided that:</p> <p>(ii) <u>Local, Rural / Coastal Villages</u></p>
NMC198	SNMC93	Gwrthw ynebu/ Object	Cadnant Planning (751)	Cadnant Planning	It is considered that only allowing local market housing and affordable housing within settlements will weaken communities both socially and economically resulting in an increase in deprivation. It is identified within	Duly made objections regarding the principle of Policy TAI 5 were received at the Deposit stage and these are being considered by the Inspectors. The

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
					<p>national planning policy that there is a requirement to provide a mix of affordable and market housing within settlements in order to create and maintain sustainable communities. Restricting housing development to local market housing will result in the social imbalance of settlements and therefore contrary to national planning policy.</p> <p>The strategy of only allowing local need or affordable housing within settlements such as Beaumaris, Moelfre and Trearddur is also likely to lead to the plan strategy as a whole failing to deliver the required level of housing. The delivery of local need and affordable housing can only be achieved through a balanced and viable development which incorporates a mix of open market and affordable housing.</p> <p>The 'local needs' housing in effect duplicates the affordable housing provision and is not necessary or deliverable.</p> <p>No evidence by the Local Authority was presented in the hearing sessions held in September 2016 to show that local market housing would tackle rural deprivation. Therefore, it is considered that the requirements for local market housing in settlements such as Beaumaris, Moelfre and Trearddur should be deleted.</p> <p>We also object to the housing allocation of site T32, Casita, Beaumaris. The site has benefited from a 10 year historic consent but has not been deliverable, therefore an alternative allocation should be considered.</p>	<p>Councils have responded to these previous objections. Whilst MAC changes have been proposed to the policy, the fundamental principle of the policy is not subject to a MAC. The public consultation period about the MACs is not an opportunity to add to previous comments.</p> <p>Nonetheless the objectors are reminded that detailed evidence has been presented pre and post submission to demonstrate that this policy would strengthen rather than weaken communities where there are obvious problems in the local housing market. Local housing market is different to affordable housing and it would provide opportunities within local housing markets, thereby promoting social sustainability. As such it helps to address issues relating to rural deprivation.</p> <p>PPW offers an opportunity to introduce such a policy and the specific settlements have been chosen on the basis of a clear methodology in Topic Paper 17. It is noted that open market housing is still available at these locations within the existing housing stock.</p> <p>There is no reason to consider that this policy will not lead to the provision of the required level of housing in particular settlements. Topic Paper 17 and the response to Action Point S2/PG8 refers to</p>
NMC199	SNMC95	Gwrthw ynebu/	Cadnant Planning	Cadnant Planning	It is considered that only allowing local market housing and affordable housing within settlements will weaken	

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
		Object	(751)		<p>communities both socially and economically resulting in an increase in deprivation. It is identified within national planning policy that there is a requirement to provide a mix of affordable and market housing within settlements in order to create and maintain sustainable communities. Restricting housing development to local market housing will result in the social imbalance of settlements and therefore contrary to national planning policy.</p> <p>The strategy of only allowing local need or affordable housing within settlements such as Beaumaris, Moelfre and Trearddur is also likely to lead to the plan strategy as a whole failing to deliver the required level of housing. The delivery of local need and affordable housing can only be achieved through a balanced and viable development which incorporates a mix of open market and affordable housing.</p> <p>The 'local needs' housing in effect duplicates the affordable housing provision and is not necessary or deliverable.</p> <p>No evidence by the Local Authority was presented in the hearing sessions held in September 2016 to show that local market housing would tackle rural deprivation. Therefore, it is considered that the requirements for local market housing in settlements such as Beaumaris, Moelfre and Trearddur should be deleted.</p> <p>We also object to the housing allocation of site T32, Casita, Beaumaris. The site has benefited from a 10 year historic consent but has not been deliverable, therefore an alternative allocation should be considered.</p>	<p>the success of similar policies in areas of England that experience housing pressure. The monitoring framework will identify whether the Policy has been successful or not.</p> <p>Site T32 in Beaumaris was allocated for housing in the deposit JLDP. Part of the MAC change refers to the fact that the site is now identified within Policy TAI 5 rather than TAI 15. This is to reflect the fact that Beaumaris is one of the settlements where Policy TAI 5 would apply, and that this site contributes to the indicative housing provision in the settlement. This change therefore helps to ensure the internal consistency of the Plan.</p> <p>As such, an objection to the housing allocation cannot be considered at this stage as this is not a MAC. The site has been assessed in accordance with the Plan's housing strategy and it is deemed appropriate for inclusion.</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
NMC211	SNMC89	Gwrthw ynebu/ Object	Llywelyn Rhys (2770)		<p>The NMC notes “Therefore the importance of the role of the Plan in terms of strengthening towards meeting the need for affordable housing is therefore acknowledged”. Whilst this is welcomed it is noted that there is insufficient land for building affordable housing and moderately affordable housing suitable for families in the Porthmadog area due to flood zone restrictions. We own land on the outskirts of Porthmadog which is above the flood plain. If it can be included within the development boundary it could be allocated for 100% affordable housing. The land opposite the site has been developed for industry and has recently extended to the West though this land is on the flood plain. It is important to identify suitable land for affordable housing also in order to maintain a viable society. I wish to emphasise that the Welfare of Future Generations Act (2015) places a duty on Gwynedd Council to work better with communities and to prevent problems from worsening. I wish to show that having suitable land for affordable housing and moderately affordable housing for families in the Porthmadog area is essential for this objective.</p>	<p>It is believed that the Plan provides adequate opportunities to meet the need for housing, including affordable housing, in the Plan area. NMC 212 shows the different elements which will contribute to address as much as possible of the need for affordable housing during the lifetime of the Plan.</p> <p>It is noted that the objector has offered a site for housing during the consultation period for the deposit plan. The Inspector therefore is familiar with the matter. The demand for new housing and the supply of land for housing in Porthmadog has been considered at a hearing. On the basis that no compelling evidence was presented at the Deposit Plan stage and that no action point was identified in the hearing, it is noted that the Councils have not proposed a Focus Change or a MAC to include this site within the development boundary or to allocate it for housing.</p> <p>In terms of promoting affordable housing, the objector’s attention is drawn to Policy TAI 10. If there is a proven local need for affordable housing a suitable site can be developed for 100% affordable housing on sites immediately adjacent to development boundaries in accordance with Policy TAI 10, Exception Sites, as long as it conforms to all the policy’s requirements as well as other policies in the Plan and national planning</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						policy (including TAN 15 'Development and Flood Risk').
NMC214	SNMC134	Gwrthw ynebu/ Object	Mark Harris (1470)	Home Builders Federation	<p>HBF object to the lowering of the threshold for affordable housing from 5 to 2.</p> <p>HBF object to the percentage requirement for affordable housing has been increase in two housing areas.</p> <p>HBF raise various concerns about the 2016 Viability study.</p> <p>HBF support the reduction from 15% to 10%</p> <p>HBF object to the proposed additional wording within the policy which refers to the potential for a higher percentage of affordable provision depending on tenure mix.</p> <p>HBF object to point 3(i) and suggest additional wording to make it clear that these requirements only apply to the Affordable housing element of the scheme.</p>	<p>The objector has raised various concerns and objections in relation to this policy. The Councils provide their response in relation to these matters below. The matters are also covered in the Councils' response to Action Points S4/ PG4-7:</p> <ul style="list-style-type: none"> • The updated AHVS notes that whilst a threshold level of a single housing unit could be viable in some circumstances, a level of 2 units has been selected as this is a balance between maximising affordable housing delivery, complying with national planning policy and guidance, and saving resources in terms of negotiating Section 106 matters on single dwelling sites and also the potential negative impact upon the delivery of units. • A high proportion of developments in the Plan area are for less than 5 units. Reducing the appropriate threshold to 2 units would therefore ensure that opportunities for providing affordable housing are increased whilst ensuring that new housing development incorporates a reasonable mix and balance of house types so as to cater for a range of housing needs (in

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						<p>accordance with paragraph 9.2.15 of Planning Policy Wales).</p> <ul style="list-style-type: none"> • By applying ‘social rented tenure affordable housing’ as the basis for establishing the affordable housing requirements, a ‘lowest case’ scenario is established in terms of the number of affordable housing provided. A proposal incorporating a different tenure mix could yield a higher affordable housing provision (subject to detailed viability work). If a developer wishes to provide an alternative type of affordable units, this will have to be reflected in the affordable housing provision. • Gwynedd Council is undertaking a revised and more detailed LHMA during 2016 – 2017 and this will inform the SPG in support of the Plan. This will provide further detail with regard to the type of affordable units that are required. • Based on the updated AHVS, it is concluded that the affordable housing provision indicated for each Housing Price Area is viable and appropriate. The percentage of affordable housing sought has increased (from 25% to 30%) in the 9 higher value areas. In all other housing price areas, the percentage noted has decreased (either from 30% to 20% or from 15% to 10%) in order to reflect viability factors. • The Policy states that where the

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						<p>viability of individual schemes fall short of the policy requirements specified, the onus will be on the applicant/ developer / landowner to clearly demonstrate on a viability assessment pro-forma the circumstances justifying a lower affordable housing contribution or tenure mix. If following the submission of a viability pro-forma, disagreement remains, an independent external assessment of the scheme (e.g. by the District Valuers Service) will be undertaken at the applicant's expense.</p> <ul style="list-style-type: none"> • It is proposed that the policy should not be amended based on the objection to the additional wording that refers to a higher provision of affordable housing dependant on tenure mix. The policy states the minimum number of affordable housing to be provided based on all the required units being of social rented tenure. TAI 9 provides the policy requirement and the basis for negotiating the price of land. Different affordable housing tenure and provision should be taken into account at this stage. The Anglesey 2016 LHMA update and the updated Gwynedd LHMA will be important in this respect. • It is believed that the worked example that is cited in the objection refers to the previous AHVS and not the most

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						<p>recent Study (that forms part of the reply to Action Points S4/PG4-9).</p> <ul style="list-style-type: none"> It is noted that point 3(i) does specifically refer to affordable housing and therefore there is no need to include the additional suggested wording. Policy TAI 1 refers to 'Appropriate Housing Mix' more generally.
NMC214	SNMC116	Gwrthw ynebu/ Object	Richard J Roberts (868)	Cyngor Cymuned Llanystumdwy	We object to changing the percentage of affordable housing for the Llyn area to 10% only. We believe that this is too low for an area which has an average salary which is so low and is under such pressure from holiday homes.	<p>The percentage of affordable housing to be provided is based on the findings of the Affordable Housing Viability Study. The method of establishing the percentage of affordable housing to be provided within the various housing price areas is therefore based on a sound and clear methodology. These figures convey what is viable to be provided in specific areas, not the need for housing in an area. It would be possible to provide more affordable housing than that set out in the policy if the evidence at the time of planning application justifies this approach.</p> <p>As a result of updating the Viability Study and also when considering the impact of the cost sprinklers on viability figures, it is concluded that setting targets based on a three way split (30%, 20% and 10%) is more suitable than a two way split (25% and 15%).</p> <p>It was felt that it was challenging for some of the lower value areas to achieve 15% affordable housing provision, while it</p>
NMC214	SNMC83	Gwrthw ynebu/ Object	Robin Hughes (Clerc) (1235)	Cyngor Tref Pwllheli	Reducing the percentage of affordable housing in the Dwyfor area (and elsewhere) from over 15% to 10% is definitely a policy error; the percentage should be increased not reduced.	
NMC214	SNMC85	Gwrthw ynebu/ Object	Iwan Edgar (3050)	Grŵp Ffocws Cynllun Datblygu Lleol	The percentage of affordable housing is reduced to 10% from over 15% in NMC214 (third collection of communities). Such a percentage should be higher not lower according to my interpretation of the housing situation.	

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						<p>is viable to ask for more affordable housing in areas of higher value.</p> <p>It is believed that including a wider range of targets is a more subtle and sensitive way to tackle this issue, as it ensures that development is truly viable while increasing the availability of affordable housing in the areas where this is possible.</p> <p>The figures in the policy (as amended by the NMC 214) are based on social rented tenure, and it is noted that a proposal that includes a mix of alternative affordable tenure should yield a higher percentage of affordable provision.</p> <p>Together with the requirement in Policy TAI 9 that an appropriate mix of affordable housing is provided, it is also noted that Policy TAI 1 ('Appropriate mix of housing ') will apply with regard to ensuring that the type of housing provided is suitable.</p>
NMC214	SNMC105	Gwrthw ynebu/ Object	Cyng Aled Evans (2646)		<p>It is recommended that the percentage of affordable housing should be reduced to 10% (other percentages lower than the original in several areas of the plan e.g. Pen Llyn.</p> <p>Whilst accepting the observations made by the inspector (and also a housing industry representative) that is that having a higher percentage makes it more difficult for builders to make developments feasible in having too many affordable housing and consequently</p>	<p>Reference is made to the response to representations SNMC 83, 85 and 116 in respect of the part of the objection that refers to reducing the percentage of affordable housing to 10% in the housing price area of Pen Llŷn.</p> <p>It is emphasised that the information in this policy conveys the provision of affordable housing that is viable to be</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
					<p>making it difficult for the plan to reach its target should builders decide not to build at all.</p> <p>It is possible to overcome this with the support of housing associations and so on and Cynefin made a comment to that end in the hearing.</p> <p>Also, I do not believe that reaching the government's target is equivalent to achieving the local need for housing.</p>	<p>provided in specific housing price areas when considering local factors (based on social rented tenure). It does not convey the need for affordable housing that exists in these areas. The policy does not prevent housing associations or any other developer from providing a higher percentage of affordable housing if the evidence at the time of a planning application shows that this is viable.</p>
NMC217	SNMC133	Gwrthw ynebu/ Object	Mark Harris (1470)	Home Builders Federation	<p>Although the HBF do not object outright to this additional wording as it provides flexibility, there is concern that when considered along with the proposed changes to the wording of Policy TAI 9: (see HBF comments on MAC 214) this does cause potential uncertainty for the industry. It will make it difficult to know firstly what the mix of tenures and house types will be asked for by the Council but also what the percentage requirement for affordable will be as the suggested policy wording allows this to be varied depending on tenure mix. This will make it harder for land to be purchased and schemes brought forward due to the potentially impact on the viability of the site at the planning stage.</p>	<p>Reference is made to the response to objection SNMC134.</p> <p>Specifically, the policy states the minimum number of affordable housing to be provided based on all the required units being of social rented tenure. TAI 9 provides the policy requirement and the basis for negotiating the price of land. Different affordable housing tenure and provision should be taken into account at this stage.</p> <p>The Anglesey 2016 LHMA update and the updated Gwynedd LHMA will be important in this respect.</p> <p>This provides much more certainty than the current development plan policies in terms of the expected affordable housing provision.</p>
NMC221	SNMC90	Gwrthw ynebu/ Object	Llywelyn Rhys (2770)		<p>It is noted that "local need for affordable housing that cannot be met within a reasonable timescale... as an exception, proposals for 100% affordable housing</p>	<p>Reference is made to the response to representation SNMC89, specifically in terms of the opportunity to provide</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
					<p>schemes on sites which are directly adjacent to development boundaries which form a reasonable extension to the settlement.” This statement is welcomed and I urge Gwynedd Council to implement it in the context of affordable housing and moderately affordable housing suitable for families in the Porthmadog area. Due to the zone restrictions of the flood plain there are insufficient sites to build new suitable housing within the existing development boundary. There is a need, therefore, to take a flexible approach and identify sites near the town but outside the development boundary at present. Fields closest to the town on Moelwyn Dairy land are proposed, which are above the flood plain and opposite the Porthmadog industrial estate which is on the flood plain. There would be convenient services and accessibility to the town from the site.</p> <p>Some of the well-being goals identified in the Well-being of Future Generations Act are a prosperous Wales, Wales of coherent communities and Wales with a lively culture in which the Welsh language prospers. The proposed LDP do not achieve those well-being goals in the context of the Porthmadog community as there is no effort to resolve housing problems.</p> <p>I would like to propose a partial solution for the problems of a lack of suitable sites to build new affordable housing and moderately affordable housing for local families in the Porthmadog area. I wish to show evidence that land which is protected from flooding and practical in terms of location is available to be developed for affordable housing.</p>	<p>affordable housing on sites that are immediately adjacent to the development boundary (exception sites). Policy TAI 10 is a way of providing affordable housing to meet the recognised need as long as the proposal is suitable and compatible with the relevant requirements. In this regard careful consideration should be given to the justification for the need for affordable housing in considering the suitability of the site together with the indicative provision of units that the Plan facilitates in specific settlements.</p> <p>A response in relation to the site referred to is given in the response to representation SNMC89. It is noted that this isn't an objection to a specific MAC.</p> <p>In terms of the Plan's relationship with the Well-being of Future Generations Act, reference is made to the Councils' response to Action Point S16/ PG41.</p>
NMC240	SNMC33	Gwrthwynebu/ Object	Iona Foulkes (3425) Dominic &		Para 7.4.93 indicates that there will be 4 pitches on the land at Penhesgyn, Penmynydd. It omits to state that (i) this is next to the 'tip' (the County Council altered the	The latest GTANA (2016) identified a need to provide 4 pitches for Travellers on Anglesey over the Plan Period to

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
			Judith Brooke (3431) John Davies (3434) Ruth Eley (3435) Owain & Alaw Evans (2879) Margaret Flynn (3436) John, Eirianwen a Glyngwyn Foulkes (437) Laurie Lane (3438) Gareth & Haulwen Morgan (3439) Idris & Jane Roberts (3440)		<p>signage on the A5205 a few months ago from tip to recycling centre) and that its access will require the compulsory purchase of adjoining agricultural land; or (ii) that a January 2016 report, Identifying suitable sites for the Gypsy and Traveller community stated that a permanent site with four pitches...should have capacity for growth for some additional pitches; or even that (iii) the Assistant Chief Executive stated There haven't been any children living at the unauthorised encampment in the layby on Pentraeth Road for many years. The need to be in close proximity to a school was not therefore a factor in selecting a permanent residential site...We have been clear throughout the consultation process that we were consulting on a site specifically for the individuals living on Pentraeth Road...set out in paragraph 2.2.1 of the consultation document...We do not anticipate a growth in the number of households at the site in Penhesgyn. (Letter of 31 August 2016)</p>	<p>replace the existing unauthorised site on the Pentraeth Road. The latest GTANA did not identify a need for additional pitches on Anglesey between 2021 and 2026. The next GTANA's is required in 2021. Therefore the estimated number of additional pitches required may change during the Plan period. The Council knows that it has to acquire private land to provide suitable access to the proposed site. (See also response to NMC 245)</p>
NMC245	SNMC32	Gwrth ynebu/ Object	Iona Foulkes (3425) Dominic & Judith Brooke (3431) John Davies (3434) Ruth Eley (3435)		<p>"4. Detailed site assessment which looks at environmental issues, accessibility, site context and character". Nowhere in the schedule is there any reference to the fact that the 4 pitches on the land at Penhesgyn, Penymynedd is next to the 'tip'. A 2003 study found that 50 percent of sites were on contaminated land, with 12 percent near tips. The equality and Human Rights Commission confirmed such unsatisfactory conditions in 2009, e.g. the location of sites can be poor (for instance, under motorways or</p>	<p>The Penhesgyn Site is considered to be suitable to meet the needs of Travellers identified in the GTANA 2016. The Council has considered the methodologies referred to Topic Papers 18,18A and 18B to identify possible suitable sites. It has also taken account of Welsh Government Circular 30/2007 (PCC24) and Good Practice Guide in Designing Traveller sites in Wales (2015)</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
			Owain & Alaw Evans (2879) Margaret Flynn (3436) John, Eirianwen a Glyngwyn Foulkes (437) Laurie Lane (3438) Gareth & Haulwen Morgan (3439) Idris & Jane Roberts (3440)		next to sewage works (page iv, EHRC Research Report 12)	(PCC27). The Councils' Gypsy and Traveller policies and the Penhesgyn Site have been subject to Sustainability Appraisals. A number of studies have been prepared for the Penhesgyn Site including:- General Site Appraisal, Air Quality Assessment, Noise Assessment, and Ecological Assessment. The findings of these studies show that the Penhesgyn site is a suitable location for provision of a permanent residential development for Travellers, provided some mitigation measures are incorporated into the design of the scheme. A copy of a relevant extract from the Preliminary Appraisal Report is included in Appendix 5.
NMC249	SNMC25	Cefnogi/ Support	Angharad Crump (1521)	Cyfoeth Naturiol Cymru	We note the amendment to Policy TAI13 New Permanent or Transit Pitches or temporary stopping places for Gypsies and Travellers. We are satisfied with the inclusion of criteria 10 which confirms that a highly vulnerable development will not be permitted within a C2 flood zone.	Note the supporting comment
NMC249	SNMC31	Gwrthwynebu/ Object	Iona Foulkes (3425) Dominic & Judith Brooke (3431) John Davies (3434) Ruth Eley (3435) Owain &		Point 2: "Where possible the site will be in reasonable proximity to local services and facilities". It is not clear why the selection criterion has been softened from that which is set out in the "Consultation on Gypsy and Traveller sites in Anglesey 11 February – 11 March 2016." In this, the Penhesgyn site is awarded a low accessibility score of 2 and a low amenities score of 2. The same document states, "Local amenities and facilities such as shops and schools should be close by. It is considered that the proximity of local amenities is more important when considering the location of	The Matters Arising Change relating to Criterion 2 was made to make it clearer and more practical, and to better reflect national guidelines that do not expect sites to fully meet each criterion. "As with all developments, it is likely that Local Authorities will need to follow the 'line of best fit' when assessing potential sites" (paragraph 3.22 Welsh Government Designing Gypsy and Traveller Sites 2015).

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
			Alaw Evans (2879) Margaret Flynn (3436) John, Eirianwen a Glyngwyn Foulkes (437) Laurie Lane (3438) Gareth & Haulwen Morgan (3439) Idris & Jane Roberts (3440)		residential sites than Temporary Stopping Places.” “Where appropriate, the standards and design of the development demonstrate that due regard has been to..... and the Welsh Government Good Practice Guide in Designing Gypsy and Travellers sites” (point 6). Who or which agency is charged to determine appropriateness?	Deciding planning applications is a Development Management Role. PPW advises that applications for planning permission should be determined in accordance with the approved or adopted development plan for the area, unless material considerations indicate otherwise. Material considerations could include current circumstances, policies in an emerging development plan and planning policies of the Welsh Government.
NMC259	SNMC127	Gwrth ynebu/ Object	Mark Harris (1470)	Home Builders Federation	The HBF suggest that the amended wording should include the word ‘windfalls’ which is what we presume is meant by ‘suitable unallocated sites’ this would provide consistency with other parts of the document and the housing supply tables.	<p>The Councils have used the term ‘suitable unallocated sites’ within the Policy which does refer to Windfall provision. Discussion at Hearing Sessions drew attention to the need for consistency in the use of terminology. The Councils therefore wish to draw attention to a minor consequential change to NMC 259 (in red), which would address the objection, ensuring internal consistency:</p> <p><u>In the Sub-Regional Centre of Bangor and the following Urban Service Centres, housing to meet the Plan’s strategy will be delivered through housing allocations identified below and suitable windfall unallocated sites within the</u></p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						<p><u>development boundary based upon the indicative provision in the table below:</u></p> <p><u>(ii) Unallocated Windfall Sites</u></p>
NMC259	SNMC87	Gwrthw ynebu/ Object	Bryan Rees Jones (2737)		<p>Concern that no specific location has been allocated for housing development in Porthmadog contrary to other urban centres.</p> <p>Concern that there is a misinterpretation of figures and no adequate provision for housing which are suitable for local people and families.</p> <p>Call for a review of the type of dwelling units which have been approved in Porthmadog and call to extend the construction boundary to suitable land nearby.</p>	<p>Matters Arising Change NMC 259 includes an amendment to the indicative supply of land for housing in Porthmadog. This change is required to correctly address the Plan's Settlement Strategy, which was identified in response to Action Point S3/ PG5. Distributing 52% of the housing supply provides for 150 housing units in Porthmadog, a level that takes account of the limited availability of land for housing development within the Centre. Appendix 5 of the Plan provides a snapshot of how the Plan can facilitate the required level of development in each settlement.</p> <p>Hearing Session 11 – South Gwynedd considered objections relating to specific sites in Porthmadog including land proposed for allocation by this objector.</p> <p>Following this Session, no Action Points were raised that required to Councils to identify additional sites for inclusion within the Porthmadog area.</p>
NMC260	SNMC128	Gwrthw ynebu/ Object	Mark Harris (1470)	Home Builders Federation	The HBF suggest that the amended wording should include the word 'windfalls' which is what we presume is meant by 'suitable unallocated sites' this would provide consistency with other parts of the document	The Councils have used the term 'suitable unallocated sites' within the Policy which does refer to Windfall provision. Discussion at Hearing Sessions

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
					and the housing supply tables.	<p>drew attention to the need for consistency in the use of terminology. The Councils therefore wish to draw attention to a minor consequential change to NMC 260 (in red), which would address the objection, ensuring internal consistency:</p> <p><u>In the following Local Service Centres housing to meet the Plan’s strategy will be delivered through housing allocations identified below and suitable windfall unallocated sites within the development boundary based upon the indicative provision in the table below:</u></p> <p><u>(ii) Unallocated Windfall Sites</u></p>
NMC261	SNMC129	Gwrthw ynebu/ Object	Mark Harris (1470)	Home Builders Federation	The HBF suggest that the amended wording should include the word ‘windfalls’ which is what we presume is meant by ‘suitable unallocated sites’ this would provide consistency with other parts of the document and the housing supply tables.	<p>The Councils have used the term ‘suitable unallocated sites’ within the Policy which does refer to Windfall provision. Discussion at Hearing Sessions drew attention to the need for consistency in the use of terminology. The Councils therefore wish to draw attention to a minor consequential change to NMC 261 (in red), which would address the objection, ensuring internal consistency:</p> <p><u>In the following Service Villages housing to meet the Plan’s strategy will be delivered through housing allocations identified below and suitable windfall</u></p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						<p><u>unallocated sites within the development boundary based upon the indicative provision in the table below:</u></p> <p><u>(ii) Unallocated Windfall Sites</u></p>
NMC262	SNMC4	Gwrthw ynebu/ Object	Candice Myers (1561)	Llywodraeth Cymru	<p>Welsh Government has similar concerns to those listed above in respect of Policy TAI5. Clarification on the following would be helpful:</p> <ul style="list-style-type: none"> ·Do the thresholds within Policy TAI 9 relate to this policy? ·Under the specified thresholds in TAI 9, would only general market housing be permitted? ·Is the intention of this policy that a 10 unit scheme in Y Fron, expected to provide 10% affordable housing (1 affordable unit). Would the 9 units be open market, and would the 1 affordable unit be for local need only? 	<p>The objector has sought clarification in relation to specific matters within the Policy. Below the Councils have provided clarification in relation to these matters:</p> <ul style="list-style-type: none"> • The Threshold table within policy TAI 9 clearly state that the threshold for Local, Rural and Coastal Villages is 2 or more housing units. • Applications below the threshold of 2, i.e. single dwelling application, would not trigger the requirement for an affordable housing requirement. However an application for a single affordable unit would still be supported under the policy subject to evidence of need for the affordable unit. • Should an application for 10 units within a development boundary of a Village be submitted it would be expected to provide 10% affordable housing for local need subject to the scheme's viability. The remaining 9 would be open market housing. The original policy did include under criteria (ii) a requirement for the proposal to outline how it would secure the viability of the local

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						<p>community, and strengthen the community and linguistic character. In response to Action Point S2/PG7 questioning the appropriateness of criteria (ii) the Councils agreed to the removal of this criterion.</p> <ul style="list-style-type: none"> To ensure consistency with Policies TAI 14 to TAI 16 and provide greater clarity within the Policy the removal of reference to affordable housing is recommended from the opening sentence within Policy TAI 17 with an additional criteria being added to Section 3 of Policy TAI 9 as a consequential change. These amendments are outlined in red below: <p><u>TAI 17</u> Proposals for <u>open market housing</u> and affordable housing for local need (as defined in the Glossary of Terms) in the following Local, Rural and Coastal Villages will be granted provided they conform to all the following criteria:</p> <p><u>TAI 9</u> <u>ix. Within Local, Rural or Coastal Villages only affordable housing for local need (as defined in the Glossary of Terms) will be permitted.</u></p>
NMC262	SNMC91	Gwrthw ynebu/ Object	Cadnant Planning (751)	Cadnant Planning	Now that the requirement of certain settlements to comply with Policy TAI 5 Local Housing Market has been removed from this policy, it is considered that there is a need to allocate land for housing within these villages.	The Plan's Settlement Strategy was the subject of detailed discussion at the Hearings. No Action Points were set that required the Councils to re-consider their

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
					There is an over-reliance on windfall sites within the Local Development Plan. Land should be allocated for housing in some of the larger villages such as Y Felinheli to accommodate the identified housing need. It is not considered that there is sufficient landbank within the development boundary to accommodate the identified need within these villages.	<p>approach. For clarity, the 12 Villages that have been removed from Policy TAI 17 now appear within Policy TAI 5.</p> <p>Development in settlements that are subject to Policy TAI 5 will contribute towards the 25% Growth anticipated from the Villages and Clusters category. Therefore there is no need for additional provision within Policy TAI 17 to meet the Plan's Growth from this category.</p>
NMC263	SNMC92	Gwrthw ynebu/ Object	Cadnant Planning (751)	Cadnant Planning	Now that the requirement of certain settlements to comply with Policy TAI 5 Local Housing Market has been removed from this policy, it is considered that there is a need to allocate land for housing within these villages. There is an over-reliance on windfall sites within the Local Development Plan. Land should be allocated for housing in some of the larger villages such as Y Felinheli to accommodate the identified housing need. It is not considered that there is sufficient landbank within the development boundary to accommodate the identified need within these villages.	
NMC266	SNMC140	Gwrthw ynebu/ Object	Cadnant Planning Ltd (751)	Cadnant Planning Ltd	<p>We strongly object to the removal of the larger settlements such as Llanddeusant and Llanfairynghornwy from the list of clusters within this policy. There is a lack of consistency in terms of sizes of clusters within this policy. Large clusters such as Llanddeusant and Llanfairynghornwy have been removed however, a row of 16 houses in Hendre Hywel is included within the policy. We believe that the Council haven't properly considered all of the factors which contribute to what makes a settlement.</p> <p>The removal of the larger settlements from the list of clusters will weaken those communities both socially and environmentally resulting in an increase in deprivation in those areas. It is identified within National Planning Policy that there is a requirement to provide a mix of affordable and market housing within settlements in order to create and maintain sustainable</p>	<p>Action Point 2 from Hearing Session 1 and Action Point 6 from Hearing Session 3 required the Councils to review Policy TAI 18 having specific regard to paragraph 4.7.7 of Planning Policy Wales (PPW) and consider whether certain Clusters should therefore be removed.</p> <p>The Councils' response to these Action Points is included in the Examination Library. As paragraph 4.7.7 of PPW refers to a sustainable functional link for clusters of smaller settlements, it was decided to review the Clusters identified under Policy TAI 18, focussing on their sustainability credentials in terms of their accessibility to other settlements. The methodology used to categorise</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
					communities. The loss of housing developments within these settlements will result in the deterioration in deprivation of these settlements. Therefore, it is vital that these settlements are included within this policy in order to achieve sustainable rural communities and tackle deprivation.	settlements had recorded the availability of public transport services. In order to address the Inspector's concerns as well as concerns expressed by Welsh Government it was considered reasonable to only keep those with a score of 2 or more for Bus Service (this equates to 12 or more buses passing through the Cluster daily during the working week). It is believed that this is a rational way to review the situation. This would reinforce the principle that settlements have a link with a higher tier settlement in the Settlement Hierarchy. It is acknowledged that this results in Clusters of differing sizes being removed from the Policy. However this approach is based upon the sustainability of its location rather than the size of the Cluster and therefore ensures that the Plan better aligns with paragraph 4.7.7 of Planning Policy Wales. Whilst Pencaenewydd is served by a Bus Service it is below 12 daily buses during the working week. In light of this the Matters Arising Change removes Pencaenewydd from the list of identified Clusters.
NMC268	SNMC114	Gwrthw ynebu/ Object	Richard J Roberts (868)	Cyngor Cymuned Llanystumdwy	Object the fact that Pencaenewydd is removed as a Cluster as the settlement is served by a bus service.	
NMC268	SNMC132	Gwrthw ynebu/ Object	Anna Jones (885)	Cyngor Cymuned Tref Alaw	Cyngor Cymuned Tref Alaw OBJECT to the removal of Elim, Llanddeusant and Penygroes from the list of Clusters identified within Anglesey.	
NMC268	SNMC141	Gwrthw ynebu/ Object	Cadnant Planning Ltd (751)	Cadnant Planning Ltd	<p>We strongly object to the removal of the larger settlements such as Llanddeusant and Llanfairynghornwy from the list of clusters within this policy. There is a lack of consistency in terms of sizes of clusters within this policy. Large clusters such as Llanddeusant and Llanfairynghornwy have been removed however, a row of 16 houses in Hendre Hywel is included within the policy. We believe that the Council haven't properly considered all of the factors which contribute to what makes a settlement.</p> <p>The removal of the larger settlements from the list of clusters will weaken those communities both socially and environmentally resulting in an increase in deprivation in those areas. It is identified within National Planning Policy that there is a requirement to provide a mix of affordable and market housing within settlements in order to create and maintain sustainable communities. The loss of housing developments within these settlements will result in the deterioration in deprivation of these settlements. Therefore, it is vital that these settlements are included within this policy in order to achieve sustainable rural communities and tackle deprivation.</p>	

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
NMC268	SNMC86	Gwrthw ynebu/ Object	Cynghorydd Aled Evans (2646)		<p>The clusters removed should be reinstated in the plan as clusters. As a reason for removing the “villages” noted, such as Pencaenewydd, it is noted that they do not comply with Policy 4.7.7 of Planning Policy Wales. It appears that these villages/clusters are not on public bus routes.</p> <p>Nevertheless, from my knowledge of some of these places, they are fairly lively communities and depriving them of any type of development (other than housing for farms and rural businesses) means that there is no hope of them prospering in the future – nor the rural areas as a result. Only a few houses are in question here but they are very important to the countryside.</p> <p>The Gwynedd Council Strategic Plan claims that it wishes to promote the rural economy. This change in policy, the weak policy 4.7.7 or not, works against this.</p> <p>Honestly, compliance with policy 4.7.7 of Planning Policy Wales is a very poor reason for the change. I remember hearing the inspector talking about this in the hearing in Bangor and was astounded at his observations and that he cut the discussions short without giving much of an opportunity for anyone to respond to the arguments he gave to defend the policy. He noted that the fact that there was no shop (for example) in a village meant that it was not “green”... with such arguments the countryside will be a wilderness.</p>	
NMC268	SNMC88	Gwrthw ynebu/ Object	Evan Owen (416)		<p>These are general comments on the proposal to remove clusters from the plan policies: I believe future generations and the Welsh language will suffer from any restrictions on house building in rural areas. Local Welsh people will be forced out of what have</p>	

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
					<p>become the only areas where the Welsh language and culture appears to be thriving according to 2011 Census statistics. I use one example only which is Langwnadl, a community the council proposes to class as open countryside following the Examination stage.</p> <p>The population is clearly Welsh, the majority are well educated and highly skilled, they can get to work without the decreasing number of buses (a factor which should not indicate any degree of sustainability) and most importantly keeps the Welsh language alive, what future will their children have when they need a house? (statistical profile provided)</p> <p>Will the high proportion of young children be forced to live in towns far away from their families in grey and faceless built up areas which are not familiar territory for people who are accustomed to the quiet life in traditionally united rural communities with a strong identity?</p> <p>Both the Secretary for State in 1985 and Rosemary Thomas (Chief Planner for Wales) in 2014 have spoken out against planning conditions and obligations to attempt to restrict who can live in private dwellings. Would expect more planning to meet the requirements of the Wellbeing of Future Generations Act and the Welsh Language legislation.</p>	
NMC271	SNMC49	Cefnogi	Helen Ashby-Ridgeway, Lichfields (3427)	Bourne Leisure Limited	<p>Bourne Leisure supports the Councils' approach within this draft policy to managing development so as to conserve "or" enhance the natural environment, given that the context for each development proposal will be different.</p> <p>The Company also supports this MAC in as far as it seeks to balance the need for and benefits of development against the value and national policy protection for the site and area.</p>	Note the supporting comment
NMC271	SNMC118	Gwrthw ynebu/	Chris Wynne (2626)	North Wales Wildlife Trust	We strongly recommend that the wording throughout policy SP16 reverts to the original "maintain AND	See comments in respect of SNMC37 below.

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
		Object			enhance biodiversity". This will ensure consistency within the LDP and be in line with the Environment Act and the Well-being &Future Generations Act.	
NMC271	SNMC37	Gwrthw ynebu/ Object	Angharad Crump (1521)	Cyfoeth Naturiol Cymru	<p>We draw your attention to para 5.2.8 of PPW, which identifies that 'the planning system has an important part to play in meeting biodiversity objectives by promoting approaches to development which create new opportunities to enhance biodiversity, prevent biodiversity losses, or compensate for losses where damage is unavoidable'.</p> <p>We are therefore concerned that the proposed change to the policy to confirm that development proposals will have to conserve or enhance biodiversity does not fully reflect the potential of the planning system to contribute, where appropriate to enhancing biodiversity as is recognised in PPW (para 5.2.8).</p> <p>We therefore suggest that the title of strategic policy PS16 is amended to include 'Conserving and where appropriate Enhancing the Natural Environment'. The first sentence of the policy, criteria 2) and 4) should also be amended in accordance with the suggested amendment.</p> <p>In this case our definition of conserve equates to either the maintenance or restoration of the conservation status of habitat and species in Gwynedd and Ynys Môn, This would therefore accord with the provisions of Article 2(2) of the Habitats Directive.</p>	<p>It is considered that the objector makes a valid point. It is considered that the suggested minor amendment will ensure consistency with Planning Policy Wales and ensure internal consistency within the Plan, i.e. in relation to policy AMG4 of the LDP. It is suggested that the amended wording should read as follows:-</p> <p>STRATEGIC POLICY PS 16: CONSERVING AND, WHERE APPROPRIATE, OR ENHANCING THE NATURAL ENVIRONMENT</p> <p>The Councils will manage development so as to conserve and or enhance the Plan area's distinctive natural environment, countryside and coastline, and proposals that have a <u>significant adverse effect on them will be refused unless the need for and benefits of the development in that location clearly outweighs the value of the site or area and national policy protection for that site and area.</u> When considering permitting an application the Planning Authorities will ensure that they are:</p> <p>1. Safeguarding the Plan area's habitats and species, geology, history and landscapes;</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						<p>2. Protecting and, where appropriate, or enhancing sites of international, national, regional and local importance and, <u>where appropriate,</u> their settings in line with National Policy;</p> <p>3. Have <u>ing appropriate</u> regard to the relative significance of the <u>international, national or local</u> designations in considering the weight to be attached to acknowledged interests, <u>ensuring that any international or national responsibilities and obligations are fully met</u> in accordance with National Policy;</p> <p>4. Protect <u>ing and, where appropriate,</u> or enhance <u>ing</u> biodiversity within the Plan area and enhance <u>ing</u> and/or restore <u>ing</u> networks of natural habitats in accordance with the Local Biodiversity Action Plan and Policy AMG 4;</p> <p>5. Protect <u>ing or</u> and enhance <u>ing</u> biodiversity through networks of green/ blue infrastructure;</p> <p>6. Safeguard <u>ing</u> internationally, nationally and locally protected species;</p> <p>7. Protect <u>ing,</u> retain <u>ing</u> or enhance <u>ing</u> the local character and distinctiveness of the individual Landscape Character Areas (in line with Policy AMG 2) and Seascape Character Areas (in line with Policy</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						<p>AMG 3);</p> <p>8. Protect ing, retain ing or enhance ing trees, hedgerows or woodland of visual, ecological, historic cultural or amenity value.</p> <p>In order to ensure consistency, it is suggested that the following modifications are made to policy PS17:-</p> <p>POLICY PS 17: PRESERVING <u>AND, WHERE APPROPRIATE, OR</u> ENHANCING HERITAGE ASSETS</p> <p>In seeking to support the wider economic and social needs of the Plan area, the Local Planning Authorities will preserve <u>and, or</u> where appropriate, enhance its unique heritage assets.</p> <p>Proposals that will preserve <u>and, where appropriate, or</u> enhance the following heritage assets, their setting and significant views into and out of the building/area will be granted:</p> <ol style="list-style-type: none"> 1. Scheduled Ancient Monuments and other areas of archaeological importance (in line with Policy AT 4). 2. Listed Buildings and their curtilages. 3. Conservation Areas (in line with

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						<p>Policy AT 1).</p> <p>4. Beaumaris Castle and Caernarfon Castle and Town Walls World Heritage Sites (in line with Policy AT 1).</p> <p>5. Candidate World Heritage Sites.</p> <p>6. Registered Historic Landscapes, Parks and Gardens (in line with Policy AT 1).</p> <p>7. Buildings of architectural/ historic/ cultural merit which are not designated or protected (in line with Policy AT 3).</p>
NMC275	SNMC50	Gwrthwynebu	Helen Ashby-Ridgeway, Lichfields (3427)	Bourne Leisure Limited	Bourne Leisure supports the Councils' approach in NMC275 in requiring proposals to "have regard to" rather than "address and coincide with" the relevant Statement of Value and Significance. This change should help to enable a case-by-case assessment of each proposal in relation to its impact on the Special Landscape Area. Bourne Leisure considers that the circumstances where a Landscape and Visual Impact Assessment will be required should be defined within Policy AMG 1 and that the previous version of this policy provided greater clarity.	It is not considered that the modifications to the wording will improve the clarity of the policy.
NMC290	SNMC110	Cefnogi/Support	Ben Lewis, GVA (3418)	Nuclear Decommissioning Authority & Magnox Ltd	The NDA and Magnox would like to confirm their support for the following modifications, which are consistent with the representations made by the GVA (on behalf of the NDA and Magnox.	Note the supporting comment
NMC290	SNMC111	Gwrthw	Ben Lewis,	Nuclear	It is noted that the revised Policy GWA 3 includes	It is considered appropriate to continue

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
		ynebu/ Object	GVA (3418)	Decommissioning Authority & Magnox Ltd	references to Wylfa Newydd and Policy GWA 1. As stated earlier Article 2(1) (d) of the Waste Framework Directive excludes radioactive waste from the scope of the Directive. As Policy GWA 1 deals with facilities for waste covered by the Directive, it is not applicable to radioactive waste management and disposal, therefore the cross-reference to GWA 1 should be deleted, particularly as GWA 3 already includes criteria relating to the need to minimize any adverse impacts of the proposals. If the Councils consider it necessary, a minor amendment to Policy GWA 3 could be made to include the general provisions of GWA 1 (see suggested wording overleaf). It should also be noted that Policy PS9 - Wylfa Newydd and Related Development includes a provision for radioactive waste management so reference to Wylfa Newydd under GWA 3 may not be necessary. Therefore, and for clarity, it is requested that the reference to GWA 1 is deleted from Policy GWA 3.	to include a reference towards Policy GWA 1's together with GWA2 in the explanation to Policy GWA3 because this policy sets out the principles in terms of considerations which are relevant when considering applications for waste management.
NMC292	SNMC51	Gwrth ynebu	Helen Ashby-Ridgeway, Lichfields (3427)	Bourne Leisure Limited	The use of the term "local communities" makes the draft policy unclear and therefore would not provide adequate protection from adverse impacts of waste development. The policy should provide protection for "sensitive receptors" rather than "local communities". Holiday accommodation in particular should be recognised as vulnerable to adverse impacts, and this should be acknowledged within the justification text. Bourne Leisure supports the stipulation in draft Policy GWA 2 (last sentence) that waste management proposals should be considered on a case-by-case basis.	The Plan needs to be read as a whole. There are other policies within the Plan which protect the amenity of users/residents. (Policy CYFF 1)
NMC294	SNMC112	Gwrth ynebu/ Object	Ben Lewis, GVA (3418)	Nuclear Decommissioning Authority & Magnox Ltd	It is noted that the Councils have proposed to remove the reference to radioactive waste "disposal" from Policy GWA 3. The NDA and Magnox are concerned that exclusion of radioactive waste disposal from Policy GWA 3 fails to recognise that some waste may need to be disposed of at the existing Wylfa site, and this approach is supported by national policy and guidance.	The term 'waste management' (as referred to in Policy GWA3) includes the disposal of waste. For clarity, it is proposed that the term 'waste management' is defined by amending para 7.5.51.

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
					<p>The objector also states that the word ‘discharges’ should be removed from criterion 1 as it doesn’t comply with national strategies.</p> <p>Further an objection was received to criteria 5 regarding the validity of requiring a Waste Management Assessment.</p>	<p>With regard to the reference being made to the term ‘discharges’ within criterion 1, the reference is deemed necessary.</p> <p>It is considered necessary to delete criterion 5 as the requirement for a Waste Planning Assessment wouldn’t apply to radioactive waste due to radioactive waste falling outside the Waste Framework Directive. For clarity it is proposed that a footnote is included within the reference to Waste Planning Assessment to Policy GWA1 to clarify the status of radioactive waste in relation to the Waste Directive Framework.</p> <p>Please see Appendix 4 for revised wording of the Waste chapter in light of this representation.</p>
NMC295	SNMC48	Gwrthw ynebu/ Object	Ben Lewis, GVA (3418)	Nuclear Decommissioning Authority & Magnox Ltd	<p>The second paragraph of 7.2.56 only acknowledges that Low and Very Low Level Radioactive Waste will be produced from the decommissioning process. However as the comments on Policy GWA3 above, ILW will be generated as a result of the decommissioning process. For clarity and consistency, this sentence needs to be amended to acknowledge that ILW will be generated at the existing Wylfa Nuclear Power Station as the site progresses through the decommissioning process. It is therefore proposed that the sentence is amended.</p>	<p>It is agreed that it would be appropriate to include a reference to intermediate radioactive waste because it is likely to be produced from the decommissioning process. Further it is considered appropriate to include the definition of the different levels of radioactive waste for clarity. It is therefore proposed that Please see amended para 7.5.56 in Appendix 4.</p>
NMC 296	SNMC150	Cefnogi/ Support	Ben Lewis, GVA (3418)	Nuclear Decommissioning Authority & Magnox Ltd	<p>The NDA and Magnox would like to confirm their support for the Proposed Matters Arising Changes.</p>	<p>Note the supporting comment</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
)		
NMC297	SNMC106	Gwrth ynebu/ Object	Malcolm Ratcliff (1647)	Minerals Products Association	<p>We generally support the changes proposed with two exceptions,</p> <p>a) Criterion two misses out an essential reference to a minimum 10 year landbank for crushed rock, making the minimum only apply to sand and gravel in the proposed changes. This should be rectified since the minimum applies to both.</p> <p>b) We reiterate that national policy requires the maintenance of a landbank during the entire plan period in accordance with PPW para 14.7.5 which says, "Authorities should include policies in their development plans for the maintenance throughout the plan period of land-banks for non-energy minerals which are currently in demand."</p> <p>Accordingly, we suggest the following additional changes to the criterion, (new text in italics)</p> <p>2. Maintaining a minimum 7 year land bank of Sand and Gravel and a minimum 10 year land bank of crushed rock aggregate reserves throughout the plan period in line with national guidance.</p>	<p>It is not considered appropriate to amend the wording of the strategic policy in line and the objection because the text in its current form is clear regarding the need to maintain a minimum landband for both hard rock and sand and gravel.</p> <p>Further, the previous explanatory paragraph notes the need for the continued land bank of aggregates for the lifetime of the plan.</p>
NMC298	SNMC16	Cefnogi/ Support	Anthony B Northcote (2998)	Coal Authority	The Coal Authority supports the proposed the change.	Note the supporting comment
NMC299	SNMC17	Cefnogi/ Support	Anthony B Northcote (2998)	Coal Authority	The Coal Authority supports the proposed the change.	Note the supporting comment
NMC300	SNMC18	Cefnogi/ Support	Anthony B Northcote (2998)	Coal Authority	The Coal Authority supports the proposed the change.	Note the supporting comment
NMC300	SNMC108	Gwrth ynebu/ Object	Malcolm Ratcliff (1647)	Minerals Products Association	We are disappointed that the need for a specialist report detailing the impact of a development on the MSA and the feasibility of prior extraction has not been acknowledged in the plan's supporting text. This follows	PS19 has been amended (NMC297) to refer to high quality aggregates. It isn't therefore deemed necessary to also amend Policy MWYN4.

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
					<p>good practice as outlined in the BGS safeguarding guidance. We therefore suggest the following addition to the text of para 7.5.62a (new text in bold).</p> <p>With the exception of exempt development, all applications in Minerals Safeguarding Areas should be accompanied by a Mineral Assessment Report prepared by a qualified person, which includes a site-specific desk-based assessment of the existing surface and solid geological and mineral resource information, including where appropriate, borehole data leading to an estimate of the economic value (for example quality and quantity) of the mineral resource, its potential for use in the forthcoming development and an assessment of whether it is feasible and viable to extract the mineral resource ahead of development to prevent unnecessary sterilisation. Where there is an overriding need for a development that would otherwise sterilise resource, a condition will be attached to the planning permission requiring the extraction of that resource prior to the commencement of the development unless the developer satisfactorily demonstrates that it is impracticable or environmentally unacceptable.</p>	
NMC308	SNMC107	Gwrthw ynebu/ Object	Malcolm Ratcliff (1647)	Minerals Products Association	<p>We are disappointed that our proposals for changes to this policy to address the qualifications to the apportionment process inherent within the RTS and mentioned in paragraphs 6.11 and 6.23 of the Topic Paper have not been acknowledged even though our recollection of the hearings was that the point was accepted by the Councils. Our members are greatly concerned that there should be recognition within policy that the needs of higher quality aggregates are accepted and addressed. The existing text is inadequate because the argument goes beyond the bare maintenance of a minimum landbank in which quality considerations are</p>	<p>If considered acceptable by the Inspector it is proposed that the wording of para 7.5.62a should be amended for clarity. The suggested wording would read as follows:-</p> <p><u>7.5.62a</u></p> <p><u>Development proposals affecting a mineral resource will be required to demonstrate, through appropriate investigation, that the resource will not be sterilised or demonstrate that the</u></p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
					<p>not necessarily taken into account. Moreover, the policy does not address the issues noted by the RTS Review Appendix A (North Wales) paragraph A53 which are relevant for mineral policy within the Plan area.</p> <p>We therefore propose a further amendment to the policy as follows (new text in bold) Mineral exploration, new working or extensions to existing operations will be granted to maintain the Plan area's landbank of aggregates, or to meet a demonstrated need for special qualities of aggregates which cannot be met by existing sources, or to maintain productive capacity of higher quality aggregates, or to meet a demonstrated need for other minerals provided the following criteria are met:</p>	<p><u>future extraction is not hindered by the proposed development. Where there is an overriding need for a development, that would otherwise sterilise resource, a condition will be attached to the planning permission requiring the extraction of that resource prior to the commencement of the development unless the developer satisfactorily demonstrates that it is impracticable or environmentally unacceptable.</u></p>
NMC311	SNMC19	Cefnogi/ Support	Anthony B Northcote (2998)	Coal Authority	The Coal Authority supports the proposed the change.	Note the supporting comment
NMC311	SNMC12	Gwrthw ynebu/ Object	Candice Myers (1561)	Llywodraeth Cymru	Coal referral areas. If Policy MWYN 6 refers to such areas they should be shown on the Proposals Map, as they are part of the plan. If they are shown on the Constraints Map then there should be no reference to them in the policy.	MTAN2 (para 228) states that the Coal Authority notifies the local planning authority of the areas of past, present or possible future coal mining and that these areas should be identified in the development plan. As a result of the guidance given in MTAN2 the Development High Risk Areas are referred to within the body of the policy. However they are shown on the constraint map as opposed to the proposal map because it is the Coal Authority which determine the high risk areas not the Councils and the Plan.
NMC315	SNMC130	Cefnogi/ Support	Mark Harris (1470)	Home Builders Federation		Note the supporting comment
NMC322	SNMC80	Gwrthw ynebu/ Object	Kieran Somers (3441)	Horizon Nuclear Power Wylfa Limited	Object to the Policy targets regarding highway improvements. It is inaccurate to state that a planning application for improvements to the A5025 will be	The policy targets included in the Monitoring Framework are based on the information available to the Councils in

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
					submitted in May 2017. Given the scale, nature and complexity of the Wylfa Newydd Project it is inappropriate and unnecessary to include timeframes for such development. If timeframes are included they need to be flexible.	late 2016/ early 2017. Amended indicators and policy targets to be confirmed.
NMC323	SNMC149	Gwrthw ynebu / Object	Mairede Thommas (318)	Chair Anglesey Branch CPRW	<p>We object to the Matters Arising Change as a basis for assuming that there should be a target of 50% of local electricity and heat provided by renewables by 2021 rising to 100% by 2026.</p> <p>The Plan needs to better address "the most efficient and effective use of land in the public interest" and "ensure necessary services and facilities are built where they are most needed". This should be done by focussing on "low environmental impact developments" and by placing solar PV and solar thermal installations within the built environment and close to the place where the energy generated will be most effectively used . The Plan should also address other means of achieving energy efficiently and cheaper power for business and communities.</p> <p>The Plan should also recognise that under the new devolution settlement, the Welsh Government is about to gain control of energy generation opportunities up to 300MW. There is no mention of Small Modular Nuclear Reactors (SMR) in the Plan, despite this being a low carbon land based power option, which has local support.</p> <p>The objector has included references to numerous external websites in an attempt to support their objections.</p>	<p>The Councils' response to the responder's Objections to NMC93, 94, 95 and 96 outlines the Councils' justification over the inclusion of renewable energy targets within the Plan.</p> <p>The Objector refers to the Policy Targets set against against Local Indicator D21 in Theme 2 Sustainable Living within the Monitoring Framework (NMC323).</p> <p>A review of these Policy Targets as part of responding to the objector's comments has led the Councils to conclude that they currently do not fully represent the information contained within Tables 12A and 12B for Renewable Electricity & Heat potential introduced in Chapter 7.2 under NMC 96 and 97.</p> <p>The targets as written refer to 'demand' rather than 'potential'. In order to ensure internal consistency it is suggested that the text could be amended as outlined in red below - Policy Targets to Local Indicator D21:</p> <p><u>To meet 50% (1,123.35 GWh) of projected electricity potential demand through renewable energy sources by</u></p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						<p><u>2021</u> <u>To meet 100% (2,246.7 GWh) of projected electricity potential demand through renewable energy sources by 2026</u> <u>To meet 50% (26.397 GWh) of projected heat potential demand through renewable energy sources by 2021</u> <u>To meet 100% (52.795 GWh) of projected heat potential demand through renewable energy sources by 2026</u></p>
NMC326	SNMC81	Gwrthw ynebu/ Object	Kieran Somers (3441)	Horizon Nuclear Power Wylfa Limited	The policy sets targets for various associated planning applications. The timescales included within the policy no longer reflect the consistent strategy for large components of the Wylfa Newydd Project or the timeframes for submission. Given the scale, nature and complexity of the Wylfa Newydd Project it is inappropriate and unnecessary to include timeframes for such development. If timeframes are included they need to be flexible.	The policy targets included in the Monitoring Framework are based on the information available to the Councils in late 2016/ early 2017. Amended indicators and policy targets to be confirmed.
NMC327	SNMC82	Cefnogi/ Support	Kieran Somers (3441)	Horizon Nuclear Power Wylfa Limited	Support the updated proposals map.	Note the supporting comment
NMC340	SNMC121	Gwrthw ynebu/ Object	Glenda Burke (Clerc) (932)	Cyngor Tref Porthmadog	<p>The Town Council noted the inconsistency in the figures shown under Porthmadog town.</p> <p>It is noted under 'Indicative Supply' 150, 'Commitments (Land Bank – Housing)(April 2015) – 87. In the next column 'Commitments (Land Bank – Housing)(April 2015) – 0.</p> <p>It is questioned how the housing supply will be delivered without any suitable land to be developed having been allocated. (This is despite various</p>	<p>In undertaking work on Action Point S3/PG8 (New Windfall Growth Level) it was observed that the indicative growth level recorded for Porthmadog was lower what it should be. Application of the Plan's Strategy means that that Porthmadog's total housing supply should be 150 units instead of 128 units.</p> <p>There was a need for a MAC to record the correct figure for Porthmadog, i.e. 150</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response					
					<p>suggestions about suitable land to be developed by the councillors in recent years – who know the area very well).</p> <p>There was a strong feeling that these figures are unclear and contradict one another. If there is a need for 150 houses in the Porthmadog area, where will they be built without any suitable land allocated?</p> <p>It is noted that there is an error in the report and the Council’s concern that no specific location has been given for Porthmadog contrary to all other urban centres. There is a misinterpretation of the figures as there is no provision for the supply of suitable housing for local people. Reference is made to building flats which are suitable for families. There is concern about the long-term effect that this will have on the town’s economy with the high street already suffering.</p> <p>It is felt that there is a need to extend the development boundary in order to identify suitable land to build a supply of affordable housing.</p>	<p>units instead of 128 units within Policy TAI 14. Unfortunately the MAC was not fully reflected in Appendix 5.</p> <p>The figure within column (dd) ‘Indicative Supply Level – Windfall Sites’ should be 58 rather than 36.</p> <p>Paragraphs 2.27 and 2.28 of the Councils response to Action Point S2/PG3 outlines the justification for a higher level of windfall provision within certain settlements, including Porthmadog.</p> <p>Hearing session 11 – South Gwynedd considered objections relating to specific sites in Porthmadog. Following this Session, no Action Points were raised that required the Councils to identify additional sites for inclusion within the Porthmadog area.</p> <p>The Inspector’s attention is therefore drawn to the fact that Appendix 5 Table 1 Column (dd) in relation to the settlement of Porthmadog should therefore read as shown in Red below:</p> <table border="1" data-bbox="1653 1177 1906 1362"> <tr> <td data-bbox="1653 1177 1906 1214"><u>Indicative Supply</u></td> </tr> <tr> <td data-bbox="1653 1214 1906 1251"><u>Level – Windfall</u></td> </tr> <tr> <td data-bbox="1653 1251 1906 1287"><u>Sites</u></td> </tr> <tr> <td data-bbox="1653 1287 1906 1324"><u>(dd)</u></td> </tr> <tr> <td data-bbox="1653 1324 1906 1362"><u>36 58</u></td> </tr> </table>	<u>Indicative Supply</u>	<u>Level – Windfall</u>	<u>Sites</u>	<u>(dd)</u>	<u>36 58</u>
<u>Indicative Supply</u>											
<u>Level – Windfall</u>											
<u>Sites</u>											
<u>(dd)</u>											
<u>36 58</u>											
NMC344	SNMC131	Gwrthw ynebu/ Object	Mark Harris (1470)	Home Builders Federation	We support the inclusion of Appendix 20 Housing Trajectory as a baseline on which to monitor the plan. The status of the document should however be made	It is considered that the wording included at the start of the Appendix provides an adequate picture of the					

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
					clear in the document to avoid any future confusion, particularly it can only be based on information at the time of production	purpose and status of the housing trajectory.
NMC362	SNMC26	Cefnogi/ Support	Angharad Crump (1521)	Cyfoeth Naturiol Cymru	We welcome the amendment to the notation for the Adwy'r Hafan employment site to align align with new Policy CYF1B (NMC147 & NMC154).	Note the supporting comment
NMC363	SNMC36	Gwrthw ynebu/ Object	Indeg Wyn (3394)		I wish to reiterate by objection to the site proposed here. It is now even larger than previously. As I said, developing here would encroach on new greenfield land and would cause serious traffic problems. The street is already jammed with traffic at times and it is very difficult to go up and down it, not to mention come out of the road to our house.	<p>Following the hearing session Gwynedd Council's Transportation Unit was asked to confirm the suitability of the site in terms of access. The correspondence received from the Transportation Unit is as follows:-</p> <p>"Having looked at the site we can confirm that there is no objection from the Transportation Unit to the land in question. The site is on the outskirts of the town and within the 30 m.p.h. speed limit zone and we believe that the local road network can cope with an increase in traffic generated by up to 8 additional houses.</p> <p>It is recommended that one access is provided to the site, rather than a series of individual entrances, in the form of an estate road. The plan below shows the favoured access points and route through the estate." (Action Point S12/PG1)</p>
NMC364	SNMC1	Cefnogi/ Support	Robin Hughes (1235)	Clerc Cyngor Tref Pwllheli		Note the supporting comment
NMC367	SNMC27	Cefnogi/ Support	Angharad Crump	Cyfoeth Naturiol	We note and welcome the proposal to exclude the area hatched red on the map from allocation reference C39.	Note the supporting comment

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
			(1521)	Cymru	<p>We confirm that this removes our objection to the proposal to safeguard and reserve site reference C39 for employment use.</p> <p>As previously advised, unlike the rest of the land that forms allocation reference C39, the land within the area hatched red was not raised as a result of landfill - the reason for this is that this land has historically been allocated as a place to store floodwater.</p> <p>In the absence of an assessment of the Flood Risk, we would therefore be concerned if the level of the land hatched red was raised as this could increase the risk of flooding of land and property in the Penrhyndeudraeth area. In general, we consider that land raising could only be considered if equivalent compensatory storage was provided in the vicinity i.e. Reducing the level of an adjacent area of land to compensate for raising the site.</p> <p>As confirmed in our earlier responses, without a detailed assessment of the possible impact on flood risk, we agree to the exclusion of the area hatched red from allocation reference C39.</p>	
NMC367	SNMC101	Gwrthwynebu/ Object	Glyn E Roberts (Clerc) (1261)	Cyngor Tref Penrhyndeudraeth	<p>Penrhyndeudraeth Town Council would have liked to have been able to submit representations on the entire amended Plan, but as the process prevents this, our representations are limited to the map related to Penrhyndeudraeth which is on page 385 of the Evaluation.</p> <p>It shows that a part of the land in the outskirts of Griffin Industrial Estate has been exempt because, it seems, this part of the natural environment which is within the Development Plan territory contains examples of vegetation / wildlife which deserve to be conserved and protected in order for them to prosper and survive. The Council is of the opinion that at least the same</p>	<p>To clarify, the MAC proposes to remove the site on the basis of its role as a flood storage area. The remainder of the objection does not relate to a MAC.</p> <p>Paragraph 2.4 of the Councils' guidance to the Matters Arising Change Schedule (Jan 2017) states:</p> <p>"2.4 This consultation is not therefore an opportunity to add to previous comments or to make new comments on parts of the original Deposit Plan not subject to a</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
					<p>esteem and importance should be given to the identity of the residents of Penrhyndeudraeth by protecting the linguistic-cultural environment and the social environment in order for that identity to prosper and survive similarly. This will be achieved by significantly reducing the number of houses intended to be built here.</p> <p>In the interests of this community, and in the interests of every other community which are besieged by the Development Plan and in the interests of the Welsh language, we urge you to listen to us.</p>	<p>Matters Arising Changes. Any such comments will be disregarded as they should have been made during earlier stages of Plan preparation.”</p>
NMC367	SNMC30	Gwrthw ynebu/ Object	Alexander H Badley (255)		<p>NRW's objection is to the 'infilling' of the site. In the extant planning permission it clearly states that a 'FCA' would need to be completed before any further development could take place on the site. This objection ensures that no infilling would be able to be done on the site.</p> <p>Our FCA (attached) concerns development uses that do not require infilling, yet are still commercial development.</p> <p>Therefore removing the development boundary does nothing to the site except devalu the land and put in question the viability of maintaining the site to the standards of the biodiversity obligation from Welsh Government (maintain access and treat invasive species mainly).</p>	<p>Part of the safeguarded employment site as shown within the Deposit Plan allocation was located within the C2 flood zone. Continued engagement with Natural Resources Wales has revealed that vacant land at the Griffin Industrial Estate, Penrhyndeudraeth forms a flood storage area created when the land was developed in the 1980s. It was therefore deemed necessary to propose a MAC to exclude this area from the safeguarded employment site.</p> <p>The objector states that the site has extant planning permission. However, following discussions with the Planning Service it is understood that that there isn't an extant permission on the site as the reserved matters weren't submitted within the specified timeframe.</p>
NMC398	SNMC15	Gwrthw ynebu/ Object	Ann Coxon (2940)	Cyngor Tref Ffestiniog	<p>The reference table included with the map is incorrect - place names don't match the locations.</p>	<p>Comment is noted – The Councils acknowledge that the references in the notation for the map in Appendix 3 of the 'Matters Arising Changes – Maps' do not</p>

NMC	Rep. No.	Type	Name	Company/ Organisation	Summary	Response
						match the locations on the map. The references for the different areas that are on the map match those included in Table 24 in the explanatory text to Policy AMG 1. The map was for illustration purposes only, i.e. to show the location of areas that will be moved from the Constraints Map to the Proposals Map.

Anglesey County Council and Gwynedd Council Deposit Joint Local Development Plan

APPENDIX 1

SUSTAINABILITY APPRAISAL ADDENDUM REPORT

March 2017

enfusion



CONTENTS		PAGE
1.0	INTRODUCTION Purpose and Structure of the Report	1
2.0	SA OF ADDITIONAL CHANGES TO THE PLAN	2
3.0	SUMMARY AND NEXT STEPS	2
	APPENDIX 1A	
I	SA of Further Changes to the Plan	

1.0 INTRODUCTION

1.1 Anglesey County Council and Gwynedd Council (the Councils) are currently preparing a Joint Local Development Plan (JLDP) for the Gwynedd and Anglesey Local Planning Authority Areas. The JLDP will set out the strategy for development and land use in Anglesey and Gwynedd for the 15 year period 2011- 2026. It will set out policies to implement the strategy and provide guidance on the location of new houses, employment opportunities and leisure and community facilities.

1.2 The Councils have been undertaking Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) since 2011 to inform the preparation of the JLDP. The SA process for the JLDP has produced the following reports to date:

- **Scoping Report July 2011** - which should be used for consultation on the scope of the SA/SEA - placed on public consultation on 21/07/2011 for a period of 7 weeks. A notice was placed in local newspapers presenting information regarding the consultation period and invited interested parties to submit written comments about the Report.
- **Draft Initial Sustainability Appraisal Report July 2012** - was made available on the Council's websites in July 2012
- **Initial Sustainability Appraisal Report May 2013** - This report was placed on public consultation alongside the Preferred Strategy for a period of 7 weeks.
- **Deposit Sustainability Appraisal Report February 2015** - This report was placed on public consultation alongside the Deposit Plan for a period of 7 weeks.
- **Deposit & Focused Changes Sustainability Appraisal Report February 2016** - accompanied the Deposit JLDP & Focused Changes on submission to the Welsh Government.
- **Sustainability Addendum Report July 2016** considered proposed amendments to the JLDP following consideration of responses to the Focused Changes as well as further work in relation to Gypsy & Traveller site options, renewable energy development, and addressed the Inspector's concerns.
- **Sustainability Appraisal of Matters Arising Changes (NMC)** considered proposed amendments to the JLDP which have emerged as a result of matters arising during the LDP Hearing Sessions.
- **Sustainability Appraisal of Additional Changes Addendum Report 2017** (this report) considers potential further changes to the Plan.

Purpose and Structure of this SA Addendum Report

- 1.3 The purpose of this Addendum Report is to clearly set out the method and findings of further SA work carried out in relation to amendments to the plan as a result of further changes to the Plan identified following public consultation on the Matters Arising Changes. Following this introductory section, the report is organised into two further sections:
- **Section 2** - explains the method and sets out the findings of the further SA work in relation to Matters Arising Changes.
 - **Section 3** - sets out the overall summary findings and next steps for the JLDP and the SA.

2.0 SA OF FURTHER POTENTIAL CHANGES TO THE PLAN

- 2.1 During the process of examination, a number of amendments were proposed to the JLDP. These Matters Arising Changes (NMC) were subject to public consultation. Following consideration of the comments received during the consultation period, further potential changes to the Plan have been suggested. It is important to ensure that any proposed changes are screened through the SA process to determine if they significantly affect the findings of the previous SA work presented in the SA Report (February 2016) and if further appraisal work is required.
- 2.2 The first step in the assessment was therefore to screen all the further changes proposed to identify those that could have a significant effect on the final outcomes that result from implementation of the Plan. A screening table was produced to consider all the proposed amendments. The findings of this work are provided in Appendix A of this Report.

3.0 SUMMARY

- 3.1 The potential changes proposed following the public consultation on NMC have been screened through the SA process to determine if they significantly affect the findings of the previous SA work. It is concluded that the changes do not significantly affect the findings of the previous SA work as they seek to provide further clarification, or ensure consistency and accuracy, as well as conformity with higher level (national) planning policy guidance and statements.

APPENDIX 1A

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
NMC022	3.7 – 3.9	<p><i>Reference to the Wales Act 2017 included in order to ensure that the Plan is as up-to-date as possible.</i></p> <p><u>“Wales Act 2017</u></p> <p><u>The Wales Act 2017, which received Royal Assent on 31 January 2017, introduced changes to the application of Planning Act 2008 in Wales. Planning Act 2008 provides that projects defined as Nationally Significant Infrastructure Projects, e.g. Wylfa Newydd Nuclear Power Station, are of such potential importance to the UK that a different consenting process has been established. Under the Nationally Significant Infrastructure Project consenting procedure in Planning Act 2008, an application for a Development Consent Order (DCO) is examined by the Planning Inspectorate, who will then make a recommendation to the Secretary of State for Business, Energy and Industrial Strategy. Section 43 of the Wales Act permits the inclusion of development commonly referred to as “associated development” within the application for DCO. Associated development can be described as, for example, development that supports the delivery and operation of Wylfa Newydd and could include such works as highway improvements, temporary accommodation for construction workers, park and ride facility, logistics centre, etc. It means that developers may choose whether to include these types of developments within a DCO application or make separate planning applications to the Local Planning Authorities.</u></p>	<p>Minor change to provide further clarification, which does not significantly affect the findings of the SA.</p>
NMC052	6.43	<p><i>Amend in order to clarify position regarding land availability studies in the Plan area during 2015.</i></p> <p>6.43 <u>Based on the information available, including the 2015 Gwynedd Joint Housing Land Availability Studies and the 2015 Anglesey Housing Land Monitoring Statement,</u> approximately half of the overall housing land requirement is being is being <u>could be</u> met from housing <u>built since 2011,</u> sites that already benefit from planning consent given under the <u>previous</u> existing development plans or</p>	<p>Minor change to provide further clarification, which does not significantly affect</p>

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
		previous Interim Planning Policies under other material planning considerations. Appendix 5 provides more details about this. The shortfall will be met by windfall sites, existing buildings and new sites that have been selected to provide flexibility and choice. Chapter 7 provides more detail about this.	the findings of the SA.
NMC056	Policy PS 1	<p><i>Amend text to streamline criterion 3a.</i></p> <p>Refusing proposals which would cause significant harm to the character and language balance of a community that cannot be avoided or suitably mitigated by the use of appropriate planning mechanisms to ensure that suitable mitigating measures are provided or contribution is made towards mitigating those impacts.</p>	Minor change to add clarity which does not significantly affect the findings of the SA.
NMC068	Policy TRA 1	<p><i>Amend text to provide clarification.</i></p> <p>(iii) A5025 Valley to Wylfa and other transport infrastructure improvements associated with the new nuclear development at Wylfa Newydd, including improvements from Amlwch to Wylfa Newydd where need for improvement on that section is demonstrated following a highway impact assessment of development of an Integrated Traffic and Transport Strategy for the Wylfa Newydd Project on the A5025.</p>	Minor change to add clarity which does not significantly affect the findings of the SA.
NMC 070	7.1.41	<p><i>Amend text to provide clarification.</i></p> <p>A5025 Valley to Wylfa Newydd / Amlwch to Wylfa Newydd and other transport infrastructure improvements associated with new nuclear development at Wylfa Newydd including improvements from Amlwch to Wylfa Newydd where need for improvement on that section is demonstrated</p>	Minor change to add clarity which does not significantly affect

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
		<p>following a highway impact assessment of development of an Integrated Traffic and Transport Strategy for the Wylfa Newydd Project on the A5025, a Corporate Hub necessitated by major infrastructure schemes</p>	the findings of the SA.
NMC083	New policy	<p><i>Include alternative wording to second part of the Policy to improve clarity.</i></p> <p>“Proposals on sites outside Development Boundaries must conform to this Plan’s Policies and national planning policies and, unless there is specific support within them for the proposed development located in the countryside, the proposal must demonstrate that its location in the countryside is essential for the development.”</p> <p><u>Outside the development boundaries development will be resisted unless it is in accordance with specific policies in this Plan and national planning policies.</u></p>	Minor change to add clarity which does not significantly affect the findings of the SA.
NMC 087	Policy PCYFF 1	<p><i>Amend to improve the grammar of the criteria</i></p> <p>Proposals should:</p> <p>4. Should make the most efficient...</p> <p>5. Must provide appropriate amenity space...</p> <p>6. Should have regard to the generation...</p> <p>7. Includes, where applicable, provision...</p>	Minor editing changes to ensure correctness that do not significantly affect the findings of the SA.
NMC 090	Policy PCYFF 4	<p><i>Amend the threshold that triggers the requirement for an Energy Assessment for non-residential development</i></p> <p>“Residential development on sites for 100 housing units or more, and non-residential development of</p>	Minor change which does not significantly affect the findings of the

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
		100- 1,000 -sq metres or more..."	SA.
NMC 101	Policy ADN 1	<p><i>Amend criterion (vii) to clarify that an aftercare and restoration scheme needs to be agreed with the Local Planning Authority.</i></p> <p>(vii) turbines and associated infrastructure will, at the end of the operational life of the facility, be removed in accordance with a restoration and aftercare scheme submitted and agreed by to the Local Planning Authority and an appropriate land restoration and aftercare scheme agreed.</p>	Minor change to add clarity which does not significantly affect the findings of the SA.
NMC 115	Policy ADN 2	<p><i>Amend criterion (vii) to clarify that an aftercare and restoration scheme needs to be agreed with the Local Planning Authority.</i></p> <p>(7)where required, the equipment and associated infrastructure are removed from the site in accordance with a restoration and aftercare scheme submitted and agreed by to the Local Planning Authority.</p>	Minor change to add clarity which does not significantly affect the findings of the SA.
	7.3.4	<p><i>Amend explanatory text to reflect changes to the decision making process in relation to the Wylfa Newydd Project and the North Wales Connection Project.</i></p> <p>.....In terms of a Development Consent Order application, a local authority's role is set out in the Planning Act 2008 (as amended by the Wales Act 2017); 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. Similarly, applications may be made to other statutory bodies. In Wales-The local planning</p>	Minor change to add clarity which does not significantly affect the findings of the

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
		authorities are the determining authorities for some any development related to the Wylfa Newydd Project. associated with the Development Consent Order application, for example, construction workers accommodation.	SA.
NMC 127	7.3.5	<p><i>Amend explanatory text to reflect changes to the decision making process in relation to the Wylfa Newydd Project and the North Wales Connection Project.</i></p> <p>The scale and impact of NSIPs and related associated development will be mitigated through an appropriate package of planning permission conditions, planning or highway agreements, DCO requirements, and CIL receipts (if a CIL charging schedule is implemented).</p>	Minor change to add clarity which does not significantly affect the findings of the SA.
NMC 128	7.3.6	<p><i>Minor amendment to improve clarity</i></p> <p>In addition the Councils may require will encourage developers to consider packages of community benefits to be provided by the developer to offset and compensate the community for the burden imposed by hosting a project. Any such packages fund will be used to off-set the burden on the locality, and would identify potential legacy uses, including transport, social, economic and community infrastructure which would benefit the community in the long term.</p>	Minor change to add clarity which does not significantly affect the findings of the SA.
	7.3.10	<p><i>Minor amendment to improve clarity</i></p> <p>viii in determining any approvals subsequent to consent (including planning permission conditions and DCO requirements), and in discharging functions as the enforcing authority.</p>	Minor change to add clarity which does not significantly affect the findings of the SA.

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
NMC 130	Policy PS 8	<p><i>Amend explanatory text to reflect changes to the decision making process in relation to the North Wales Connection Project.</i></p> <p>STRATEGIC POLICY PS 8: PROPOSALS FOR NATIONAL SIGNIFICANT INFRASTRUCTURE PROJECTS AND ASSOCIATED RELATED DEVELOPMENTS</p> <p>In their role as authorities giving permission for associated <u>related</u> development or as consultees for applications to other bodies, within the context of national policy statements and national planning policy, the Councils will aim to ensure that development makes a positive contribution to achieving the vision and strategic objectives set out in the Plan. In doing so, consideration will be given to the nature, scale, range and possible impact of any development.</p> <p>The Councils will therefore aim to ensure conformity, as far as is appropriate or relevant, with the following criteria:</p>	<p>Minor change to add clarity which does not significantly affect the findings of the SA.</p>
NMC 131	7.3.12	<p><i>Amend explanatory text to reflect changes to the decision making process in relation to the Wylfa Newydd Project.</i></p> <p>WYLFA NEWYDD AND ASSOCIATED RELATED DEVELOPMENT</p> <p>INTRODUCTION</p> <p>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</p>	<p>Diwygiad bach i ychwanegu eglurder, nad yw'n effeithio'n arwyddocaol ar ganfyddiadau'r AC.</p>

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
		<p>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 the proposed Wylfa Newydd Project, including developments that are related associated with it where either the Isle of Anglesey County Council or Gwynedd Council is the determining planning authority on planning applications.</p>	
NMC 132	7.3.13	<p><i>Amend explanatory text to reflect changes to the decision making process in relation to the Wylfa Newydd Project</i></p> <p>Although the Councils are not the consenting authorities for the Wylfa Newydd Project Development Consent Order, 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 related development <u>which is subject to an application for planning consent from the Councils</u> conforms with the relevant policies and strategies included in this Plan. <u>The Isle of Anglesey County Council's vision (as the host authority) for the Wylfa Newydd Project is set out in Chapter 5 of this Plan, and has informed the Plan's Vision and Objectives. The Project will be expected to contribute to achieving the Plan's Vision by:</u></p> <ul style="list-style-type: none"> • <u>contributing to the delivery of the Anglesey Energy Island Programme and the Anglesey Enterprise Zone;</u> • <u>driving the transformation of the economy, maximising opportunities for the employment and up-skilling of local people;</u> • <u>maintaining and enhancing the quality of life of local communities and visitors</u> • <u>conserving and strengthens the unique identity of the Plan area;</u> 	<p>Minor change to add clarity which does not significantly affect the findings of the SA.</p>

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
		<ul style="list-style-type: none"> <u>conserving, or where appropriate, enhance the Plan area's distinctive environment and resources, taking into account climate change.</u> 	
NMC133	7.3.14	<p><i>Amend explanatory text to reflect changes to the decision making process in relation to the Wylfa Newydd Project</i></p> <p>The <u>Revised</u> 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 <u>the Wylfa Newydd</u> 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 <u>for associated related development proposed in connection with the Wylfa Newydd</u> linked to the Project. <u>In combination with the Plan's policies,</u> the <u>revised</u> New Nuclear Build at Wylfa SPG document will help the County Council to:</p> <ul style="list-style-type: none"> <u>provide detailed guidance on Project related development, e.g. construction workers' accommodation</u> make robust decisions on all enabling works and <u>related associated</u> development planning applications ensure that the potential impacts of the New Nuclear Build and its <u>related associated</u> developments are identified and mitigated where possible ensure that the socio-economic benefits linked with the construction and operation of the power station are fully <u>maximised</u>.realised. [NMC 133] 	Minor change to add clarity which does not significantly affect the findings of the SA.
NMC 134	7.3.15a	<p><i>Relocate text to improve clarity.</i></p> <p>The Project will be expected to contribute to achieving the Plan's Vision by:</p>	Minor change to add clarity which does not

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
		<ul style="list-style-type: none"> • contributing to the delivery of the Anglesey Energy Island Programme and the Anglesey Enterprise Zone; • driving the transformation of the economy, maximising opportunities for the employment and up-skilling of local people; • maintaining and enhancing the quality of life of local communities and visitors • conserves and strengthens the unique identity of the Plan area; • conserve, or where appropriate, enhance the Plan area's distinctive environment and resources, taking into account climate change. [NMC 134] 	significantly affect the findings of the SA.
NMC 136	7.3.17	<p><i>Delete reference to Policy TAI 3 from paragraph to clarify its role</i></p> <p>Mitigation of the impacts of the Project would be optimised if such development is located in accordance with the Plan's Spatial Strategy as set out in Chapter 6, <u>Policy PS 9, the specific policies set out in PS 9A – 9C,</u> and other relevant policies included in the Plan (<u>including Policy TAI 3, Policy TAI 8 and Policy PS 1,</u> depending on the type of use <u>and its scale,</u> in order to be consistent with the principle of sustainable development. [NMC 136]</p>	Minor change which does not significantly affect the findings of the SA.
NMC 137	7.3.17a	<p><i>Relocate sentence to paragraph to improve clarity.</i></p> <p><u>Proposals for The accommodation requirements</u> of construction workers should minimise the 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), and the tourism sector. <u>The construction workforce should be accommodated via various means, including the existing housing stock (to buy or rent), holiday accommodation and new purpose built permanent or modular accommodation provided by Horizon or through a third party.</u> Where appropriate, the Councils require the Project to deliver legacy benefits to local communities during the Plan period or beyond the construction period. A draft construction workers accommodation strategy has been developed and will be finalised having regard to the Plan's Spatial Strategy and any relevant</p>	Minor change to which does not significantly affect the findings of the SA.

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
		<p><u>policies in the Plan, including a suite of policies that provides further guidance on the management of Associated development related to the Project. [NMC 137]</u></p>	
NMC 138	7.3.17b – 7.3.18b	<p><i>Include additional text to clarify the Councils' position in relation to accommodation of the construction workforce</i></p> <p><u>The construction workforce should be accommodated via various means, including the existing housing stock (to buy or rent), holiday accommodation and new purpose built permanent or modular accommodation provided by Horizon or through a third party. Such use should not however result in an unacceptable impact on availability of housing (owner occupied and private rented) or on the availability of tourist accommodation. The impacts should be made acceptable. Tourism is a key economic sector and requires to be given specific consideration and assessment in finalising the construction workers accommodation strategy.</u></p> <p><u>In terms of location, the Councils' position is that accommodation for the temporary construction workers should as far as possible be provided within, or adjacent to, or well related close to the development boundaries of the Centres and Service Villages identified in the Plan's Settlement Hierarchy (depending on the scale of the development), or and 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. <u>The following criteria will be used to assess whether a proposed site is well related to a development boundary:</u></u></p> <ul style="list-style-type: none"> <u>Physical distance / degree of separation with an increasing distance and separation less preferable; and</u> 	<p>Minor change to add clarity to which does not significantly affect the findings of the SA.</p> <p>The clarification provided by the addition of criteria to assess site relationship with development boundary will confirm that mitigation measures are in place to mitigate potential negative effects. Overall, no significant effects</p>

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
		<ul style="list-style-type: none"> • <u>The location of the site in relation to facilities, services and other sustainability assets (such as recreation provision, employment opportunities, etc.) of the Centre/ Service Village; and</u> • <u>Accessibility to the Centre/ Service Village (primarily by non-car transport modes) and ability to improve on it; and</u> • <u>Visual impacts and ability to integrate the development into the landscape and townscape.</u> <p><u>Paragraph 7.3.17 bA refers to the various types of accommodation. Given the scale of the anticipated number of construction workers required during the construction phase, it is considered that modular development will be part of the supply of accommodation but will not be the first option except for necessary provision for essential workers on the Wylfa Newydd Project main site. Providing some modular accommodation in temporary buildings on the Wylfa Newydd Project site would be acceptable where it is supported by provision of an appropriate level of community facilities and the transport impact (including workers' access and parking) can be demonstrated to be acceptable. Policy PS 9 and Policy PS 9A sets out the requirements for such modular accommodation related to the Wylfa Newydd Project.</u></p> <p><u>Project promoters must should consider re-using demonstrate that they have fully considered the re-use of existing buildings and/ or the provision of permanent buildings capable of being adapted for permanent use following use by construction workers and proportionate use of the private rented sector before proposing modular accommodation in temporary buildings which will be removed at the end of the temporary use. Project promoters should also demonstrate how they have engaged with and sought to use any facilities which have a granted planning consent for accommodating nuclear workers before they apply for any further consents. [NMC 138]</u></p>	<p>on the findings of the SA.</p>

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
NMC 139	7.3.18c – 7.3.18ch	<p><i>Include additional text to clarify the Councils' position in relation to accommodation of the construction workforce</i></p> <p><u>Any modular accommodation provided outside the Wylfa Newydd Project site should provide a sustainable legacy use for the buildings or the site and demonstrate how that legacy will be secured.</u> 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 comply with the relevant policies <u>in</u> this Plan. Potential legacy uses include serviced plots for affordable housing, elderly or special needs accommodation, student accommodation, offices or hotels, <u>or serviced plots for similar uses or employment related uses</u> or buildings that can be refurbished for similar uses. <u>A permanent residential legacy should be informed by the published Local Housing Market Assessment in order to ensure that the type of housing units required to address local need can be incorporated into the proposal at the design stage.</u> If the project promoter and the Council agree that an after use is <u>demonstrated to the Council's satisfaction</u> not <u>to be</u> 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. <u>In such cases off-site legacy benefits will be required to compensate for the lack of legacy on the site and should be included within the proposal.</u> Policy PS 9A sets out the criteria for large scale temporary construction workers' accommodation over 500 bedspaces, Policy TAI 3 sets out the policy context for temporary workers accommodation of up to 500 bedspaces, Policy TAI 8 sets out the policy context in relation to the residential use of holiday accommodation as temporary workers accommodation</p> <p><u>In order to mitigate the effects of the Wylfa Newydd Project on the housing market and to help co-</u></p>	Minor changes which does not significantly affect the findings of the SA.

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
		<p><u>ordinate the best use of all types of accommodation, construction workers will be required expected to use the services provided by, what is currently referred to as, the Construction Worker Accommodation Management Portal. This Portal will comprise of a register of rooms or property that will be available for rent, and the applicant will be required to propose and secure methods by which construction workers will be required or encouraged to arrange their accommodation through this Portal. The Portal will also be used to monitor the uptake of accommodation and provide breakdowns by sector and spatially. This information will be shared with the Councils as set out in the construction workers accommodation strategy in order to allow the Councils and the applicant to monitor the impacts on sectors and locations and respond appropriately where these do not accord with the predicted impacts.</u></p>	
NMC 141	Policy PS 9	<p><i>Amend wording of the opening clause and criteria 1, 4, 5, 6, 7, 10 and 11 to improve clarity</i></p> <p>STRATEGIC POLICY PS 9: WYLFA NEWYDD AND RELATED PROJECT ASSOCIATED DEVELOPMENT</p> <p>In their role either as determining authorities for associated related development, or as consultees for a DCO application for Wylfa Newydd and applications to other bodies, and within the provisions of national policy, when assessing and responding to emerging proposals for Wylfa Newydd and related its-associated or ancillary developments development, the Councils will seek to ensure compliance, where appropriate or relevant, with the following criteria:</p> <ol style="list-style-type: none"> 1. Any relevant policies included in the Plan, and any relevant supplementary planning guidance should shape the approach to the development of the nuclear power station and <u>proposals for</u> and any associated related development; and 4. <u>Early or preparatory works for the development of the nuclear power station shall demonstrate that they are necessary to ensure the timely delivery of the Wylfa Newydd Project or and are designed to</u> 	Minor change to add clarity which does not significantly affect the findings of the SA.

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
		<p><u>provide mitigation for the effects of the construction or operation of the Wylfa Newydd Project. Any early or preparatory works must be accompanied by a strategy to enable the sites to be restored to an acceptable standard should the Project not be consented or constructed and demonstrate how the costs of undertaking such restoration will be secured, including through bonding;</u></p> <p>5. The accommodation requirements of construction workers should be met in a way that minimises 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, <u>taking account the published Local Housing Market Assessment, or and</u> not result in unacceptable adverse economic (<u>including the tourism sector</u>), social, linguistic or environmental impacts. Proposals should form part of a robust construction workers accommodation strategy that has regard to the Plan's Spatial Strategy and any relevant policies in the Plan, <u>including Policy PS 9A, Policy TAI 3;</u></p> <p>6. <u>Where proposals are for a temporary period both the site selection and the proposal detail shall</u> the siting and design of associated development 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. <u>Where appropriate, Delivery plans should be agreed for legacy uses will be required with</u> during the pre-application process <u>planning applications to demonstrate how legacy use has</u> that will informed the approach to the design and layout of the <u>associated related</u> development sites, as well <u>to contribute to as</u> the framing of a S106 and/or other agreements and CIL payments (if applicable);</p> <p>7. <u>Proposals for associated development for large scale (500 or more workers) campus style temporary workers accommodation, logistics centres and park and ride facilities will also be assessed against the criteria set out in policies PS 9A – 9C;</u></p> <p>10. <u>Early engagement by the promoter with the Council in respect of the promoter's</u></p>	

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
		<p><u>procurement, employment, education, training and recruitment strategies, with an objective to maximise employment, business and training opportunities for the local communities both in the short and longer term is required.</u> The promoter's procurement, employment, education, training and recruitment strategies and delivery plans should be agreed with <u>by will require to be approved by submitted to</u> the Council <u>as part of any planning application</u> 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;</p> <p>11. Where Community infrastructure is <u>will be</u> provided for construction workers, for example, park and ride <u>or park and share</u> facilities, shops, healthcare and sports and leisure facilities. Where feasible this should be sited and designed so that it can be made available for community use during the construction phase and ultimately, where appropriate, serve a community legacy use. Where there would be additional impacts or demands on existing community facilities the Council will seek either appropriate contributions for off-site facilities or upgrading existing facilities. Legacy use of any additional facilities provided should be considered where that is appropriate;</p>	
NMC 143	Policy PS 9A	<p><i>Amend Policy to reflect new decision making framework and to clarify the Councils' position in relation to accommodation of the construction workforce</i></p> <p><u>NEW SUB POLICY PS 9A - WYLFA NEWYDD – LARGE SCALE CAMPUS STYLE TEMPORARY ACCOMMODATION FOR CONSTRUCTION WORKERS</u></p> <p><u>In their role either as determining authorities for related development or as consultees for a DCO application for Wylfa Newydd, the Councils will seek to ensure that compliance proposals for large scale campus style temporary accommodation for construction workers with more than 500 bed</u></p>	Minor change to add clarity and accuracy which does not significantly affect the findings of the SA.

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
		<p>spaces will only be granted, in addition to the proposal complying have regard to or comply with <u>Policy PS 9, (where relevant) and the following criteria:</u></p> <ol style="list-style-type: none"> 1. <u>the developer can firstly demonstrate that the proposal satisfies the demonstrable need for temporary accommodation for construction workers that cannot be met through either existing residential accommodation, or the re-use of existing buildings, or the provision of new permanent buildings capable of being adapted for permanent use following their use by construction workers; and</u> 2. <u>The proposal is located on the Wylfa Newydd Project site or a the site is located adjacent or well related in close proximity to the development boundary of a Holyhead, Amlwch, Llangefni, Gaerwen or Y Fali a Centre identified within the Plan's Settlement Hierarchy, and is close to the main highway network where adequate access can be provided without significantly harming landscape characteristics and features; and or</u> 3. in exceptional circumstances, the site is located in the open countryside, provided that the applicant can demonstrate that there is no available site which meets the criteria set out in criterion 1 for the proposed use and that there is an essential and proven need for the amount and type of accommodation for temporary workers; and 4. <u>The proposal must include appropriate mechanisms to mitigate any adverse impacts of the proposed development on the Welsh language and culture or a contribution is made towards mitigating those impacts in accordance with Policy PS 1 and Policy ISA 1; and</u> 5. <u>Where there is insufficient capacity within existing off-site leisure, recreational, retail and healthcare facilities to meet the needs of occupiers of the site or such facilities are not available within an acceptable distance which facilitates pedestrian or cycle access to them, the proposal must include appropriate mechanisms to mitigate negative impacts which may include onsite provision of ancillary facilities for the use of the occupiers; and</u> 	

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
		<p>6. <u>Operators will be required to maintain occupancy information, including the number of construction workers accommodated, the duration of occupancy and keep a record of anonymised data of workers accommodated</u> keep a register of all workers living in the accommodation and to make this information register immediately available, on request, to the Council.</p>	
NMC 144	Policy PS 9B	<p><i>Amend Policy to reflect new decision making framework</i></p> <p><u>NEW SUB POLICY PS 9B - WYLFA NEWYDD – LOGISTICS CENTRES</u></p> <p><u>In their role either as determining authorities for associated development, or as consultees for a DCO application for Wylfa Newydd the Councils will seek to ensure that proposals for logistics centres associated with the Wylfa Newydd Project and its supply chain will comply or have regard to be permitted where, in addition to the proposal complying with Policy PS 9 (where relevant), and with the following criteria it can be demonstrated that:</u></p> <ol style="list-style-type: none"> 1. <u>The site is located:</u> <ol style="list-style-type: none"> i. <u>on a safeguarded or allocated employment site; or</u> ii. <u>within development boundaries of Centres identified within the Plan’s Settlement Hierarchy; or</u> iii. <u>In other locations adjacent to development boundaries of Centres that are located along or close to the A5/A55 corridor where the applicant has demonstrated that sites identified in criteria 1 i and ii have been first considered and discounted based on planning and environmental criteria and that the impacts of development in the countryside can be acceptably minimised and mitigated</u> 2. <u>Proposals include sustainable transport proposals for staff including links to public transport.</u> 	Minor changes that do not significantly affect the findings of the SA.

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
NMC 144	Policy PS 9C	<p><i>Amend Policy to reflect new decision making framework</i></p> <p><u>NEW SUB POLICY PS 9C - WYLFA NEWYDD ASSOCIATED DEVELOPMENT - PARK AND RIDE AND PARK AND SHARE FACILITIES.</u></p> <p><u>In their role either as determining authorities for related development, or as consultees for a DCO application for Wylfa Newydd the Councils will seek to ensure that proposals for park and ride and park and share facilities associated with the Wylfa Newydd Project and its supply chain will comply or have regard to be permitted where, in addition to the proposal complying with Policy PS 9 (where appropriate), and the following criteria it can be demonstrated that:</u></p> <ol style="list-style-type: none"> <u>1. In order to minimise the need for construction workers and workers that service the facility to travel by private car, the site is located:</u> <ol style="list-style-type: none"> <u>i. within or adjacent to development boundaries of Centres that are located along or close to the A5/ A55 corridor; or</u> <u>ii. In other locations along the A5/A55 corridor where the applicant has demonstrated that sites within or adjacent closer to Centres have been first considered and discounted based on planning and environmental criteria and where provision for travel to the site by sustainable means, including public transport and cycling, can be provided.</u> <u>2. Proposals should make provision for new and enhancement of existing pedestrian and cycle paths and improvement to public transport services</u> <u>3. The siting of buildings and activities, means of access and egress and appropriate mechanisms are used to mitigate negative impacts of the proposed development on the amenity of local communities</u> 	

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
NMC 155	7.3.28a	<p><i>Include reference to the total amount of land which is safeguarded in accordance with the Policy and up date the explanatory text to refer to information in the latest version of the Development Advice Maps (March 2017)</i></p> <p><u>Adwy'r Hafan is a well established employment site (10.5ha) in Pwllheli, providing an important supply of units for local businesses. Safeguarding of existing employment areas will encourage market activity to maintain a supply of employment floorspace. However, this Industrial Estate is vulnerable to flooding, being located within a C1 C2 Flood risk area. Flood modelling indicates that, over its lifetime, the site would be at risk of flooding from overtopping the harbour wall to the west and the site would be at risk of flooding from the east should the sand dunes be breached. The West Wales Shoreline Management Plan 2 policy for epochs that cover the Plan period provide a hold the line policy approach for the relevant policy area that covers Pwllheli. The Council's main aim through its approach to flood risk is to ensure the safety of its existing and future residents and businesses. Adwy'r Hafan is a brownfield site. The site's continued use would contribute to sustaining an existing key settlement and would contribute to key employment objectives supported by the Council. On balance, the Councils consider that the Plan should facilitate 'like for like' development at Adwy'r Hafan in the short term, but, that its continued use during the Plan period should be strictly controlled and that options to identify options for an alternative site should be investigated. This policy serves as the best interim solution to maintain a supply of units in Pwllheli at least until further options, including funding, can be explored in detail. Applicants will be encouraged to take advantage of the pre-application service provided by the Council and should also discuss proposals with Natural Resources Wales.</u></p>	Minor change to provide further clarification, which do not significantly affect the findings of the SA.
NMC 164	7.3.66	<p><i>Amend to improve clarity.</i></p> <p>..... Outside the Areas of Outstanding Natural beauty and Special Landscape Areas a minor increase in</p>	Minor change which does not

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
		units on site may be approved providing it can be demonstrated that the proposal offers significant <u>landscape or environmental</u> improvements to the site, reducing its landscape <u>and environmental</u> impact.	significantly affect the findings of the SA.
NMC 188	7.3.83	<p><i>Amend policy title, insert new criterion and details of the records that operators are required to maintain.</i></p> <p>POLICY TAI 3: <u>SMALL-SCALE CAMPUS STYLE</u> TEMPORARY ACCOMMODATION FOR CONSTRUCTION WORKERS</p> <p>Proposals for <u>small-scale campus style</u> temporary accommodation (<u>up to a maximum of 500 bedspaces</u>) for construction workers will be permitted provided that they form part of the overall solution to providing temporary construction worker accommodation and the following criteria are satisfied:</p> <p>....</p> <p><u>10a A Construction Workers Accommodation Strategy is submitted to the Council as part of any planning application..</u></p> <p>Operators will be required to <u>maintain occupancy information, including the number of construction workers accommodated, the duration of occupancy and keep a record of anonymised data of workers accommodated</u> keep a register of all workers living in the accommodation and to make this <u>information register</u> register immediately available, on request, to the Council.</p>	Minor changes to provide further clarification, which do not significantly affect the findings of the SA.
NMC 189	7.4.23	<i>Amend explanatory text to clarify the Policy's remit</i>	Minor change to

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
		<p>This Policy applies to new build purpose built temporary accommodation provided for construction workers required in connection with large scale construction projects , e.g. other than the Wylfa Newydd Project or any other work that requires a large number of temporary/ transient resident workforce. <u>Policy PS 9 and Policy PS 9A will apply to proposals for campus style temporary construction worker accommodation required in connection with the Wylfa Newydd Project.</u></p>	<p>provide further clarification, which do not significantly affect the findings of the SA.</p>
NMC 192	7.4.23C	<p><i>Amend explanatory text to clarify the Policy's remit</i></p> <p>7.4.23c This Policy only addresses developments of up to 500 bed spaces together with ancillary facilities for welfare, leisure and recreation. Larger proposals will be considered under Policy PS 9A and other relevant policies in the Plan.</p>	<p>Minor change which does not significantly affect the findings of the SA.</p>
NMC 196	7.4.26	<p><i>Amend explanatory text to clarify the Policy's requirements for supporting evidence</i></p> <p>The creation of mixed, sustainable and inclusive communities can be adversely affected where purpose built accommodation, HMOs or shared housing is proposed. This type of accommodation creates a concentration of relatively short-term residents, and can be unwelcome in an established community. Specific concerns can include pressure on services and facilities that meet the needs of longer term residents, particularly key services and facilities such as doctors' surgery, dentist, leisure centres, libraries, schools. The Councils are committed to supporting residential communities in the Plan area. Each application for temporary workers accommodation shall be accompanied by a <u>Construction Workers Accommodation Strategy, which should provide</u> assessment for the proposal, including:</p> <ul style="list-style-type: none"> <li data-bbox="719 1286 1783 1351">i. a detailed assessment of compliance with any relevant supplementary planning guidance; 	<p>Minor change which does not significantly affect the findings of the SA.</p>

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
		<ul style="list-style-type: none"> ii. a detailed explanation of the need for the facility; iii. how it accords with the Construction Workers' Accommodation Strategy iv. details of the extent to which the proposal places demands on physical and community infrastructure; v. the extent to which the local community will benefit from the proposal; vi. a demonstrable solution for the end of the life of the structure or building, unless it can be clearly demonstrated that a legacy use isn't feasible. 	
NMC 198	Policy TAI 5	<p><i>Amend wording to clarify the requirements of the Policy and ensure internal consistency of the Plan.</i></p> <p><u>Only Local market housing (as defined in the Glossary of Terms) will be permitted within the development boundaries of the settlements named below, except where the proposal contributes towards providing affordable housing in accordance with Policy TAI 9, and on the condition that the proposal complies with the following criteria</u> New residential development within the development boundaries of the specific settlements noted below will be permitted provided that:</p> <p>(ii) <u>Local, Rural / Coastal Villages</u></p>	Minor changes to ensure consistency between other policies, which does not significantly affect the findings of the SA.
NMC 204	Policy TAI 9	<p><i>Include additional criterion to Section 3 of Policy TAI 9 as a consequential change to Policy TAI 17, which improves the Plan's clarity.</i></p> <p><u>ix. Within Local, Rural or Coastal Villages only affordable housing for local need (as defined in the Glossary of Terms) will be permitted.</u></p>	Minor change to improve clarity and ensure conformity with amendment to TAI 17 (see NMC 262), which does

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
			not significantly affect the findings of the SA.
NMC 259	Policy TAI 14	<p><i>Replace the term 'Suitable Unallocated sites' with 'Windfall sites' to ensure internal consistency of the Plan.</i></p> <p><u>In the Sub-Regional Centre of Bangor and the following Urban Service Centres, housing to meet the Plan's strategy will be delivered through housing allocations identified below and suitable windfall unallocated sites within the development boundary based upon the indicative provision in the table below:</u></p> <p><u>(ii) Unallocated Windfall Sites</u></p>	Minor change to ensure consistency which does not significantly affect the findings of the SA.
NMC 260	Policy TAI 15	<p><i>Replace the term 'Suitable Unallocated sites' with 'Windfall sites' to ensure internal consistency of the Plan.</i></p> <p><u>In the following Local Service Centres housing to meet the Plan's strategy will be delivered through housing allocations identified below and suitable windfall-unallocated sites within the development boundary based upon the indicative provision in the table below:</u></p> <p><u>(ii) Unallocated Windfall Sites</u></p>	Minor change which does not significantly affect the findings of the SA.
NMC 261	Policy TAI 16	<p><i>Replace the term 'Suitable Unallocated sites' with 'Windfall sites' to ensure internal consistency of the Plan.</i></p>	Minor change

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
		<p>In the following Service Villages <u>housing to meet the Plan's strategy will be delivered through housing allocations identified below and suitable windfall-unallocated sites within the development boundary based upon the indicative provision in the table below:</u></p> <p><u>(ii) Unallocated Windfall Sites</u></p>	<p>which does not significantly affect the findings of the SA.</p>
NMC262	Policy TAI 17	<p><i>Amend Policy to improve clarity.</i></p> <p>Proposals for <u>open market</u> housing and affordable housing for local need (as defined in the Glossary of Terms) in the following Local, Rural and Coastal Villages will be granted provided they conform to all the following criteria:</p>	<p>Minor change to add clarity and conformity with TAI 14 a TAI 16, which does not significantly affect the findings of the SA.</p>
NMC 271	Policy PS16	<p><i>Amend Policy to improve clarity.</i></p> <p>STRATEGIC POLICY PS16: CONSERVING AND WHERE APPROPRIATE OR ENHANCING THE NATURAL ENVIRONMENT</p> <p>The Councils will manage development so as to conserve and or enhance the Plan area's distinctive natural environment, countryside and coastline, and proposals that have a <u>significant</u> adverse effect on them will be refused <u>unless the need for and benefits of the development in that location clearly outweighs the value of the site or area and national policy protection for that site and area.</u> When</p>	<p>Minor change to add clarity, which does not significantly affect the findings of the SA.</p>

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
		<p>considering permitting an application the Planning Authorities will ensure that they are:</p> <ol style="list-style-type: none"> 1. Safeguarding the Plan area's habitats and species, geology, history and landscapes; 2. Protecting ing or and where appropriate enhancing sites of international, national, regional and local importance and, where appropriate, their settings in line with National Policy; 3. Have ing appropriate regard to the relative significance of the international, national or local designations in considering the weight to be attached to acknowledged interests, ensuring that any international or national responsibilities and obligations are fully met in accordance with National Policy; 4. Protect ing or and where appropriate enhance ing biodiversity within the Plan area and enhance ing and/or restore ing networks 	
NMC 283	Policy PS 17	<p><i>Amend Policy to improve clarity.</i></p> <p>POLICY PS 17: PRESERVING <u>AND, WHERE APPROPRIATE, OR</u> ENHANCING HERITAGE ASSETS</p> <p>In seeking to support the wider economic and social needs of the Plan area, the Local Planning Authorities will preserve <u>and, or</u> where appropriate, enhance its unique heritage assets.</p> <p>Proposals that will preserve <u>and, where appropriate, or</u> enhance the following heritage assets, their setting and significant views into and out of the building/area will be granted:</p> <ol style="list-style-type: none"> 1. Scheduled Ancient Monuments and other areas of archaeological importance (in line with Policy AT 4). 2. Listed Buildings and their curtilages. 3. Conservation Areas (in line with Policy AT 1). 4. Beaumaris Castle and Caernarfon Castle and Town Walls World Heritage Sites (in line with Policy 	<p>Minor change to add clarity, which does not significantly affect the findings of the SA.</p>

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
		<p>AT 1).</p> <p>5. Candidate World Heritage Sites.</p> <p>6. Registered Historic Landscapes, Parks and Gardens (in line with Policy AT 1).</p> <p>7. Buildings of architectural/ historic/ cultural merit which are not designated or protected (in line with Policy AT 3).</p>	
N/a	7.5.51	<p><i>Amend explanatory text to improve clarity</i></p> <p>In accordance with the waste hierarchy set out in TAN 21, a sustainable approach to waste management will require greater emphasis on reduction, re-use and recovery and less reliance on disposal without recovery. Waste management includes for example keeping, storing, handling and the disposal of waste.</p>	Minor change to add clarity which does not significantly affect the findings of the SA.
NMC 294	Policy GWA 3	<p><i>Amend Policy to improve clarity.</i></p> <p>POLICY GWA 3:—LOW AND VERY LOW LEVEL RADIOACTIVE WASTE <u>MANAGEMENT</u> TREATMENT AND STORAGE</p> <p>Facilities for the treatment storage and/or management disposal of Low and Very Low Level radioactive waste generated on-site <u>within the nuclear licensed area at Wylfa/Wylfa Newydd</u> to facilitate an existing business will be granted, provided <u>that all the following criteria can be met:</u></p> <ol style="list-style-type: none"> 1. It is consistent with the national strategies and policies for managing Low and Very Low Level radioactive waste and discharges and/or the decommissioning plans for the Wylfa Nuclear Power Station; 2. The outcome of social economic and environmental health assessments justify it being dealt with on-site or appropriate locations outside the main nuclear site <u>at the proposed location;</u> 	Minor change to add clarity which does not significantly affect the findings of the SA.

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
		<p>3. Facilities are sited and designed in order to minimise adverse impacts on the environment and appropriate environmental restoration measures are available;</p> <p>4. Proposals shall comply with the general considerations set out in Policy GWA 1;</p> <p>5. The proposal is supported by a Waste Planning Assessment (as defined by TAN21: Waste); [NMC294]</p>	
NMC 295	7.5.56	<p><i>Include reference to intermediate radioactive waste and definition of the different levels of radioactive waste</i></p> <p>The decommissioning process is likely to give rise to a large quantity of <u>Intermediate(1)</u> Low (2) and Very Low Level(2) radioactive waste.</p> <p>Footnotes:</p> <p>(1) <u>Intermediate Level Waste is more radioactive than low-level radioactive waste (see below), but does not generate enough heat to require this to be taken into account of in storage or disposal facilities. However, like other radioactive waste it still needs to be contained to protect people and the environment. ILW arises mainly from the reprocessing of spent fuel and from general operations and maintenance at nuclear sites, and can include metal items such as fuel cladding and reactor components, graphite from reactor cores, and sludge from the treatment of radioactive liquid effluents.</u></p> <p>(2) <u>Low level waste (LLW) is radioactive waste having a radioactive content not exceeding 4 GBq/te (gigabecquerels per tonne) of alpha or 12 GBq/te of beta/gamma activity. LLW makes up more than 90% of the UK's radioactive waste legacy by volume but contains less than 0.1% of the total radioactivity.</u></p>	<p>Minor changes to add clarity and correctness which does not significantly affect the findings of the SA.</p>

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening
		<p>(3) <u>Very low level waste (VLLW) is a sub-category of LLW and is defined as either low volume VLLW or high volume VLLW. The principal difference between the two definitions is the need for controls on the total volumes of high volume VLLW being deposited at any one particular landfill or other waste facilities.</u></p>	
NMC308	7.5.62a	<p><i>Amend explanatory text to improve clarity.</i></p> <p><u>Development proposals affecting a mineral resource will be required to demonstrate, through appropriate investigation, that the resource will not be sterlised or demonstrate that the future extraction is not hindered by the proposed development. Where there is an overriding need for a development, that would otherwise sterilise resource, a condition will be attached to the planning permission requiring the extraction of that resource prior to the commencement of the development unless the developer satisfactorily demonstrates that it is impracticable or environmentally unacceptable.</u></p>	Minor changes to add clarity and correctness which does not significantly affect the findings of the SA.
NMC 323	Chapter 8 Monitoring Framework	<p><i>Amend text to provide clarification of the Policy Targets for Local Indicator D21 in the Monitoring Framework</i></p> <p><u>To meet 50% (1,123.35 GWh) of projected electricity potential demand through renewable energy sources by 2021</u></p> <p><u>To meet 100% (2,246.7 GWh) of projected electricity potential demand through renewable energy sources by 2026</u></p>	Minor change which does not significantly affect the findings of the SA.

NMC Number	Policy/ Para/ Map	Potential additional changes	SA Screening		
		<p><u>To meet 50% (26.397 GWh) of projected heat potential demand through renewable energy sources by 2021</u></p> <p><u>To meet 100% (52.795 GWh) of projected heat potential demand through renewable energy sources by 2026</u></p>			
NMC 340	Appendix 5 Table 1	<p><i>Amend figure on Table 1 (Appendix 5) to ensure accuracy</i></p> <table border="1" data-bbox="544 675 797 932"> <tr> <td data-bbox="544 675 797 890"> <p><u>Indicative Supply Level – Windfall Sites (dd)</u></p> </td> </tr> <tr> <td data-bbox="544 890 797 932"> <p><u>36.58</u></p> </td> </tr> </table>	<p><u>Indicative Supply Level – Windfall Sites (dd)</u></p>	<p><u>36.58</u></p>	Minor change to ensure accuracy and consistency that does not significantly affect the findings of the SA.
<p><u>Indicative Supply Level – Windfall Sites (dd)</u></p>					
<p><u>36.58</u></p>					

**Anglesey County Council and Gwynedd
Council Joint Local Development Plan**

**HABITATS REGULATIONS ASSESSMENT
ADDENDUM REPORT**

March 2017

enfusion



HABITATS REGULATIONS ASSESSMENT ADDENDUM REPORT

Anglesey County Council and Gwynedd Council Joint Local Development Plan (Matters Arising Changes)

<i>date:</i>	28 March 2017	
<i>prepared for:</i>	Anglesey County Council and Gwynedd Council	
<i>prepared by:</i>	JPPU	
<i>quality assurance:</i>	Enfusion	

enfusion
environmental planning and management for sustainability



Treenwood House
Rowden Lane
Bradford on Avon
BA15 2AU
T: 01225 867112
www.enfusion.co.uk

	CONTENTS	PAGE
1.0	INTRODUCTION	4
	Background	4
	Purpose and Structure of the Report	4
2.0	HRA SCREENING OF FURTHER CHANGES TO THE PLAN	5
3.0	CONCLUSIONS	5

1.0 INTRODUCTION

Background

- 1.1 Anglesey County Council and Gwynedd Council are preparing a Joint Local Development Plan (JLDP) for the Anglesey and Gwynedd local authority plan areas. The JLDP will set out the strategy for development and land use in Anglesey and Gwynedd for the 15 year period 2011 to 2026. It will set out policies to implement the strategy and provide guidance and allocations for the location of new housing, employment opportunities and leisure and community facilities.
- 1.2 In line with the requirements of the Conservation of Habitats and Species Regulations 2010 (as amended) [the Habitats Regulations] the Councils, in their roles as the competent authorities, have been undertaking Habitats Regulations Assessment (HRA) of the JLDP. The HRA process for the JLDP has produced the following reports to date:
- **HRA Screening Report May 2013** accompanied the Preferred Strategy Document on public consultation for 7 weeks ending 27 June 2013.
 - **HRA Report February 2015** accompanied the Deposit Plan on public consultation for 7 weeks ending 31 March 2015.
 - **HRA Report February 2016** accompanied the Deposit JLDP & Focused Changes on submission to the Welsh Government
 - **HRA Addendum Report July 2016** considered proposed amendments to the JLDP following consideration of responses to the Focused Changes as well as further work undertaken in relation to Gypsy and Traveller site options
 - **HRA Addendum Report December 2016** considered Matters Arising Changes during examination of the JLDP
 - **HRA Addendum Report March 2017 (this report)** considers potential further changes to the Plan.

Purpose and Structure of the Report

- 1.3 The purpose of this Addendum Report is to clearly set out the findings of further HRA work carried out in relation to amendments to the plan as a result of potential further changes to the Plan identified following public consultation on the Matters Arising Changes. Following this introductory section, the report is organised into two further sections:
- **Section 2** – sets out the findings of the screening assessment of the potential Changes
 - **Section 3** – summarises the conclusions of the further HRA work.

2.0 HRA SCREENING OF FURTHER POTENTIAL CHANGES TO THE PLAN

- 2.1 During the process of examination, a number of amendments were proposed to the JLDP. These Matters Arising Changes (NMC) were subject to public consultation. Following consideration of the comments received during the consultation period, further potential changes to the Plan have been suggested. These potential changes have been considered (screened) through the HRA process to determine if they significantly affect the findings of the previous HRA work presented in the HRA Report (February 2016) and HRA Addendum Report (July 2016) and if further appraisal work is required.
- 2.2 The review and screening of the further potential changes to the Plan has found that the changes seek to provide further clarification, ensure consistency and accuracy, and ensure conformity with higher level (national) planning policy guidance and statements. These changes are considered to be minor and do not significantly affect the findings of the previous HRA work.
- 2.3 Overall, therefore, the minor amendments to the policies through the , potential changes are not considered to significantly affect the findings of the previous HRA.

3.0 CONCLUSIONS

- 3.1 The potential changes proposed following the public consultation on NMC have been screened through the HRA process to determine if they significantly affect the findings of the previous HRA work presented in the HRA Report (February 2016) and HRA Addendum Report (July 2016). It is concluded that the changes do not significantly affect the findings of the previous HRA work as they seek to provide further clarification, or ensure consistency and accuracy, as well as conformity with higher level (national) planning policy guidance and statements. Policy strengthening proposed through the NMC are also not considered to significantly affect the findings of the previous HRA.

Appendix 2 – Representations Not Duly Made on Matters Arising Changes (MACs)

Name of Representer	Type and Summary of Representation	Relevant Section of the Plan	Reason why Representation was not Duly Made
SE Edwards, Cadnant Planning Ltd	Objection that there is no increase in units in AONBs and SLAs	Policy TWR3: Static Caravan, Chalet and Permanent Alternative Accommodation Sites	Not a MAC. This issue was discussed in the Hearing Session but the Inspector did not propose an action point.
British Homes and Holiday Parks Association, c/o David Middleton, Savills (UK) Ltd	Objection that there is no increase in units in AONBs and SLAs	Policy TWR3: Static Caravan, Chalet and Permanent Alternative Accommodation Sites	Not a MAC. This issue was discussed in the Hearing Session but the Inspector did not propose an action point.
S E Edwards, Cadnant Planning Ltd	Objection that the word “increase” is missing from the text in NMC164	Paragraph 7.3.66 (Policy TWR3)	All MACs are included in the Schedule of Matters Arising Changes document which was subject to public consultation. NMC 164 in the Schedule included the word “increase”. It is recognised that the MAC was not repeated in full in the Composite Plan. However, the Composite Plan was not subject to public consultation. It was provided to allow reader to see MACs in context in the whole plan.
British Homes and Holiday Parks Association, c/o David Middleton, Savills (UK) Ltd	Objection that the word “increase” is missing from the text in NMC164	Paragraph 7.3.66 (Policy TWR3)	MACs are included in the Schedule of Matters Arising Changes document which was subject to public consultation. NMC 164 in the Schedule included the word “increase”. It is recognised that the MAC was not repeated in full in the Composite Plan. However, the Composite Plan was not subject to public consultation. It was provided to allow reader to see MACs in context in the whole plan.
Bourne Leisure Limited, c/o Helen Ashby-Ridgway, Lichfields	Objection that the word “increase” is missing from the text in NMC164	Paragraph 7.3.66 (Policy TWR3)	MACs are included in the Schedule of Matters Arising Changes document which was subject to public consultation. NMC 164 in the Schedule included the word “increase”. It is recognised that the MAC was not repeated in full in the Composite Plan. However, the Composite Plan was not subject to public consultation. It was provided to allow reader to see MACs in context in the whole plan.

Name of Representor	Type and Summary of Representation	Relevant Section of the Plan	Reason why Representation was not Duly Made
Jeremy Lambe, Lambe Planning and Design Ltd	Objection that the word "increase" is missing from the text in NMC164	Paragraph 7.3.66 (Policy TWR3)	MACs are included in the Schedule of Matters Arising Changes document which was subject to public consultation. NMC 164 in the Schedule included the word "increase". It is recognised that the MAC was not repeated in full in the Composite Plan. However, the Composite Plan was not subject to public consultation. It was provided to allow reader to see MACs in context in the whole plan.
Jeremy Lambe, Lambe Planning and Design Ltd	Objection refers to the operational period of sites	Paragraph 7.3.78 (Policy TWR5)	Not a MAC
Einir Wyn, Clerk, Llanengan Community Council	Objection to Abersoch's indicative growth figure	Policy TAI15: Local Service Centres	Not a MAC
Einir Wyn, Clerk, Llanengan Community Council	Objection to Abersoch's development boundary	Policy Tai 15: Local Service Centres	Not a MAC
Einir Wyn, Clerk, Llanengan Community Council	Objection that Llanengan is a Cluster and not rural village	Policy TAI18: Housing in Clusters	Not a Mac
Rhosybol Community Council	Objection to the deletion of Penygraigwen and Capel Parc clusters	NMC268 / Policy TAI18: Housing in Clusters	Late submission – received on the 22 March 2017
Emyr E. Williams, Liberty Properties	Objection that SP765 is not included within the development boundary	Map 8: Pwllheli	Not a MAC
Owen Lloyd, c/o Michael Hand, Hand Consultancy	Objection that SP765 is not included within the development boundary	Map 8: Pwllheli	Not a MAC
Gareth Hughes	Objection to T71: Land opposite Rhoslan, Bethel	Policy TAI16: Service Villages and Map 32: Bethel	Not a MAC
Anwen Jones	Objection to T71: Land opposite Rhoslan, Bethel	Policy TAI16: Service Villages and Map 32: Bethel	Not a MAC
Peter Gaffey	Objection to T71: Land opposite	Policy TAI16: Service Villages and Map 32: Bethel	Not a MAC

Name of Representor	Type and Summary of Representation	Relevant Section of the Plan	Reason why Representation was not Duly Made
	Rhoslan, Bethel		
Gwynfor Ellis	Objection to T71: Land opposite Rhoslan, Bethel	Policy TAI16: Service Villages and Map 32: Bethel	Not a MAC
Myrna Owen	Objection to T71: Land opposite Rhoslan, Bethel	Policy TAI16: Service Villages and Map 32: Bethel	Not a MAC
Mr HB & Mrs S Owen	Objection to T71: Land opposite Rhoslan, Bethel	Policy TAI16: Service Villages and Map 32: Bethel	Not a MAC
Peter & Carys Jones	Objection to T71: Land opposite Rhoslan, Bethel	Policy TAI16: Service Villages and Map 32: Bethel	Not a MAC
W H Vize	Objection to T71: Land opposite Rhoslan, Bethel	Policy TAI16: Service Villages and Map 32: Bethel	Not a MAC
Mr H H Williams	Objection to T71: Land opposite Rhoslan, Bethel	Policy TAI16: Service Villages and Map 32: Bethel	Not a MAC
Mrs BH Williams & Mr EG Williams	Objection to the inclusion of SP860 in the development boundary of Talysarn	Map 84: Talysarn	Not a MAC

Appendix 3

1. As the Inspector is aware, the Wales Act 2017 received Royal Assent at a very late stage in the Plan's preparation process. The Councils' response to objection SNMC 66 (Horizon Nuclear Power) describes the relevance of the Wales Act 2017 to the application of policies in the Plan.
2. The Councils agree that the explanatory text leading up to Policy PS 9 as well as the Wylfa Newydd related policies would benefit from minor amendments to reflect the changes arising from the Wales Act 2017. The Councils do not agree with Horizon's preferred approach, which would include replacing criteria based policies with text to outline the principles and approach that the Councils would take into account in responding to the Project.
3. The Councils' stance is based on the continued need to include detailed policies in the Plan in order: to carry on to inform Horizon's approach to the matter before it finalises its strategy; to inform the Councils evidence base when it responds to the Wylfa Newydd DCO application; and to provide sufficient flexibility in the Plan to deal with planning applications for development that may be submitted under the TCPA.
4. As an alternative to Horizon's approach, the Inspector's attention is therefore drawn to minor amendments to explanatory text in section 7.3 and to Policy PS 9A, Policy PS 9B, and Policy PS 9C that would address the matter – see Appendix 3A. No additional amendments are considered to be required to reflect the very recent change in legislation.
5. As set out in its representation about the MACs, Horizon has continued to develop the Project since the Hearings in September 2016. This process of developing the Project is looking at optimisation in a number of core areas including programme/schedule of delivery - recognising the need for the Power station to be operational by 2025, safety, environmental impact, and cost. Some the changes proposed by the this optimisation process affect elements key to the assessment of impacts such as peak worker numbers and will substantially change the approach to some of the associated development. As that process is ongoing the Councils must retain flexibility in the plan to adapt to changes in Horizon's proposals. Horizon intends to undertake a third PAC during May/ June 2017 following which more certainty on the final proposals should be known.
6. In light of the emerging information from Horizon and comments submitted by Welsh Government regarding MACs, the Councils consider that further clarity is required as to their priorities in relation to the Wylfa Newydd Project. The Councils consider that this can be achieved via minor amendments to explanatory/ contextual text and the new sub-set of Policies. This suggested approach is considered to align with Action Point S9/PG2, which required the Councils to present amendments to clarify its priorities in relation to the Wylfa Newydd Project.
7. As set out in the Councils' Statement to Hearing Session 9 and then in their response to Action Point S9/PG3, the submitted Plan included a single Policy (TAI 3) to provide a framework to consider any scale of campus style temporary construction workers' accommodation, whether or not it related to the Wylfa Newydd Project. The Councils considered that there were no tipping points in terms of impacts. The impacts will vary with the facts and circumstances. However, based on the discussion during the Hearing Session that revolved around the potential impact of different scales of development on different

Appendix 3

types of settlements, Action Points S9/PG3 & 4 required the Councils to put forward MACs to Policy TAI 3 and to introduce a new policy to deal with large scale temporary construction workers accommodation development.

8. The emerging information from Horizon relating to its Construction Workers Accommodation Strategy suggests that fewer construction workers may be required at the peak period. This, and a revised layout on the Wylfa Newydd Project site, could lead to opportunities for more temporary accommodation being provided on site. NMC 138 to paragraph 7.3.18 notes the Council's support for some on-site provision. This stance was based on research work undertaken by IACC, which informed the Plan, SPG and IACC's Position Statement, is referred to in various background documents to the Plan, is referred to in the Councils' Statements to various Hearing Sessions and in response to Action Points.
9. Having considered the matter further it is considered that the Council's position in relation to on site provision should be clarified via minor amendments to explanatory text (NMC 138) and Policy PS 9A (NMC 143) – see Appendix 3A. The Council's support of some on site provision is now also embodied in Policy as opposed to relying on explanatory text.
10. In terms of the provision of modular temporary construction workers' accommodation outside the Wylfa Newydd Project site, the Councils continue to maintain that its priority is for such provision to be located on sites adjacent to or close to Centres identified in the Plan's Settlement Hierarchy. For the avoidance of doubt the Councils have suggested additional wording to clarify which Centres they consider could absorb campus style temporary construction workers accommodation. The amended explanatory text refers to a consented site on the edge of Holyhead at which it is proposed to house 3,500 temporary workers. The impacts of that development on the Centre have been appropriately managed and the consent has been issued. The Councils consider that this demonstrates that these developments can be suitably located in sustainable settlement and edge of settlement locations although each would have to be proportionate to the size of the settlement .
11. It is accepted that more clarity is required as to what would constitute 'close to', and proposes to address the matter by minor amendments: replacing "close to" with "well related" and defining "well related".
12. The Councils have given further consideration to the rationale for splitting temporary workers accommodation into "small" and "large" scale development. The Councils note that Horizon (in its response to the MACs) does not anticipate that campus style development of less than 500 bedspaces will form part of its portfolio of accommodation for construction workers.
13. Subject to minor amendments that do not change the thrust of the Policies (see Appendix 3A), the Councils consider that Policy PS 9 and Policy PS 9A in combination provide a sufficient framework in relation to campus style construction workers' accommodation for the Wylfa Newydd Project. In addition to addressing the effect of Wales Act 2017, the amendments also seek to address comments made by Welsh Government (SNMC 9) and Land & Lakes Ltd. (SNMC60). The amended policies provide the criteria based principles that

Appendix 3

should apply or form part of the considerations in relation to all modular temporary construction workers' accommodation that relate to Wylfa Newydd.

14. The Councils consider that Policy TAI 3 should be retained as part of the framework of policies in order to provide a policy framework for potential proposals not related to the Wylfa Newydd Project. Amendments are suggested to the Policy to clarify its role – see Appendix 3B. This approach is considered pertinent given the scale of non Wylfa related construction work forecasted or anticipated to be undertaken in the Plan area during the Plan period, e.g. North Wales Connections Project (National Grid), Biomass facility (Orthios), Bontnewydd – Caernarfon by-pass, new Menai crossing.

7.3 ECONOMY AND REGENERATION

NATIONAL SIGNIFICANT INFRASTRUCTURE PROJECTS AND ASSOCIATED DEVELOPMENTS

7.3.1 Context

- 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 (NSIPs – as defined by the Planning Act 2008), including specifically for power generation.
- 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 National Grid proposal to provide transmission lines from the new nuclear station.
- These NSIPs could have major infrastructure implications for the Plan area in the form of new electricity transmission lines and associated development

Introduction

- 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.
- 7.3.3 ~~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 are the decision maker for associated or related development not included within the main Development Consent Order application, and national policy will be a material consideration as appropriate. Where associated or ancillary development is related to the construction or operation of a Nationally Significant Infrastructure Project, these proposals will be considered under Strategic the relevant policies in the Plan as well as Strategic Policies PS 8, and PS 9, PS 9A – 9C where applicable. [NMC 125]~~
- 7.3.4 ~~The Planning Inspectorate will examine The applications for new Nationally Significant Infrastructure Projects development will be examined 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). 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 may also be considered, including 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, revised 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 (as amended by the Wales Act 2017); 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. Similarly, applications may be made to other statutory bodies. ~~In Wales~~ The local planning authorities are the determining authorities for some any development~~

~~related to associated with~~ the Development Consent Order application. ~~for example, construction workers accommodation.~~ [NMC 126]

- 7.3.5 The scale and impact of NSIPs ~~and related associated development~~ will be mitigated through an appropriate package of planning permission conditions, planning or highway agreements, DCO requirements, and CIL receipts (if a CIL charging schedule is implemented). [NMC 127]
- 7.3.6 In addition the Councils ~~may require~~ will encourage developers to consider packages of community benefits to be provided by the developer to offset and compensate the community for the burden imposed by hosting a project. Any such ~~packages fund~~ will be used to off-set the burden on the locality, and would identify potential legacy uses, including transport, social, economic and community infrastructure which would benefit the community in the long term. [NMC 128]
- 7.3.7 Community benefits may be sought 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.
- 7.3.8 Voluntary community benefits contributions are monetary payments or other provisions from a developer for the benefit of communities hosting a development which are 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. Voluntary 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.~~ [NMC 129]
- 7.3.9 There are currently two proposed NSIP at the pre-application stage which are located within the Plan area:
- 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);
 - ii. Improvements/ new National Grid Transmission Lines connecting the proposed Wylfa Newydd with Pentir and beyond proposed by National Grid.
- 7.3.10 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. providing advice to inform project promoters during the development of their proposals for consultation and project development;
 - ii. responding to formal consultations during project development and on applications to other determining bodies;
 - iii. suggesting appropriate requirements for inclusion in the Development Consent Order and obligations (such as Section 106 Agreements and Community Infrastructure Levy – if adopted);
 - iv. determining applications for associated, ancillary or related development outside the Development Consent Order;
 - v. commenting on the adequacy of consultation,
 - 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,

- vii. making representations as part of the formal examination of the Development Consent Order by the Planning Inspectorate,
- viii. in determining any approvals subsequent to consent (including planning permission conditions and DCO requirements), and in discharging functions as the enforcing authority.

7.3.11

Strategic Policy PS 8 is an overarching policy relating to any application 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 PS 8 does not relate to any NSIP application for development at Wylfa Newydd, or development proposals associated with or ancillary to that application.

STRATEGIC POLICY PS 8: PROPOSALS FOR NATIONAL SIGNIFICANT INFRASTRUCTURE PROJECTS AND ASSOCIATED RELATED DEVELOPMENTS

In their role as authorities giving permission for associated related development or as consultees for applications to other bodies, within the context of national policy statements and national planning policy, the Councils will aim to ensure that development makes a positive contribution to achieving the vision and strategic objectives set out in the Plan. In doing so, consideration will be given to the nature, scale, range and possible impact of any development.

The Councils will therefore aim to ensure conformity, as far as is ~~appropriate or~~ relevant, with the following criteria:

1. The development and associated/ancillary infrastructure, including any proposals for accommodation, education and training facilities, employment, supply chains, and transport, community, environmental and green infrastructure, will contribute to a balance of positive outcomes for local communities, visitors and the environment; ~~and~~
2. An assessment is submitted of how a consideration of alternative options influenced the proposals; ~~and~~
3. A comprehensive assessment is provided of the proposal's environmental (landscape, built, historic and natural), social (including health and amenity), linguistic and cultural, transport and economic impacts (positive, negative and cumulative) during the construction, operation and decommissioning and restoration (if relevant) phases, as well as measures to be achieved where appropriate to avoid, reduce, alleviate and/or off-set the harm done; ~~and~~
4. Provision of contributions to the Council or other appropriate and agreed organization to offset any adverse impacts and harm caused by the project through effective engagement with local communities and the Council at the pre-application stage. The objective will be to identify measures, projects and services to enhance the long term well-being and sustainability of the communities affected; ~~and~~
5. In recognition of any burden and disturbance borne by the community in hosting significant national infrastructure project, the Council may require appropriate packages of community benefits to be provided by the developer to offset and compensate the community for the burden imposed by hosting the project; ~~and~~
6. Local economic and community benefits are where feasible maximized, through agreement of strategies for procurement, employment, education, training and recruitment with the Council at an early stage of project development; ~~and~~
7. Any proposal for development, including all ancillary and induced development, must be accompanied by a project level Habitats Regulations Assessment, which meets the requirements of the Conservation of Habitats and Species Regulations 2010 (as amended); ~~and~~
8. The provision of flood protection measures to manage flood risk and, where feasible,

deliver improvements in the locality. The provision of an assessment of anticipated impacts of the proposal on the surrounding marine and terrestrial environment and delivery of measures to manage and minimise any harm caused.

In order to have sufficient information to be able to assess the effects of the proposals, the Councils may request the preparation of management or delivery plans identifying the measures to be taken to maximize benefits and to mitigate and/or compensate for impacts where this is justified by national or local policy. These plans should identify the timetables for delivery and the systems and resources that will be used to implement the proposed measures. [NMC 130]

WYLFA NEWYDD AND ~~ASSOCIATED~~ RELATED DEVELOPMENT

INTRODUCTION

7.3.12 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 the proposed Wylfa Newydd Project, including developments that are related ~~associated~~ with it where either the Isle of Anglesey County Council or Gwynedd Council is the determining planning authority on planning applications. [NMC 131]

7.3.13 Although the Councils are not the consenting authorities for the Wylfa Newydd Project Development Consent Order, 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~~ related development which is subject to an application for planning consent from the Councils conforms with the relevant policies and strategies included in this Plan. The Isle of Anglesey County Council's vision (as the host authority) for the Wylfa Newydd Project is set out in Chapter 5 of this Plan, and has informed the Plan's Vision and Objectives. The Project will be expected to contribute to achieving the Plan's Vision by:

- contributing to the delivery of the Anglesey Energy Island Programme and the Anglesey Enterprise Zone;
- driving the transformation of the economy, maximising opportunities for the employment and up-skilling of local people;
- maintaining and enhancing the quality of life of local communities and visitors
- conserving and strengthens the unique identity of the Plan area;
- conserving, or where appropriate, enhance the Plan area's distinctive environment and resources, taking into account climate change. [NMC 134]

~~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.~~ [NMC 132]

7.3.14 The Revised 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 the Wylfa Newydd 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 related development proposed in connection with the Wylfa Newydd linked to the Project. In combination with the Plan's policies, the revised New Nuclear Build at Wylfa SPG document will help the County Council to:

- provide detailed guidance on Project related development, e.g. construction workers' accommodation
- make robust decisions on all enabling works and related associated development planning applications
- ensure that the potential impacts of the New Nuclear Build and its related 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 fully maximised. realised. [NMC 133]

7.3.15 The Project will be expected to contribute to achieving the Plan's Vision by:

- contributing to the delivery of the Anglesey Energy Island Programme and the Anglesey Enterprise Zone;
- driving the transformation of the economy, maximising opportunities for the employment and up-skilling of local people;
- maintaining and enhancing the quality of life of local communities and visitors
- conserves and strengthens the unique identity of the Plan area;
- conserve, or where appropriate, enhance the Plan area's distinctive environment and resources, taking into account climate change. [NMC 134]

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~~ 10 years, with around ~~8,500~~ 8,000 to 10,000 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 ~~8501,000~~. 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 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 holiday 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/wylfa-nuclear-new-build-construction-workers-accomodation-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>. [NMC 135]

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 is located in accordance with the Plan's Spatial Strategy as set out in Chapter 6, **Policy PS 9, the specific policies set out in PS 9A – 9C,** and other relevant policies included in the Plan (**including Policy TAI 3, Policy TAI 8 and Policy PS 1**), depending on the type of use **and its scale**, in order to be consistent with the principle of sustainable development. [NMC 136]~~

7.3.17a

~~**Proposals for The accommodation requirements of construction workers should minimise the 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), and the tourism sector. The construction workforce should be accommodated via various means, including the existing housing stock (to buy or rent), holiday accommodation and new purpose built permanent or modular accommodation provided by Horizon or through a third party. Where appropriate, the Councils require the Project to deliver legacy benefits to local communities during the Plan period or beyond the construction period. A draft construction workers accommodation strategy has been developed and will be finalised having regard to the Plan's Spatial Strategy and any relevant policies in the Plan, including a suite of policies that provides further guidance on the management of Associated development related to the Project.** [NMC 137]~~

7.3.17b

~~**The construction workforce should be accommodated via various means, including the existing housing stock (to buy or rent), holiday accommodation and new purpose built permanent or modular accommodation provided by Horizon or through a third party. Such use should not however result in an unacceptable impact on availability of housing (owner occupied and private rented) or on the availability of tourist accommodation. The impacts should be made acceptable. Tourism is a key economic sector and requires to be given specific consideration and assessment in finalising the construction workers accommodation strategy.**~~

7.3.18

~~**In terms of location, the Councils' position is that** accommodation for the temporary construction workers should as far as possible be provided within, ~~or~~ adjacent to, **or well related close to** the development boundaries of the Centres **and Service Villages** identified in the Plan's Settlement Hierarchy (**depending on the scale of the development**), ~~or~~ **and** 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. **The following criteria will be used to assess whether a proposed site is well related to a development boundary:**~~

- ~~• **Physical distance / degree of separation with an increasing distance and separation less preferable; and**~~
- ~~• **The location of the site in relation to facilities, services and other sustainability assets (such as recreation provision, employment opportunities, etc.) of the Centre/ Service Village; and**~~
- ~~• **Accessibility to the Centre/ Service Village (primarily by non-car transport modes) and ability to improve on it; and**~~
- ~~• **Visual impacts and ability to integrate the development into the landscape and townscape.**~~

7.3.18a

~~**Paragraph 7.3.17 bA refers to the various types of accommodation. Given the scale of the anticipated number of construction workers required during the construction phase, it is considered that modular development will be part of the supply of accommodation but will not be the first option except for necessary provision for essential workers on the Wylfa**~~

Newydd Project main site. Providing some modular accommodation in temporary buildings on the Wylfa Newydd Project site would be acceptable where it is supported by provision of an appropriate level of community facilities and the transport impact (including workers' access and parking) can be demonstrated to be acceptable. Policy PS 9 and Policy PS 9A sets out the requirements for such modular accommodation related to the Wylfa Newydd Project.

7.3.18b

Project promoters **must** ~~should consider re-using~~ **demonstrate that they have fully considered the re-use of existing buildings and/ or the provision of permanent buildings capable of being adapted for permanent use following use by construction workers and proportionate use of the private rented sector before proposing modular accommodation in temporary buildings which will be removed at the end of the temporary use. Project promoters should also demonstrate how they have engaged with and sought to use any facilities which have a granted planning consent for accommodating nuclear workers before they apply for any further consents. [NMC 138]**

7.3.18c

Any modular accommodation provided outside the Wylfa Newydd Project site should provide a sustainable legacy use for the buildings or the site and demonstrate how that legacy will be secured. 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 comply with the relevant policies in this Plan. Potential legacy uses include serviced plots for affordable housing, elderly or special needs accommodation, student accommodation, offices or hotels, or serviced plots for similar uses or employment related uses ~~or buildings that can be refurbished for similar uses.~~ A permanent residential legacy should be informed by the published Local Housing Market Assessment in order to ensure that the type of housing units required to address local need can be incorporated into the proposal at the design stage. If the project promoter and the Council agree that an after use is demonstrated to the Council's satisfaction ~~not to be~~ 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. In such cases off-site legacy benefits will be required to compensate for the lack of legacy on the site and should be included within the proposal. ~~Policy PS 9A sets out the criteria for large scale temporary construction workers' accommodation over 500 bedspaces. Policy TAI 3 sets out the policy context for temporary workers accommodation of up to 500 bedspaces. Policy TAI 8 sets out the policy context in relation to the residential use of holiday accommodation as temporary workers accommodation~~

7.3.18ch

In order to mitigate the effects of the Wylfa Newydd Project on the housing market and to help co-ordinate the best use of all types of accommodation, construction workers will be required expected to use the services provided by, what is currently referred to as, the Construction Worker Accommodation Management Portal. This Portal will comprise of a register of rooms or property that will be available for rent, and the applicant will be required to propose and secure methods by which construction workers will be required or encouraged to arrange their accommodation through this Portal. The Portal will also be used to monitor the uptake of accommodation and provide breakdowns by sector and spatially. This information will be shared with the Councils as set out in the construction workers accommodation strategy in order to allow the Councils and the applicant to monitor the impacts on sectors and locations and respond appropriately where these do not accord with the predicted impacts. [NMC 139]

- 7.3.19 Strategic Policy PS 9 applies to the proposed Wylfa Newydd Project including development associated with it. Strategic Policy PS 9 does not apply to any other NSIP application, or any development associated with or ancillary to such NSIP applications. The project level HRA should be informed by the findings and conclusions of the HRA: Site Report for Wylfa¹ as well as the HRA process for the Joint LDP. **[NMC 140]**

STRATEGIC POLICY PS 9: WYLFA NEWYDD AND RELATED PROJECT ASSOCIATED DEVELOPMENT

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

1. Any relevant policies included in the Plan, and any relevant supplementary planning guidance should shape the approach to the development of the nuclear power station and **proposals for** and any **associated related** development; and
2. In order to minimise impact and maximise 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 PS 4 and any relevant detailed Policies in the Plan and minimises adverse transport impacts to an acceptable level, including those arising during the construction, and operation and decommissioning stages, and any restoration stages. Proposals should where feasible make a positive contribution to transportation policy objectives in the locality, and should include multi-modal solutions and investment that encourages travel by public transport, walking and cycling; and
4. Early or preparatory works for the development of the nuclear power station shall demonstrate that they are necessary to ensure the timely delivery of the Wylfa Newydd Project ~~or~~ and are designed to provide mitigation for the effects of the construction or operation of the Wylfa Newydd Project. Any early or preparatory works must be accompanied by a strategy to enable the sites to be restored to an acceptable standard should the Project not be consented or constructed and **demonstrate** how the costs of undertaking such restoration will be secured, including through bonding;
5. The accommodation requirements of construction workers should be met in a way that minimises 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, **taking account the published Local Housing Market Assessment, ~~or~~ and** not result in unacceptable adverse economic (**including the tourism sector**), social, linguistic or environmental impacts. Proposals should form part of a robust construction workers accommodation strategy that has regard to the Plan's Spatial Strategy and any relevant policies in the Plan, **including Policy PS 9A, Policy TAI 3;**
6. Where proposals are for a temporary period both the site selection and the proposal detail shall the siting and design of associated development 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 will be required with during the pre-application process planning applications to demonstrate how legacy use has that will informed the approach to the design and layout of the **associated related** development sites, as well to contribute to as

¹ Department of Energy and Climate Change (2010) Habitats Regulations Assessment: Site Report for Wylfa. EN-6: Revised Draft National Policy Statement for Nuclear Power Generation.

- the framing of a S106 and/or other agreements and CIL payments (if applicable);
7. Proposals for associated development of for large scale (500 or more workers) campus style temporary workers accommodation, logistics centres and park and ride facilities will also be assessed against the criteria set out in Policies PS 9A – 9C;
 8. The scheme layout and design and the scale of open spaces, landscaping, planting (including hedging and tree belts), waterways and similar features green infrastructure proposed should avoid, minimize, 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;
 9. Any proposal for development, including all associated ancillary and induced development, must be screened in accordance with accompanied by a project level Habitats Regulations Assessment, which meets the requirements of the Conservation of Habitats and Species Regulations 2010 (as amended) and where required be accompanied by an appropriate assessment; and
 10. Early engagement by the promoter with the Council in respect of the promoter's procurement, employment, education, training and recruitment strategies, with an objective to maximise employment, business and training opportunities for the local communities both in the short and longer term is required. The promoter's procurement, employment, education, training and recruitment strategies and delivery plans should be agreed with by will require to be submitted approved by the Council as part of any planning application 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;
 11. Where Community infrastructure is will be provided for construction workers, for example park and ride or park and share facilities, shops, healthcare and sports and leisure facilities. Where feasible this should be sited and designed so that it can be made available for community use during the construction phase and ultimately, where appropriate, serve a community legacy use. Where there would be additional impacts or demands on existing community facilities the Council will seek either appropriate contributions for off-site facilities or upgrading existing facilities. Legacy use of any additional facilities provided should be considered where that is appropriate;
 12. Proposals should include appropriate measures for promoting social cohesion and community safety;
 13. All proposals shall be appropriately serviced by transport infrastructure including public transport and shall not have adverse impacts on local communities and tourism and this shall be demonstrated in a transport assessment. Where there is insufficient transport linkage, the road network does not have sufficient capacity to accommodate the level of traffic which will result from any development or an adverse impact is predicted appropriate improvements to the transport network and the provision of sustainable transport options shall be provided to mitigate; and
 14. 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;
 15. Any proposal on the Wylfa Newydd site (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:
 - a. Be strongly justified;
 - b. Demonstrate that the planning impacts are acceptable; and

- demonstrate that the environmental, social and economic benefits outweigh any negative impacts.
16. If a future or legacy use for any temporary development is not feasible the Council shall require that temporary buildings are removed; and
- i. the serviced land is left in a suitable condition following the removal of the structures in accordance with a scheme of work submitted and approved by the Local Planning Authority; or
 - ii. all waste disposal facilities, roads, parking areas and drainage facilities are permanently removed from the site and the land is reverted to its original state in accordance with a scheme of work submitted to and approved by the Local Planning Authority.
- It is possible that as the project develops, due to unforeseen consequences resulting from the construction and operation of the Wylfa Newydd Project, 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 in order to monitor the full range of impacts, and to review the adequacy of mitigation or compensation measures and to make adjustments as necessary. [NMC 141]

- 7.3.19a Associated development covered by policies PS 9A, PS 9B, or PS 9C will not be required to comply with policies TAI 3, TAI 5, TAI 8, TAI 9, TAI 14, TAI 15, TAI 16 and TAI 17; PS 12 and PS 15; ISA 2 and ISA 5; and TWR 2 within the Plan. [NMC 142]

NEW SUB POLICY PS 9A - WYLFA NEWYDD – ~~LARGE SCALE~~ CAMPUS STYLE TEMPORARY ACCOMMODATION FOR CONSTRUCTION WORKERS

In their role either as determining authorities for related development or as consultees for a DCO application for Wylfa Newydd, the Councils will seek to ensure that ~~compliance~~ proposals for ~~large scale~~ campus style temporary accommodation for construction workers ~~with more than 500 bed spaces~~ will ~~only be granted, in addition to the proposal complying~~ have regard to or comply with Policy PS 9, (where relevant) and the following criteria:

1. the developer can firstly demonstrate that the proposal satisfies the demonstrable need for temporary accommodation for construction workers that cannot be met through either existing residential accommodation, or the re-use of existing buildings, or the provision of new permanent buildings capable of being adapted for permanent use following their use by construction workers; and
2. The proposal is located on the Wylfa Newydd Project site or ~~the site is~~ located adjacent or well related in ~~close proximity~~ to the development boundary of Holyhead, Amlwch, Llangefni, Gaerwen or Y Fali ~~a Centre identified within the Plan's Settlement Hierarchy~~, and is close to the main highway network where adequate access can be provided without significantly harming landscape characteristics and features; ~~and or~~
3. ~~in exceptional circumstances, the site is located in the open countryside, provided that the applicant can demonstrate that there is no available site which meets the criteria set out in criterion 1 for the proposed use and that there is an essential and proven need for the amount and type of accommodation for temporary workers; and~~

4. The proposal must include appropriate mechanisms to mitigate any adverse impacts of the proposed development on the Welsh language and culture or a contribution is made towards mitigating those impacts in accordance with Policy PS 1 and Policy ISA 1; and
5. Where there is insufficient capacity within existing off-site leisure, recreational, retail and healthcare facilities to meet the needs of occupiers of the site or such facilities are not available within an acceptable distance which facilitates pedestrian or cycle access to them, the proposal must include appropriate mechanisms to mitigate negative impacts which may include onsite provision of ancillary facilities for the use of the occupiers; and
6. Operators will be required to maintain occupancy information, including the number of construction workers accommodated, the duration of occupancy and keep a record of anonymised data of workers accommodated ~~keep a register of all workers living in the accommodation~~ and to make this information register immediately available, on request, to the Council. [NMC 143]

NEW SUB POLICY PS 9B - WYLFA NEWYDD – LOGISTICS CENTRES

In their role either as determining authorities for related development, or as consultees for a DCO application for Wylfa Newydd the Councils will seek to ensure that proposals for logistics centres associated with the Wylfa Newydd Project and its supply chain will ~~comply or have regard to be permitted where, in addition to the proposal complying~~ with Policy PS 9 (where relevant), and ~~with the following criteria it can be demonstrated that:~~

1. The site is located:
 - i. on a safeguarded or allocated employment site; or
 - ii. within development boundaries of Centres identified within the Plan's Settlement Hierarchy;
or
 - iii. In other locations adjacent to development boundaries of Centres that are located along or close to the A5/A55 corridor where the applicant has demonstrated that sites identified in criteria 1 i and ii have been first considered and discounted based on planning and environmental criteria and that the impacts of development in the countryside can be acceptably minimised and mitigated
2. Proposals include sustainable transport proposals for staff including links to public transport.

NEW SUB POLICY PS 9C - WYLFA NEWYDD ~~ASSOCIATED DEVELOPMENT~~ - PARK AND RIDE AND PARK AND SHARE FACILITIES.

In their role either as determining authorities for related development, or as consultees for a DCO application for Wylfa Newydd the Councils will seek to ensure that proposals for park and ride and park and share facilities associated with the Wylfa Newydd Project and its supply chain will ~~comply or have regard to be permitted where, in addition to the proposal complying~~ with Policy PS 9 (where appropriate), and the following criteria ~~it can be demonstrated that:~~

1. In order to minimise the need for construction workers and workers that service the facility to travel by private car, the site is located:
 - i. within or adjacent to development boundaries of Centres that are located along or close to the A5/ A55 corridor; or
 - ii. In other locations along the A5/A55 corridor where the applicant has demonstrated that sites within or adjacent closer to Centres have been first considered and discounted based on planning and environmental criteria and where provision for

travel to the site by sustainable means, including public transport and cycling, can be provided.

2. Proposals should make provision for new and enhancement of existing pedestrian and cycle paths and improvement to public transport services
3. The siting of buildings and activities, means of access and egress and appropriate mechanisms are used to mitigate negative impacts of the proposed development on the amenity of local communities [NMC 144]

POLICY TAI 3: ~~SMALL-SCALE CAMPUS STYLE~~ TEMPORARY ACCOMMODATION FOR CONSTRUCTION WORKERS

Proposals for ~~small scale campus style~~ temporary accommodation ~~(up to a maximum of 500 bedspaces)~~ for construction workers will be permitted provided that they form part of the overall solution to providing temporary construction worker accommodation and the following criteria are satisfied:

1. The site is located within or adjacent to development boundaries of Centres or Service Villages identified within the Plan's Settlement Hierarchy, and
 2. It is proportionate in scale to the Centre or Service Village; and
 3. It will not prejudice the Councils' ability to sustain a continuous minimum 5 years supply of land for permanent homes; or
 4. In exceptional circumstances, the site is located elsewhere ~~in Anglesey~~ provided:
 - i. the developer can demonstrate that there is an essential and proven need for the amount and type of accommodation that cannot be met within or adjacent to development boundaries of Centres or Service Villages in the locality through either existing accommodation or the re-use of an existing building;
 - ii. the accommodation is provided to meet the temporary accommodation needs of workers;
 - iii. the site is accessible to public transport routes, workplaces, and key social infrastructure, promoting sustainable travel options as appropriate;
 - iv. a satisfactory standard of accommodation and adequate communal leisure and recreational facilities are provided on site to meet the amenity needs of occupiers;
 5. Proposals within or adjacent to development boundaries ~~The proposal is designed for permanent legacy use—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 unless, in exceptional circumstances, the Council is satisfied that a legacy use is not feasible or appropriate;~~
 6. The proposal will be assessed in accordance with this Policy, ~~with Policy PCYFF 1 and other policies relating to the alternative future use~~ and Policy ISA 1, but will not be required to comply with policies relating to the development of permanent residential accommodation and retailing in the countryside;
- ~~If provision of permanent homes is the intended legacy use of the accommodation, the proposal should make a positive contribution to the long term affordable housing objectives of the Council in accordance with the requirements of Policy TAI9 and Policy TAI10;~~
7. Where the proposal would result in impacts or additional demands on existing community facilities (including healthcare facilities), in accordance with Policy ISA 1, either additional facilities or appropriate contributions for the development or improvement of existing facilities off site within Centres or Service Villages will be provided, unless it can be demonstrated that temporary ancillary facilities should be provided ~~elsewhere~~ on site;
 8. That appropriate improvements to the transport network are provided to mitigate adverse impacts on local communities and tourism;
 9. The accommodation, and the agreed legacy use, contribute to creating a mixed, inclusive and sustainable community, and The proposal does not cause an over-concentration of such a use in the local area or harm to the residential amenity or the surrounding area;
 10. If a ~~alternative future or~~ legacy use is not feasible the Council shall require that temporary buildings are removed and

i. the serviced land is left in a suitable neat and tidy condition following the removal of the structures in accordance with a scheme of work submitted to and approved by the Local Planning Authority, or

ii. all waste disposal facilities, roads, parking areas and drainage facilities are permanently removed from the site and the land is reverted to its original state in accordance with a scheme of work submitted to and approved by to the satisfaction of the Local Planning Authority.

Planning permission will always only be granted subject to a time-limited period in order to enable the Council to review the overall trend the construction project's associated accommodation needs. Appropriate planning mechanisms will be applied to secure the agreed legacy use.

10a A Construction Workers Accommodation Strategy is submitted to the Council as part of any planning application.

Operators will be required to maintain occupancy information, including the number of construction workers accommodated, the duration of occupancy and keep a record of anonymised data of workers accommodated ~~keep a register of all workers living in the accommodation~~ and to make this information register immediately available, on request, to the Council. [NMC 188]

Explanation:

7.4.23 Homes with shared facilities are often known as houses in multiple occupation (HMOs)/ shared homes. HMOs/ shared homes are flats or houses occupied by more than one household, where each household does not have exclusive use of all cooking, washing and toilet facilities. This Policy applies to the construction of new HMOs/ shared homes as opposed to the conversion of existing buildings (which would fall under Policy TA12). This Policy applies to new build purpose built temporary accommodation provided for construction workers required in connection with large scale construction projects ~~, e.g. other than the~~ Wylfa Newydd Project or any other work that requires a large number of temporary/ transient resident workforce. Policy PS 9 and Policy PS 9A will apply to proposals for campus style temporary construction worker accommodation required in connection with the Wylfa Newydd Project. The accommodation will be required for 6 months or more. The duration will be restricted to a maximum period agreed to by the Council and will be conditioned for refurbishment of the building/ structure or reinstatement of the site at the end of the period. The Council encourages accommodation designed to allow transition to an alternative legacy use. [NMC 189]

7.4.23a These would be specially provided, campus-style developments including modular single worker en-suite accommodation units, arranged in blocks that share communal facilities, such as a kitchen, dining space and lounge. The modular build would allow flexibility to meet changes in demand over time. [NMC 190]

7.4.23b The Council favours sites located within or adjacent to the identified Centres or Services in order to promote sustainable development (including access to public transport linkages), integration with communities (unless the scale of the development would not be proportionate to the Centre or Service Village), and to facilitate beneficial long-term legacy uses. This could enable efficiency in terms of accessibility to welfare, leisure and recreation facilities in the nearest settlements. Where required and appropriate, the solution to ensure that the occupiers' requirements are addressed could involve investment to upgrade facilities

in the nearest settlements. Alternatively, these sites could be more self-contained, providing on site welfare, sports, leisure and recreation facilities as well as bus pick up and drop off points for the occupiers. Other services, e.g. canteen, administrative services, would also form part of the development covered by this Policy. [NMC 191]

~~7.4.23c This Policy only addresses developments of up to 500 bed spaces together with ancillary facilities for welfare, leisure and recreation. Larger proposals will be considered under Policy PS 9A and other relevant policies in the Plan. [NMC 192]~~

7.4.23ch While Policy TAI 3 (and PCYFF 1 and Policy ISA 1) would be the relevant policies for this style of temporary accommodation provided for construction workers, this Policy would not apply to a proposal for permanent housing, for example houses that would initially be sub-divided to allow use by construction workers, then adapted to become homes for families or other members of local communities. Policies TAI 14 to TAI 17 would apply to this type of provision, depending on the site's location, as well as other relevant Policies, e.g. Policy TAI 9 – Affordable housing threshold and distribution (for use following use by construction workers); Policy ISA 5 – Provision of open spaces in new housing development; Policy ISA 1 – Infrastructure provision. Policy TAI 3 would not apply to any form of purpose built accommodation that has been designated as student housing or designated for use by older people or would be suitable for young adults with a limited income. Policy TAI 6 provides part of the framework to deal with proposals for new purpose build student accommodation. [NMC 193]

7.4.24 This type of accommodation has the potential to mitigate pressure on the stock of private rented homes or open market housing or visitor accommodation in communities. Policy TAI3 would not apply to any form of purpose built accommodation that has been designated as student housing or designated for use by older people or would be suitable for young adults with a limited income. Policy TAI6 provides part of the framework to deal with proposals for new purpose build student accommodation. [NMC 194]

7.4.25 The aim of this Policy is to ~~achieve~~ contribute to achieving the appropriate balance by facilitating the development of HMOs/ shared housing and purpose built accommodation required for temporary construction workers and of solutions to address the need to accommodate a large number of construction workers, thus protecting the supply of housing suitable for local communities during the Plan period. [NMC 195]

7.4.26 The creation of mixed, sustainable and inclusive communities can be adversely affected where purpose built accommodation, HMOs or shared housing is proposed. This type of accommodation creates a concentration of relatively short-term residents, and can be unwelcome in an established community. Specific concerns can include pressure on services and facilities that meet the needs of longer term residents, particularly key services and facilities such as doctors' surgery, dentist, leisure centres, libraries, schools. The Councils are committed to supporting residential communities in the Plan area. Each application for temporary workers accommodation shall be accompanied by a Construction Workers Accommodation Strategy, which should provide assessment for the proposal, including:

- ~~i. a detailed assessment of compliance with any relevant supplementary planning guidance;~~
- ii. a detailed explanation of the need for the facility;
- ~~iii. how it accords with the Construction Workers' Accommodation Strategy~~
- iv. details of the extent to which the proposal places demands on physical and community infrastructure;
- v. the extent to which the local community will benefit from the proposal;

APPENDIX 3B

- vi. a demonstrable solution for the end of the life of the structure or building, unless it can be clearly demonstrated that a legacy use isn't feasible. **[NMC 196]**

- 7.4.27 Where proposals for ~~purpose built accommodation, HMOs or housing with shared facilities for~~ **temporary** accommodation for construction workers are likely to impact adversely on the balance of the community because of their scale or because of an existing concentration, the Councils may seek mitigating measures in accordance with Policy ISA1. **In cases where the solution to addressing the requirements of the occupiers involve providing on site facilities, Policies that address the relevant land use would apply (e.g. Policy MAN 6 retailing in the countryside; Policy ISA 2 Community facilities), unless the ancillary facilities are temporary buildings designed at the outset to be removed from the site.** **[NMC 197]**
- 7.4.28 Where mitigation cannot be secured, the Councils will refuse proposals that would disrupt the balance of the community or prevent the local community's requirements from being met.
- 7.4.29 The Councils will expect that the developer will ensure that purpose built accommodation and any facilities associated with the accommodation (e.g. recreational facilities) are developed on a sustainable basis, and that proposals identify the legacy opportunities / proposed after use for consideration from the outset. Where an alternative policy compliant legacy use is not feasible, but the proposal is otherwise acceptable, the planning permission for the accommodation will be granted for a limited period and a mechanism, e.g. planning conditions or planning obligations/ Section 106 agreements, will ensure that all temporary buildings, works, uses of land or other development, are removed or discontinued and the land reinstated in accordance with a scheme previously approved, or serviced plots are retained and the land is landscaped in accordance with an approved landscaping scheme. The Council may require that a bond is provided to ensure that the landscaping is maintained.

WASTE MANAGEMENT

7.5.47 Context

- The National Waste Strategy Towards Zero Waste – One Wales: One Planet 2009 provides an overarching framework for the management of all types of waste, with the overall aim of reducing residual waste to zero by 2050. It is supported by a series of sector plans which details how the outcomes, targets and Policies in Towards Zero Waste are to be implemented.
- In order to enable the North Wales authorities to achieve the targets contained within the Municipal Sector Plan and Collections Infrastructure and Market Sector Plan (CIMSP) a number of projects have been established across North Wales, including the North Wales Residual Waste Treatment Partnership Project, which seeks to divert residual waste from landfill. Also, a partnership between North Wales Local Authorities and the private sector has secured the construction of anaerobic digestion plants in Gwynedd and Denbighshire to process food waste collected from households and businesses, generating renewable energy for the grid and the production of biofertiliser for use on local farmland. These projects will influence the spatial need for certain types of waste facility
- Waste is a cross cutting issue because it is produced by all types of land use, during construction, operation and demolition. The need to change the way in which waste is dealt with is recognised in policy at all levels.
- Anglesey and Gwynedd are rural authorities with a rich and varied landscape which includes the Llyn/Môn Areas of Outstanding Natural Beauty. Further, the Gwynedd Local Planning Authority Area abuts the Snowdonia National Park Authority. Both authorities have limited road infrastructure serving a network of small communities and scattered settlements. Measures should be taken to encourage the sustainable transfer of waste by ensuring that there is adequate waste management provision across the authority area. The Councils aim to reduce the amount of waste disposed of through landfill sites. Due to the nature of waste management facilities it may be appropriate to locate the provision on a suitable employment site.
- It is necessary to ensure that any proposed policies comply with the principles of Planning Policy Wales (PPW) (Edition 9, 2016 ~~7, 2014~~). The relevant Technical Advice Note that relates to waste is TAN 21 Waste (2014).

Introduction

7.5.48 The Plan has regard to, and is compatible with, the content of the Collections Infrastructure and Markets Sector Plan (CIMSP). One of the requirements of the Plan is to identify the types of location where waste management uses are likely to be acceptable.

POLICY PS 18: WASTE MANAGEMENT

The Councils will seek to ensure an adequate availability of land in appropriate locations for an integrated network of waste facilities to meet regional and local obligations in accordance with the requirements of the current relevant national/regional policy/guidance. The sites and types of facilities chosen will promote a sustainable approach to waste management based on the waste hierarchy of prevention and reuse, preparation for reuse, recycling, other recovery and then

disposal whilst taking into consideration the unique character of the area including the transport links and rural nature.

POLICY GWA 1: PROVISION OF WASTE MANAGEMENT AND RECYCLING INFRASTRUCTURE

Land and property listed below and shown on the Proposals Maps, is allocated for the provision of infrastructure that could sustain or add to the range of suitable waste management facilities.

	Site name	Location
Gwynedd	Land at Cibyn Industrial Estate*	Caernarfon
	Llwyn Isaf Site	Clynnog Fawr
	Coed Bolyn Mawr*	Near Bethel
	Penygroes Industrial Estate*	Penygroes
	Williams & Williams	Pencaenewydd
	H Parry Composting*	Chwilog
	Cookes	Penrhyndeudraeth
	Cefn Graianog*	Llanllyfni
	Bryncir Quarry*	Bryncir
	Nanhoron Granite Quarry*	Nanhoron, Pwllheli
	Part of Peblig	Caernarfon
	Penrhyn Quarry*	Bethesda
	Griffiths Crossing	Caernarfon
	Cefn Bychan	Blaenau Ffestiniog
Manod Quarry*	Blaenau Ffestiniog	
Anglesey	Penhesgyn	Penmynydd
	Recycling Centre	Gwalchmai
	Mona Industrial Estate	Mona

APPENDIX 4

	Former Anglesey Aluminium Site*	Holyhead
	Rhuddlan Bach Quarry*	Brynteg
	Cae'r Glaw Quarry*	Gwalchmai
	Nant Newydd Quarry*	Brynteg
	Bwlch Gwyn Quarry*	Holland Arms

***Sites suitable for urban quarries as defined by TAN21: Waste**

In addition to the above allocated sites, waste management and recycling infrastructure, excluding landfill and open windrow composting, may be acceptable on existing industrial estates, quarries and brownfield sites. Proposals for waste management and recycling infrastructure (which are not proposed on the above allocated sites) will be assessed on their own merit provided that there is a justifiable need for the development. The justifiable need should refer to the local need as specified within the Municipal Sector Plan and Collections Infrastructure and Markets Sector Plan (CIMSP).

Any new development must be suitable in terms of size and scale and must not have an adverse impact upon the landscape, the natural environment or the amenity and health of the local population. All new proposals for Waste Management facilities should be accompanied by a Waste Planning Assessment¹ (as defined by Annex B of TAN21, Waste).

Explanation:

7.5.48a Some of the denoted sites as listed within the policy may be appropriate for urban quarries or recycling repository for the purpose of storing construction and demolition waste as a means of avoiding unnecessary landfilling of inert waste in accordance with TAN21: Waste.

7.5.49 In order to deal with waste sustainably, it is essential that the Plan area has an adequate integrated network of waste facilities. TAN 21 aims to ensure that the right facilities are located in the right place and at the right time to meet environmental, economic and social needs.

7.5.50 The sites have been allocated to direct developers to locations that are considered suitable for waste management and recycling facilities. The policy acknowledges that there may be other suitable sites on existing industrial estates, quarries and sites allocated for employment uses where B2 & B8 uses are acceptable in principle. The suitability of a site will depend on a variety of different factors, including the nature and

¹ **Radioactive waste falls outside the remit of the Waste Directive Framework, therefore the requirement for a Waste Planning Assessment in accordance with TAN21 isn't required for Radioactive Waste.**

APPENDIX 4

scale of the waste facility and any site constraints such as flood risk, sensitive landscape and ecological sensitivity. Annex C of TAN 21 sets out the detailed planning issues which are necessary for applicants and planning authorities to have regard to whilst preparing and determining applications for waste management proposals. Any proposal that will need planning permission will be required to comply with all the other relevant policies in the Plan.

- 7.5.51 In accordance with the waste hierarchy set out in TAN 21, a sustainable approach to waste management will require greater emphasis on reduction, re-use and recovery and less reliance on disposal without recovery. Waste management includes for example keeping, treating, storing, reception/transfer and the disposal of waste.
- 7.5.52 TAN 21 states that the resultant materials from the demolition of buildings may be recycled on site using temporary plant and machinery where it would be appropriate and would not cause a detrimental impact on neighbours in terms of noise and dust. The guidance explains that where there are longer term prospects for a sufficient and economic supply of demolition and construction waste within an appropriate catchment area, it may be appropriate to identify a permanent repository or urban quarry for this purpose. It is considered that the criteria referred to in the above policy should be used to guide the determination of planning applications for storage repositories of construction and demolition waste to avoid unnecessary landfilling of inert waste.

POLICY GWA 2: WASTE MANAGEMENT OUTSIDE DEVELOPMENT BOUNDARIES AND ALLOCATED SITES

Proposals for the management of waste on appropriate sites outside development boundaries and allocated sites (in accordance with Policy GWA1) (including, for example, biodegradable municipal waste by means of composting, including anaerobic digestion and in vessel composting and specialist waste facilities (e.g. low level radioactive waste, clinical waste and hazardous waste)) will be granted in accordance with the waste hierarchy provided there is a demonstrable need for the development, that the development is supported by a Waste Planning Assessment (as defined by TAN21: Waste) and that all the following criteria can be met:-

- 1. Allocated sites are either unavailable or unsuitable for the proposed activity;**
- 2. There are no suitable sites within the development boundary;**
- 3. The proposal will have incorporated measures to mitigate impact upon the environment and the health and amenity of the local population;**
- 4. The proposal is of an appropriate scale and nature in terms of the site and its surroundings;**
- 5. The proposal wouldn't have an adverse impact upon the natural environment and heritage value of the area;**
- 6. The development and any associated traffic do not result in unacceptable disturbance to local communities, through noise, smell, vibration, smoke or air pollution.**

Each proposal will be considered on a case by case basis, taking account of factors including the nature, type, size, need and location of the development.

Explanation:

- 7.5.53 The Councils consider that in some instances, some waste management facilities may be acceptable on agricultural land as part of farm diversification, particularly where it can be demonstrated that the waste is generated locally and the output is applied locally. The rural nature of the Plan area may also necessitate small scale facilities being located outside development boundaries to reflect existing transport infrastructure.
- 7.5.54 Proposals **will have to show that appropriate consideration has been given to sites of international, national, regional and local biodiversity or landscape value in accordance with national planning policy guidance as well as the relevant policies within the Plan.** ~~within or directly adjacent to landscape designated areas such as Areas of Outstanding Natural Beauty, the National Park and Special Landscape Areas will be rigorously tested to ensure that there isn't any adverse impact upon the designation or it's setting.~~
- 7.5.55 Currently there is no required need for landfill provision within the Plan area. As part of the process of monitoring the Plan, measures will be taken to review the future landfill requirement. Any proposed landfill which has proven a demonstrable need would have to conform to Policy GWA 2.
- 7.5.55a Collaboration between planning authorities is extremely important to monitor progress towards establishing an integrated and adequate network of waste disposal. Monitoring is a means of ensuring that there is sufficient capacity within the local region to treat waste as well as assessing if the current provision is appropriate.

POLICY GWA 3: ~~LOW² AND VERY LOW² LEVEL RADIOACTIVE WASTE~~ MANAGEMENT TREATMENT AND STORAGE

Facilities for the ~~treatment storage~~ and/or management disposal of Low and Very Low Level radioactive waste generated ~~on-site~~ within the nuclear licensed area at Wylfa/Wylfa Newydd ~~to facilitate an existing business~~ will be granted, provided that all the following criteria can be met:

- 1. It is consistent with the national ~~strategies and policies~~ strategies and policies for managing Low and Very Low Level ~~radioactive waste and discharges~~ radioactive waste and/or the ~~decommissioning plans for the Wylfa~~**

² ~~Low level waste (LLW) is radioactive waste having a radioactive content not exceeding 4 GBq/te (gigabecquerels per tonne) of alpha or 12 GBq/te of beta/gamma activity. LLW makes up more than 90% of the UK's radioactive waste legacy by volume but contains less than 0.1% of the total radioactivity.~~

³ ~~Very low level waste (VLLW) is a sub-category of LLW and is defined as either low volume VLLW or high volume VLLW. The principal difference between the two definitions is the need for controls on the total volumes of high volume VLLW being deposited at any one particular landfill or other waste facilities.~~

Nuclear Power Station;

2. The outcome of social economic and environmental health assessments justify it being dealt with ~~on site or appropriate locations outside the main nuclear site~~ at the proposed location;
3. Facilities are sited and designed in order to minimise adverse impacts on the environment and appropriate environmental restoration measures are available;
4. ~~Proposals shall comply with the general considerations set out in Policy GWA 1;~~
5. ~~The proposal is supported by a Waste Planning Assessment (as defined by TAN21: Waste).~~

Explanation:

- 7.5.56 Within the Plan area there are businesses, research establishments as well as health care establishments which produce low and very low radioactive waste. A more notable low and very low level producer of radioactive waste is the existing nuclear power station at Wylfa which is due to stop producing electricity in 2015. The process of decommissioning will then start. The Wylfa Nuclear Power Station is currently being decommissioned. The decommissioning process is likely to give rise to a large quantity of Intermediate¹, Low² and Very Low Level³ radioactive waste.
- 7.5.57 The national policy for handling such waste is to deal with them as far up the waste hierarchy as possible. However it is likely that some of this waste will need to be disposed of either on or adjacent to licensed nuclear sites or to landfill sites elsewhere.
- 7.5.58 Current NRW guidance is that some Low and Very Low Level radioactive wastes may be suitable for disposal at existing non-hazardous landfill sites. Planning permission may be required for such disposal depending on the conditions attached to any existing planning permission. An appropriate consent /permit from the NRW would also be required.
- 7.5.59 This Policy provides for the implementation of such facilities within the confines of the Nuclear Licensed Site. ~~This Policy applies solely to the storage of Low and Very Low Level radioactive wastes and would not permit the disposal of intermediate Level Waste at the site.~~

¹ Intermediate Level Waste is more radioactive than low-level radioactive waste (see below), but does not generate enough heat to require this to be taken into account of in storage or disposal facilities. However, like other radioactive waste it still needs to be contained to protect people and the environment. ILW arises mainly from the reprocessing of spent fuel and from general operations and maintenance at nuclear sites, and can include metal items such as fuel cladding and reactor components, graphite from reactor cores, and sludge from the treatment of radioactive liquid effluents

² Low level waste (LLW) is radioactive waste having a radioactive content not exceeding 4 GBq/te (gigabecquerels per tonne) of alpha or 12 GBq/te of beta/gamma activity. LLW makes up more than 90% of the UK's radioactive waste legacy by volume but contains less than 0.1% of the total radioactivity.

³ Very low level waste (VLLW) is a sub-category of LLW and is defined as either low volume VLLW or high volume VLLW. The principal difference between the two definitions is the need for controls on the total volumes of high volume VLLW being deposited at any one particular landfill or other waste facilities.

Anglesey Gypsy and Traveller Project

Permanent Residential Site, Penhesgyn
Temporary Stopping Place, Star

Preliminary Appraisal Report (PAR)
Executive Summary

February 2017



Contents

1. Introduction
2. Permanent Residential Site, Penhesgyn
3. Temporary Stopping Place, Star

1. Introduction

- 1.1 This is an Executive Summary of a Preliminary Appraisal Report (PAR) prepared by Capita Real Estate and Infrastructure on behalf of Isle of Anglesey County Council (IACC). The purpose of the PAR is to:-
- Review and understand what the potential environmental issues and risks are associated with two gypsy and traveller sites proposed by IACC
 - Undertake technical assessments for each of the proposed sites
 - Test how feasible it would be to develop each of the sites for gypsy and traveller accommodation
 - Make recommendations as to the suitability of each site to be taken forward through the planning process
- 1.2 The Housing (Wales) Act 2014 places a duty on Local Authorities to provide sites for Gypsy and Travellers where a need has been identified. The Welsh Government's *'Travelling to a Better Future'* (2015) sets out a detailed policy framework for Local Authorities to follow. The Welsh Government *Circular 30/2007 Planning for Gypsy and Caravan Sites* also strengthens the requirement that local authorities identify and make provision for sufficient and appropriate sites in their Local Development Plans.
- 1.3 The Isle of Anglesey County Council is therefore legally required (by the Housing Act (Wales) 2014) to assess and meet the accommodation needs of the population within their area. This includes the needs of the Gypsy and Traveller Community and that of travelling show people. The term Gypsies and Travellers includes Romany Gypsies and Irish Travellers as well as people from any group who follow a travelling life. It also includes Travelling Show people and New Travellers where they have a history of travelling and living in mobile homes.

Title	Description
The Housing (Wales) Act 2014	Section 225 and 226 states that the Local Authority has a duty to carry out an assessment of the accommodation needs of Gypsies and Travellers
Mobile Homes (Wales) Act 2013	The Act consolidates the legislation on mobile home sites in Wales.
Circular 30/2007 Planning for Gypsy and Caravan Sites	Welsh Government Circular highlights the requirement for Local Authorities to identify and make provision for appropriate sites in their plans.

- 1.4 *"The Anglesey and Gwynedd Gypsy and Travellers Accommodation Needs Assessment 2016 (GTAA)"* has been prepared jointly by Isle of Anglesey Country Council and Gwynedd Council during the latter part of 2015 and updates the previous North West Wales GTAA which was published in 2013. The contents of the GTAA 2016 have been approved by Welsh Government with Section 102 of the Housing (Wales) Act 2014.

- 1.5 Following consultation exercises, IACC has identified two potential gypsy and traveller sites on the island that could contribute to meeting the need for additional pitches identified in the GTAA (2016). One is a permanent residential site to replace the unauthorised Traveller encampment on the A5025 and the other, a temporary stopping place to accommodate the needs of visiting gypsy and travellers. The two potential gypsy and traveller sites are as follows:-
- Permanent Residential Site, Penhesgyn
 - Temporary Stopping Place, Star
- 1.6 A brief description of each site and the proposals is set out below and is followed by a summary of the technical assessments undertaken on each of the sites in question.

2. Permanent Residential Site, Penhesgyn

Description of the Site and Proposals

- 2.1 The Penhesgyn site has been identified by IACC as the most appropriate location for a permanent residential gypsy and traveller site following a site selection process undertaken in 2016.
- 2.2 The proposals are for a permanent residential site at Penhesgyn of four pitches for the New Age Traveller community currently residing in a lay-by next to the A5025 between Menai Bridge and Pentraeth.
- 2.3 The proposed site at Penhesgyn is located off a minor road between the A5025 and the B5420 on land east of the Penhesgyn Recycling Centre and south east of the former Penhesgyn Landfill Site. The land is composed of two fields under the ownership of IACC that are currently used for rough grazing; it is understood that the land has not been previously developed.
- 2.4 Access to the two fields would need to be via the main access road to the Penhesgyn Recycling Centre (PRC) and over land in private ownership that is currently grazed by livestock.
- 2.5 The proposals for the permanent residential gypsy and traveller accommodation at Penhesgyn include for the following:-
 - Access road to site across field in private ownership
 - Four residential pitches
 - Each pitch would have an area of hard standing for the living vehicle of the household
 - Each pitch would have an amenity block with toilet, bathroom and kitchen
 - Lighting for public safety and security
 - Space for storage of domestic refuse bins and recycling containers
 - Secure boundary fence and lockable gate

General Site and Technical Assessments

- 2.6 Technical assessments for the following environmental topics were undertaken for the Penhesgyn site. The aim of undertaking the technical assessments was to establish if there were any technical reasons or constraints that could prevent the site being suitable for occupation as a permanent residential site by the traveller community currently living in vehicles at the lay-by in Pentraeth. In addition to the specific technical appraisals other more general considerations such as size of the site, access and other physical characteristics were also taken into consideration:-
 - General Site Appraisal
 - Air Quality Assessment
 - Noise Assessment
 - Ecological Assessment

A summary of each technical appraisal is set out below:-

General Site Appraisal

- 2.7 The site encompasses two fields in the ownership of IACC that cover an area of approximately 3.5 hectares (8.65 acres) and a further field to the south that is in private ownership of around 2.91 hectares (7.19 acres) resulting in a total land take of 6.41 hectares (15.84). The following general observations have been made as part of the site appraisal process:
- The site is located in a rural location with no access to local amenities or facilities within easy walking distance
 - Access to the site would need to cross the field in private ownership and re-arrangement of the security gate for the Penhesgyn Recycling Centre (PRC)
 - The two fields in which the four pitches would be located is steeply sloping and badly drained.
 - A new access road to access the four pitches would be required and involve significant drainage and earthworks
 - Earthworks will be required to form a noise attenuation bund along the western boundary (see below)
 - Utility connections to potable water and electricity would be required
 - Sewerage is likely to be managed using a septic tank
- 2.8 There is adequate space for the proposed four permanent residential pitches on the Penhesgyn site that would require the provision of a new access road and development plateaus for the four residential pitches. There are no constraints resulting from the general site appraisal that would prevent the site being suitable as a permanent residential site for the traveller community. There would be a requirement for some re-design of the public entrance to the Penhesgyn Recycling Centre (PRC), entrance gate and site security fencing.

Air Quality Assessment

- 2.9 The site lies next to a former landfill site and existing recycling centre; posing a potential health risk, however, the site is not located within an Air Quality Management Area (AQMA). Due to the small size of the proposed development and low baseline levels of pollutants, a baseline assessment has been considered sufficient to assess the potential exposure of future users and existing receptors such as users of the Penhesgyn Recycling Centre.
- 2.10 In line with the Social Services and Well Being Act 2014 and the Well-being of Future Generations Act 2015, consideration has duly been given to issues surrounding the potential health and well-being of likely residential occupants at the Penhesgyn Site.
- 2.11 The baseline study concluded that excessive levels of nitrogen dioxide (NO₂) at the site boundary are unlikely. These conditions are existing and will likely not worsen as a result of the development. It is also likely that levels of particulate matter (PM₁₀) will not exceed acceptable levels at the site boundary and therefore impacts from PM₁₀ are not considered significant. However, dust soiling impacts from the movement of waste vehicles and Heavy Goods Vehicles (HGVs) associated with the recycling facility are considered potentially high risk..
- 2.12 The risk assessment for potential dust impacts during construction of the proposed pitches and access road concluded the site is deemed to be a low risk site for dust soiling impacts and human health impacts.

- 2.13 Impacts on new receptors from Land Fill Gas (LFG) of the former landfill site are not considered significant. Methane concentrations will be well below flammability levels and will also not have an adverse effect on human health. Carbon dioxide concentrations are expected to disperse to insignificant atmospheric concentrations. Mitigation of impacts from LFG is therefore not deemed necessary.
- 2.14 Odour levels are not considered significant. Based on records of complaints provided by IoACC Council and Natural Resources Wales it is considered that no mitigation is required. Bio-aerosol concentrations are unlikely to be above the Environment Agency's thresholds onsite, providing receptors are located greater than 250 m from the Penhesgyn composting site.
- 2.15 It is the conclusion of this air quality assessment that with appropriate dust impact mitigation measures in place and providing new residents are located greater than 250 m from the existing Penhesgyn composting facility, the proposed permanent residential scheme for the traveller community is suitable to be considered for planning permission.

Noise Assessment

- 2.16 A noise measurement survey has been undertaken to establish typical ambient noise levels during the day and at night. The site is located within a very quiet rural environment and the main noise source affecting the development site was daytime operational noise from the Penhesgyn Recycling Centre (PRC), most notably through the activity of wood crushing. The survey data was used to undertake a noise modelling study to predict the noise levels at the façade locations of the proposed pitches.
- 2.17 Recommended internal noise criteria are expected to be achieved in mobile homes with windows open and closed. External levels are expected to achieve the lower limit of 50 dB L_{Aeq} as recommended by the World Health Organisation (WHO) for external amenity spaces.
- 2.18 Another assessment undertaken in accordance with Technical Advice Note 11: Noise (TAN 11) indicated that potential caravan/trailer plots located on the development site will fall within Noise Exposure Category (NEC) A during day and night periods. This means that noise need not be considered as a determining factor in granting planning permission.
- 2.19 An assessment undertaken in accordance with British Standard (BS 4142:2014) used for assessing sound levels of an industrial/commercial nature has indicated a potential for adverse impact due to daytime PRC operational noise, notably the wood crushing operation. A scheme of mitigation is therefore recommended and should include the following:-
- An earth bund along the south west PRC boundary at a height of 1.5m;
 - In addition a further a further 1.8m close-boarded acoustic timber fence should be located around the edge of the wood crushing area compound within the PRC site.
- 2.20 This noise mitigation strategy reduces the potential of adverse impact to a satisfactory level across the proposed permanent residential traveller site at Penhesgyn. Furthermore, existing waste recycling processes and operations may change in the future and could be managed to further reduce current noise levels.

Ecology

- 2.21 A preliminary ecological assessment and a Phase 1 Habitat Survey and assessment of the site, was undertaken in November 2016. The habitats within the surveyed area include poor semi-improved grassland, improved grassland, broadleaved trees, hedgerows and dry stone walls, scattered scrub and marshy grassland.
- 2.22 The potential ecological issues on site include:
- Potential disturbance to tree with bat roosting potential (dependent upon location of proposed security fence)
 - Disturbance to nesting birds during vegetation removal (if site clearance is done within the nesting bird season)
 - Assessment of nearby pond (not within the site boundary but north west of the site) required to determine its potential for amphibians as a precautionary measure
- 2.23 The site does not appear to have any significant ecological constraints that would result in a planning application being refused on ecological grounds. There are opportunities on the site through the design development phase to retain areas of existing hedgerows and site boundaries and also increase the potential biodiversity of the site.

Summary and Conclusions

- 2.24 The Preliminary Appraisal Report (PAR) summarises the findings of the technical assessments undertaken to date, the technical appraisals are also available as standalone documents. The findings of the PAR indicate that the Penhesgyn site is a suitable location for provision of permanent residential development for travellers. Some mitigation measures will need to be incorporated into the scheme proposals in order for the site to meet certain requirements particularly in respect of noise and air quality. It is therefore recommended that the design and scheme proposals be progressed with a view to preparing a detailed planning application for submission some time in 2017.
- 2.25 The next stages are to prepare outline designs in accordance with good practice guidelines and for discussions with key stakeholders to ensure that other technical and health and safety requirements are incorporated into the scheme proposals. There may be a requirement for further technical or environmental assessments to be undertaken in order to ensure all the information required for a detailed planning application is in place. The Local Planning Authority will be consulted during this process in order to ensure that a bone fide planning application can be prepared and validated for further consideration. However, this does not guarantee that the planning application will be successful or take into account other matters that may affect the successful provision of a permanent residential site at Penhesgyn
- 2.26 There may also be a requirement to undertake an Environmental Impact Assessment or EIA as the site is previously undeveloped land and the total area required may fall within the requirement of the EIA Regulations. Again, this will be a matter of the Local Planning Authority to determine what is required in order to validate any planning application.