

SYLWADAU NMC188 COMMENTS

GWRTHWYNEBU / OBJECT



Department for Natural Resources
Adran Adnoddau Naturiol

Nia Davies
Yr Uned Polisi Cynllunio ar y Cyd
Gwynedd a Môn
Neuadd y Dref
Bangor
Gwynedd
LL57 1DT

Our ref:
Your ref:

20^{fed} Chwefror 2017

Annwyl Nia,

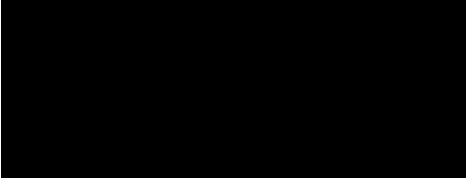
Cynllun Datblygu Lleol ar y Cyd Gwynedd ac Ynys Môn – Ymgynghoriad ar yr Amserlen o Newidiadau Materion sy'n Codi (NMCau)

Diolch am eich gohebiaeth ynghylch yr ymgynghoriad ar y NMCau arfaethedig. Rydym yn cydnabod ymrwymiad eich Awdurdod i sicrhau Cynllun Datblygu Lleol cadarn a'r gwaith sydd wedi'i wneud gan y tîm cynllunio ymlaen llaw er mwyn cyrraedd y cam hwn.

Mae'r Newidiadau i'r Materion sy'n Codi arfaethedig ar gyfer nifer y tai sydd ar gael, y cyfiawnhad drostynt a pha mor eglur yw'r sefyllfa, i'w croesawu. Mae bellach yn amlwg pa elfennau sy'n sylfaen i'r ddarpariaeth dai a sut y maent yn berthnasol i'r hierarchiaeth setliadau. Mae'r gwaith hwn bellach wedi roi ar ffurf tablau trywydd tai a chyflenwad tir sydd bellach wedi'u cynnwys yn y cynllun. Mae'r Newidiadau i'r Materion sy'n codi o ran yr angen am dai fforddiadwy a'u deiliadaeth, a tharged diwygiedig tair ffordd yn seiliedig ar gefnogi gwaith hyfywedd wedi'i ddiweddarau. Mae'r diffiniadau diwygiedig o ran y farchnad, y farchnad leol a thai fforddiadwy yn rhoi'r eglurder sydd ei angen i fframwaith y polisi. Hefyd, mae Llywodraeth Cymru yn cefnogi'r NMCau ar gyfer Sipsiwn a Theithwyr ac nid oes unrhyw wrthwynebiadau yn weddill o ran hyn. Ystyriwch bod **y NMCau arfaethedig, ar y cyfan, wedi mynd i'r afael â mwyafrif ein pryderon o ran strategaeth, tai, tai fforddiadwy a'r ddarpariaeth ar gyfer Sipsiwn a Theithwyr.**

Yr Arolygydd/Arolygwyr sydd wedi'u penodi sydd i benderfynu a yw cynllun yn cael ei ystyried yn gynllun 'cadarn'. Er ein bod yn credu bod y Cyngor wedi mynd i'r afael â mwyafrif y pryderon a nodir yn ein sylwadau ac mewn datganiadau mewn gwrandawiaadau i ddilyn, rydym yn **ystyried bod rhai materion pwysig sy'n parhau heb eu datrys wedi eu nodi yn yr Atodiad.**

Yn gywir,



Atodiad

mor agos yw "...yn agos iawn..."?
 Maen Prawf 2 – Nid oes yn rhaid i'r maen prawf hwn fod yn gysylltiedig â phamor agos yw i'r prif rwydwaith cefnffyrdd, pam?

Mae'r dull o gyfeirio Llety Gweithwyr Dros Dro i gefn gwlad yn cael ei ystyried gan y Cyngor "yn groes i agwedd y Cynllun a'i amcanion cynaliadwyedd" (S7/PG15 paragraff 2.7). Fodd bynnag, mae'r Polisi PS9A newydd (Maen Prawf 2) a'r Polisi TAI3 diwygiedig (Maen Prawf 4) yn caniatáu Llety Gweithwyr Dros Dro bach a mawr yng nghefn gwlad. Dylai'r Cyngor egluro sut y byddai Llety Gweithwyr Dros Dro mewn ardal wledig yn dilyn egwyddorion datblygu cynaliadwy ac yn hyrwyddo'r defnydd o'r adeilad yn y gymuned wedi cyfnod adeiladu Wylfa Newydd? Yn wir, byddai'n ddefnyddiol deall lleoliad y safleoedd sy'n cael eu hyrwyddo ar gyfer Llety Gweithwyr Dros Dro, yn enwedig mewn perthynas â chyflogi gweithwyr wrth gefn yn Rhosgoch, a sut y mae safleoedd o'r fath yn cyd-fynd â pholisïau y cynllun, gan gynnwys Polisi PS9B a Pholisi PS9C.

Maen Prawf 3 – Pam bod angen defnyddio polisi yr Iaith Gymraeg ar gyfer y math yma o ddatblygiad, h.y. mae rhan fwyaf y gweithwyr dros dro fel arfer o'r tu allan i'r ardal leol? Rwy'n cymeryd bod y math yma o ddatblygiad yn angenrheidiol ar gyfer prosiect Wylfa ac na fyddai'n cael ei wrthod? Pa fesurau lliniaru sydd eu hangen pe byddai cynnig o'r fath yn hunan-gynhaliol?

Maen Prawf 5 – A yw'n briodol i ofyn am restr o'r gweithwyr ar y safle, pam bod angen hyn, at pa ddiben? A yw hyn o fewn cwmpas gwaith y system gynllunio?

NMC 143
 NMC 188

Gwrthwynebiad

Polisi PS9A Llety Dros Dro ar Raddfa Fawr i Weithwyr / Polisi TAI3 Llety Dros Dro ar Raddfa Bach i Weithwyr

Mae'r maen prawf manwl ym Mholisi TAI3 Llety Dros Dro ar Raddfa Fechan yn ymddangos fel petae yn gwrthddweud Polisi PS9A Llety Dros Dro ar Raddfa Fawr. Dylai'r Cyngor ystyried y canlynol:

Polisi TAI3 Llety Dros Dro ar Raddfa Fechan		Polisi PS9A Llety Dros Dro ar Raddfa Fawr	
Maen Prawf 4(iv)	Darperir cyfleusterau cymunedol a hamdden ar safleoedd gwledig	Maen Prawf 4	Asesu beth sydd ar gael odd ar y safle a'r amser teithio cyn sicrhau darpariaeth cymunedol a hamdden ar y safle
Maen Prawf 5	Dylid llywio'r cynigion drwy ystyried y defnydd wedi cwblhau'r adeiladu	N/A	Dim sôn am ddefnydd wedi'r adeiladu
Maen Prawf 8	Cefnogi gwelliannau i'r rhwydwaith trafniadaeth	N/A	Dim sôn am welliannau i'r rhwydwaith trafniadaeth
Maen Prawf 10	Tynnu adeiladau dros dro i lawr os nad yw yn ymarferol i'w defnyddio wedi'r adeiladu	N/A	Dim crybwyll dychwelyd y tir i'w ddefnydd gwreiddiol

Dylai'r Cyngor hefyd ystyried cynnwys y testun cyfiawnhau canlynol ym Mholisiâu perthnasol TAI3 a PS9 gan ei fod yn cael ei ystyried yn angenrheidiol gan yr awdurdodau i lywio canlyniad unrhyw gais cynllunio yn y dyfodol:

	<ul style="list-style-type: none"> • Paragraff 7.4.26 yn galw am asesiadau i gyd-fynd â'r cynnig am Lety Dros Dro i Weithwyr; • Paragraff 7.3.18 yn rhoi amlinelliad o'r chwilio sydd angen ei wneud cyn cynnig llety modiwlwr, a • Paragraff 7.3.18B sy'n galw am sicrhau bod y LHMA yn cyd-fynd ag unrhyw gynigion am lety preswyl parhaol wedi i'r adeiladu ddod i ben.
NMC 144	<u>Polisi PS 9B & C – Datblygiad Cysylltiedig â Wylfa Newydd – Parcio a Theithio/ Canolfannau Logisteg</u>
Gwrthwynebiad	Golyga bolisiâu PS 9B & PS 9C y gallai canolfannau logisteg/cyfleusterau parcio a theithio gael eu sefydlu unrhyw le ar hyd coridor yr A5/A55. A yw hyn yn gywir ac yn briodol? Pa mor llydan yw'r coridor? A fyddai hyn yn cynnwys Llangefni?
Mwynau	
NMC 311	<u>Polisi MWYN 6 – Clustogfeydd o Amgylch Safleoedd Mwynau</u>
Gwrthwynebiad	Ardal atgyfeirio glo. Os yw Polisi MWYN 6 yn cyfeirio at ardaloedd o'r fath dylid eu dangos ar y Map Cynigion, gan eu bod yn rhan o'r cynllun. Os ydynt ar y Map Cyfyngiadau yna ni ddylid cyfeirio atynt yn y polisi.
Diogelu Tir Cyflogaeth	
NMC147 NMC148	<u>Polisi PS10: Cynnig Cyfleoedd ar gyfer Economi Ffyniannus / CYF 1: Diogelu, Dyrannu a Chadw Tir ac unedau at Ddefnydd Cyflogaeth</u>
Gwrthwynebiad	Mae Polisi PS10 wedi ei addasu i nodi bod 55.1ha o dir wedi ei neilltuo at ddibenion cyflogaeth gyda 643.8ha o'r tir presennol wedi ei ddiogelu. Fodd bynnag mae'r safleoedd a ddiogelwyd sydd wedi'u rhestru yn y Polisi CYF 1 cyfatebol (fel a ddiwygwyd drwy NMC148) yn cynnig cyfanswm o 633.3ha, 10.5ha yn llai na'r hyn a nodwyd ym Mholisi PS10. Dylai'r Cyngor sicrhau bod cyfansymiau cyflogaeth yn cyd-fynd â Pholisi PS10 a Pholisi CFY1.

Department for Natural Resources
Adran Adnoddau Naturiol



Llywodraeth Cymru
Welsh Government

Nia Davies
Yr Uned Polisi Cynllunio ar y Cyd
Gwynedd a Mon
Neuadd y Dref
Bangor
Gwynedd
LL57 1DT

Our ref:
Your ref:

20th February 2017

Dear Nia,

Gwynedd and Ynys Mon's Joint Local Development Plan (JLDP) – Consultation on the Schedule of Matters Arising Changes (MACs)

Thank you for your correspondence in relation to the consultation on the proposed MACs. We recognise your Authority's commitment to achieving a sound LDP and the amount of work undertaken by the forward planning team in reaching this stage.

The proposed MACs in respect of the level, justification and clarity of housing provision are welcome. It is now clear what components underpin the housing provision and how they relate to the settlement hierarchy. This work has been translated into a housing trajectory and land supply tables that are now embedded within the plan. The MACs in respect of affordable housing need and tenure, and a revised three way target based on updated viability work is supported. The revised definitions in respect of market, local market and affordable housing provide the necessary clarity in the policy framework. In addition, the Welsh Government supports the MACs in respect of Gypsy and Travellers and has no outstanding objections in this respect. It is considered that **the proposed MACs have in broad terms addressed the majority of our concerns in respect of strategy, housing, affordable housing and Gypsy and Traveller provision.**

The matter of whether a plan is considered 'sound' will be for the appointed Planning Inspector(s) to determine. Whilst we consider that the Council has addressed the majority of the concerns set out in our representations and subsequent hearing statements, we **consider there are some important matters that remain unresolved which are set out in the supporting Annex.**



[REDACTED]

[REDACTED]

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 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.

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?

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?

NMC 143
NMC 188

Objection

Policy PS9A Large Scale TCWA / Policy TAI3 Small Scale TCWA

The detailed criterion in Policy TAI3 Small Scale TCWA appears at odds with Policy PS9A Large Scale TCWA. The Council’s should give consideration to the following:

Policy TAI3 Small Scale TWCA		Policy PS9A Large Scale TWCA	
Criteria 4(iv)	Communal and leisure facilities are provided on rural sites	Criteria 4	Assesses off-site capacity and travel distances before requiring on-site provision for communal and leisure facilities
Criteria 5	Proposals should be informed by a consideration of legacy uses	N/A	No mention of legacy uses
Criteria 8	Supports transport network improvements	N/A	No mention of transport network improvements
Criteria 10	Temporary buildings are removed if a legacy use is not feasible	N/A	No mention of reinstating land to original use

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:

- 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.
NMC 144 Objection	<u>Policy PS 9B & C – Wylfa Newydd Associated Development – Park & Ride/Logistics Centres</u> 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?
Minerals	
NMC 311 Objection	<u>Policy MWYN 6 – Buffer Zones Around Mineral Sites</u> 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.
Employment Land Safeguarding	
NMC147 NMC148 Objection	<u>Policy PS10: Providing Opportunity for a Flourishing Economy / CYF 1: Safeguarding, Allocating and Reserving Land and units for Employment Use</u> Policy PS10 has been amended to identify that 55.1ha 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 Council's should ensure employment totals align in both Policy PS10 and Policy CFY1.



Your ref: [REDACTED]

Our ref: [REDACTED]

09 March 2017

Anglesey and Gwynedd Joint Planning Policy Unit
1st floor Bangor City Council Offices
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Bangor
Gwynedd
LL57 1DT

By Post and Email: planningpolicy@gwynedd.llyw.cymru

Dear Sir or Madam

**REPRESENTATIONS TO THE ANGLESEY AND GWYNEDD JOINT LOCAL DEVELOPMENT PLAN:
MATTERS ARISING CHANGES CONSULTATION (JANUARY 2017)**

These representations have been prepared by HOW Planning on behalf of Land & Lakes (Anglesey) Ltd ("Land & Lakes") in response to the consultation on the Anglesey and Gwynedd Joint Local Development Plan Matters Arising Changes document (January 2017).

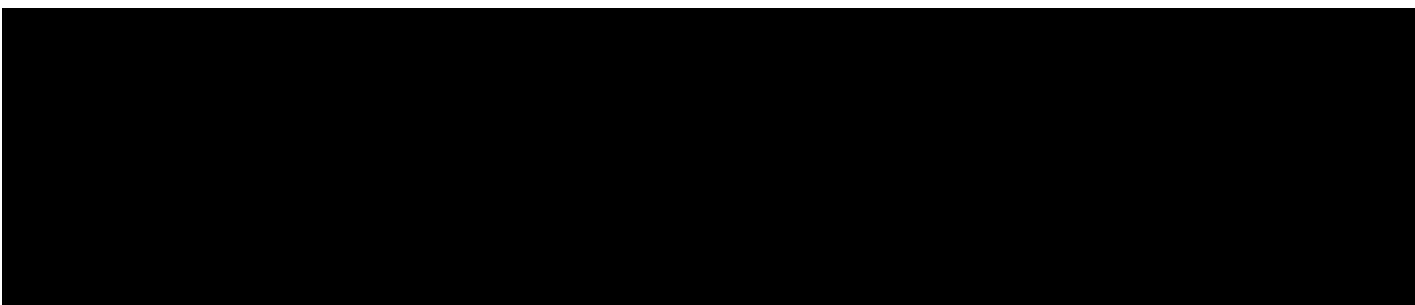
The Matters Arising Schedule provides details of the relevant changes that have emerged from the Public Examination into the Local Plan. We understand that comments made at this stage can only address and relate to the 'Matters Arising Changes' as detailed in the Schedule. We also understand that all comments made (by the closing date) will be forwarded by Anglesey and Gwynedd Councils ("the Councils") to the Inspector and that the Councils will prepare a report responding to the comments.

We respectfully request that these representations are considered by the Councils in the preparation of their report responding to the consultation comments and the Inspector in assessing the Local Plan. We would also like to request to speak at a hearing session at the Public Examination about the representations set out in this letter. At the hearing session I wish to be heard in English.

BACKGROUND

Isle of Anglesey County Council ("IoACC") has prepared a range of policy statements relating to construction workers' accommodation associated with Wylfa Nuclear New Build. The policy statements establish IoACC's objectives for various accommodation solutions for construction workers including purpose built permanent accommodation situated in accessible locations and which will deliver future and legacy uses.

The Wylfa Nuclear New Build Construction Workers Accommodation Position Statement (March 2011) sets out IoACC's objectives for the provision of accommodation through an equal mix of purpose built accommodation, private rented (new and existing) and tourist accommodation (new and existing).



At paragraph 2.3, in reference to Stakeholder aspirations, the Position Statement states:

“There is significant concern over the impact temporary accommodation demand could have on the tourism sector, particularly in the north of the Island where it is least developed. There is therefore a need for the Council and other parties to ensure potential negative impacts are mitigated against.”

The Position Statement states at paragraph 4.13 that the preferred option will be to “ensure that legacy is sustainable” and “promote local legacy benefits”. Paragraph 4.34, in relation to the option of creating further tourism legacy use in appropriate locations, states:

“Any proposals will need to be carefully reviewed to ensure that the proposed site(s) is appropriate in terms of its location, proximity to existing communities, the environmental implication, the traffic implications, its long term viability and its ability to support further investments such as new facilities on the island that will attract more day and staying visitors”

IoACC’s objective to deliver purpose built permanent accommodation which will be located in accessible locations and deliver legacy uses for the area is also supported within the Nuclear New Build at Wylfa Supplementary Planning Document (“SPD”) (July 2014). SPD Policy GP10 (Construction Worker Housing in Anglesey Housing Market) states that the following measures should be taken to account:

- *“Deliver a legacy use by promoting permanent new accommodation that addresses local needs.... beyond the construction period”*; and
- *“Ensure that construction worker accommodation is located so as to minimise the need to travel and promotes the provision and use of sustainable transport modes”*.

SPD Policy GP12 (Tourism and Accommodation) refers to the measures that will be taken when accommodating one third of the construction workforce within the tourist accommodation sector. Such measures include ensuring that the take up of accommodation by construction workers does not generate adverse impacts on the tourism sector in the long term, and that accommodation is located “so as to ensure ease of access by sustainable means of travel to relevant tourism facilities and attractions, community services and facilities and the main NNB site”.

In accordance with the objectives of these two policy statements, IoACC granted planning permission (LPA ref 46C427K/TR/EIA/ECON) on 19 April 2016 for Land and Lakes' proposals for a leisure village and temporary construction worker accommodation with future and legacy tourism and residential uses at Holyhead. The approved development comprises:

- A leisure village at Penrhos Coastal Park, Holyhead, comprising up to 500 new leisure units and associated leisure development;
- The erection of leisure village accommodation and facilities comprising up to 315 lodges at Land at Cae Glas to be used initially as temporary construction workers' accommodation and to be subsequently converted into an extension of the Penrhos Coastal Park; and,
- The construction of up to 320 new houses at Land at Kingsland, to be used initially as temporary construction workers' accommodation and subsequently converted into a residential development.

LAND & LAKES' REPRESENTATIONS

Land & Lakes' representations relate to the changes proposed to policies PS 9, PS 9A, CY 1, CY 4 and TAI 3. Each policy is considered in turn below.

Policy PS 9

Paragraph 7.3.17a is a new paragraph with reference NMC 137. Land & Lakes has comments on the wording of the part of the paragraph which with the proposed changes states:

...“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”...

In principle, Land & Lakes supports the requirement for construction workers to be accommodated via various means as this reflects the policies established by the IoACC since 2011. However, 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 adopting the following wording (with HOW emphasis in **bold**): “new purpose built permanent or modular accommodation” and “**Where appropriate**...”.

It is Land & Lakes understanding, having reviewed the textual changes proposed to paragraph 7.3.18 of the Local Development Plan under reference NMC138, that temporary accommodation which will have no future or legacy use will only be considered by the Council if a future or legacy use is not feasible. Therefore, greater weight should be given to new purpose built permanent accommodation rather than temporary accommodation in buildings which will be removed at the end of the temporary use. To address this, Land & Lakes request that paragraph 7.3.17a is amended as shown in red below:

...“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”...

Paragraph 7.3.18 is an existing paragraph which has been amended and with the proposed changes states:

“In terms of location, the Councils position is that accommodation for temporary construction workers should as far as possible be provided within, adjacent to, or close to the development boundaries of the Centres and Service Villages identified in the Plans settlement hierarchy (depending on the scale of the development), 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. Paragraph 7.3.17A 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 site. Project promoters should 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.”

Overall, Land & Lakes is very supportive of paragraph 7.3.18 as amended because it re-enforces the objective of the re-use of existing buildings and / or the provision of permanent buildings capable of being used and adapted for future and legacy uses. Land & Lakes does object to the first part of the paragraph which allows accommodation for temporary construction workers to be provided close to development boundaries of the Centres and Service Villages. The reference to “close to” is not precise and is open to interpretation which could lead to development in locations which are not sustainable nor accessible. Land & Lakes requests that the paragraph is amended as shown in red below:

*“In terms of location, the Councils' position is that accommodation for temporary construction workers should as far as possible be provided within **or adjacent to** ~~or close to~~ the development boundaries of the Centres and Service Villages identified in the Plans settlement hierarchy (depending on the scale of the development), 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. Paragraph 7.3.17A 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 site. Project promoters should 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.”*

In principle, Land & Lakes also supports the amendments proposed to Policy PS 9 (under reference NMC 143), and specifically to criteria 6 and 16 which relate to future or legacy use. The policy with the proposed changes states:

- (6) *“Where proposals are for a temporary period both the site selection and the proposal detail shall 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, for legacy uses will be required with planning applications to demonstrate how legacy use has informed the approach to the design and layout of the associated development sites, as well as contribute to the framing of a s106 and / or other agreements and CIL payments (if applicable).*
- (16) *if a future or legacy use for any temporary development is not feasible the Council shall require that temporary buildings are removed...”*

Land & Lakes is concerned however that the text set out at 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 consistency and clarity, Land & Lakes request that Policy PS 9 is amended to include an additional criterion which could be inserted between criteria 5 and 6. This is necessary because the policy as currently drafted does not reflect the requirements of paragraph 7.3.18. To address this, it is suggested that the criterion could read:

“Proposals for the re-use of existing buildings or the provision of permanent buildings capable of being adapted for permanent future and / or legacy use will be supported by the Council. Proposals for temporary buildings which will be removed at the end of the temporary use will only be allowed on the Wylfa Newydd site or on alternative sites within or adjacent to the development boundary of Centres or Service Villages identified within the Plans settlement hierarchy where it has been demonstrated through rigorous assessment that:

- (i) There are no suitable and alternative sites available within or adjacent to the development boundary of Centres or Service Villages identified within the Plans*

settlement hierarchy which can re-use existing buildings or deliver permanent buildings capable of being adapted for permanent future and / or legacy use; and.

- (ii) *It is not feasible to deliver a future or legacy use for the temporary development on the proposed site”.*

Policy PS 9A

Policy PS 9A is a new policy under reference NMC 143. In principle, Land & Lakes support the policy however minor changes are sought to ensure that the policy wording reflects paragraphs 7.3.18 and Policy PS 9. To achieve this, Land & Lakes propose the following changes to criteria 1 and 2 as shown in red below:

1. *“The site is located **within or adjacent** ~~or in close proximity~~ to the development boundary of a Centre **or Service Village** 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; or*
2. *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 **in that location**; and...”*

Policy TAI 3

Policy TAI 3 relates to small scale campus style accommodation for construction workers under reference NMC 188. For consistency, the changes proposed to policies PS 9 and PS 9A should be carried through into Policy TAI 3. In line with the representations set out above, Land & Lakes propose the following changes to the wording of Policy TAI 3 as shown in red below:

*“Proposals for small scale campus style accommodation (up to a maximum of 50 bed spaces) for construction workers will be permitted **where the proposal complies with Policy PS 9**, and ~~provided that they~~ forms part of the overall solution to providing temporary construction worker accommodation, and the following criteria are met...*

4. *...In exceptional circumstances, the site is located elsewhere provided:*
 - i. *the developer can demonstrate that there is an essential and proven need for the amount and type of accommodation **in that location** that cannot be met within or adjacent to development boundaries of Centres or Service Villages ~~in the locality~~ identified within the **Plan’s Settlement Hierarchy** through either existing accommodation or the re-use of an existing building **or the provision of new purpose built permanent accommodation**;*

In addition, Land & Lakes propose that an additional criterion is inserted between criteria 4 and 5 which should read:

“Proposals for the re-use of existing buildings or the provision of permanent buildings capable of being adapted for permanent future and / or legacy use will be supported by the Council. Proposals for temporary buildings which will be removed at the end of the temporary use will only be allowed on the Wylfa Newydd site or on alternative sites within or adjacent to the development boundary of Centres or Service Villages identified within the Plans settlement hierarchy where it has been demonstrated through rigorous assessment that:

- (iii) *There are no suitable and alternative sites available within or adjacent to the development boundary of Centres or Service Villages identified within the Plans*

settlement hierarchy which can re-use existing buildings or deliver permanent buildings capable of being adapted for permanent future and / or legacy use; and.

- (iv) *It is not feasible to deliver a future or legacy use for the temporary development on the proposed site”.*

Policy CYF 1

Policy CYF1 safeguards, allocates and reserves land and units for employment use. In the policy, three tables are provided identifying the existing employment sites safeguarded for employment, land allocated for employment and reserve employment sites.

Under reference NMC 148, changes to the policy wording relating to reserve sites has been incorporated which with the proposed changes states:

“The following sites are identified as ‘reserve employment sites’ not for local market demand for general industrial or business uses, but rather to accommodate business and employment uses that would initially cater specifically for the needs of Wylfa Newydd or other ‘Energy Island’ / ‘Enterprise Island’ development. Proposals for B1, B2 or B8 uses on these sites would need to demonstrate that there was no suitable safeguarded or allocated employment site or the supply is insufficient to meet the need”

Land & Lakes understands following a meeting with Senior Officers at IoACC and the Joint Planning Policy Unit (JPPU) on 27 February 2017 that the following is IoACC’s intention with regards to the future use of the reserved sites:

- (i) The reserved sites are not for local market demand for general industrial or business uses;
- (ii) The reserved sites are for B1, B2 or B8 uses associated with the needs of Wylfa Newydd or other Energy Island / Enterprise Island development;
- (iii) Proposals on the reserved sites for B1, B2 or B8 uses associated with the needs of Wylfa Newydd or other Energy Island / Enterprise Island development would only be acceptable if it has been demonstrated that there was no suitable safeguarded or allocated employment site or the supply is insufficient to meet the need.

It is Land & Lakes view that the policy as drafted does not reflect the Councils' intention as set out above. The reserve site policy wording could allow a wide ranging interpretation allowing an initial phase of uses specifically for the needs of Wylfa Newydd or other Energy Island / Enterprise Island development. We understand that this is not the intention of IoACC and to address this, Land & Lakes propose amended wording as shown in red below:

*“The following sites are identified as ‘reserve employment sites’ not for local market demand for general industrial or business uses, but rather **for B1, B2 or B8 to accommodate business and employment** uses that would initially cater specifically for the needs of Wylfa Newydd or other ‘Energy Island’ / ‘Enterprise Island’ development. Proposals for B1, B2 or B8 uses on these sites **that would cater specifically for the needs of Wylfa Newydd or other ‘Energy Island’ / ‘Enterprise Island’ development** would need to demonstrate that there was no suitable safeguarded or allocated employment site or the supply is insufficient to meet the need”*

In addition to the changes set out above, a change would also be required to the reserve sites table in the policy which makes it clear that the use of the sites is for B1, B2 or B8 uses associated with the Wylfa Newydd or other Energy Island / Enterprise Island development.

Paragraph 7.3.25 defines the different strata within the hierarchy under reference NMC 149. In relation to reserve sites it states:

Reserve Sites Sites that have the potential to meet the demand resulting from Wylfa Newydd as well as the rest of the Anglesey Energy Island Programme / Enterprise Island.

To relate more closely to what we understand are the Councils intentions for the reserve sites, the following changes to the wording of this paragraph are proposed in red below:

*Reserve Sites Sites that have the potential to meet the **B1, B2 or B8** demand resulting from Wylfa Newydd as well as the rest of the Anglesey Energy Island Programme / Enterprise Island.*

Policy CYF 4

Policy CYF 4 states that *“Proposals to release employment land on existing employment sites safeguarded for Use Classes B1, B2 or B8 in accordance with Policy CYF1 for alternative uses will be granted only in special circumstances, provided they conform to one or more of the following criteria...”*

It is also understood following the meeting with Senior Officers at IoACC and the JPPU on 27 February 2017 that it is IoACC;s intention that proposals for alternative uses on existing employment sites safeguarded for Use Classes B1, B2 or B8 and only those sites in accordance with Policy CYF1 will be assessed against this policy. The existing employment sites safeguarded for Use Classes B1, B2 or B8 are identified in the first table in Policy CYF1. Confirmation on this matter from the IoACC is sought by Land & Lakes and specifically that proposals for alternative uses on reserve employment sites in accordance with Policy CYF1 will not be assessed against this policy.

We would be grateful if you could confirm safe receipt of this letter and we respectfully request that these representations are considered by the Councils in preparing its report responding to the consultation comments and by the Inspector in assessing the Local Plan.

Should you require further information or wish to discuss then please don't hesitate to contact me.

Yours faithfully

