

**From:** [PMO](#)  
**To:** [Wylfa Newydd](#)  
**Subject:** RE: IACC Deadline 2 Submission : Local Impact Report - Policy Framework (email 4)  
**Date:** 04 December 2018 20:23:32  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[Policy Chapter.pdf](#)

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**Please note, a number of emails will follow in relation to the LIR – we will confirm the final e-mail.**

Pnawn Da/ *Good afternoon,*

Gweler ynglwm cynrychiolaeth CSYM mewn perthynas â'r uchod / *Please see IACC's representation in respect of the above.*

Bydd fersiwn Gymraeg yn cael ei ddarparu cyn gynted a phosib / *A Welsh version of the submission will be provided in due course.*

Cofion/ *Regards,*

Manon

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Mae cynnwys y neges e-bost hon yn cynrychioli sylwadau'r gyrrwr yn unig ac nid o angenrheidrwydd yn cynrychioli sylwadau Cyngor Sir Ynys Mon. Mae Cyngor Sir Ynys Mon yn cadw a diogelu ei hawliau i fonitro yr holl negeseuon e-bost trwy ei

rwydweithiau mewnol ac allanol.

Croeso i chi ddelio gyda'r Cyngor yn Gymraeg neu'n Saesneg. Cewch yr un safon o wasanaeth yn y ddwy iaith.

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# Ynys Môn THE ISLE OF Anglesey

## Wylfa Newydd Local Impact Report

Chapter 2: Policy Framework

December 2018

PINS Ref: EN010007



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## **1.0 Policy Framework**

### **1.1 Introduction**

### **1.2 Important and relevant matters under the Planning Act 2008**

- 1.2.1 The two relevant NPS to this application are EN1 (Overarching National Policy Statement on Energy) and EN6 (National Policy Statement for Nuclear power Generation).
- 1.2.2 The matters considered in those documents on need are not disputed and the LIR has proceeded on an acceptance that there is an urgent un-met need for this type of development and also that the broad locational characteristics relating to the location of the generating plant at Wylfa are also met.
- 1.2.3 It is accepted that Secretary of State will attach substantial weight to both the national need and the contribution that this development would make to meeting that need in making the decision on the development consent order.
- 1.2.4 There are, however, a wide range of site specific locational considerations that were reserved in the two NPS for consideration on a site by site basis. The two NPS do not attempt any assessment of whether the detailed design of the nuclear facilities or the manner in which they are proposed to be constructed, result in a development that is appropriate to be approved. The NPS provides narrative on the criteria to be applied at local level however it is also clear that those criteria were largely based at a national level to apply to all nuclear power station proposals.
- 1.2.5 In the present case, the statutory Joint Local Development Plan has emerged during the period in which the Wylfa Newydd proposal has been under pre-application consultation. The JLDP has accordingly been able to address, with a high level of specificity, the questions that need to be asked in order to assess the acceptability of the impacts of such a major development proposal.
- 1.2.6 The JLDP was adopted on the 31<sup>st</sup> July 2017 and is therefore up-to-date. The JLDP:
  - (a) is based upon a clear and published evidence by which their assessment criteria could be reviewed;
  - (b) was the subject of comprehensive consultation of the public, statutory authorities, stakeholders and the developer; and
  - (c) Was subject to independent assessment by local plan inspectors and was found to be sound by the Inspectors.
- 1.2.7 The JLDP was assisted in its preparation by the pre-existence of SPG (Supplementary Planning Guidance) which was initially developed and adopted prior to the JLDP adoption. The SPG was reviewed, revised, publicly consulted on and re-adopted in the light of the adoption of the JLDP. The SPG provides another layer of detail by which impacts of the development and their acceptability can be assessed.

1.2.8 The chapters that follow adopt an evidence based approach but also overlay local planning policy and guidance in the form of JLDP and SPG to guide attention to particular impacts and the importance of dealing with them.

1.2.9 The IACC consider that the ministerial statement<sup>1</sup> makes it clear that the Government considers that nuclear power stations yet to apply for development consent and due for deployment beyond 2025 should be considered under section 105 of the Act, rather than section 104. Under section 105, the Secretary of State will continue to have regard to the NPSs and all other matters which are important and relevant. The IACC submits that the JLDP and SPG as the up-to-date relevant development plan and project specific guidance should be held to be important and relevant considerations under sections 104 and/or 105 of the Planning Act 2008 and should be given considerable weight in considering and determining this application.

1.2.10 The following paragraphs provide an overview of Planning Policy Wales, Technical Advice Notes, and the Wylfa Newydd Supplementary Planning Guidance. As the Anglesey and Gwynedd Joint Local Development Plan is the statutory Plan locally for assessing and making decisions about new development, more detail is provided in this Chapter and in each relevant chapter to this Local Impact Report.

### **1.3 National Planning Policy**

#### **Planning Policy Wales**

1.3.1 PPW sets out the land use planning policies of the Welsh Government. It translates the Government's commitment to sustainable development into the planning system so that it can play an appropriate role in moving towards sustainability. PPW, the Technical Advice Notes, circulars and policy clarification letters comprise national planning policy. National planning policy should be taken into account in the preparation of development plans. It may be material to decisions on individual planning applications and will be taken into account by the Welsh Ministers and Planning Inspectors in the determination of called-in planning applications and appeals.

1.3.2 At the moment, the PPW Edition 9 is the adopted document. Of particular relevance, PPW, is underpinned by the Well-being goals, and confirms the presumption in favour of sustainable development. It promotes places that promote economic, social, environmental and cultural well-being by:

- a) providing well-connected employment and economic development in pleasant surroundings. These places are designed and sited to promote healthy lifestyles and tackle climate change by making them easy to walk and cycle to and around, access by public transport, minimising the use of non-renewable resources and using renewable and low carbon energy sources;

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<sup>1</sup> Statement on Energy Infrastructure: Written statement – HCWS321, made on 07 December 2017 by Richard Harrington (Parliamentary Under-Secretary (Department for Business, Energy and Industrial Strategy) ([Link](#))

- b) providing well-connected cohesive communities for all sectors of society, allowing everyone to have a good quality of life by living in strong and safe communities, improving access to services, cultural opportunities and recreation facilities to support people to adopt healthy lifestyles, securing socially inclusive development and more cohesive communities; and
- c) valuing the quality of landscapes and historic environment, future proof economic assets both in response to the challenges presented by climate change and in promote low carbon solutions, protecting landscapes and habitats, enabling opportunities for connecting with the natural environment and encouraging healthier lifestyles with the benefit of improving physical and mental well-being.

1.3.3 PPW has been reworked by Welsh Government into policy themes around the well-being goals, with policies updated to reflect new Welsh Government strategies. Welsh Government consulted on PPW Edition 10 during February – May 2018. It is understood that it will be adopted and published by the end of 2018.

#### **Technical Advice Notes (TANs)**

1.3.4 As described above, TANs form part of national planning policy, and therefore may be material to decisions on planning applications. From the Council's perspective, of particular relevance are: TAN 2: Planning and affordable housing; TAN 5 Nature Conservation and Planning; TAN 11 Noise; TAN 12 Design; TAN 18: Transport; TAN 20: Planning and the Welsh language; TAN 23: Economic development; and TAN 24: Historic environment. Individual chapters in the Local Impact Report will provide more details, as necessary.

#### **The adopted Anglesey and Gwynedd Joint Local Development Plan (July 2017)**

1.3.5 The adopted Anglesey and Gwynedd Joint Local Development Plan 2011 – 2026 is particularly relevant to this Local Impact Report, having been developed with specific regard to the Wylfa Newydd proposals and having had the benefit of recent formal Public Examination (2016 – 2017) resulting in it found sound following modifications stipulated by the Planning Inspectors. The Plan's vision and strategic objectives (Chapter 4), the Nationally Significant Infrastructure Projects and related development section (para 6.3.1 – 6.3.10) and the Wylfa Newydd and related development section (para 6.3.12 – 6.3.24) in chapter 6 of the Plan seek to ensure that local impacts of Wylfa Newydd are fully addressed. The latter section includes four Strategic Policies (Policies PS 9 – Policy PS 12) that deal specifically with Wylfa Newydd and its related development.

1.3.6 Chapter 4 of the Plan identifies the Council's vision and objectives, of which the following are of particular relevance to Wylfa Newydd:

- a) Extracts from the Plan's Vision:

“By 2026, Anglesey and Gwynedd will be recognized for their vibrant and lively communities that celebrate their unique culture, heritage and environment and for being places where people choose to live, work and visit.

This means that the Joint Local Development Plan area will be one:

- which is recognized as a leading location for a variety of renewable and low carbon energy sectors and knowledge based industries, which will have contributed to transforming the local economy, including hosting a new generation nuclear power station, generating low carbon energy and catalysing regeneration in the Plan area

Amlwch will have improved its role as a key centre in the North of the Island for housing, commerce and employment opportunities to support the nearby new nuclear power station at Wylfa. Investment in its town centre will mean that it will have an improved shopping environment. Investment in the Copper Kingdom heritage between Amlwch and Parys Mountain will have improved its role as a visitor destination.”

b) A Strategic Objective:

“Theme 3: Support growth and regeneration that will transform the local economy under the umbrella of Anglesey Energy Island Programme and other strategies and plans, building on those elements of its unique economic profile that are identified as being of regional and national significance:

SO 9 - Support and capitalise on the development of the Wylfa Newydd Project and associated development to maximise socio-economic opportunities for local business and sustainable employment opportunities for local people, including facilitating a suitable network of Wylfa Newydd Project-related associated development sites while ensuring that adverse effects of the Wylfa Newydd Project on the local communities are appropriately avoided, or mitigated and where appropriate legacy benefits are provided.”

1.3.7 It is expected that proposals should, where possible, contribute positively to the implementation of the spatial strategy and meet the underlying strategic objectives of the Plan. Policies set out an expectation of a commitment from Horizon to adopt initiatives to mitigate and compensate for impacts. The following policies of the Anglesey and Gwynedd Joint Local Development Plan 2017 are considered to be of particular relevance to Horizon’s proposal from the perspective of the Council. Other Policies will apply and are, where appropriate, referred to in individual Chapters in this Local Impact Report.

c) Strategic Policy PS 1: Welsh Language and Culture

Of particular relevance here is criterion 2, (which is linked to criterion 4 of Strategic Policy PS 5), *‘Requiring a Welsh Language Impact Assessment, which will set out how the proposed development will protect, promote and enhance the Welsh Language, where the proposed development is on an unexpected windfall site for a large scale housing development or large scale employment development that would lead to a significant workforce flow’*

d) Strategic Policy PS 2: Infrastructure and Developer Contributions

Of particular relevance here is '*The Councils will expect new development to ensure sufficient provision of essential infrastructure (either on-site or to service the site) is either already available or provided in a timely manner to make the proposal acceptable, by means of a planning condition or obligation*'... and...

*'Where the essential, enabling and necessary infrastructure is required as a consequence of a scheme and cannot be provided on site, financial contributions will be requested, within limits allowed by legislation, to get essential investment off site'.*

e) Policy ISA 1: Infrastructure Provision

Of relevance here is '*Proposals will only be granted where adequate infrastructure capacity exists or where it is delivered in a timely manner. Where proposals generate a directly related need for new or improved infrastructure and this is not provided by a service or infrastructure company, this must be funded by the proposal. A financial contribution may be sought to secure improvements in infrastructure, facilities, services and related works, where they are necessary to make proposals acceptable. Where appropriate, contributions may be sought for a range of purposes, including: 1. Affordable housing...3. Education facilities 4. Employment and training facilities..6. Transport infrastructure including public transport'..8. Nature conservation....12 Welsh language measures.*

f) Strategic Policy PS 4: Sustainable Transport, Development and Accessibility

Of particular relevance here is Part 2 in relation to Transfer between Transport Modes. Part 2 ii. states '*Strategically located permanent park and ride facilities within or adjacent to Centres or in other locations close to the main highway network when it can be demonstrated that no alternative sites closer to the Centres are suitable, where customers are supported by frequent bus services between the facility and the destination*'...and...

Part 2 v. states '*Facilities for park and share in appropriate locations within or adjacent settlements on the strategic highway network*'.

g) Policy TRA 4: Managing Transport Impacts

This policy seeks where appropriate that '*proposals should be planned and designed in a manner that promotes the most sustainable modes of transport having regard to a hierarchy of users*' and that...

*'Proposals that would cause unacceptable harm to the safe and efficient operation of the highway, public transport and other movement networks including pedestrian and cycle routes, public rights of way and bridle routes, will be refused. The degree of unacceptable harm will be determined by the local authority on a case by case basis'.*

h) Strategic Policy PS 5: Sustainable Development

Of relevance here is '*Development will be supported where it is demonstrated that they are consistent with the principles of sustainable development. All proposals should...4 'Protect, support and promote the use of the Welsh language in accordance with Strategic Policy PS 1'...6. 'Protect and improve the quality of the natural environment, its landscapes and biodiversity assets, including understanding and appreciating them for the social and economic contribution they make'...and*

*'Proposals should also where appropriate: 9. Meet the needs of the local population throughout their lifetime in terms of their quality, types of tenure and affordability of housing units...11. Support the local economy and businesses by providing opportunities for lifelong learning and skills development in accordance with Strategic Policy PS 13... 12. Reduce the need to travel by private transport and encourage the opportunities for all users to travel when required as often as possible by means of alternative modes, placing particular emphasis on walking, cycling and using public transport'.*

i) Strategic Policy PS 9: Wylfa Newydd and Related Development

This policy is particularly relevant in that it states that the Council will take a number of matters included in this Policy into consideration in preparing its Local Impact Report. The relevant considerations include criteria 3, 5, 6, 7, 9, 12 and 16:

*'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, operation and decommissioning stages, and any restoration stages.....*

*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 of the published Local Housing Market Assessment), and not result in unacceptable adverse economic (including the tourism sector), social, linguistic or environmental impacts.....*

*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 a legacy use is proposed, 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 related development sites, as well to contribute to the framing of a S106 and/or other agreements and CIL payments (if applicable);*

*7. Proposals for campus style temporary workers accommodation, logistics centres and park and ride facilities will also be assessed against the criteria set out in Policies PS 10 - 12;*

9. *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.....*

12. *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 or 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 the impacts;*

16. *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 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, to review the adequacy of mitigation or compensation measures and to make adjustments as necessary.*

j) Strategic Policy PS 10: Wylfa Newydd – Campus Style Temporary Accommodation for Construction Workers

This policy is concerned with the adequacy of proposed temporary accommodation and is particularly relevant in respect of the criteria 1, 2, 3 and 5 and will require that:

1. *the developer can firstly demonstrate that the proposal satisfies a 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 a site located adjacent to or well related to the development boundary of Holyhead, Amlwch, Llangefni, Gaerwen or Valley and is close to the main highway network where adequate access can be provided without significantly harming landscape characteristics and features, and also takes account of policy preference for use of previously developed land*

3. *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*

k) Strategic Policy PS 11: Wylfa Newydd – Logistics

Of particular relevance in terms of location is:

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 where the applicant has demonstrated that sites identified in criteria 1 i and ii have been first considered and discounted based on landscape and environmental considerations and that the impacts of development in the countryside can be acceptably minimised and mitigated

I) Strategic Policy PS 12: Wylfa Newydd - Park and Ride and Park and Share Facilities

Of particular relevance in minimising travel by private car through a location:

- i. within or adjacent to development boundaries of Centres located along or close to the A5/ A55; or
- ii. in other locations along the A5/A55 where the site is part of a comprehensive approach to mitigating the transport effects of the Project, takes account of the Councils' preference to consider sites closer to Centres

m) Strategic Policy PS 14: The Visitor Economy

Particularly relevant is part 5: 'Preventing development that would have an unacceptable adverse impact on tourist facilities, including accommodation.....'

n) Policy TAI 14: Residential Use of Caravans, Mobile Homes or Other Forms of Non-Permanent Accommodation

Of particular relevance here are criteria 1, 4 and 6. '1. The siting is for a limited period of time, and is required to accommodate temporary workers during construction.....or ii. the site is located so as to minimise the need to travel and promotes the use of sustainable transport modes.....

4. The site is located so as to minimise the need to travel and promotes the use of sustainable transport modes .....

6. It can be demonstrated that the proposal would not have a significant detrimental impact on the tourism industry.

o) Strategic Policy PS 19: Conserving and where appropriate enhancing the natural environment

Of particular relevance are 1. Protect or where appropriate enhance sites of international, national, regional and local importance, and, where appropriate, their settings in line with National Policy;

3. Have appropriate regard to the relative significance of 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;

## 6. Safeguard internationally, nationally and locally important species

p) Strategic Policy PS 20: Preserving and where appropriate enhancing heritage assets

*Of particular relevance is that the Policy aims to preserve and where appropriate enhance a set of heritage assets, which include Registered Historic Landscapes, Parks and Gardens (in line with Policy AT 1).*

## **Wylfa Newydd: Supplementary Planning Guidance (May 2018)**

1.3.8 The Anglesey and Gwynedd Joint Local Development Plan contains policies and proposals to provide the basis for determining planning applications, while avoiding excessive detail. However, selective use of Supplementary Planning Guidance is promoted by Welsh Government as a means of setting out more detailed, thematic, or site specific guidance on the way in which the policies of a local development plan are interpreted and applied in particular circumstances, or areas.

1.3.9 The first iteration of the Wylfa Newydd SPG was prepared and adopted to align with the previous development plan's policies and the emerging Joint local Development Plan's policies in order to inform pre- application discussions with Horizon. In line with Welsh Government advice, the Council reviewed the SPG in order to ensure it is consistent with the adopted Joint Local Development Plan, i.e. when the policy approach had been confirmed at the end of the Plan's Public Examination, and to ensure consistency with legislative changes and that the advice about the Plan's implementation responded to the changes in elements of the Project.

1.3.10 The adopted Wylfa Newydd SPG is divided into a number of sections. Of particular relevance are Sections 4 and 5 they:

- i. Provide project-wide guidance related to the likely main potential impacts linked to the Wylfa Newydd Project and will help to ensure that associated and related development is sustainably located, taking account of the evidence base and national and local planning policy (Section 4); and
- ii. Set out guidance with respect to development in North Anglesey and the Rest of Anglesey, including the main Wylfa Newydd site (Section 5).

## **2. Policy compliance**

2.1.1 The IACC has for over a decade consistently taken a position of support in principle for the Wylfa Newydd project subject to the impacts being appropriately minimised, managed and mitigated. This position is reflected in the JLDP which supports the principle of the construction and operation of a new nuclear power station at Wylfa. The policy compliance of the project for each site and/or topic is considered in detail in the relevant LIR chapters; this section considers the project as a whole to give an overarching view.

2.1.2 The IACC considers that central importance of Well-being and the application of the Well-being legislation has not been given due regard or weight by Horizon in developing the application and finalising the proposals before the Examining Authority. It is noted that the Welsh Government is currently restructuring Planning Policy Wales around the well-being goals which will give them a central place in planning policy as well as legislation. Horizon have, despite being requested to provide well-being assessment, failed to engage with these goals and objectives. The IACC has accordingly produced a well-being assessment as part of this LIR to assist in addressing this omission.

2.1.3 The project does not fully comply with PPW9. The proposals do not take opportunities which are available to provide well-connected employment and economic development by providing sustainable transport links, including cycle paths. This LIR identifies a number of opportunities for the project to improve compliance with this objective, including, as an example, enabling better cycle access to the logistics centre site at Parc Cybi, which is an allocated employment site and should be sustainably designed and developed to allow future use as well as the proposed temporary use. The site specific and traffic and transportation chapters of the LIR address these issues in detail. The PPW requirement to provide cohesive communities and improve access to services, cultural opportunities and recreation facilities is not currently met but again opportunities for Horizon to comply are identified in this LIR. In particular the housing and community chapters set out how the project currently fails to properly promote safe, cohesive communities and fully address the negative impact on leisure and recreation, including open space and use of walking routes and how these impacts could be mitigated to improve compliance.

2.1.4 The JLDP vision (4.5) provides that “the Councils consider that the Wylfa Newydd Project provides a unique and unprecedented opportunity for Anglesey and project promoters to work together to contribute to the socio-economic transformation of Anglesey and the wider North Wales region, providing sustainable employment opportunities, improving quality of life for existing and future generations and enhancing local identity and distinctiveness. “

2.1.5 The Wylfa Newydd specific section (6.3.13) provides further detail on how this project is expected to contribute to that vision by:

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

2.1.6 The Wylfa Newydd project it is identified as a key component of the Energy Island Programme. The Council considers that the proposals as made in the application do not however fully comply with remaining four bullets.

2.1.7 The project as proposed is generally reactive to impacts it will cause and therefore allows a problem to arise before it is addressed; this approach is contrary to the need to maintain, conserve and enhance the identified features. The IACC object in principle to the reactive monitor and respond approach adopted in the application as it is contrary to strategic objective 9 which requires that adverse effects of the Wylfa Newydd Project on the local communities are appropriately avoided where possible. This LIR sets out where mitigation is considered to be too reactive and suggests alternative pro-active measures which align with the principles of the policy requirements to maintain and conserve the quality of life and identity of Anglesey.

2.1.8 The IACC consider that the project has the potential to provide substantial and skills benefits to local people however the plans as proposed do not maximise those as required. Providing meaningful educational and skills training would promote the well-being of current and future generations by upskilling the community in line with the objective to maximise opportunities under policy PS9 criterion 9. This opportunity has not been maximised by Horizon and the Council considers that they have underestimated the impact of the project on the local labour market and the need to encourage local young people to consider careers connected to the project. The Education and skills and local employment chapters identify measures which would promote maximisation of these opportunities and thereby compliance with the JLDP.

2.1.9 The project does not properly value, protect and seek to enhance the quality of landscapes and historic environment contrary to PPW9, JLDP policies [PS19 and PS20] and TAN24. In particular, the historic environment chapter identifies a number of instances where the historic environment has been undervalued and harm to assets has not been justified. Impacts on the landscape and historic environment are not fully explained or adequately justified and some of the impacts proposed could be avoided through minor design changes. These changes could include the relocation of construction works to avoid destruction of assets at Cestyll and the alteration of the layout of the site campus to reduce the footprint and avoid negative landscape impacts on Wylfa Head. More detail on these issues and measures proposed by the IACC to reduce the impacts are given in the relevant chapters.

2.1.10 The proposals do not comply with the JLDP policies' need to consider, promote and secure a positive legacy from the development. The approach taken seeks to monitor and then address impacts rather than avoid or minimise them. Legacy has not been built into the proposals and only the immediate needs of the project itself have received meaningful consideration. The correct approach of pro-actively avoiding adverse impacts occurring would, in and of itself, help to deliver legacy. For example, the Plan (at 6.3.21) requires the consideration of re-use or conversion of buildings or provision of permanent buildings before temporary buildings are considered. Providing worker housing in permanent buildings would comply with Policy PS10, would minimise the impact on the accommodation sector in accordance with Policy PS9 criterion 5 and create a permanent legacy of increased housing stock which could be used for social housing. Simply proposing temporary housing in modular units to be removed

offers no legacy at all. Horizon have avoided the policy requirement to provide legacy on the accommodation campus site by siting on this main site which is not in or adjacent to a development boundary to which PS10(4) therefore does not apply. Any other site would be required to be informed by a legacy use under that policy. Only where a legacy use was unfeasible would temporary building to be removed be allowed and the site cleared (PS10(10)).

2.1.11 The section of the site at Dalar Hir, a greenfield site remote from any settlement, fails to properly allow for legacy as suitable re-uses of the site once developed have not been identified and are not proposed, with the intention being to remove all of the installed infrastructure completely. As well as being a poor proposal in sustainability terms, this offers no legacy for the Island. The development of the site at Parc Cybi offers some legacy in that that allocated employment site will have been improved however the proposals for that site could be improved, including through improving connectivity by sustainable transport methods.

2.1.12 On balance the Council considers that the principle of the development is supported by policy and that much of the proposal is compliant. Some of the non-compliant elements which cannot be avoided or fully mitigated, such as the loss of heritage assets on the main site, are capable of being outweighed by the general policy support for the project. The IACC does not however accept that the proposals as made are fully compliant, particularly on delivering measures to maximise opportunities for employment and upskilling of local people, minimising impacts on the housing market, protecting and enhancing the natural environment. The IACC wishes to see the mitigation measures identified in this LIR secured in order to ensure that the impacts of the development are addressed in a manner which complies with the JLDP and SPG. The IACC considers that proposals as made are non-compliant with the policies of the JLDP and do not follow the guidance set out in the SPG regarding the need to secure legacy.

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