



Dear Mr Leigh.

Application by Horizon Nuclear Power Limited for an Order Granting Development Consent for the proposed Wylfa Newydd Nuclear Power Station, Isle of Anglesey

Request for information and comments on the application

Further to your letter dated 23rd October 2019 requesting an update and further information from parties with regards to the application by Horizon Nuclear Power Limited for an Order Granting Development Consent for the proposed Wylfa Newydd Nuclear Power Station, Isle of Anglesey, please find attached the Isle of Anglesey County Council's (IACC) response.

The IACC recognises the critical importance of the DCO process, and despite the recent delay, fully respect that it must be a thorough, robust and comprehensive process. This is imperative given the scale of the Wylfa Newydd Project and its implications for North Anglesey, the Island as the local host community, and wider North Wales region.

The IACC remains fully committed to its Energy Island Programme. Wylfa Newydd continues to be an integral part of this vision to put Anglesey at the forefront of the low carbon energy sector that has the potential for significant employment opportunities and transformational economic benefits in the region. Please be assured that the IACC will continue to play its part in the process and will respond to any further requests in a timely manner,

**Mr Gareth Leigh,
Pennaeth Cynllunio'r Seilwaith Ynni
Head, Energy Infrastructure Planning,
Yr Adran Busnes, Ynni a Strategaeth Ddiwydiannol
Department for Business, Energy and Industrial
Strategy**

Annwyl Mr Leigh,

**Cais gan Horizon Nuclear Power Limited am
Orchymyn yn Rhoi Caniatâd Datblygu i Atomfa
Arfaethedig Wylfa Newydd, Ynys Môn**

Cais am wybodaeth a sylwadau ar y cais

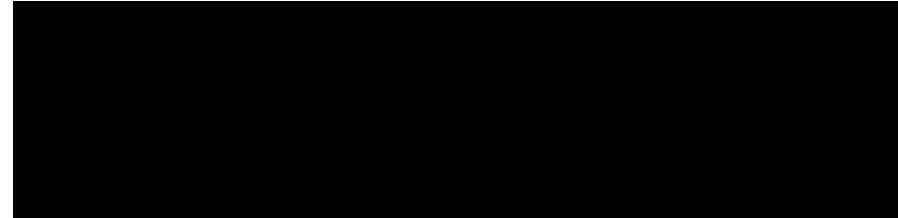
Yn dilyn eich llythyr dyddiedig 23ain Hydref 2019 yn gofyn am ddiweddarriad a gwybodaeth bellach gan bartiōn yngylch y cais gan Horizon Nuclear Power Limited am Orchymyn yn rhoi caniatâd datblygu ar gyfer Gorsaf Bŵer Niwclear arfaethedig Wylfa Newydd, Ynys Môn, amgaeaf ymateb Cyngor Sir Ynys Môn (CSYM).

Mae CSYM yn cydnabod pwysigrwydd hanfodol y broses GCD, ac er gwaethaf yr oedi diweddar, mae'n llwyr barchu'r ffaith bod yn rhaid i'r broses fod yn un drylwyr, yn gadarn ac yn gynhwysfawr. Mae hyn yn hollbwysig o ystyried maint prosiect Wylfa Newydd a'i oblygiadau i ogledd Ynys Môn, yr Ynys fel y gymuned leol, a rhanbarth ehangach Gogledd Cymru.

Mae CYSM yn parhau i fod yn gwbl ymrwymedig i'w Rhaglen Ynys Ynni. Mae Wylfa Newydd yn parhau i fod yn rhan annatod o'r weledigaeth hon i roi Ynys Môn ar flaen y gad yn y sector ynni carbon isel sydd â'r potensial ar gyfer cyfleoedd cyflogaeth sylweddol a manteision economaidd trawsnewidiol yn y rhanbarth. Fe'ch sicrheir y bydd CSYM yn parhau i chwarae ei ran yn y broses ac y bydd yn ymateb i unrhyw geisiadau pellach mewn modd amserol, er

mwyn hwyluso penderfyniad terfynol ar y cais erbyn in order to facilitate a final decision on the application by 31st March, 2020.

Yn gywir / Yours sincerely,



Dylan J. Williams
Dirprwy Brif Weithredwr / Deputy Chief Executive

Application by Horizon Nuclear Power Limited for an Order Granting Development Consent for the proposed Wylfa Newydd Nuclear Power Station, Isle of Anglesey, North Wales

REQUEST FOR INFORMATION AND COMMENTS ON THE APPLICATION

The deadline for a response is midnight Tuesday 31 December 2019.

The response should be submitted by email to wylfa@planninginspectorate.gov.uk. Please send any hard copy response to Wylfa Newydd Nuclear Power Station Project Team, Secretary of State for Business, Energy and Industrial Strategy, c/o the Planning Inspectorate, Eagle Wing 3/18, Temple Quay House, Temple Quay, Bristol, BS1 6PN

Reference	Request for update/further information	IACC Response
1	<p>There are a number of other licenses and consents that the Applicant must obtain before it can construct and operate the Development (in the event consent is granted). The Secretary of State is aware that during the examination, the Applicant's parent company, Hitachi Limited, announced in January 2019 that it was suspending the project and withdrawing funding for the Development. Subsequently, the Applicant withdrew its applications for various licences and other consents required for the Development. Under the relevant National Policy Statements (EN-1 and EN-6), applicants are required to demonstrate that processes are in place to meet relevant requirements of permitting and other consenting regimes to facilitate the Secretary of State's decision making. In particular Part 4.10 of EN-1 explains that the Secretary of State should work closely with regulators and paragraph 4.10.3 makes clear that the Secretary of State should work on the assumption that environmental regulation will be properly applied and enforced, so she should act to complement but not duplicate environmental regulation. However, paragraph 4.10.8 says that the Secretary of State "should not refuse consent on the basis of pollution impacts unless it has good reason to believe that any relevant necessary operational pollution control permits or licences or other consents will not subsequently be granted.</p>	
2	<p>The Secretary of State requests the Applicant demonstrates how it will manage certain environmental and other impacts that would normally be controlled through a licence or other consent in light of the withdrawal of its applications for such licences and consents. In particular, the Secretary of State asks the Applicant to provide:</p> <ul style="list-style-type: none"> • an updated version of the document "Other Consents and Licences", last submitted at deadline 6 of the examination; • information that will demonstrate how it will manage impacts that would be controlled through an Operational Combustion Installation permit. The Secretary of State also requests the Applicant and Natural Resources Wales ("NRW") confirms if agreement on whether the Applicant's modelling of nitrogen deposition and acidification of vegetation has been reached and has considered the worst-case scenario; and • information demonstrating how it will manage impacts that would be controlled through Marine Licences. In particular, how a Marine Mammal Mitigation Plan, a marine invasive non-native species plan and any European Protected Species licences will be secured. 	
3	<p>The Secretary of State also invites comments from NRW, Office for Nuclear Regulation, Isle of Anglesey County Council ("IACC"), the Health and Safety Executive, Welsh Water and any other consenting or licencing body on any risks or impediments to the management of impacts that may result from the withdrawal by the Applicant of the licence and/or permit applications.</p>	<p>IACC will review the updated 'Other Consents and Licences' document following submission by HNP. As identified in the 'Other Consents and Licences' document (Deadline 6 Submission by HNP REP6-017) HNP will require various Permits and Consents from the IACC in order to manage certain environmental and other impacts. These will include;</p> <ul style="list-style-type: none"> - Environmental Permits - Ordinary Watercourse Consent for any in-channel works or construction activities that may affect flow of an Ordinary Watercourse - Section 61 Prior Consent - Planning (Hazardous Substances) Consent - Building Regulation Approval

		<p>The IACC trusts that HNP will apply for the required consents prior to the construction of the development or at any other appropriate time.</p> <p>The IACC granted Planning Permission on the 13th July 2018 for the A5025 Online Highway Improvement works (27C106E/FR/ECON).</p>
	<p>Representations of the Government of the Republic of Ireland under the Espoo Convention</p> <p>On 15 February 2019 the Government of the Republic of Ireland responded to notification of the proposed development under the Espoo Convention (Examination Library reference AS-0153) (Link). The Secretary of State notes that this response was received during the examination and that many of the matters raised in it have been examined. However the Secretary of State requests comments on the response from the Applicant and all interested parties, particularly NRW and the Welsh Government.</p>	
5	<p>Note that there is no no.5 in the English version – note that there is in the Welsh version and that the Welsh and English version in terms of numbering are out of sync.</p>	
6	<p>Imperative Reasons of Overriding Public Interest</p> <p>The parties put provisional submissions to the Examination in relation to grounds for a derogation under Article 6(4) of the Habitats Directive in relation to possible disturbance impacts on the tern qualifying features of the Anglesey tern Special Protection Area ("SPA") from the Development. The Applicant, in consultation with NRW and other Interested Parties as necessary, is invited to provide evidence as to:</p> <ul style="list-style-type: none"> • whether there are any feasible alternative solutions for delivery of the overall objective of the plan which will be less damaging to the integrity of the site; • any imperative reasons of overriding public interest for the plan or project to proceed; • the compensatory measures proposed to ensure that the overall coherence of the network of Natura 2000 sites is protected and how these will be secured. 	
7	<p>Ecological Mitigation Sites</p> <p>The Secretary of State notes that the Applicant has proposed a number of habitat creation and enhancement works as compensation for any potential effects from the Development. The Secretary of State is aware that concerns were raised by a number of Interested Parties regarding the length of the lease of land for wildlife enhancement and reptile translocation and the management of these mitigation sites beyond 2032 when the Applicant's leases expire. The Secretary of State requests the Applicant to confirm whether any further steps have been taken to secure the rights to these mitigation sites once the lease expires, and what, if any, measures it has taken to ensure benefits beyond the 15-year lease period. The Secretary of State also invites comments from NRW, IACC and the North Wales Wildlife Trust ("NWWT") on this issue.</p>	<p>With regards to the Ecological Mitigation Sites, the IACC confirmed in its response to the first round of written questions (Q2.06 REP2-153) that it considered that the 15-year lease arrangements are only acceptable provided that there is provision for the lease to be extended depending on the results of site monitoring and the success of the restoration.</p> <p>For the IACC, it is crucial that the DCO includes appropriate mechanisms to ensure that the establishment of the landscaping on the completed landform and the colonisation of protected and notable species populations are appropriately monitored throughout the project construction stage in order identify any establishment/colonisation issues at the earliest opportunity and for appropriate intervention to take place immediately. It is essential that any required intervention takes place immediately and prior to the end of the 15-year lease period in order to rectify the situation at the earliest.</p> <p>In addition, colonisation of the restored habitats by target species must be confirmed before the lease is ended; it will not be acceptable to translocate or displace species and then remove the habitat support without evidence that the restored habitats are suitable and accessible.</p> <p>The IACC is satisfied that the LHMS (REP8-063) secures appropriate monitoring mechanisms that are to be put in place, including the regular review of the monitoring mechanisms.</p>

8	<p><i>Mitigation of Onshore Construction on Sandwich Tern</i></p> <p><i>Noise</i></p> <p>The Secretary of State notes that at the end of the examination, NRW's concerns regarding the practicality of measuring and enforcing noise levels on the construction site and concerns on how wind and weather conditions would be taken into account to implement noise controls had not been addressed. The Secretary of State requests the Applicant and NRW to confirm whether agreement has been reached following the close of the examination. If agreement has not been reached, the Secretary of State requests that the Applicant, with agreement from NRW, provides a plan to measure and control construction noise levels, (taking into account all atmospheric conditions) or explain why this is not appropriate or cannot be agreed.</p>	
9	<p><i>Visual Disturbance</i></p> <p>The Secretary of State is aware that concerns were raised by environmental Non-Governmental Organisations ("eNGOs") on the lack of mitigation of visual disturbance west of the Afon Cafnan given the scale of the work in the Mound E construction area. To address these concerns, the Secretary of State understands that the Applicant confirmed that it would include a control in its Main Power Station Site Code of Construction Practice ("MPSSCoCP"). The Secretary of State requests the Applicant to confirm whether the MPSSCoCP has been updated, with agreement from NRW and interested eNGOs, to reference the agreed control measure. If agreement has not been reached, the Secretary of State requests that the Applicant, with agreement from NRW and the relevant eNGOs provides an updated MPSSCoCP which includes visual disturbance controls.</p>	
10	<p><i>Disturbance from Recreational Users</i></p> <p>The Secretary of State is aware that during the examination, NRW and eNGOs queried whether there was sufficient detail in the Workforce Management Strategy ("WFMS") to manage visitor behaviour so as to avoid disturbance to terns, and that NRW and the eNGOs' concerns had not been addressed by the end of the examination. The Secretary of State requests the Applicant, NRW and eNGOs to confirm whether agreement on this issue has been reached following the close of the examination. If agreement has not been reached, the Secretary of State requests that the Applicant, with agreement from NRW and the relevant eNGOs provides an updated WFMS which manages visitor behaviour so as to avoid disturbance to terns or explain why this is not appropriate or cannot be agreed.</p>	
11	<p><i>Dee Estuary SPA</i></p> <p>The Secretary of State notes that NRW advised that if the Sandwich tern abandoned the colony at Cemlyn Bay, this could impact the passage population of Sandwich tern in the Dee Estuary SPA and therefore lead to an AEoI on the SPA. The Secretary of State requests that the Applicant, in consultation with NRW, addresses NRW's concerns over connectivity between the Cemlyn Bay SPA and the Dee Estuary SPA, or shows how compensatory measures for the Anglesey Terns SPA would impact the Dee Estuary SPA.</p>	
12	<p><i>Landscape and Habitat Management Strategy</i></p> <p>The Secretary of State notes that in response to concerns regarding the provision of habitats creation areas, the Applicant revised the area figures for coarse sward and close-sward grasslands in Table 4.1 on page 61 of the Landscape and Habitat Management Strategy ("LHMS"). However, the Secretary of State notes that the figures in the text of section 6.5 on page 110 of the LHMS have not been updated. To avoid any doubt in the provisions that the Applicant has made for a net gain in habitat, the Secretary of State requests the Applicant to confirm that it has updated the text in section 6.5 with the updated figures in Table 4.1.</p>	

13	<p>Sites of Special Scientific Interest ("SSSI") Network</p> <p>Paragraph 5.3.11 of National Policy Statement ("NPS") EN-1 (Overarching National Policy Statement for Energy) states that "<i>(w)here a proposed development on land within or outside an SSSI is likely to have an adverse effect on an SSSI (either individually or in combination with other developments), development consent should not normally be granted. Where an adverse effect, after mitigation, on the site's notified special interest features is likely, an exception should only be made where the benefits (including need) of the development at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of SSSIs</i>".</p>	
14	<p>The Environmental Statement and the parties' submissions point to potential impacts on three SSSIs. The Secretary of State requests the Applicant and any Interested Party to provide further information on how the potential impacts on the Tre'r Gof, Cae Gwyn and Cemlyn Bay SSSIs would affect the broader national network of SSSIs.</p>	
15	<p>Water Framework Directive</p> <p>Mitigation</p> <p>The Secretary of State is aware that during the examination, NRW advised that there was a risk of deterioration of the Ynys Môn Secondary groundwater body and the Skerries coastal water body but that a reasonable case has been made that all practical steps will be taken to mitigate the adverse impacts. The Secretary of State notes that NRW said that this mitigation could be secured by the development consent order. The Secretary of State requests NRW and the Applicant to confirm whether appropriate mitigation has been secured.</p>	
16	<p>Derogation</p> <p>The Secretary of State notes that during the examination, no views were expressed as to whether the wider benefits of the Development to the environment and to society, outweigh the benefits of achieving the Water Framework Directive objectives, and invites views from the Applicant and any Interested Parties on this point.</p>	
17	<p>Flooding</p> <p>Flood risk – Exception test</p> <p>The Secretary of State notes that while the Development will largely be located in Flood Zone A areas, some of the marine works and parts of the A5025 offline highway improvement works would be located in Flood Zone C areas. EN-1 states that the Exception Test should be applied where infrastructure projects are located in Flood Zone C areas. For the Exception Test to be passed:</p> <ul style="list-style-type: none"> • it must be demonstrated that the project provides wider sustainability benefits to the community that outweigh flood risk; • the project should be on developable, previously developed land or, if it is not on previously developed land, that there are no reasonable alternative sites on developable previously developed land subject to any exceptions set out in the technology-specific NPSs; and • a flood risk assessment must demonstrate that the project will be safe, without increasing flood risk elsewhere and, where possible, will reduce flood risk overall. <p>The Secretary of State requests the IACC and NRW to confirm whether the Development will not increase flood risk elsewhere, or whether the Applicant has demonstrated that flood risk can be mitigated to an acceptable level.</p>	<p>Wylfa Newydd Development Area (WNDA)</p> <p>In relation to the WNDA, the IACC is satisfied that requirement WN1 3(c) of the draft DCO allows for the approval of a 'WNDA Overarching Construction Drainage Scheme' and that requirement WN12 2(e) allows for the approval of a 'Proposed watercourse diversions and permanent drainage designs'. The IACC will consider these schemes in consultation with NRW.</p> <p>The IACC is satisfied that the above referred to requirements that are to be included in the draft DCO allows for the approval of detailed drainage designs schemes for the WNDA which will ensure that flood risk can be avoided elsewhere.</p> <p>A5025 offline highway improvements</p> <p>In relation to the A5025 offline highway and Section 2 (Llanfachraeth) in particular, in its Deadline 6 submissions (REP6-061 - Appendix D) the IACC confirmed that it had reviewed HNP's Deadline 5 submissions (REP5-056 Appendix 1-8 Technical Note on A5025 Flooding (Llanfachraeth) - response to actions set in Issue Specific Hearing on the 11th January 2019) and acknowledged that the Technical Note confirmed that compensatory storage is not a sufficiently effective measure in isolation to offset impacts on flood extent and flood level upstream of the proposed Afon Alaw Viaduct as a result of reductions in floodplain storage and conveyance.</p> <p>In the same submission the IACC confirmed that the proposal to allow flooding on private land from the A5025 section 3 (Llanfachraeth) is contrary to policy TAN15 (increase in flood levels by 0.09m to agricultural land).</p>

		<p>The IACC noted that HNP confirmed that discussions were underway with the landowner in terms of progressing a legal agreement. The IACC notes that the SoS is seeking an update from HNP (question 19) with regards to whether an agreement with the landowner has been reached.</p> <p>Additionally, HNP advised that it would also re-visit the flood compensatory storage requirements as part of the detail design of the viaduct once a design and build contractor has been appointed.</p> <p>The IACC is satisfied that requirements to include compensatory storage within the design and obtain agreement with the landowner have been secured through the A5025 Off-line Highway Improvement CoCP (paragraph 10.5.1) [REP10-028] which HNP will need to comply with during the construction phase.</p>
18	<p>A5025 Off-line Highways Improvements – TAN15</p> <p>The Secretary of State notes that the Applicant accepted that there would be increased flood risk impacts at the Afon Alaw viaduct. NRW advised that “the Secretary of State will need to consider the scheme in the context of non-compliance with TAN15 at this specific location, with or without landowner agreement” (see below). The Secretary of State invites comments from the Applicant and any Interested Parties in relation to the application of TAN15 to this element of the A5025 Off-line Highways Improvements.</p>	<p>As confirmed in the response above, in its Deadline 6 submissions (REP6-061- Appendix D) the IACC confirmed that it had reviewed HNP’s Deadline 5 submissions and acknowledged that the Technical Note confirmed that compensatory storage is not a sufficiently effective measure in isolation to offset impacts on flood extent and flood level upstream of the proposed Afon Alaw Viaduct as a result of reductions in floodplain storage and conveyance. In the same submission the IACC confirmed that the proposal to allow flooding on private land from the A5025 section 3 (Llanfachraeth) is contrary to policy TAN15 (increase in flood levels by 0.09m to agricultural land).</p> <p>In addition, in its Deadline 5 submission (REP5-056), HNP advised that it would also re-visit the flood compensatory storage requirements as part of the detail design of the viaduct once a design and build contractor has been appointed.</p> <p>The IACC is satisfied that requirements to include compensatory storage within the design and obtain agreement with the landowner have been secured through the A5025 Off-line Highway Improvement CoCP (paragraph 10.5.1) [REP10-028] which HNP will need to comply with during the construction phase.</p> <p>The IACC notes that the SoS is seeking an update from HNP (question 19) with regards to whether an agreement with the landowner has been reached.</p>
19	<p>A5025 Off-line Highways Improvements – compensatory storage</p> <p>In relation to the flood risk at the Afon Alaw viaduct, the Secretary of State notes that during the examination, the Applicant said that it was pursuing a legal agreement with a landowner at Llanfachraeth to allow flooding from section 3 of the A5025 on private land.</p> <p>The Secretary of State requests the Applicant to confirm whether an agreement with the landowner has been reached.</p>	<p>The IACC notes that the SoS is seeking an update from HNP with regards to whether an agreement with the landowner has been reached.</p> <p>The IACC confirms that consideration needs to be given to the maintenance of the compensation storage area by HNP during the detailed design stage.</p>
20	<p>Ecological Compensation Sites</p> <p>The Secretary of State notes that NRW expressed concern with the environmental impacts of fen creation works within the SSSI compensation sites and advised that a backwater analysis of the compensation sites be undertaken. The Secretary of State is aware that NRW proposed the following additional text for inclusion in the LHMS to secure backwater analysis:</p> <p><i>Drainage modifications will be informed by a suitable analysis (backwater assessment impacts or similar) which will consider the flood risk impacts to 3rd parties from the works. The detailed drainage design should demonstrate no increase in flood risks to 3rd parties due to the compensation site works</i></p> <p>The Secretary of State is aware that the Applicant included the suggested text in its LHMS but added the term “significant” to the increase of flood risks. NRW requested this text be removed or a definition be provided as to what would constitute a “significant increase” of flood risks. The Secretary of State notes that the Applicant responded at the end of the examination to explain the term “significant”, but that NRW was not</p>	

	able to respond. The Secretary of State requests NRW to confirm whether it is satisfied with the explanation provided by the Applicant.	
21	<p>Dalar Hir Park and Ride</p> <p>The Secretary of State is aware of the concerns raised by IACC regarding the risk of flooding at the Dalar Hir Park and Ride and that the IACC raised the risk of debris from the upstream Nant Dalar Hir could result in the spine road/car parks being inundated. The Secretary of State notes that the Applicant did not address IACC's concerns and that IACC did not raise it again as an issue by the end of the examination. The Secretary of State requests confirmation from IACC as to whether this issue remains a concern and if so, whether it wishes to suggest any mitigation measures.</p>	<p>The IACC is satisfied that HNP has resolved its concerns with regards to the risk of flooding at the Dalar Hir Park and Ride.</p> <p>HNP amended the design drawings for the Park and Ride at Deadline 2 (REP2-019) to include flood attenuation areas to address potential flooding risk. An additional design principle requiring the inclusion of flood attenuation was also included in the Design and Access Statement for the Park and Ride (REP2-030) to ensure that any revised or new designs for this site also included this mitigation.</p> <p>At Deadline 5, HNP submitted additional information (Appendix 1-7 Clarifications regarding Park and Ride Flood Risk) as part of its response to actions set in Issue Specific Hearing on the 11th January 2019 (REP5-056).</p> <p>In its Deadline 6 submissions (REP6-061 - Appendix D) the IACC confirmed that following review of HNP's submission referred to above that it is satisfied that the proposals at Dalar Hir are fully compliant with TAN15 and that no flooding is expected along the spine road/car parks.</p> <p>HNP also submitted as part of its Deadline 5 submission, Appendix 1-9 – Updated Modelling to include the Possible Blockage of Culverts within Dalar Hir (REP5-056).</p> <p>In its Deadline 6 submission (Appendix D) (REP6-061) the IACC confirmed that following review of HNP's submission referred to above it considered that the Culvert blockage modelling takes a conservative approach (100% blockage of the A5/A55 culvert) to ascertain area/depth of inundation under baseline/with development scenarios. The modelling of the A5/A55 culvert blockage finds that the overall depth increase is limited, and the proposals result in a slight betterment over the baseline scenario (as expected since the flood storage areas provide slightly more capacity).</p> <p>The IACC confirmed in the same submission that the approach for the A5/A55 taken is acceptable and the resulting conclusion that the operational site would not be at risk if the culverts were to block demonstrates the proposals comply with TAN15. This is achieved primarily via slight increases in the proposed design level of the car parking areas/spine road crossing.</p> <p>The IACC welcomes HNP's commitment to carry out regular inspection and maintenance of the channel and structures within the Dalar Hir site to minimise the flood risks associated with blockage and is satisfied that this commitment is secured in the Dalar Hir Park and Ride Code of Construction Practice, paragraph 10.1.1; <i>'All culvert apparatus within the site boundary will be periodically inspected for potential blockages. Debris found will be removed from the culvert to remove the potential for blockages'.</i></p>
22	<p>Archaeology</p> <p>The Secretary of State notes that during the examination and following the announcement that Hitachi Limited was withdrawing its funding for the Development, the Applicant ceased all intrusive archaeological work in and around the Development site and stated that it would not adhere to the written scheme of investigation ("WSI") that it had agreed with IACC, Gwynedd Archaeological Planning Service ("GAPS") and Cadw. The Secretary of State also notes that later in the examination, the Applicant stated that it was working to achieve full post-excavation assessment and analysis of the archaeological finds in and around the Development site in accordance with best practice guidance by the end of October 2019. The Secretary of State requests an update from the Applicant on the progress of these works. The Secretary of State also requests a response from Welsh Government ("WG"), IACC, Cadw and GAPS as to whether they are of the view that post excavation archaeological investigations have been or will be completed in a satisfactory manner.</p>	<p>The IACC confirms that it has liaised with GAPS, the regional curator with regulatory and advisory function and the Council's advisor with regards to matters concerning archaeology to prepare the following response.</p> <p>Through our on-going engagement with HNP, the IACC understands that initial processing of all environmental samples has been completed and that specialist assessments of potential for the different categories of material recovered from the sample processing, as well as from the excavations, are now in progress, with the works being carried out in accordance with the agreed Written Scheme of Investigation (WSI). The IACC confirms that it receives monthly progress reports from HNP which is welcomed.</p> <p>The IACC understands that the separate reports on the results of these assessments are to be completed and submitted at the end of April 2020 for each of the mitigation sites (nearly 30 in all), together with one overarching report, and that they will each be accompanied by an Updated Project Design (UPD). Each UPD will contain recommendations for further work (including analysis, final reporting, archiving, publication and dissemination) together with costings and a programme for completing this work. This is in accordance with the normal process and framework for post-excavation work.</p>

	<p>Whilst the IACC acknowledges that the archaeological excavation works conducted to date within the WNDA constitute part of the project mitigation, which has been implemented in advance of DCO approval to facilitate and assist in the delivery of the Wylfa Newydd DCO Project, the IACC during the examination confirmed that it was concerned that this mitigation would only be secured through the grant of the DCO and through the submission and approval of a WNDA Archaeological Mitigation Scheme including a Written Scheme of Investigation (WSI) under Requirement WN1.</p> <p>Following further engagement with the IACC/GAPS and WG/CADW, HNP has agreed to offer a contractual commitment to complete the processing, assessment and subsequent reporting/publication and archiving of the current archaeological finds, in accordance with the agreed WSI. This commitment is to be made through HNP entering into an agreement with the IACC, the details of which are currently being progressed between parties.</p> <p>The IACC welcomes this commitment and is satisfied that this contractual agreement (subject to being satisfied with its detail) will provide the reassurance that the IACC has been seeking in terms of the agreed WSI being complied with for the excavations undertaken to date. The IACC will continue to positively engage with HNP during the coming weeks to ensure that a satisfactory agreement can be entered in to and will provide a further update to the SoS regarding this matter in January 2020.</p>
23/24	<p>Schedulable monuments</p> <p>The Secretary of State is aware that a number of archaeological assets of high value or of national importance are located in or around the Development site, and that during the examination WG stated that it is considering scheduling some of these archaeological assets to avoid any substantial harm being caused to them. The Secretary of State understands that at the end of the Examination there were six such sites that were agreed to be of schedulable quality.</p> <p>NPS EN-1 states that heritage assets that have not been designated as a scheduled monument but have yet to be formally assessed for designation, or have assessed as capable of being designated but have not yet been designated, must be subject to the same considerations as those that apply to designated heritage sites. NPS EN-1 also states that any harm to, or loss of, designated assets should be "wholly exceptional". The Secretary of State asks the Applicant to:</p> <ul style="list-style-type: none"> • confirm the current state of those six sites; • provide details of the features of these sites that make them schedulable quality; • confirm the basis for the assertion that substantial harm to such assets can be avoided by archaeological excavation, reporting, etc; and • provide evidence to demonstrate how the harm to or loss of the high value archaeological assets or archaeological assets of national importance in and around the Development site is "wholly exceptional". <p>The Secretary of State also invites views from WG, Cadw, IACC and GAPS.</p>
25	<p>Requirement SCP8 Archaeological Written Scheme of Investigation</p> <p>The Secretary of State is aware that during the examination, WG requested an amendment to requirement SCP8 to require an approved Archaeological Mitigation Scheme to be in place prior to work commencing on site clearance and preparation works so that it is in line with the approach proposed for other works during the construction phase. The Secretary of State notes that the wording suggested by the WG was resisted by the Applicant on the basis that an Archaeological Mitigation Scheme, in addition to the Archaeological Written Scheme of Investigation it had agreed with IACC, was not necessary due to the scale and non-intrusive nature of the site clearance and preparation works. The Secretary of State requests comments from both the Applicant and the WG on the following text:</p>

	<p>1) No development shall take place within the WNDA area until the Applicant or their agent or their successors in title has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted and approved in writing by IACC, in consultation with Cadw.</p> <p>2) No demolition/development shall take place other than in accordance with the Written Scheme of Investigation approved under condition (1).</p> <p>3) Commissioning of Unit 2 shall not take place until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition (1) and the provision made for analysis, publication and dissemination of results and archive deposition has been secured. This is dealt with at PW9.</p>	
26	<p>Turning Head</p> <p>The Secretary of State is aware that towards the end of the examination, IACC requested an alternative turning head adjacent to the Development to replace the existing vehicular turning area which would be lost as a consequence of the Development's proposed access road junction, and that the Examining Authority did not have the opportunity to examine this matter in detail. The Secretary of State invites views from the Applicant on IACC's proposed amendment to requirement WN1(3) in Schedule 3 of the draft development consent order below:</p> <p><i>(h) A scheme for the provision of a vehicle turning head which will form part of the public highway at the layby adjacent to access to the WNDA, which scheme must include the details of the design of the turning head, details of when this will be delivered, together with an explanation of how this will be dedicated as public highway, how it will be classified and what traffic regulation measures (including any applicable speed limits or waiting restrictions) will be put in place over the turning head prior to it opening for use for by the public.</i></p>	<p>In its Deadline 9 submission (REP9-031), the IACC confirmed that as a direct consequence of implementing the WNDA junction access arrangement, the existing vehicular turning area (circled red on the map included on page 9 of the IACCs Deadline 9 submission) will be lost.</p> <p>To mitigate for this loss, the IACC seeks the provision of a new (alternative) vehicle turning area adjacent the existing layby as part of the WNDA junction access arrangement works. The proposed location of the new vehicle turning area is shown also on page 9 of the IACCs Deadline 9 submission (REP9-031).</p> <p>The IACC confirms that the southern entry/exit point of the existing lay-by is currently un-safe, hence why large stone cobbles have been laid at this point to deter vehicles using this access/exit point. Consequently, there is only one suitable access/exit for the lay-by, which results in the need for a turning head i.e. for refuse vehicles to turn around, rather than reverse back onto the Class 1 carriageway.</p> <p>Following further engagement, details of a new requirement (requirement OH11) has been agreed between the IACC and HNP which will allow for the approval of a scheme to provide a vehicle turning head within the existing lay by at the Power Station Access Road Junction.</p>
27	<p>If the proposed amendment to requirement WN1 is not acceptable, the Secretary of State invites the Applicant and IACC to agree wording that addresses IACC's concerns and provide it to the Secretary of State for her consideration.</p>	<p>IACC includes below details of the new OH11 requirement that has been agreed between IACC and HNP which satisfies our requirements;</p> <p>OH11 Turning Head at Work No.9</p> <p>(1) <i>Prior to the construction of Work No.9, the undertaker must submit a scheme for the provision of a vehicle turning head within the existing layby shown on WN0902-HZDCO-OHW-DRG-00063 in Schedule 2 of the Order to IACC for approval.</i></p> <p>(2) <i>The scheme submitted under paragraph (1) must include the details of:</i></p> <p class="list-item-l1">(a) <i>the design of the turning head;</i></p> <p class="list-item-l1">(b) <i>details of when this will be delivered, together with an explanation of how this will be dedicated as public highway; and</i></p> <p class="list-item-l1">(c) <i>how it will be classified and what traffic regulation measures (including any applicable speed limits or waiting restrictions) will be put in place over the turning head prior to it opening for use for by the public.</i></p>
28	<p>Fly Parking</p> <p>The Secretary of State notes that concerns regarding the potential for fly parking were raised by IACC, Gwynedd County Council and Conwy County Borough Council. The Secretary of State is aware that at the end of examination, IACC considered that the measures proposed to deal with fly parking were deficient, and it requested further provision in the Workforce Management Strategy ("WKMS") setting out the action the Applicant will take in confirmed instances of fly parking, and also requested an update to the Code of Construction Practice ("CoCP") to make clear that upon receipt of an initial complaint, investigation and any appropriate disciplinary action is to be identified and implemented within 5 days. The IACC also requested</p>	<p>Following further engagement with HNP, the IACC recognises the rationale as to why disciplinary action cannot take place within 5 days of the investigation and is now satisfied with the detail included in Paragraphs 5.10.7 and 5.12.4 of the Wylfa Newydd CoCP (REP10-018);</p> <ul style="list-style-type: none"> • <i>Paragraph 5.10.7: "Horizon commits to manage, monitor and regulate the availability of car parking spaces to reflect the number of workers on the Wylfa Newydd DCO Project, balancing an overprovision of car parking (which could encourage car travel) with an under-provision of car parking (which could encourage fly parking)."</i>

	<p>that all incidents and investigations be reported to the IACC. The Secretary of State requests the Applicant to confirm whether the WKMS and CoCP have been updated to address IACC's concerns.</p>	<ul style="list-style-type: none"> Paragraph 5.12.4: "<i>Investigation of all suspected incidents related to fly-parking and rat-running will be commenced within 48 hours of the initial complaint being submitted to Horizon, and a final report completed within five working days.</i>" <p>IACC is also satisfied that there is provision in the s106 which will allow transport impacts and issues to be monitored and managed.</p>
29	<p>Dalar Hir</p> <p>The Secretary of State notes that at the end of the examination, WG raised concerns regarding the modelling of the capacity of Junction 4 at Dalar Hir and asked for confirmation as to whether the modelling was based on 1,900 daily vehicle movements or 1,000 daily vehicle movements. The Secretary of State requests the Applicant to confirm the figure used for modelling daily vehicle requirements, and for its views on WG's proposed amendment to Requirement PR5 Site Access Design.</p>	<p>Following further engagement between HNP, the IACC and WG, it has been agreed that HNP will amend Schedule 4 of the draft DCO to specifically identify Welsh Ministers as a consultee to the Parking Phasing Scheme in column (3) of Part 1 of Schedule 4.</p> <p>The IACC confirms that it is satisfied with this amendment to the draft DCO.</p>
30	<p>Abnormal Indivisible Loads</p> <p>The Secretary of State notes that during the examination, the Applicant confirmed that no Abnormal Indivisible Loads ("AIL") would be required in relation to works no 12, and that WG requested that for the avoidance of doubt this should be secured through amendment of the CoCP. The Secretary of State requests confirmation from the Applicant and WG that the CoCP has been amended to address this issue or explain why this is not appropriate or cannot be agreed.</p>	
31	<p>The Secretary of State is aware that concerns were raised by the WG regarding the impact of demand in housing during the construction phase, particularly on tourist accommodation. To address this concern, WG suggested the insertion of the following requirement:</p> <p><i>The number of construction workers occupying accommodation in the Tourist Sector shall at no time exceed 1100.</i></p>	
32	<p>The Secretary of State invites comments from the Applicant for views on the cap of the use of tourist accommodation by construction workers, and for details on how the Applicant intends to monitor and enforce the use of tourist accommodation by its staff and subcontractors.</p>	<p>The IACC notes that the request is directed to the Applicant, however as the relevant enforcing authority for the proposed requirement and the planning authority for the S106 agreement, the IACC wishes to make the following representations on this point.</p> <p>The IACC would direct the Secretary of State to Schedules 3 (tourism and public rights of way) and 5 (Worker Accommodation) of the completed section 106 agreement (Examination Library REP10-009) where accommodation and tourism impacts are addressed in detail.</p> <p>The underpinning approach to the section 106 is to prevent unacceptable impacts occurring rather than seek to address them once they have arisen. The section 106 therefore provides a number of measures to proactively prevent tourism accommodation use rising above the assessed level. These measures include obligations on the Applicant to promote 100% use of the temporary site campus¹ and to take action, including reducing prices, to make the campus attractive to workers where occupancy falls below 85%, and to provide a contribution to IACC, Gwynedd Council and Conwy County Borough Council to increase capacity in the local housing markets ahead of peak demand.</p> <p>Schedule 5 provides inter alia, prior to implementation of the development the Applicant must establish a "Workforce Accommodation Management Service" in accordance with the terms of reference set out in the S106. All workers will be required to register their names and addresses with the service³ to assist in monitoring where workers are residing.</p>

¹ Schedule 5, paragraph 4.2

² Schedule 5, paragraph 4.3

³ Schedule 5, paragraphs 1.1 and 1.2

	<p>Up to three Accommodation Officers will be employed by the Council; which roles will be funded by the Accommodation Officers Contributions to be paid to the Council by the Applicant under Schedule 5. As part of their role, these officers will monitor accommodation impacts arising from the project, including liaising with neighbouring Councils, Welsh Government and other organisations to ensure a collaborative approach is taken.</p> <p>Schedule 3 at paragraph 2.3 sets out that the Applicant will provide funding for the employment by the Council of a Tourism Officer throughout the construction period and for the first two years of operation. Part of the role of that Officer is to liaise with the Accommodation Officers and “monitor the effects of the Wylfa Newydd DCO project on the tourist accommodation sector”⁴.</p> <p>Given the provisions of the above the IACC is entirely confident that appropriate, robust mechanisms are in place to monitor the number of workers residing in tourism accommodation and the impacts of those workers.</p> <p>As the section 106 has also considered and provided for the risk of impact on the tourism accommodation sector exceeding the level allowed, the IACC as the relevant planning authority submits that the proposed requirement is unnecessary. The IACC considers that any potential impact above 1,100 workers in tourism accommodation requires to be dealt with at a level of managing supply and directing workers to other accommodation through interventions in the local market. The Schedule 5 provisions explicitly provide the means to do this through provision of funding to enhance capacity of other forms of accommodation and contingency funding.</p> <p>The IACC as the relevant enforcing authority for the DCO objects to the insertion of the proposed requirement. The question asks how HNP would monitor and enforce such a cap, however in practice if they did not comply with this cap it would be for IACC to enforce. IACC is not aware of how it could practically do so. The IACC does not have the ability to require individuals to move out of tourist accommodation, or to require operators to refuse to accept paying guests, and nor would the Council wish to interfere with individuals freedom of choice in such a manner.</p> <p>In the view of IACC the proposed requirement would not meet the test of enforceability and should not be imposed.</p>
33	<p>Protective Provisions</p> <p>The Secretary of State notes that bespoke protective provisions in respect of the interests of Network Rail Infrastructure Limited (“Network Rail”) and the interests of the Nuclear Decommissioning Authority were not agreed by the close of the examination. The Secretary of State requests the Applicant, Network Rail and the Nuclear Decommissioning Authority to confirm whether any agreement on bespoke protective provisions has been reached and, if so, to provide the agreed provisions to the Secretary of State. If an agreement has not been reached, an indication of whether an agreement is possible and, if so, when it might be reached would be helpful. If an agreement has been reached, the Secretary of State requests Network Rail and the Nuclear Decommissioning Authority to state whether or not it will withdraw its representations (see section 127(1)(b) of the Planning Act 2008).</p>
34	<p>Outstanding Objections and Agreements</p> <p>The Secretary of State notes that objections had not been withdrawn or agreements were still outstanding between the Applicant and the National Trust, RE and JA Roberts, G and I Roberts and WM, EW and M Harper at the end of the examination. The Secretary of State requests the Applicant and the landowners listed above for an update on the status of negotiations.</p>

⁴ Schedule 3, paragraph 2.3.4

35	Compulsory Acquisition Time Limit The Secretary of State notes that Article 28 of the proposed development consent order was amended to allow the Applicant a period of 8 years, rather than the usual 5 years, to exercise its Compulsory Acquisition powers. The Secretary of State notes the information already provided by the Applicant during the examination to justify this. However, in order to consider this matter fully, the Secretary of State requests that the Applicant provide further detail as to why the 8 year period is necessary and proportionate in this case. The Secretary of State would also be interested in comments from any landowners affected by compulsory acquisition on this point.	
36	The Secretary of State is aware that following the examination, WG published its draft National Development Framework for consultation on 7 August 2019 with responses due by 1 November 2019. The Secretary of State is also aware that after the close of the examination, WG made a climate emergency declaration on 29 April 2019 committing the WG to help other areas of the economy to make a decisive shift away from fossil fuels and reinforced support for the policies and proposals contained within Prosperity for all: A Low Carbon Wales (2019). The Secretary of State invites comments from any Interested Party in regard to the Development and WG's draft National Development Framework and climate emergency declaration.	IACC confirms that it has responded to Welsh Governments' consultation on the draft National Development Framework (NDF) (copy attached). As the NDF is currently in draft form, the IACC considers that although it forms a material consideration it has limited weight. In its response to the Consultation, the IACC confirms that ' <i>Anglesey could potentially host two Nationally Significant Infrastructure Projects (NSIPs) during the timescales of the NDF – a new nuclear power station at Wylfa and new associated transmission network. The Easy Read version of the NDF consultation does not promote nuclear in a positive light and there is only a passing reference to these developments under Policy 22. This is disappointing and unacceptable, and we would strongly urge the WG to review and update.</i> ' <i>It is widely recognised that nuclear new build will be critical, together with all other forms of low carbon energy generation, to enable the UK to meet its Net Zero carbon emissions target by 2050. The final NDF should fully and accurately reflect this.</i> <i>The IACC request that both developments (i.e. nuclear new build at Wylfa and the potential electricity transmission enhancements) are recognised fully in the NDF, notwithstanding that consenting decisions are being made by UK Government. Their scale and significance cannot be underestimated in terms of opportunities and threats (during construction, operation, and decommissioning phases) for existing and future generations.</i> <i>The importance of these projects, and nuclear new build in particular, to the future economic growth of Anglesey and North West Wales, cannot be underestimated. Without having a full appreciation of these, and other similar developments in Wales, the framework is unlikely to be inclusive, comprehensive, and fit for purpose. If or when these developments progress will determine the appropriateness of the NDF locally'.</i>
37	The Secretary of State notes that during the examination, NRW proposed wording to be added to the Design Access Statement ("DAS") to mitigate landscape and visual impacts from the Marine Off-Loading Facility on the Anglesey Area of Outstanding Natural Beauty and North Anglesey Heritage Coast, but that this wording had not been included in the final version of the DAS. The Secretary of State requests the Applicant to confirm whether the text suggested by NRW has been included in the final version of the DAS.	
38	The Secretary of State is aware that the WG is of the view that Welsh Ministers are the enforcing authority in respect of requirements relating to Marine Works below the mean low water mark. The Secretary of State is also aware that a new Article, Article 86, was inserted to make clear that Welsh Ministers are the enforcement authority for land below the mean low water mark. The Secretary of State requests confirmation from the WG and IACC whether they are content with the drafting below: <i>For the purposes of section 173 of the 2008 Act, the Welsh Ministers will be the relevant planning authority in respect of land seaward of the mean low water springs.</i>	The IACC confirms that it is satisfied with the drafting proposed. IACC was consulted on this wording prior to Deadline 10 and agreed to its inclusion. IACC's jurisdiction as a planning authority ends at mean low water springs. IACC agrees there is a gap in the legislation because the Planning Act 2008 does not specify an authority below mean low water springs. The language of the Act assumes that the land on which an NSIP will be proposed will always have a local planning authority, which is not the case below mean low water springs unless specific steps are taken to extend the neighbouring local planning authority's jurisdiction. IACC does not have the internal resource or expertise to undertake enforcement in the marine environment. IACC therefore consider it appropriate and reasonable the Welsh Ministers are specified as the relevant planning authority for land seaward of mean low water springs, in the DCO as proposed.

	IACC have in place a draft MoU to work collaboratively with NRW as the discharging authority for the marine requirements (below mean high water springs) and would be happy to discuss a similar approach with Welsh Ministers with regard to co-ordinating any potential enforcement action should the need arise.
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DYLAN J. WILLIAMS BA (Hons), MSc, MA, M.R.T.P.I
Cyfarwyddwr Lle a Llesiant Cymunedol
Director of Place and Community Well-Being

CYNGOR SIR YNYS MÔN
ISLE OF ANGLESEY COUNTY COUNCIL
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Gofynnwch am / Please ask for: Dylan J. Williams
E-bost / Email: PMO@anglesey.gov.uk
Ein Cyf / Our Ref:
Eich Cyf / Your Ref:

Dyddiad / Date: 11/11/2019

Dear Sir / Madam,

Response to Welsh Government's National Development Framework (2020-2040) Consultation

The Isle of Anglesey County Council (IACC) takes the opportunity to comment on the Welsh Government's (WG) consultation on the draft National Development Framework (NDF) 2020-2040 to constructively influence the final version of the document.

The IACC supports the principle of creating a NDF for Wales. It acknowledges that the NDF is a development plan that focuses on national strategic issues and challenges, and recognises its importance as it will set a direction for where investment in infrastructure will take place for the greater good of Wales and its people.

However, the IACC does have serious concerns and reservations in relation to a number of policies in the draft NDF. These build on previous correspondence with WG (IACC letter dated 19th July 2018). The main strategic points are outlined below (and should be read in conjunction with Appendix A which contains additional detail).

1. Approach to Strategic Development Plans / Regional Planning

The IACC is committed to regional collaboration and is a proactive partner of the North Wales Economic Ambition Board (NWEAB) ([LINK](#)). The NWEAB work is driven and informed by the North Wales Growth Vision and Growth Deal in developing a confident, cohesive region with sustainable economic growth, capitalising on the success of high value economic sectors and our connection to the economies of the Northern Powerhouse and Ireland. It is imperative that the final NDF recognises and aligns with these strategies.

The IACC accepts the principle of Strategic Development Plans and Regional Planning. However, being part of the first and only Joint Planning Policy Unit (JPPU) and Joint Local Development Plan (JLDP) in Wales the merits of three layers of

planning policy remain unclear. This is especially the case as resources, capacity and expertise is stretched and reducing. We remain to be convinced that the benefits for all parties of introducing a regional level of Development Plan is worth the additional work to prepare and monitor without creating complexities, inconsistencies and potential loop holes.

2. Recognition of Existing NSIPs

Anglesey could potentially host two Nationally Significant Infrastructure Projects (NSIPs) during the timescales of the NDF – a new nuclear power station at Wylfa and new associated transmission network. The Easy Read version of the NDF consultation does not promote nuclear in a positive light and there is only a passing reference to these developments under Policy 22. This is disappointing and unacceptable, and we would strongly urge the WG to review and update.

It is widely recognised that nuclear new build will be critical, together with all other forms of low carbon energy generation, to enable the UK to meet its Net Zero carbon emissions target by 2050. The final NDF should fully and accurately reflect this.

The IACC request that both developments (i.e. nuclear new build at Wylfa and the potential electricity transmission enhancements) are recognised fully in the NDF, notwithstanding that consenting decisions are being made by UK Government. Their scale and significance cannot be underestimated in terms of opportunities and threats (during construction, operation, and decommissioning phases) for existing and future generations.

The importance of these projects, and nuclear new build in particular, to the future economic growth of Anglesey and North West Wales, cannot be underestimated. Without having a full appreciation of these, and other similar developments in Wales, the framework is unlikely to be inclusive, comprehensive, and fit for purpose. If or when these developments progress will determine the appropriateness of the NDF locally.

3. Approach to Low Carbon Energy

The IACC is committed to delivery of the Anglesey Energy Island Programme ([LINK](#)). The EIP's vision is to create a once in a lifetime opportunity for jobs, economic growth and prosperity through capitalising on a number of transformational projects putting Anglesey and the wider region at the forefront of low carbon energy, research and development, production and servicing. This support for new low carbon energy development is grounded upon securing long-term employment and supply chain opportunities, and creating transformational and sustainable economic growth, whilst ensuring adverse impacts are effectively mitigated.

In respect of community energy, reference is made to one gigawatt of renewable energy consumption to be generated from locally owned renewable energy projects. Further clarification should be included in the final NDF over what is defined as local ownership of a project to ensure that the project is to the benefit of the host community.

The IACC believes that the NDF's approach to low carbon energy is too narrow and should incorporate all forms of low carbon energy (including tidal energy to the West

of Isle of Anglesey and Off-shore Wind Leasing Round 4 ([LINK](#))). As outlined above, following both the UK and WG's commitment to achieving the Net Zero by 2050, and the need for a diverse energy mix to deliver this commitment, all forms of low carbon energy production should be given the same weight, prominence and importance within the NDF. The draft NDF does not do this and instead focusses on wind and solar developments only.

The IACC has reviewed the background documents supporting the proposed Priority Areas for wind and solar. There is a lot of information in relation to the criteria applied. The justification and evidence for selection of the majority of the Island as a Priority Area for wind and solar energy is unclear. This is not acceptable and is of significant concern. The IACC objects to this designation.

In being designated a Priority Area, the proposed new policy (Policy 10) gives a presumption in favour of development and an acceptance of landscape change, with significant weight being given to the proposal's contribution to greenhouse gas reduction and meeting decarbonisation and renewable energy targets. IACC understands that planning applications will need to be dealt with on a case by case basis, but this approach creates a strong expectation that such developments will be acceptable, notwithstanding landscape and other impacts. In designating such areas, the NDF creates a spatial envelope expressly supported in policy which has already seen significant on and off shore development, and continues to do so with the proposed new nuclear power station at Wylfa and associated National Grid (NG) infrastructure. Whilst Anglesey is an Energy Island, that does not mean the majority of the Island should be considered as available to host additional new energy developments no matter what the environmental, economic and community impacts might be, which IACC consider will be the result of the NDF as currently drafted.

It is noted that wind and solar are the only areas within the NDF where a spatial approach is taken, rather than a criteria based approach. The IACC considers that a criteria based approach would be preferable rather than creating defined Priority Areas. The IACC is already potentially hosting the Wylfa Newydd and NG developments, which will impose a significant burden on the communities, and this does not appear to have been taken into account in relation to the allocation of Anglesey as a Priority Area. There are also concerns in relation to infrastructure. For instance the proposed NG overhead lines were only designed for Wylfa Newydd and it is unclear what additional NG infrastructure would be needed to connect to the centre of the Island. Certainly grid capacity has not been taken into account as part of allocating a Priority Area and this raises significant concerns. There are also likely to be significant transportation concerns arising from this proposal without, for instance, a third crossing which, again, has not been raised in any of the background documents supporting the NDF which the IACC has reviewed. For all these reasons the IACC cannot support the proposed Priority Area designation.

4. Regional Growth Area - Holyhead

The IACC is extremely disappointed and surprised that Holyhead has not been recognised or defined as a Regional Growth Area for Wales, especially given that the NDF specifically identifies the importance of the port of Holyhead to serve Wales, the wider UK and Ireland. This is not acceptable. The IACC is of a strong view that a clear

evidence base exists to justify Holyhead's inclusion as a Regional Growth Area given its potential strategic importance to Wales, and therefore suggests that the NDF is amended accordingly. Furthermore, this should be given greater prominence due the uncertainty surrounding Brexit. The implications for Anglesey and the wider region should the UK leave the EU on the 31st October (with or without a deal) are not clear, but it can be assumed that there would be a transitional period and this should be factored into the NDF when considering Regional Growth Areas. Whilst not objecting to North East Wales being the focus of strategic economic growth; the IACC seeks clarity as to how the plan will enable and influence growth in North West Wales. The potential of the Energy Island Programme and projects such as Wylfa Newydd in transforming the socio-economic landscape in North West Wales has been overlooked.

5. Vision for Rural Areas

Given the rural nature of Anglesey, supporting rural communities and their development is a key priority. The IACC is of the view that the draft NDF does not provide enough direction for rural areas. The importance of the NDF in guiding and informing development in rural areas of Wales is critical. Without such vision, there is a risk for greater disparity between urban and rural areas creating further challenges to rural areas. As such the IACC considers that the NDF should contain more policy guidance in relation to supporting employment opportunities, protecting and enhancing the Welsh language, tackling inequalities, resilient and cohesive communities, promoting connectivity (both transport and digital infrastructure) and enabling sustainable development. Greater recognition and guidance on the growth and development of tourism and the visitor economy in the final NDF is also required.

Tourism is the largest economic sector on the Island generating £311M (STEAM Report 2018) per annum to its economy. The sector supports approximately 4,000 jobs. Visitors come to Anglesey to experience its unique character and very special sense of place, peaceful and tranquil setting, its beaches, seascapes and its dramatic landscapes. Approximately 95% of Anglesey's coastline is designated Area of Outstanding Natural Beauty, it has 50km of Heritage Coast (including North Anglesey) as well as a number of other National and European designated sites. The designation of the majority of the Island for solar and wind (with virtually no socio-economic benefits) could potentially have a significant detrimental effect on the Island's tourism industry as the landscape and visual element of rural Anglesey could be significantly affected.

Whilst there is a significant difference between urban and rural development, it is essential that the NDF equally enables appropriate development to drive prosperity and growth in rural areas. The IACC believes that further engagement with the Welsh Local Government Association (WLGA) Rural Forum is required to discuss a shared plan.

6. Welsh Language Policy

Rural towns, villages and communities are critical to the character and fabric of Wales and it is these towns and communities that shape and define Wales. However, what makes Wales unique is the Welsh language. The Welsh language is most prevalent

in rural Wales and whilst IACC acknowledges the intention in the NDF to meet the objective of reaching one million Welsh speakers by 2050, it believes that not having a dedicated policy on the Welsh Language is a fundamental omission. Including such policy would align with the WG's Cymraeg 2050: Welsh Language Strategy and performance should be measured to sustain these Welsh communities and to meet the WG's target of 1 million Welsh Speakers by 2050. It is critical that this target is met to prevent net out migration of young people through providing affordable housing, jobs and opportunities for these rural areas to flourish from Welsh speaking communities.

7. Affordable Housing

Delay to the delivery of affordable housing is a key issue. The IACC note the reference to the need for an average of 47% of additional homes to be affordable housing for the 5 year period 2018/19 to 2022/23. However, this does not have regard to the impact of viability on market sites and that, on average; it is unlikely that a level of circa 50% affordable provision will be achieved in the majority of sites in rural locations across Wales. Whilst it is acknowledged that WG intend to use its funding, land, planning and housing policies to drive delivery, the issue of addressing market failure and infrastructure costs are not explained in the NDF. There is a growing need to raise the standard of existing social housing to modern standards; however, additional resources are required to ensure this happens.

8. Connectivity and Potential Third Crossing

The IACC is disappointed that no mention is made of the proposed new third crossing between the Island and mainland. This is considered to be short-sighted, unambitious and discouraging especially given the potential developments that could take place on the Island which would result in significant increases in traffic volume cumulatively. This would make entering and leaving the Island a major constraint and a barrier for growth. As a scheme previously promoted by the WG, this crossing should be included in the NDF. Whilst supportive of the principle for a North Wales Metro in enabling access to jobs, services and facilities, the IACC is of the view that this infrastructure should expand the entire North Wales region to Holyhead which will facilitate improved connectivity between North West Wales and North East Wales (and into North West England). Additionally, the final NDF should consider a range of solutions for a greener future for low carbon travel, including charging points, community transport, bio-fuel vehicles, and solutions to reduce the use of the private vehicle.

9. Air connectivity between North and South Wales

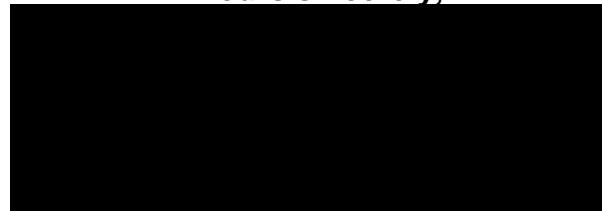
Draft Policy 32 relates to Cardiff Airport and supports its growth and development. Its importance as an international gateway is acknowledged connecting Wales to the world, and the IACC supports this. However, no mention is made of its national role and the importance of connecting North and South Wales, which is referred to in the Wales Transport Strategy and which acknowledges that the service plays a significant part in the economic development of north-west Wales, providing improved business connectivity, tourism opportunities and reduced journey times. IACC consider that the NDF should reflect this.

The issues raised, and further detail provided in Annex A need to be considered and addressed in preparing the final version of the NDF. If this is not the case, then the plan will not work for the residents, communities, economy and environment of the Island. This submission takes full regard for the present and the future and is in full alignment with the Wellbeing and Future Generations Act (2015).

It is hoped that the WG finds the IACC response to the NDF to be constructive in order to assist in creating an overarching development plan for the next 20 years that will shape the future growth and development of the country for the greater good of its people and the next generation.

The IACC is committed to working collaboratively locally, across North Wales and with the WG to ensure that the NDF is fit for purpose and there is clear alignment from the local level to the highest tier of planning which will provide the direction of travel for investment in infrastructure and development. In this regard I would welcome further dialogue with WG in order to ensure the above concerns are addressed appropriately.

Yours sincerely,



DYLAN J. WILLIAMS

Director of Place and Community Well-Being

APPENDIX A

1.0 Governance and Monitoring

- 1.1 The IACC accepts the principle of Strategic Development Plans and Regional Planning. However, being part of the first and only Joint Planning Policy Unit (JPPU) and Joint Local Development Plan (JLDP) in Wales the merits of three layers of planning policy remain unclear. The NDF aims to encourage local authorities to progress the creation of Strategic Development Plans (SDP) and to continue management of Local Development Plans. The governance arrangements, responsibilities and accountabilities are currently unclear in respect of developing the SDP - who is responsible and accountable in terms of co-ordination and delivery. Additionally, there are contradictions in the NDF with regards to the scale of the SDP whether this is for the whole region or at the sub-regional level. This needs to be made clearer within the framework as one would assume that the SDP's would need to be put into place in a very short period.
- 1.2 We question where the capacity and resources are to undertake the above activities. The IACC do not have the capacity, experience or capability to develop a Strategic Development Plan at the Regional level.
- 1.3 Chapter 3 outlines the NDF outcomes based on the national planning principles and national sustainable place-making outcomes set out in Planning Policy Wales (PPW). It notes that every part of the document is concerned with achieving the 11 NDF outcomes. Translating these into actions and outputs to deliver these outcomes is complex and challenging. Understanding who and how delivery will be monitored, aligned, and consistent with Local Development Plans and the Annual Performance Reviews would be beneficial.
- 1.4 The NDF forms part of the new suite of high-level documents (alongside the new Planning Policy Wales, the new Wales Infrastructure Consenting regime and the new Marine Plan for Wales). Collectively they will underpin strategic land-use planning in Wales across the next 20 years. The inter-relationships between these documents will be critical (content, interpretation, application, monitoring etc.). This will be complex, from a public sector, developer, stakeholders, and community/ resident perspective. Consistency will be key, including accessible and effective guidance and support. We would benefit from understanding how this will be progressed. Ensuring that there is consistency across all of these documents is of critical importance to ensure the way forward is clear and that there are no contradictions. This will be critical to maintain the reputation of the land use planning system in Wales, enable effective and efficient decision making, and minimise judicial processes.
- 1.5 The intention to undertake a full review every 5 years is welcomed and supported. In addition, we would propose that an annual monitoring report is collated and published. This would be consistent with the Local Development Plan arrangements.

2.0 Regional Growth Areas – Holyhead (Spatial Strategy)

2.1 We are disappointed and surprised that Holyhead has not been recognised or defined as a Regional Growth Area for Wales, especially given that Policy 20 & 21 of the NDF recognises the importance of the port at Holyhead to serve Wales, the wider UK and Ireland. The significant potential for growth and investment in Holyhead is also recognised. We request that Holyhead is added, recognised and given the status of being a key Regional Growth Areas in the final NDF. We are of the view that a clear evidence base exists to justify Holyhead being a regional growth area in the final NDF:

- Holyhead Port is one of the busiest ports in the UK with over 2 million-foot passengers and 450,000 of freight units passing through on an annual basis.
- It is the major port of embarkation/disembarkation for the North of England, Wales and the Midlands for the Irish Sea and forms a key part of international trade routes.
- Wales' busiest cruise ship port and Holy Island is a busy tourist destination characterised by attractive coastal scenery.
- There are constraints to maximising potential of the port, but significant expansion is recognised and planned as part of the North Wales Growth Deal.
- Post Brexit the Port will become a key international gateway into the UK that would ensure it continues to be a strategic gateway from Ireland through the UK into Europe.
- Significant potential for employment and housing growth which is well connected by road and rail.
- It has a large and expanding retail offer, a large industrial site with business premises, a strategic business park at Parc Cybi.
- Potential Land & Lakes Development which includes a leisure village with up to 500 lodges, cottages and associated facilities.
- Potential large scale mixed-used development at Holyhead Marina.

2.2 A number of references are made to the 'arc' of built up areas in North Wales that runs across the region where population, deprivation, key services, facilities commuting and economic activity are concentrated. The 'arc' stretches along the coast from the Menai Straits to the border with England. It appears that the decision to concentrate the majority of development to the arc from Caernarfon to Deeside is prejudicial against the economic development of Anglesey. Whilst pursuing a policy of this sort may bring economic prosperity to the area in general, it will not for Anglesey. We believe that the 'arc' should be extended further west and start from Holyhead.

3.0 Vision for Rural Areas

3.1 The importance of the NDF in guiding and informing development in rural areas of Wales, and not only urban development, is critical. Rural areas of Wales have vibrant and deprived rural towns and communities which need to be supported as important centres. Further consideration should be given to smaller / rural towns in the final NDF as they are key hubs.

- 3.2 Policy 4 states that the future of rural areas are best planned at the regional and local level – the draft NDF does not provide enough direction for rural areas. With very limited reference to rural development within the draft NDF there is greater threat that rural places in Wales are left behind and the gap between urban and rural area widens. This would be to the detriment of large parts of Wales which is rural in character and where 40% of the population live (settlements of less than 10,000).
- 3.3 If the future of rural Wales is to be limited to development focused on traditional industries (farming/tourism), and low carbon energy (which are not major employers), it is unclear where the necessary and desirable employment opportunities will come from.
- 3.4 The draft NDF does not clearly outline how the North Wales Coastal Settlements in the coastal arc from Caernarfon to Deeside, as an important sub-regional role to support the primary growth area of Wrexham and Deeside, will support viable and sustainable rural communities. It is unclear if the impacts of centralising development will be a positive and complementary enabler for the rural hinterlands. How will the NDF support rural areas to secure quality employment opportunities to stem the flow of outmigration, protect and enhance the Welsh Language, and enable sustainable development?
- 3.5 Linked to Transport and Connectivity how would WG ensure there is connectivity and good transport links from the rural areas to the identified primary growth areas?
- 3.6 Greater recognition and guidance on the further growth and development of tourism and the visitor economy in the final NDF would add value. Tourism is the largest economic sector on the Island generating £311M (STEAM Report 2018) per annum to its economy. The sector supports approximately 4,000 jobs. Visitors come to Anglesey to experience its unique character and very special sense of place, peaceful and tranquil setting, its beaches, seascapes and its dramatic landscapes. Approximately 95% of Anglesey's coastline is designated Area of Outstanding Natural Beauty, it has 50km of Heritage Coast (including North Anglesey) as well as a number of other National and European designated sites. This is of critical importance to future rural communities, with the opportunities and challenges needing careful consideration and balance.
- 3.7 Ensuring that all parts of Wales, including rural areas, are supported by modern telecoms infrastructure is welcomed. We are eager to better understand how the Mobile Actions Zones will be defined and allocated.

4.0 Welsh Language

- 4.1 We welcome the fact that the NDF recognises that the Welsh language is a key opportunity and challenge facing the nation, and the role of the plan in ensuring the national target of reaching a million Welsh speakers by 2050 is achieved.
- 4.2 For context, the Isle of Anglesey is a very unique and special place where the Welsh language and culture are integral to Anglesey's island identity. The

Welsh language, culture and heritage are of paramount importance. More than three-quarters of Anglesey children and more than half the adults living on the island can speak Welsh. Anglesey remains one of the strongholds of the Welsh language. The Welsh language is a natural element of everyday life, of social cohesion and of well-being on the Island. Safeguarding and enhancing the language is, therefore, of the highest priority in going forward and the IACC are eager to understand how the NDF will contribute towards this priority in Anglesey and North Wales.

- 4.3 We question why there is not a dedicated policy on the Welsh Language and the desired outcome of increasing the number of Welsh Speakers. This should align with the WG Cymraeg 2050: Welsh Language Strategy.
- 4.4 It is unclear why development of the Welsh language is limited only to areas '*where Welsh is the everyday language*'. What is the definition of everyday language? The current approach and wording will limit the relevance and commitment of bilingualism to defined spatial areas.
- 4.5 We question whether the NDF does enough to promote and protect the Welsh Language, and cannot over-emphasise the importance of the Welsh language and culture to Anglesey and North West Wales. This should be reconsidered prior to creating a final NDF.

5.0 Wind and Solar Energy - Renewable Designation

- 5.1 We fully accept the need for low carbon energy production to meet UK's transition following the recent announcement by UK Government of its Net Zero target by 2050. The production of various forms of low carbon energy production will be integral to reach this target and Wales will need to play its role in contributing towards this target.
- 5.2 The draft NDF highlights wind and solar energy as a form of low carbon production, however, tidal, hydro and off-shore developments should also be given the same prominence and importance.
- 5.3 The IACC in partnership with key stakeholders have established the socio-economic Anglesey Energy Island Programme (EIP) ([LINK](#)). Energy Island's vision is to create a once in a lifetime opportunity for jobs, economic growth and prosperity through capitalising on a number of transformational projects on Anglesey and putting Anglesey at the forefront of low carbon energy, research and development, production and servicing. In turn, this will provide a sound base to encourage economic diversification and transition, delivering positive benefits over the longer term.
- 5.4 However, the support for new energy infrastructure on Anglesey is grounded upon securing long-term employment and supply chain opportunities, and creating transformational economic growth, whilst ensuring adverse impacts are effectively mitigated.

5.5 The IACC has reviewed the background documents supporting the proposed Priority Areas for wind and solar. There is a lot of information in relation to the criteria applied. The justification and evidence for selection of the majority of the Island as a Priority Area for wind and solar energy is unclear. This is not acceptable and is of significant concern. The IACC objects to this designation.

5.6 The background documents to the NDF confirm that no analysis has been undertaken of the current capacity of the grid infrastructure serving the priority areas identified. This will have an impact over the level of additional infrastructure required and how such infrastructure could impact upon high value environmental designations.

5.7 The NDF identifies North and Central Anglesey as a priority area for wind and solar energy (Policy 10). However there is no detail in the NDF to explain how, why and what the criteria was for this location to be selected. We note that background work has taken place through The WG – Assessment of Onshore Wind and Solar Energy potential in Wales (Stage 1 & 2) ([LINK](#)), which provides the methodology, evidence, and justification on selecting the priority areas. The justification for the designations should be articulated far clearer in the final NDF.

5.8 The JLDP provides justification over the size of wind turbines / solar farms that can be accommodated having regard to Landscape Sensitivity and Capacity Study. It is understood that NRW are undertaking work to produce National Guidance in relation to this matter. Will the NDF consider such information in order to address site specific constraints and to see whether Priority Areas remain valid locations?

5.9 We are concerned about the presumption in favour of development for these schemes (Policy 10) and an associated acceptance of landscape change. The diagram on page 48 identifies the West as an area of high landscape and environmental quality. This contradicts the notion that this is an area that can accept in principle changes to the landscape.

5.10 It appears that one of the Special Landscape Areas identified within the Anglesey & Gwynedd Joint LDP falls within the Anglesey Priority Area. Such areas are supported by a Statement of Value and Significance which clearly set out how each area meets the criteria for designation, and includes a set of 'special qualities' that underpin the designation. Any development proposals within the SLA will need to take account of its special qualities. This should also be reflected within the NDF.

5.11 Consideration needs to be given to the impact of development on the setting of the National Park and the AONB. Part of Priority Area 1 is in close proximity to the AONB in the North of Anglesey. We note the text to draft Policy 12 which states that proposals close to the boundaries of these designated areas must demonstrate that the development will not undermine the objectives that underpin the purposes of the designation, but it is unclear how this approach dovetails with Policy 10 and the presumption in favour of development within a

Priority Area. Policy 10 simply requires impacts on National Parks and AONBs to be minimised, suggesting that the presumption in favour of development takes precedence. That should not be the case and the NDF should make it clear that Policy 12 takes priority over that presumption.

5.12 Pg.11 of the NDF states that it '*does not seek to identify the exact location for new development*' having previously stated that strategic and local development plans (that do identify locations) 'must' conform with the NDF (pg.10). In respect of the wind and solar designation there is, therefore, some contradiction as the Potential Solar Farm Search Areas in the JLDP do not correlate with what is proposed in the NDF. In addition, the Wind and Solar sites lie outside the Strategic Search Areas identified in TAN8 and it would appear, therefore, that the NDF is in conflict with TAN8 and by implication with PPW. This will need to be resolved by the time the final NDF is published.

5.13 We welcome the inclusion of Policy 22 – North West Wales and Energy (Page 54) in principle, and request that the following points are considered further to inform and enhance the final NDF:

- a) Direct reference the Isle of Anglesey's Energy Island Programme and its vision / objectives
- b) Give greater thought and prominence to the need to invest in energy transmission infrastructure
- c) Give greater recognition of the need to invest in training and skills; work with universities and businesses across the region and North West England
- d) Welcome recognition of the need to work with the North West Nuclear Arc
- e) Recognise the need to develop centres of excellence in Universities
- f) Recognise the supply chain opportunities, especially linked to nuclear energy

5.14 Reference is made to one gigawatt of renewable energy consumption to be generated from locally owned renewable energy projects and that at least an element of local ownership by 2020. Further clarification should be included in the NDF over what is defined as local ownership of a project to ensure that it complies with this target and that the project is to the benefit of the community.

6.0 Wylfa Newydd

6.1 There is currently insufficient attention and status given to the potential development of a new nuclear build on Anglesey. The Easy Read version of the NDF consultation does not promote nuclear in a positive light and there is only a passing reference to these developments under Policy 22. This is disappointing and unacceptable, and we would strongly urge the WG to review and update. A decision is due to be made by the Secretary of State on the Development Consent Order in October 2019.

6.2 The UK Government's commitment for Net Zero carbon emissions by 2050, compared to 1990 levels¹, and WG Ministers duty to ensure the net Welsh

emissions in 2050 are 80% lower than the existing baseline in 2050² means that the Wylfa Newydd Project has the potential to play a significant role in reaching these targets. As a low carbon source of energy, the UK Government has clearly stated that nuclear power generation has an important role to play in the diversification and decarbonisation of electricity demand.

- 6.3 The WG, through its low carbon transition strategy, and the IACC, both recognise the important contribution new nuclear power can make to the UK's energy mix and security of electricity supply and both support the principle of development of a new nuclear power station at Wylfa. They also anticipate that the development of a new nuclear power station at Wylfa will be a fundamental driver for long term, sustainable economic growth on Anglesey and in the wider North Wales region and this should be given more emphasis in the NDF.
- 6.4 In September 2017, the WG published Prosperity for All: The National Strategy; that sets out how WG will deliver the Programme for Government. It takes the commitments in the Programme for Government and sets out how they will be delivered by bringing together the efforts of the whole Welsh public sector. The Strategy specifically mentions the need to harness the opportunities from Wylfa Newydd and the need to link new housing with new major infrastructure developments.. Clarity is required as to how the NDF will interconnect with other high level WG documentation and that they all provide a clear and consistent message on what is to be delivered. The NDF is currently not aligned with the 'Prosperity for All' document when it comes to Wylfa Newydd.
- 6.5 The key strategic importance of the Wylfa Newydd Project is fully recognised in the IACC's Energy Island Programme (EIP) and WG Enterprise Zone ([LINK](#)) which together aim to create a geographical hub of excellence for the development, implementation and servicing of low carbon energy initiatives.
- 6.6 Therefore, the Wylfa Newydd Project will have important implications for the Island's and wider North Wales economy, its communities and environment which needs to be fully recognised in the final NDF.

7.0 Enterprise Zones

- 7.1 There is some reference to Snowdonia, Deeside and Cardiff Airport Enterprise Zones. We request that the Anglesey Enterprise Zone ([LINK](#)) is also referenced, especially when presenting North West Wales and Energy in Policy 22.
- 7.2 Anglesey's Enterprise Zone status alongside its Energy Island Programme is driving the island's growth into a world-renowned centre of excellence in low carbon power generation. There is also the designation of the Marine Demonstration Zone dedicated to marine energy devices to the deep water Port of Holyhead – one of the UK's main gateways to Ireland. These should be included in the NDF to provide relevant context and to outline that Anglesey is home to attracting low carbon energy related developments that will provide transformational job and supply chain opportunities that will contribute towards transforming the local and regional economy.

8.0 Connectivity and Potential Third Crossing

- 8.1 We agree that the regional transport connectivity is primarily West/East (and vice versa) which connects with North West England (rather than North Wales to South Wales). Ensuring that Anglesey is connected to the rest of the North Wales region is of critical importance. One of the key challenges in NWW is to improve transport infrastructure from West to East (and vice versa).
- 8.2 It is disappointing that no mention is made of the proposed new third crossing between the Island and mainland. This is considered to be short-sighted, unambitious and discouraging. We request that this is recognised, and that the final NDF includes the third crossing. This is especially the case when bearing in mind potential developments that could take place on the Island which would add up to significant increase in traffic volume cumulatively, which would subsequently make entering and leaving the Island a major constraint for both residents, commuters and visitors. Additionally, the third crossing is vitally important to connect freight from Ireland to the UK and beyond and to ensure that the Isle of Anglesey is not a barrier for growth, investment and development.
- 8.3 Greater clarity and definition (scope and benefits) of the North Wales Metro (Policy 21) would also be beneficial. This is seen as a vital service to ensure there is improved connectivity between North West Wales, North East Wales, and the North West of England (daily in both directions) to access jobs, services and facilities. The programme of investment being progressed by Transport for Wales, and links to housing, employment etc. should also be enhanced in the final NDF.
- 8.4 Further consideration to Active travel within the NDF would be valuable to explain what activities will be undertaken to improve public transport and walking / cycle paths especially in rural areas. The improvement in active travel can also bring tourism benefits, health and wellbeing benefits and green infrastructure compatibility to the region.

9.0 Air connectivity between North and South Wales

- 9.1 Draft Policy 32 relates to Cardiff Airport and supports its growth and development. Its importance as an international gateway is acknowledged connecting Wales to the world, and the IACC supports this. No contextual information nor how the Airport might be enhanced in terms of routes to connect Anglesey to other strategic locations is provided. There is no mention is made of its national role and the importance of connecting North and South Wales, which is referred to in the Wales Transport Strategy and which acknowledges that the service plays a significant part in the economic development of north-west Wales, providing improved business connectivity, tourism opportunities and reduced journey times. IACC consider that the NDF should reflect this.

9.2 The IACC considers that Anglesey Airport should be defined as 'Regional Connectivity' in the final NDF to demonstrate the connectivity by air between Anglesey and Cardiff.

10.0 Housing & Affordable Housing

10.1 The document refers to the least prosperous/most deprived area of Wales being west Wales and the Valleys, hence its qualification for European grant assisted aid in recent years. Despite this, the strategic direction taken by the NDF is to target economic and housing development on the most prosperous areas of north-east and south-east Wales (including the city of Swansea). This appears to follow a direction that is counter-productive to bringing prosperity to the areas most in need of help, whilst continuing to support the more prosperous areas. This is a cause of great concern.

10.2 Housing policy should seek to ensure socially balanced communities, avoid worsening division of Wales into rich and poor areas by supporting more affordable housing in expensive areas, and supporting higher-end market housing in poorer areas to retain / inject wealth & social capital.

10.3 The IACC agree that in order to address both the 'delivery gap' and housing need a shift in the delivery model is required. Over reliance on the private sector to deliver affordable housing has meant that fewer affordable homes have been built and this has contributed significantly not only to the widening of the 'delivery gap', but has resulted in more people/families being in affordable housing need. Cost of land, cost of construction, materials etc. has made building affordable housing (particularly at the smaller localised scale) unviable. This is particularly prevalent in rural areas where demand outstrips supply resulting in increased house prices and outward migration of younger people.

10.4 Whilst the IACC welcome the recognition that there has been over reliance on the private sector, further detail is required on how the WG intend to encourage / incentivise local authorities, social landlords and small and medium sized builders to build these affordable houses to meet the increasing demand.

10.5 Viability is a major issue for house builders, particularly in rural areas. The large number of new build housing in rural areas are self-build plots (infill sites and rural enterprise houses built on family owned land, for example) as this is the only way in which local people can afford to stay in their community. Expecting private developers to increase the provision of affordable housing in rural areas is unrealistic as these developments /sites would become unviable without financial support.

10.6 The Anglesey and Gwynedd Joint Local Development Plan (JLDP) was adopted in July 2017 and a Joint Housing Land Availability Study (JHLAS) was completed jointly for both authorities in 2019. The 2019 JHLAS ([LINK](#)) demonstrated a 6.3 years supply of land for housing. The newly adopted JLDP includes a number of housing allocations on the Island and provides for opportunities on windfall sites. Therefore, there is no current shortfall in the supply of land for housing.

- 10.7 There were 83 sites in Anglesey with planning permission for five or more units that were relevant to consider in the 2019 JHLAS study. Six of these sites were completed during the previous year but 70 of these sites did not see a single unit completed during 2017/18. Twenty-Eight sites have an element of the units permitted classified as being within categories 3 and 4 of the JHLAS i.e. not envisaged to be built within 5 years. As we have a newly adopted JLDP there are also numerous allocated housing sites within the JLDP that are not yet subject to planning permission. However, the planning system is reliant on developers to deliver required houses on policy compliant land.
- 10.8 What this demonstrates is that the planning system provides the opportunities to build affordable housing (i.e. sufficient land and allocations) but more needs to be done to encourage housebuilding. This delivery gap will continue to widen if developers have to deliver 47% affordable housing to meet the demand. This is not a viable option in rural areas and more needs to be done to incentivise private developers as well as funding Local Authorities and Social Landlords to build and let affordable units.
- 10.9 The supporting text to Policy 18 refers to planning and co-ordinating the delivery of new housing to meet identified needs. The WG central estimates 19,400 (Page 51) additional homes are needed in the North Wales region until 2038 and over the initial five years 2018-2023 51% of the additional homes need to be affordable. We are eager to better understand the evidence base, justification and rationale for the number of homes in general, especially affordable housing numbers as, although we have undertaken a broad review of the various background documents, we have not found it easy to ascertain how the various figures have been arrived at. The Framework needs to be clearer on what the status of the figure of 19,400 means within the NDF for the North Wales region so they can provide meaningful evidence and context to SDPs/LDPs.