
Retention of Site Compound: Supporting Planning, Design and Access Statement

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1 Introduction

- 1.1.1 This Planning, Design and Access Statement has been prepared by Horizon Nuclear Power Wylfa Limited (Horizon) in support of a retrospective planning application for submission to the Isle of Anglesey County Council (IACC) for the change of use of land for use as a temporary workers compound, with storage and welfare facilities for a period of 36 months on land adjacent to the access road that serves the Magnox North facility at Wylfa. The submitted Site Location Plan Dwg. No. EL (9-) 01 illustrates the location of the application site.
- 1.1.2 The retention of the Compound will ensure that there is a single, dedicated area within which staff and plant associated the various activities required within the site can be located securely. This will ensure that traffic movements to and from the site are reduced to the minimum number of routes to a single destination, it will reduce ad hoc parking and provide a focussed and managed location for vehicles attending the site.
- 1.1.3 This application has been prepared and submitted by Horizon. Horizon's ultimate parent company is Hitachi Ltd, a Japanese corporation and the parent company of the multinational Hitachi group of companies. Horizon is part of the Horizon Nuclear Power Limited group of companies and has premises in Gloucestershire and a site office on Anglesey.

2 Site Description

- 2.1.1 The Site Compound associated with the proposed Wylfa Newydd development is located approximately 500 metres to the north west of the settlement of Tregele and a similar distance from the former Wylfa Power station to the north. It is accessed directly from the main access road that continues to serve the former power station and the Wylfa Newydd site offices and connects to the A5025 (Tregele to Cemaes Road).
- 2.1.2 The Compound extends to a total of approximately 0.85 hectares (ha.) and currently includes the temporary storage of six shipping containers and two mess facilities. It is defined on its eastern (road-facing) boundary by wooden hoardings of some 2.4 metres in height.
- 2.1.3 All other boundaries are defined by temporary (Heras-type) mesh fencing of 2.0m height. A bund consisting of material form top-soil stripping is located outside of the fencing on the western side of the compound. The current layout of the facility is illustrated on drawing EL (9-) 02.
- 2.1.4 The planning application proposes to retain the compound in its current layout, with the addition of a concrete apron access onto the main access road of the former Power Station totalling an approximate 120m². Offices in temporary buildings, as well as welfare and mess facilities, a fuel store and parking for office-based staff and the site workforce are located within the site generally in close proximity to the entrance/exit.
- 2.1.5 The surface consists of placed and compacted granular fill material (MOT 1) overlying a layer of open grade single size aggregate (Type 6F2) to maintain a degree of porosity through the surface. All cleared topsoil material is stored in the bund on the western boundary. In order to enable the required flexibility of the use of the Compound by different contractors, there are no other markings (for parking etc) or fixed features within the compound, although temporary mesh fencing is deployed on occasion to demarcate areas allocated to different contractors.
- 2.1.6 Planning permission for the creation of the central area of the current compound was granted in 2014 as part of the ground investigation and borehole exploration works under planning approval reference 20C265B. This established the principle of the development on the central 0.479ha of the site. Since the formation of that part of the Compound, additional areas amounting to some 0.51ha. have been formed in order to ensure adequate provision for vehicles and associated temporary features associated with various on-going investigations and site works. These extents are as illustrated on drawing EL (9-) 03

3 The Development

3.1 The Site Compound

- 3.1.1 The planning application consists of the following elements:
- retrospective planning permission the retention of the original Site Compound area;
 - retrospective planning permission for the enlarged site compound area;
 - retrospective planning permission for the retention of the site hoardings; and
 - retrospective planning permission for the improved site access.
- 3.1.2 The retrospective nature of this planning application is such that all of these elements are currently in place on the site and will be retained for up to 36 months from the date of planning permission.
- 3.1.3 Horizon will be submitting a planning application for Site Preparation and Clearance (SPC) works associated with the Wylfa Newydd project. The SPC application will be submitted during September 2017 and include a revised layout for the Main Site Compound that will reflect its specific requirements for that scheme. In the event that the SPC application is permitted, it is intended that any permission associated with the retention of the current Compound is superseded and all operational and restoration requirements associated with the latter permission will be applied.

3.2 Operational Measures

Site Controls

- 3.2.1 The Site Compound may be illuminated during the hours of work provided, namely 07:30 to 18:30 on weekdays and 07:30 to 13:30 on Saturdays. This would be achieved using passive infra-red, LED security lighting.
- 3.2.2 The security facilities associated with the main site compound would ensure that all visitors and/or workers associated with the SPC Proposals could be security cleared centrally.

Foul Drainage

- 3.2.3 Foul drainage from on site mess facilities is discharged to a holding tank where it is removed off site to a licensed facility on a bi-weekly basis or as required.

Surface Water Drainage

- 3.2.4 The hard surfacing is graded and compacted stone and based upon the guidance contained within the Institute of Hydrology published documentation (IHR 124) and the Modified Rational method 60% of all rainfall on the surface runs off, as opposed to 35% for grassed or greenfield areas. The remaining 40% infiltrates into the underlying strata.

- 3.2.5 With regards to disposal of surface run off reference should be made the drainage strategy document which support the application.

Traffic movements

- 3.2.6 It is estimated that use of the Compound would generate an estimated 50 vehicle movements per day. The vehicle types are restricted to cars, light vans and commercial vehicles as well as occasional heavy goods vehicles associated with works and / or maintenance of the compound facility.
- 3.2.7 This relatively limited traffic generation would not significantly affect the anticipated baseline conditions of these roads and the nearby highway network is considered capable of accommodating the generated traffic.

Restoration

- 3.2.8 The 2014 permission was subject to a restoration condition, the terms of which have been approved by the planning authority. In the event that the SPC planning application is not permitted (either as a stand alone permission or as part of the Development Consent Order associated with the Project), an updated restoration scheme will be submitted for approval by the planning authority.
- 3.2.9 The restoration works, if required to be undertaken, would take approximately 6 months to complete, followed by an agreed aftercare period to ensure suitable landscape maintenance. The works required to complete the restoration would include the removal and restoration of the site compound, crushed materials and all fencing and the re-distribution of topsoils across the site.

4 Design and Access

- 4.1.1 The following section addresses matters relating to the design and access credentials of the proposals.

Use

- 4.1.2 The application relates to the retrospective change of use of land for use as a temporary compound, with storage and welfare facilities for a period of 36 months on land adjacent to the access road that serves the Magnox North facility at Wylfa.
- 4.1.3 The compound is required to allow for the provision of temporary offices, as well as welfare and mess facilities, a fuel store and parking for office-based staff and the site workforce. The site compound area is to be used for the provision of fencing and site security facilities, and a secure parking area for plant and machinery.

Design

- 4.1.4 The Compound will remain in its current location adjacent to the main access road to the former Magnox facility. It is considered to be the most desirable as it is an existing compound and would allow appropriate and safe access for delivery vehicles and site operatives. The Compound at this location also avoids sensitive features.
- 4.1.5 The size of the compound is sufficient to provide all required facilities. Its layout is largely dictated by functional and operational requirements; however, design principles have been incorporated where possible.
- 4.1.6 There is a requirement for the Site Compound to be illuminated; the amount of lighting and its luminance will be kept to a minimum necessary to operate the site and provide safety for staff. Furthermore, lighting would only be used during the operational hours for works outside of daylight. It is therefore likely that the lighting is only required for short periods at the start and end of working days during typical winter months.

Character

- 4.1.7 Given the retrospective nature of this application, the proposals do not result in either an increase in floorspace or change in design from that currently implemented. The proposed use is deemed to be appropriate to the character of nearby land uses. In addition, permission is only sought for a period of 36 months before being restored.

Access

- 4.1.8 Access for all vehicles to the site would be from the Existing Power Station access road (beyond the point at which it ceases to be public highway). The Existing Power Station access road links to the A5025 to the east.

Movement

- 4.1.9 The proposals relate solely to the temporary change of use of land. The principle of movement to and from the land has been previously established as acceptable and remains unaltered.

Environmental Sustainability

- 4.1.10 The proposed temporary change of use will result in the retention of a compound area. The management of the site and operational controls will ensure that the proposals are compliant with general sustainability requirements. Further reference to compliance with sustainable drainage is given within the drainage strategy that accompanies the application.

Community Safety

- 4.1.11 As a private facility members of the general public shall have no recourse to enter or cross the site. Notwithstanding this fact the security fencing and site controls will ensure that only authorised personnel can access the site.

5 Planning Policy

5.1.1 This section sets out the planning policy framework relevant to the consideration of the application for the SPC Proposals. A summary of the documents, their purpose and their status is provided below.

5.1.2 The basis for determining planning applications is set out at Section 38(6) of the Planning and Compulsory Purchase Act 2004, which states:

“If regard is to be had to the development plan for the purposes of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.”

5.1.3 Planning policy and guidance which form material considerations for this application and are relevant to the retention of the main site compound are:

5.2 National Planning Policy

- Planning Policy Wales: Edition 9, November 2016 (PPW);
- Technical Advice Notes (TAN):
 - TAN 5: Nature Conservation and Planning, 2009
 - TAN11: Noise, 1997
 - TAN12: Design, 2016
 - TAN14: Coastal Planning, 1998
 - TAN15: Development and Flood Risk, 2004
 - TAN18: Transport, 2007

5.3 Local Planning Policy

5.3.1 The adopted development plan for Anglesey currently comprises the following documents:

- Ynys Môn Local Plan, 1996 (YMLP); and
- Gwynedd Structure Plan, 1993 (GSP)

5.3.2 Other local planning policy and guidance which form material considerations for this application are:

- New Nuclear Build at Wylfa: Supplementary Planning Guidance, 2014 (Wylfa SPG);
- Stopped Ynys Môn Unitary Development Plan, 2005 (Stopped UDP);
- Emerging Anglesey and Gwynedd Joint Local Development Plan (Composite Plan, April 2016) (Emerging JLDP);

5.3.3 A summary of the contents of these documents and their status is provided below. Consideration is given by Horizon to the weight to be applied to individual policies and guidance within the planning policy framework in assessing the proposals.

5.4 Development Plan

- 5.4.1 The GSP and YMLP form the current development plan for Anglesey. The GSP, adopted in 1993, sets out the strategic framework for development in Anglesey for the period 1991 to 2006 and the YMLP, adopted in 1996, provides more detailed planning policies to support the broader framework of the GSP covering the period 1991 to 2001 and has the overarching purpose to 'safeguard and strengthen communities by promoting policies which help improve the local economy'.
- 5.4.2 Given their dates of adoption, neither of the plans contain policies which directly consider the development of a proposed new nuclear power station at Wylfa, or works to facilitate its delivery.
- 5.4.3 While these documents comprise the extant development plan, it is important to note that the periods they were intended to cover have now expired. Policies and provisions contained within these plans can therefore be considered out of date.
- 5.4.4 In circumstances where policies within the development plan are outdated, PPW at Paragraph 2.14.4 is instructive. This confirms that local planning authorities should give policies decreasing weight in favour of other material considerations, such as national planning policy, in the determination of individual applications, including the presumption in favour of sustainable development. Policies within the YMLP and GSP should be considered in this context.

5.5 National Level

Planning Policy Wales, Edition 9 (2016)

- 5.5.1 The 9th edition of PPW was published in November 2016. This document provides the land use planning policies of the Welsh Government, translating the commitment to sustainable development into the planning system so the Government can play an appropriate role in moving towards sustainability.
- 5.5.2 The policies cover all matters which can be material in the consideration and determination of planning applications and are supported by the various TANs and other Welsh Government Circulars and policy clarification letters. Due to its recent publication, PPW can be considered to contain an up to date representation of Welsh Government Policy and, as such, significant weight must be applied to its provisions, with weight afforded to policies contained within other material planning documents based on consistency with PPW.

Technical Advice Notes

- 5.5.3 A number of TANs, listed above, are material considerations with respect to the preparation, consideration and determination of this planning application.

These advice notes are prepared to be read alongside PPW, providing more detailed, topic specific, guidance on how national policy will be realised.

5.6 Local Level

New Nuclear Build at Wylfa: Supplementary Planning Guidance (2014)

5.6.1 The Wylfa SPG was published by IACC in 2014. Its purpose is for IACC to provide advice on important local direct or indirect matters relevant to the Wylfa Newydd Project in response to national and local policies and strategies.

5.6.2 IACC's Vision for Wylfa Newydd is confirmed as:

"The New Nuclear Build at Wylfa is a positive driver for the transformation of the economy and communities on Anglesey, providing sustainable employment opportunities, improving the quality of life for existing and future generations and enhancing local identity and distinctiveness."

5.6.3 The Wylfa SPG, while not forming part of the development plan, represents the most up to date adopted guidance and position of IACC in relation to the Wylfa Newydd Project. Given its direct relevance to the Wylfa Newydd Project and, accordingly, this application for the retention of the main site compound, its provisions represent an important material consideration. Guidance contained within the Wylfa SPG can therefore be given according weight in determination of the application. It is however understood that the SPG is currently being revised by IACC.

Stopped Ynys Môn Unitary Development Plan (2005)

5.6.4 The Stopped UDP was prepared with the intention of replacing the extant development plan. This document underwent independent examination and was subject to an Inspector's Report. However, IACC resolved to stop work on the document and not progress towards adoption in December 2005, to start work on the Local Development Plan.

5.6.5 Despite the Stopped UDP not proceeding to formal adoption, the advanced stage the document had reached in the process of adoption prior to IACC deciding to cease its further progression, means its provisions can be considered a material consideration in the determination of planning applications. The weight to be afforded to relevant policies within this document should be based on consistency with current national planning policy.

Emerging Joint Local Development Plan

5.6.6 The Emerging JLDP covers the local authorities of IACC and Gwynedd Council. Once adopted, the JLDP will replace the extant development plans

for both authorities and form the basis for land use planning in these areas. The JLDP is intended to cover the period 2011 to 2026.

5.6.7 The overall vision of the JLDP is:

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

5.6.8 The JLDP considers the Wylfa Newydd Project stating;

“The New Nuclear Station at Wylfa is a positive driver for the transformation of the economy and communities on Anglesey, providing sustainable employment opportunities, improving the quality of life for the existing and future generations and enhancing local identity and distinctiveness.”

5.6.9 It recognises that the Wylfa Newydd Project will require significant private sector investment, especially in infrastructure, bringing major economic, social and environmental opportunities. The JLDP also includes policies relating to Wylfa Newydd, including Policy PS9 which outlines the factors which will be taken into account when considering various components of the project.

5.6.10 Examination of the JLDP took place in September 2016 with the Inspector’s Report currently expected in March 2017. On this basis, the JLDP is scheduled for adoption towards the end of May 2017.

5.6.11 With regards to emerging plans, PPW at paragraph 2.14.1 confirms that the weight to be given to the document in development management decisions will depend on the stage it has reached in preparation and examination, but confirms this does not necessarily increase as the plan progresses towards adoption. It is outlined that local planning authorities must consider carefully the underlying evidence and background to policies to determine the weight to be afforded with national planning policy as a material consideration. It is also noted that certainty regarding the content of the JLDP will only be achieved once the Inspector’s Report is published. Assessment of the SPC Proposals against Emerging JLDP policies should therefore be undertaken in this context.

6 Planning Assessment

6.1.1 This Chapter demonstrates consideration of potential impacts resulting from the Site Compound proposals, both beneficial and adverse. In undertaking this assessment, the effects of the have been used and considered against material planning policy requirements. Following consideration of anticipated impacts arising from the development, any identified adverse effects and potential non-compliance with planning policy requirements which cannot be eliminated by mitigation are considered, and balanced, against the benefits resulting from (or facilitated by) the site compound proposals.

6.2 Assessment of Benefits

6.2.1 The Wylfa Newydd Project as a whole represents a significant investment into the local economy. The Wylfa SPG at paragraph 4.1.6 recognises the project is a major investment with the potential to support Anglesey's economy and the economies of the wider North Wales region. The Emerging JLDP also confirms that the Councils and their partners acknowledge the likely significant economic opportunities deriving from the Wylfa Newydd Project.

6.2.2 Undertaking initial investigation works has enabled the preparation of the DCO submission and, in the event that the DCO is granted, the benefits associated with the operational phase of the power station can therefore be realised.

6.2.3 The continued use of the compound would result in an economic benefit in themselves due to investment required to undertake the project and opportunities for the local supply chain.

6.2.4 Moreover, the provision of a facility for managed site works and access would ensure that potential transport and amenity impacts associated with site investigations are kept to an acceptable level and site access and security can be managed effectively.

6.3 Assessment of Impacts

6.3.1 In terms of the principle of the development this has been previously established under the 2014 permission, although it is acknowledged that the compound area has subsequently been extended. The provision of a site compound in this location was found to be acceptable given the nature of the surrounding land uses, the former Wylfa Sports and Social Club and the former Power Station, and the facilitative role the compound takes in supporting the overall objectives of the Wylfa Newydd Project.

6.3.2 To determine the overall acceptability of the retention of the Site Compound subject to this application, assessment against planning policy is undertaken below on all matters deemed material to its consideration. These matters are:

- Landscape and Visual Amenity;
- Design;
- Ecology;

- Cultural Heritage;
- Socio-Economic;
- Traffic and Transport;
- Residential Amenity (including noise and vibration, air quality, health and wellbeing);
- Soils and Geology;
- Surface Water and Groundwater;

Landscape and Visual Amenity

Policy Context

- 6.3.3 YMLP General Policy 1 requires development to take into account any site or area of landscape interest. This policy also requires consideration of adequate and appropriate landscaping. GSP Policy D31 also states that there is presumption against the development of open spaces which are an essential part of the character or function of a settlement. YMLP Policy 32 confirms that applications which result in the loss of trees, hedgerows, stone walls, cloddiau and other traditional landscape features will be refused, unless acceptable proposals are included for their replacement.
- 6.3.4 The Development Plan refers to the existing designation of SLA within the application site. Ynys Môn Local Plan Policy 31 requires development in such areas to have particular regard to the special character of the surroundings and Gwynedd Structure Plan Policy D3 states that development should only be permitted if it is capable of being satisfactorily integrated into the landscape.
- 6.3.5 The Wylfa SPG also requires Wylfa Newydd Project development to not have significant adverse impacts on SLAs or LCAs. The Stopped UDP Policy GP1 also requires development to safeguard and enhance the integrity and continuity of the environment, including landscape features. With regards to other material local policy and guidance, Stopped UDP Policy EN1 and the Emerging JLDP require development to fit into its surroundings without significant harm to local character areas.
- 6.3.6 The emerging JLDP proposes to remove the SLA covering the SPC Application Site. While the importance to respect local landscape character is recognised, the requirements of national policy further indicate the development plan and other policies in this regard should be given more limited weight in this respect. This is reflected in the revised wording of emerging Policy PS16 in the Statement of Common Ground between: Isle of Anglesey County Council and Gwynedd Council and Horizon Nuclear Power Wylfa Limited. Both parties agree that an amendment will be proposed to change Policy PS16 to clarify that proposals that have a significant adverse effect on Plan area's distinctive natural environment, countryside and coastline will be refused, unless the need for and benefits of the development

in that location clearly outweighs the value of the site or area and national policy protections for that site or area.

Assessment

- 6.3.7 The principle of the original compound, in its current location, was established under the 2014 permission. Given the scale and impact of the original compound it is considered that the enlarged compound, subject to this application, would have no greater impact on the landscape of the surrounding area or on visual impact over and above that of the compound previously approved.

Design

Policy Context

- 6.3.8 Good design is recognised as an important feature by the relevant planning policies. YMLP Policy 42 confirms IACC will favour proposals for development which promotes a high quality of design, while GSP Policies D4 confirms location, siting and design will be material consideration of all applications and D29 seeks to ensure new development exhibit a high standard of design and are suitably sited in the townscape or landscape.
- 6.3.9 GP20 of the Wylfa SPG requires all development related to the Wylfa Newydd project to adopt high quality design principles. The Stopped UDP at Policy GP2 and Emerging JLDP at Policy PCYFF2 also promote high quality design and set out criteria for achieving this.
- 6.3.10 PPW contains similar provisions, confirming that good design is central to achieving sustainable development.

Assessment

- 6.3.11 As a pre-existing site compound the site's location, siting and design principles have already been established and considered acceptable as part of the 2014 permission. However, whilst the proposals represent the extension of the original compound, based on those same principles, the compound has been designed to ensure that it will allow for the most efficient use of space, providing a site layout that allows for optimal operational functionality.
- 6.3.12 The compound's location and siting allow appropriate and safe access for delivery vehicles and site operatives, as it is adjacent to the Existing Power Station access road from which vehicles would enter the site, as well as avoiding the most sensitive constraints within the wide SPC site.

Ecology

Designated Sites

- 6.3.13 It should be noted that the application site does not fall within any identified ecological designated sites. The Tre'r Gof Site of Special Scientific Interest is located some 500m to the north-east. As such, given the localised effects of the compound's extension it is not considered that the proposals would have any detrimental impact on the SSSI or any other sites of ecological designation. Nevertheless an ecology survey and report have been procured and supports the submitted application.

Protected Species

Policy Context

- 6.3.14 With regards to protected species YMLP Policy 1 requires wildlife species of significance to be taken into account when determining applications. The Wylfa SPG GP20 requires Wylfa Newydd related development to not have significant adverse impacts on species protected by legislation and key habitats and species. The Emerging JLDP Policy PS16 confirms that internationally, nationally and locally protected species will be safeguarded.
- 6.3.15 These policies are consistent with the requirements of PPW which confirms the presence of protected species is a material consideration and that development must conform to any relevant statutory provisions

Assessment

- 6.3.16 The site of the existing compound is of negligible ecological value and included semi-improved grassland within both the original and the extended development area. Nonetheless clearance works were undertaken outside of breeding seasons and in accordance with prescribed methodology to avoid potential effects on protected species. As such it is considered that the site compound subject to this application would not result in significant adverse effects on protected species in this instance.
- 6.3.17 The site is in close proximity to the designated bat roost in The Lodge adjacent to the Magox access road. Reference should be made to the ecology report that supports the application for any mitigation measures.

Heritage

Archaeology

Policy Context

- 6.3.18 General Policy of the YMLP confirms that archaeological interest will be taken into account in determining planning applications. YMLP Policy 39 and GSP Policy D15 set out graded protection of archaeological assets, giving greatest protection to Scheduled Ancient Monuments.
- 6.3.19 The Stopped UDP Policy GP1 confirms development must safeguard and enhance the integrity of archaeological sites. Archaeology is considered further in Policy EN12 which confirms preservation of Scheduled Ancient Monuments and protection of unscheduled sites which merit protection. Policy

AT4 in the Emerging JLDP sets out protection of non-designated sites and confirms the proposals which affect locally important archaeological remains will only be granted if the need for the development overrides the significance of the remains.

Assessment

- 6.3.20 The archaeological investigations undertaken by Horizon in respect of the Wylfa Newydd project have not revealed any potential interest within the footprint of the extended compound.
- 6.3.21 The nature of the creation of the compound (i.e. soil stripped and a crushed material surface) is such that there would have been no material impact on features of interest below the surface.

Physical Assets

Policy Context

- 6.3.22 Policy 41 of the YMLP and D22 of the GSP are concerned with the protection of listed buildings and/or buildings of special architectural or historic interest and their setting from inappropriate development. YMLP Policy 40 and GSP Policy D26 are concerned with the protection of conservation areas and their setting from inappropriate development.
- 6.3.23 The Wylfa SPG GP22 requires cultural heritage assets and their settings to be conserved or enhanced as a result of the Wylfa Newydd development.
- 6.3.24 Policies EN12 and EN13 of the Stopped UDP confirm the same protection as outlined in development plan policies. Furthermore, Policy EN10 confirms a presumption in favour of the protection, conservation and restoration of parks and gardens of special historic interest and their setting. Emerging JLDP Policy PS17, supported by Policy AT1, confirms that proposals which preserve and enhance listed buildings, conservation areas and registered Historic Landscapes, Park and Gardens, their setting and significant views into and out of them will be granted.

Assessment

- 6.3.25 The site compound works would not physically affect any statutory physical heritage assets, including listed buildings, conservation areas or registered park and garden.

Traffic and Transport

Policy Context

- 6.3.26 With regards to the development plan, Policy 1 in the YMLP requires the effect on pedestrian and vehicular travel patterns to be taken into account in

considering applications. GSP Policy FF2 seeks to balance movement of traffic with the need to conserve the environment. Both YMLP Policy 26 and GSP Policy FF12 require appropriate parking to be provided.

- 6.3.27 GP14 of the Wylfa SPG confirms assessment of potential impacts on road infrastructure is required and seeks to ensure highway improvements are provided where appropriate to minimise congestion, ensure safety and minimise environmental impacts.
- 6.3.28 Stopped UDP Policy GP1 confirms the requirement for development to provide adequate vehicular access, safe and adequate roads leading to the site and for the highway network to be capable of accommodating the traffic generated. Policy TR10 requires proposals to comply with parking standards. The Emerging JLDP Policy TRA4 requires safe and convenient provision in development for road users.
- 6.3.29 PPW requires the impacts on travel demand, the level and nature of public transport provision, accessibility to a range of transport modes and opportunities to promote active travel to be taken into account.

Assessment

- 6.3.30 The principle of a compound at this location utilising the existing access was established under the 2014 consent. Nevertheless, it is considered that the relatively limited traffic generation would not significantly affect the anticipated baseline conditions of these roads. Therefore, the highway network is capable of accommodating the generated traffic. Moreover, the extended site compound would not alter the operational nature of the site and as such the traffic generation associated with the development would remain unchanged from that previously approved.
- 6.3.31 The proposals therefore comply with planning policy requirements with regards to highways impacts.

Residential Amenity

Policy Context

- 6.3.32 With regards to effect on residential amenity generally, YMLP General Policy 1 requires the effect on residential amenities and nuisance problems to be taken into account in determination of applications. GSP Policy D20 confirms a presumption against development which will increase levels of odour or pollution or introduce major noise or nuisance problems.
- 6.3.33 The Wylfa SPG at GP7 requires identification of potential health impacts and appropriate mitigation measures and confirms associated developments should not be proposed where construction activities would give rise to unacceptable impacts on air quality, noise/vibration and light pollution and the amenity of the existing residents, visitors, businesses and construction workers.
- 6.3.34 The Emerging JLDP Policy PCYFF1 confirms that planning permission will be refused where the development would have an unacceptable impact on the

health, safety or amenity of occupiers of local residencies, other land and property uses or characteristics of the locality due to increased activity, disturbance, vibration, noise, dust, fumes, litter, drainage, light pollution or other forms of pollution or nuisance.

- 6.3.35 The above requirements reflect the provisions of PPW, which requires amenity to be protected, and includes a requirement to undertake careful assessment of likely noise levels and to prevent light pollution.

Assessment

- 6.3.36 The location of the site in relation to residential properties and the scale and impact of the original compound is such that it is considered that retention of the compound would have no impact on residential amenity.

Surface Water and Ground Water

Flood Risk

Policy Context

- 6.3.37 YMLP Policy 1 confirms that the potential for increased danger of flooding will be taken into account in considering planning application and Policy 28 confirms the Council will refuse applications in areas liable to tidal inundation or river flooding, which would involve the loss of natural flood plain, which would increase the risk of flooding to other areas or would harm or impair the maintenance or management of river and sea defences. The Wylfa SPG GP21 confirms that Wylfa Newydd Project must include measures to control surface water runoff.
- 6.3.38 The Stopped UDP Policy SG2 states that development will only be permitted where it would not result in a risk to human life in areas of flood risk or in flooding either on or off site. The policy also confirms that development in the flood plain will only be permitted exceptionally. Policy SG6 confirms that proposals which would have an unacceptable adverse impact on the water runoff will not be permitted. The Emerging JLDP Policy PS6 confirms that, in order to adapt to effects of climate change, proposals will only be permitted where they are located away from flood risk areas, and aim to reduce the overall risk of flooding.
- 6.3.39 PPW, supported by TAN15, confirms that flood risk is a material consideration in the determination of planning applications and that new development can be justified where it would not increase potential adverse impacts of flood risk.

Assessment

- 6.3.40 The compound has not previously been subject to any drainage provision and it is considered that this approach continues to be appropriate and proportionate. Further reference is made within the Drainage Strategy that supports the application.

Water Quality

Policy Context

- 6.3.41 YMLP confirms at Policy 1 the need to protect the quality of surface, underground and coastal waters. The Wylfa SPG GP20 requires the release of potentially polluting substances to air, water or land to be minimised.
- 6.3.42 The Emerging JLDP Policy PCYFF1 confirms that planning permission will be refused where the proposed development would have an unacceptable adverse impact on the quality of ground or surface water.

Assessment

- 6.3.43 The introduction of hardstanding areas (concrete access) has the potential to convey contaminated run off from vehicles to receptors within the compound area. Reference should be made to the Drainage Strategy accompanying the application for details of mitigation and protection.

7 Conclusion

- 7.1.1 This Planning, Design and Access Statement has described the site and the proposals, before assessing the proposed temporary change of use against both local and national planning policy.
- 7.1.2 It has been established that any impacts associated with the construction of the main site compound are within acceptable levels as outlined by both national and local planning policy. Notwithstanding this fact planning permission is sought for a temporary period of 36 months which would ensure that any impacts associated with the compounds operation would be temporary in nature and relatively short-lived.
- 7.1.3 Furthermore, should the Wylfa Newydd Project not be successful in its DCO application or the project not progress for other reasons the overarching restoration process will ensure that the compound is removed and the site returned to an acceptable and agreed state.
- 7.1.4 When considering the previous approval of a site compound at this location, the facilitative role that the compound plays in the wider Wylfa Newydd Project and the small scale of the works, over and above the original, the conclusion is reached that the proposed temporary change of use, and its associated benefits relating to managed site work and access, would be in accordance with local and national policy and deemed acceptable in this instance
- 7.1.5 It is therefore respectfully requested that planning permission for a temporary period of 36 months should be granted.