

Wylfa Newydd Nuclear Power Station
Development Consent Order Application by Horizon Nuclear
Power

Land and Lakes (Anglesey) Limited
Post Hearing Submissions

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1. INTRODUCTION

1.1 On 23, 24 and 25 October 2018 the Examining Authority ("ExA") held three hearings: a preliminary meeting, an ISH on the current draft Wylfa Newydd Nuclear Power Station DCO ("the DCO") and an Open Floor Hearing ("OFH"). Land and Lakes (Anglesey) Limited ("L&L") attended all three hearings and made oral representations based upon their Relevant Representation (PINS document reference RR-071).

1.2 In accordance with the draft timetable circulated as Annex C to the ExA's Rule 6 Letter, L&L sets out below its written summary of the oral case made at the three hearings.

1.3 It is anticipated that the Examination will principally be undertaken through a written process. Therefore, the submissions below do not purport to be L&L's full detailed case which L&L intend to submit by way of detailed evidence at Deadline 2 within L&L's Written Representations.

2. ORAL CASE AT PRELIMINARY MEETING

2.1 L&L addressed the ExA in relation to Agenda Item 4: Initial Assessment of Principal Issues (Annex B to the ExA's Rule 6 Letter).

2.2 Both Issues 10 and 11, as set out within Annex B to the Rule 6 Letter, need to be considered expressly in the context of the Applicant's assessment of reasonable alternatives. This issue arises in particular in relation to the Applicant's proposal to seek to accommodate around 4000 temporary construction workers on a temporary Site Campus within the Wylfa Newydd Development Area. This is an issue that L&L will be raising in detailed written submissions at Deadline 2 and throughout the Examination. L&L request that an additional bullet point is added to the sub-issues within Issues 10 and 11 to address reasonable alternatives.

2.3 L&L will be submitting evidence in the form of detailed scrutiny from instructed independent consultants on traffic impacts, compliance with relevant local planning policy and the harmful socio-economic impacts of the Applicant's chosen scheme for the Site Campus. L&L's case on these matters sits alongside the points made by the Isle of Anglesey County Council ("IACC") and the North Wales Police in relation to harm caused by the Site Campus and lack of legacy achieved by the current proposals.

2.4 L&L agree with IACC and the Police that the Examination would benefit from early and detailed ISHs on these matters.

3. ORAL CASE AT DRAFT DCO ISH

3.1 L&L made oral representations in relation to Schedule 1 (Work 3A) and Schedule 3 Requirements WN17-WN25 as follows.

3.2 At present, the draft DCO is worded to simply seek (and grant) consent for a Site Campus, with no requirement to provide any such facility. This is inconsistent with the Applicant's recognition of the "*potential of the Wylfa Newydd Project to have significant adverse socio-economic effects*" (E.S. Non Technical Summary Para 3.2.10 PINs Ref APP-401) and the consequent need to mitigate such effects by providing temporary workers' accommodation. Indeed, the Application refers throughout to the proposed Site Campus as "embedded mitigation" for the likely significant adverse effects of the project on the private rented sector and holiday accommodation in the area, along with effects on the Welsh language and culture. Accordingly, the Applicant should be *required* to provide around 4000 bed spaces as temporary worker accommodation ("TWA").

3.3 L&L's written evidence will demonstrate the negative effects of providing all 4000 bed spaces at the proposed on-site campus. Through the Examination process L&L will seek to persuade the Applicant and ExA that the negative effects of the proposed Site Campus are such that the DCO should include a requirement stipulating that the Site Campus may only accommodate around 500

workers at any one time, leaving the balance of bed spaces to be accommodated elsewhere on Anglesey.

4. ORAL CASE AT THE OFH

4.1 There is an acknowledged need to provide around 4000 bed spaces in the form of temporary workers' accommodation in order to avoid having an unacceptable impact on tourist accommodation and the private rented sector.

4.2 All parties acknowledge that this would be an unprecedented influx of new, temporary residents onto the Island. They are unlikely to speak Welsh. In percentage terms, this is on any count an enormous influx of people into what is a sensitive and largely rural community. The project needs to be managed with great care to avoid unacceptable impacts on the Welsh language and culture and tourism. The traffic movements of workers need to be carefully assessed and arranged so as to avoid significant impacts on the small local roads around Wylfa and the north of the Island.

4.3 Additionally, and in line with the submissions made by the IACC, legacy has a huge role to play in the assessment of whether the impacts of the project are acceptable. Local policy and the LPA require the project to deliver tangible long-term legacy benefits. At present, the proposal is for an entirely temporary site campus which will be constructed on site and later removed entirely.

4.4 L&L secured hybrid planning consent in 2015 to provide high quality accommodation that would be used initially as the required TWA and later as a mix of holiday lodges and permanent residential accommodation on two adjacent sites in a sustainable location on the edge of Holyhead. L&L's scheme was created with the encouragement and support of IACC, Welsh Government and Horizon and notably with significant engagement and consultation with the local community and stakeholders. The section 106 agreement entered into in connection with the planning permission secured wide ranging benefits for the Island as well as mitigating the effects of the large construction workforce which would be housed at its sites. At the heart of the section 106 agreement was the principle of legacy with detailed mechanisms to ensure the future use of the site backed by a legacy fund.

4.5 Unsurprisingly, the site formed an integral part of Horizon's proposals at the pre-application consultation stages 1 and 2. Indeed, at that time it was the preferred site for temporary worker accommodation.

4.6 Therefore, the complete volte face by Horizon and the contraction of the project to North Anglesey in pre-application consultation 3 was met with dismay and disappointment by L&L, and indeed other consultees. It was at that point that the sites and Cae Glas and Kingsland were removed entirely from the TWA mix and replaced by an unsustainable on-site proposal which is completely at odds with planning policy and the principles which had underpinned the earlier pre-application consultations.

4.7 L&L's written and oral submissions over the coming examination will demonstrate why the scale of the onsite campus would have profound and unacceptable adverse effects on the Island. These effects would not be limited to the temporary occupation by the construction workers but would cause long lasting and irreversible damage to the local community whilst denying the Island any opportunity for legacy benefits.

4.8 By contrast, L&L have carefully developed a scheme which has the support of local groups and has been assessed, and granted planning permission by the local planning authority. L&L are passionate about securing legacy benefits for the Island through enhancing rather than harming the Island's tourism offer and delivering much needed housing of which 50% would be affordable dwellings. Through the DCO process we will submit that the only mechanism for avoiding the significant and irreversible harm caused by the site campus and gaining the much needed legacy benefits is a return to the L&L scheme promoted by Horizon at PAC1 and 2.

4.9 In answer to the ExA's oral questions, L&L committed to explaining the extant planning permission and producing relevant documentation at Deadline 2. However, for ease of reference, L&L append

to these submissions (1) the relevant planning permission (2) the accompanying s.106 agreement and (3) the Environmental Statement in relation to the proposed TWA at Cae Glas and Kingsland.

4.10 It will be apparent from the permission and s.106 agreement that L&L has a fully worked-up scheme for the accommodation of workers on L&L's two adjacent sites. The permission includes consent for a central hub building providing reception and canteen facilities, a park and ride facility to transport workers to the Wylfa Newydd Site, 700 car parking spaces, a new hotel and a lakeside hub comprising restaurant, café, retail facilities and a bar and a new grass football pitch and cricket pitch. The effects of accommodating workers in this location on local facilities, socio-economics, transport, travel and the environment were all fully assessed within the ES and relevant mitigation has been secured through the use of conditions and the s.106 agreement. IACC granted consent based upon a full assessment of the likely effects of this proposal in combination with what was then known about the Wylfa Newydd Nuclear Power Station and determined that all effects were capable of being satisfactorily mitigated. The same cannot be said for the Applicant's now proposed Site Campus.