

From: [PMO](#)
To: [Wylfa Newydd](#)
Subject: RE: IACC Deadline 2 Submission : Local Impact Report - Introduction (email 3)
Date: 04 December 2018 20:37:35
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[Annex 1D-1O \(Batch 2 of 2\).zip](#)

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

Pnawn Da/ *Good afternoon,*

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

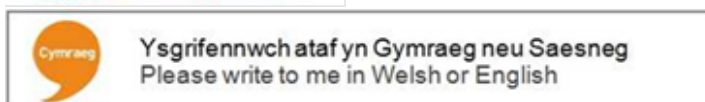
Bydd fersiwn Gymraeg yn cael ei ddarparu cyn gynted a phosib / *A Welsh version of the submission will be provided in due course.*

Cofion/ *Regards,*
Manon

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Mae'r neges e-bost hon a'r ffeiliau a drosglwyddyd ynghlwm gyda hi yn gyfrinachol ac efallai bod breintiau cyfreithiol ynghlwm wrthynt. Yr unig berson sydd 'r hawl i'w darllen, eu copio a'u defnyddio yw'r person y bwriadwyd eu gyrru nhw ato. Petaech wedi derbyn y neges e-bost hon mewn camgymeriad yna, os gwelwch yn dda, rhowch wybod i'r Rheolwr Systemau yn syth gan ddefnyddio'r manylion isod, a pheidiwch datgelu na chopio'r cynnwys i neb arall.

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

rwydweithiau mewnol ac allanol.

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

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Sent by email

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Dyddiad / Date: 19/09/2018

Dear Kieran,

OFFICIAL SENSITIVE

Review of Horizon's DCO Application (Tourism)

- 1.0 Following the submission of the Isle of Anglesey County Council's (IACC) Relevant Representations to the Planning Inspectorate and the SOCG workshop held on the 24th July 2018, the purpose of this letter is to provide you with further detail and clarity on the IACC's position in relation to tourism impacts and to seek agreement on mitigation measures. The IACC is committed to discussing and agreeing as many issues as possible prior to the DCO Examination to ensure that the proposed development is acceptable and that the Examination hearings can be as focused and productive as possible.
- 1.1 Horizon's approach to mitigation based on monitoring and then dealing with impacts as and when they occur is wholly unacceptable. The IACC's stance is that impacts should be avoided and where that is not possible mitigated through proactive and pre-emptive measures to protect and enhance the tourism industry. This principle equally applies to all thematic issues. This includes agreeing a suite of preventative measures, including up-front investment in marketing and promotion, DCO requirements, DCO obligations and changes to phasing/timing to avoid or minimise impacts wherever possible. Where adverse impacts cannot be avoided, appropriate mitigation should be implemented to offset the identified adverse impacts. Compensation will be required in respect of residual impacts that cannot be mitigated. In addition, a community resilience fund will be required to address impacts which exceed or are additional to those assessed and/or unquantifiable. The aim of this letter is to outline these issues/impacts and to define the mitigation measures required to make the development's impacts acceptable in planning terms.
- 1.2 The matters raised below represent part of IACC's ongoing engagement with you on the DCO application as regards issues related to education, skills training, supply chain and labour displacement and are made in response to the application documents as submitted. From a tourism and visitor economy perspective, the IACC reserves the right to add to or amend these issues (and raise new issues) as necessary in its Written Representations and Local Impact Report.

2.0 Tourism Context

- 2.1 Anglesey is the UK's most tourism-dependant local authority¹. The sector supports over 5,600² jobs on the Island and accounts for almost 25% of its retail expenditure. Tourism is fundamental to sustaining the island's economy, environment and culture and has been supported by various initiatives and funding programmes designed to capitalise 'upon the unique cultural, linguistic, historic and environmental assets of North West Wales'³.
- 2.2 The tourism industry is the Island's leading economic sector, providing 5,500 full-time equivalent jobs and contributing £304 million per annum (excluding cruise tourism) to its economy⁴. Visitors to the island (1.71m annually), as well as those who live and work on the Island, value the quality and diversity of its natural and historic environment. Visitors can experience and enjoy its peace and tranquility, beaches, coastline and several other key attractions as part of their visit (e.g. Beaumaris Castle, Plas Newydd etc). Most visitors are loyal, 'repeat visitors' (87%), and it is vital that the Wylfa Newydd development does not prejudice their perception of Anglesey as a leading visitor destination.
- 2.3 In 2016, Anglesey was named the UK's second-best holiday destination⁵ and its greatest tourism assets are its tranquil natural and historic environments. Its special environmental aspects have been acknowledged and designated nationally and internationally. Approximately 95% of Anglesey's 201km coastline and coastal habitat is a designated AONB and it attracts a large and growing number of visitors drawn by its beaches and 125 miles of Coastal Path. The AONB is also complemented by three sections of undeveloped coastline, which have been designated as Heritage Coasts, covering 50km of coastline, including North Anglesey.
- 2.4 The IACC cannot over-emphasise the importance of the tourism sector to Anglesey and to the Anglesey economy. Any benefit from Wylfa Newydd must be in addition to, and not to the detriment of, the tourism sector. The tourism sector has grown exponentially, from generating £176 million in 2005, to £304 million (excluding cruise) in 2017.⁶ Any stagnation or slowing down of the growth in the tourism sector because of Wylfa Newydd (during construction or operation) is wholly unacceptable.
- 2.5 Horizon state in the Planning Statement (6.2.21) that '*in acknowledgement of the importance of the tourism sector to the economy of Anglesey, Horizon will establish a tourism fund, which would be available to support Brand Anglesey during the construction project and to address adverse effects related to the Wylfa Newydd DCO Project, if identified through monitoring*'. Although the IACC recognise the importance of monitoring, this 'monitor and mitigate' approach by Horizon is completely unacceptable. Horizon's approach to monitoring tourism impacts and dealing with issues 'as and when' they occur and then become apparent through monitoring and visitor behaviour surveys etc. is wholly unacceptable. Anglesey's tourism sector must be pro-actively marketed and mitigation measures must be implemented before adverse impacts are incurred. This will ensure that Anglesey remains 'open for business', that the tourism sector continues to grow, that local jobs and the Welsh language are safeguarded and

¹ Pritchard, A. 2014. WAC Evidence; Pritchard, A. 2015. Senedd Committee evidence.

² Department of Digital, Culture, Media and Sport (DCMS) Figures produced by Deloitte (£54k of spend = 1FTE)

³ Investing in the Future, p.18.

⁴ STEAM data 2017

⁵ ONS in Davidson, 2016

⁶ STEAM data 2005 and 2017

that current positive perceptions and experiences of the Island as a place to visit are maintained and enhanced.

- 2.6 The IACC have consistently highlighted the importance of the tourism sector to Anglesey and underlined the impacts arising from the project proposals - from PAC1 in 2014 through to PAC3 in 2017 - and we continue to do so following the submission of the DCO. It is unacceptable that tourism has not been given the prominence and protection it deserves in the DCO documentation, given that this has been repeatedly detailed by the IACC and other key stakeholders (formally and informally) for several years. As stated, tourism is the largest economic sector on the Island, generating £304M per annum and supports over 5,600 jobs. Visitor spending in the AONB alone has more than doubled since 2007 to approximately £55.7 million in 2012⁷ and the numbers of visitors to the AONB has increased by 42% in the same timeframe to just under 400,000. The overall number of people employed in the tourist sector has also increased by 45% since 2007, which highlights the growth in the tourism sector over the past 10 years. This increase should not be adversely affected by Wylfa Newydd and any benefits from Wylfa must be in addition to, not to the detriment of, the tourism sector.

3.0 Summary of Main Issues

- 3.1 Following the IACC's review of the DCO submission the following points are raised:

3.2 *Tourism Accommodation*

- 3.2.1 There is a significant threat to the quality and viability of the Island's tourism accommodation base, which in turn will have substantial negative impacts on local tourism attractions, operators, etc. The main threat lies in the loss of capacity and quality as accommodation is used by construction workers. The nature and distribution of bed-spaces, the pricing mis-match between worker demands and existing provision,⁸ licensing, site restrictions, the impracticality of accommodating visitor and construction workers on the same sites and owner appetites for letting to construction workers, are all issues requiring more work to fully understand the complete extent of the impact. Moreover, the use of 'bed-spaces' as the unit of analysis underestimates both the level and the complexity of demand.
- 3.2.2 The experiences of Hinkley Point C, Torness (Dunbar) and Heysham (Morecambe) demonstrate that a 'race to the bottom' is a likely outcome without intervention, with negative impacts on quality and provision. Indeed, the Torness and Morecombe tourism sectors never recovered from the building of the power stations. Some accommodation providers may see all-year round occupation of bedspaces to Wylfa workers (at a reduced rate) as an attractive 'all-year-round' income generator rather than the uncertainty of letting for only the eight-month core period. This in turn will lead to degradation in the quality of accommodation and depress prices and profit-margins. Given the importance of the tourism sector to Anglesey, and its high-quality accommodation offer, any impact on tourism accommodation (real or perceived by tourists) is unacceptable and will be to the detriment of recent progress in making Anglesey a 'year-round' destination.
- 3.2.3 The IACC undertook a Tourism Bedstock Survey with the results published in June 2018.⁹ As just over half (56%) of those accommodation providers surveyed were interested in accommodating Wylfa Newydd construction workers, the IACC believe that Horizon have significantly over-estimated supply. Furthermore, only 35% of caravan/campsite providers are

⁷ IACC AONB Management Plan ([Link](#))

⁸ Please see IACC letter dated 19/09/2018 regarding housing where the spending power of Wylfa workers v accommodation costs is considered in detail.

⁹ Accommodation Bedstock Survey (June 2018) by Strategic Research & Insight

interested in accommodating Wylfa Newydd workers (and use of some of these providers' sites may not be possible due to licensing restrictions or health and safety restrictions). Evidence from Hinkley¹⁰ demonstrates that construction workers will want to live as close as possible to the site and the inclusion of 'Menai Mainland' accommodation artificially inflates supply estimates. This raises significant doubt as to the feasibility of Horizon's Construction Worker Accommodation Strategy proposal to house 650 workers in caravans and 450 in tourist accommodation (at peak). The IACC is eager to discuss Horizon's approach to caravans as the evidence does not support the view that this capacity is currently available, and it is clear from experience elsewhere that tourists will not want to mix with workers.

- 3.2.4 To mitigate against the impact on the tourist accommodation sector (as well as the PRS and owner-occupied sectors) the IACC requires the early delivery of the on-site temporary construction workers' accommodation campus. 1,000 bedspaces should be ready and available by end of Q2 Year 3 (to coincide with start of Unit 1 Construction, Commissioning and Start-Up). 2,500 bedspaces should be available by end of Q3 Year 4 (to coincide with the increases in home-based workers as set out in Horizon's construction worker profile in the Jobs & Skills Strategy), rising to the planned peak of 4,000 by end of Q4 Year 5. There will be a peak demand for workers between Q4 Year 6 and Q3 Year 8, a large proportion of this (i.e. 650 bedspaces) could be supplied in the form of temporary caravan site(s) for this 2-year period.
- 3.2.5 This approach, however, should be a reserve position to 'top up' accommodation if required and should not be a preferred approach or a means to reduce the size of the on-site campus. Furthermore, the on-site campus should be retained for longer, declining more gradually from Q4 Year 8 to Q1 Year 10, reducing impacts on the tourism sector. If there were a reduction in peak construction worker numbers, the IACC would expect a commensurate reduction in workers using PRS and tourism accommodation, rather than reducing the size and number of workers in the temporary workers' accommodation campus. The current proposal to use the campus as the fall-back or reserve option where demand is high is therefore entirely rejected and use of this campus should be maximised to protect other areas of provision, especially tourism accommodation, where the potential adverse impacts to this key economic sector are very significant.
- 3.2.5 The Construction Worker Accommodation Management Service (CWAMS) will also be critical to managing the distribution of works by accommodation type and location. It is vitally important that the tourism sector does not become over-saturated in one accommodation sector or location and the CWAMS will need to monitor and distribute workers accordingly. Further, to allow efficient monitoring, accommodation providers must be encouraged to be registered with the CWAMS and workers must state where they are staying. This will also assist the IACC in monitoring and restricting the use of unsuitable accommodation, preventing breach of licencing restrictions and conditons and addressing any use of unlicensed sites.
- 3.2.6 There will be a peak demand for workers between Q4 Year 6 and Q3 Year 8. To meet this demand for accommodation, the IACC recognise that the use of caravans will be required. Horizon (in discussion with the IACC) need to identify suitable site(s) for caravans for this use without adversely impacting on existing caravan sites and tourism. Sites must have suitable facilities and services on-site to meet the needs of the workforce, to prevent adverse impacts on existing facilities and services. Due to the difficulty in monitoring and enforcing the use of caravan accommodation (and the likelihood that tourists and workers will not want to mix), a 'dispersed approach' to caravan accommodation is not acceptable. Horizon should identify dedicated site(s) with suitable facilities and services for workers that will make it easier to

¹⁰ Presentation by Andrew Goodchild (Somerset Council) to Wylfa Newydd Strategic Housing Partnership 23 November 2017; stated that over 90% of construction workers live within 15km to site.

control and manage the impacts of providing this accommodation.

3.3 Staff and Supply Chain Displacement and Resilience

- 3.3.1 Evidence from other major infrastructure projects clearly demonstrates that Wylfa's higher salaries will attract employees away from local employers and that there will be difficulties with staff recruitment and retention and wage inflation. Horizon's worker accommodation campus will create demand for hospitality and related workers and will exacerbate the existing staff shortage in Anglesey and North West Wales (e.g. of qualified chefs and domiciliary staff, security staff etc.)). This issue may be further compounded through cumulative displacement with other major projects on the Island (e.g. Bluestone). The site campus alone will employ up to 400 staff, the majority of which will be local people from the domiciliary, catering and hospitality sectors. Further detail is required on the breakdown of facilities management jobs by individual roles to ensure that education, skills and training is targeted into these specific roles. This requires early intervention to ensure that the risk of displacement is avoided or minimised. This is a particular concern for the social care sector
- 3.3.2 The draw of jobs at Wylfa is likely to lead to loss of employees from roles in existing businesses. The Horizon jobs and skills strategy only briefly mentions 'churn' in the labour market and does not adequately consider or address it.¹¹ The strategy concentrates on training for mechanical engineering, construction and decommissioning trades and project management and electrical engineering to meet the project's demand¹² and does not therefore take proper account of the effect of the draw of other types of staff away from key sectors, which must be protected during the construction period. The adverse impact of job displacement can only be overcome through early investment in education, skills and training to backfill the job gaps created, as well as serving Horizon's demand.
- 3.3.3 Mitigation is required in the form of education, skills and training (particularly in hospitality and catering) to increase the local labour pool to ensure that, if any currently employed person is employed by Horizon (or one of their sub-contractors), these 'displaced' jobs/vacancies are filled by local people and the potential impact on tourism services due to loss of staff and wage inflation is mitigated. This can only be achieved with investment in education, skills and training to ensure that local people have the necessary skills and capabilities to backfill roles becoming available in the tourism sector as well as addressing increased demand (in retail and leisure sectors, social care and education). These skills are not restricted to STEM subjects as Horizon will require a wide variety of different roles and services. The IACC require funding to invest in education, skills and training across a variety of different subjects to increase the local labour pool in general and to minimise the impact of displacement.
- 3.3.4 The construction of Wylfa could seriously disrupt local supply chains, especially those related to food. If locally produced foods are diverted to the worker campus, this will starve the local tourism industry of the produce needed to differentiate the Ynys Mon 'offer.' This weakening of the links between the tourism sector and local producers on Anglesey would undermine efforts to promote a high-quality, local, sustainable food experience, build a locally distinctive tourism food offering and support local farming, fishing and craft producers. This would be hugely detrimental to Anglesey's Food Tourism Strategy and Action Plan (2014) and Welsh Government Policy initiatives to develop food tourism to maximise the amount of income retained in an area, enhance links between agri-food and tourism businesses and thereby increase their value to the local and Welsh economies.¹³

¹¹ Jobs and Skills Strategy at 2.4.12

¹² Ibid at 3.3.4

¹³ Welsh Govt Consultation: Developing Growth: An Action Plan for the Food + Drinks Industry 2014-2020

- 3.3.5. In addition to the fragility of the local food supply chain networks, the resilience of Anglesey's tourism economy also encompasses traffic congestion, the fragility of the visitor journey and the resilience of Anglesey's travel routes. The construction of Wylfa and the National Grid Power line construction will generate significant extra traffic and congestion on the island, a problem recognised by the accommodation sector survey and visitor survey.

3.4 Brand, Reputation & Visitor Perception

- 3.4.1 There are three dimensions to this impact. Firstly, during construction visitors will regard Anglesey as 'closed for business', leading to: a) a short-term diminution of visitors as they holiday elsewhere; and b) a long-term loss of repeat/return/multi-generation visitors. Secondly, pre-, during and post-construction visitors may re-evaluate Anglesey's unique natural and historic environments, especially its natural, unspoilt, rich and diverse coastlines; which are one of its greatest tourism assets. There is a real danger that the tranquility, which visitors seek on the Island will be negatively impacted. Thirdly, there is a reputational risk for the Island (which relies on older, ABC1 and family markets) that the presence of large numbers of construction workers and the impacts of construction itself (e.g. noise, dust, traffic etc.) will lead to a negative perception which will adversely affect Anglesey's reputation as a leading nature-based tourism destination. There is also 'anti-social behavior' perception associated with construction workers (alcohol, drugs, prostitution etc.) which again may adversely impact on tourism.
- 3.4.2 Anglesey's AONB is characterised by expansive views, the borrowed landscapes of Snowdonia, the Llyn etc, and the ever-changing seascape, conveying perceptions of 'exposure, openness, wilderness and a feeling of isolation'.¹⁴ Energy production and transmission have been identified as a specific threat to key aspects of the AONB, including its expansive views and peace and tranquillity. Tranquillity is a key measure and attraction of the AONB and in 2009 58% of the AONB was designated as 'undisturbed.' The Welsh language is similarly significant for the AONB as 60%+ of people living within the AONB speak Welsh as their daily means of communication. The Welsh language is integral to Anglesey's culture and identity and its strong presence in the AONB has been clearly identified as 'an economic asset' (p20). Air Quality is also good throughout the AONB and is 'important for both residents and visitors and threats to this, such as Energy Production have implications for health and wellbeing, tourism and recreation' (p22). Critically Wales is seen by most visitors as a sustainable destination and Anglesey's appeal is built around this offering.¹⁵
- 3.4.3 The quality of the natural environment is key to the Wales, and particularly the Anglesey tourism offer.¹⁶ As this report also notes, some forms of nature-based tourism (such as wildlife and walking) are particularly vital to Anglesey's appeal. The Anglesey Spring Visitor Survey (2018) clearly reinforces the dominance of the island's natural appeal in all its various guises, including its natural landscapes/views, peace and quiet and beaches. Tranquillity is cited as the number one positive attribute of natural settings and is a function of landscape (visual context/setting) and soundscape (aural context/setting). It is fundamental to the visitor experience and has clear economic (tourism) and health and well-being (restorative) benefits.¹⁷ The tranquility of Anglesey's natural tourism environments will inevitably be compromised during and post-construction. The most recent research (Anglesey's Accommodation Survey

¹⁴ Summary of Evidence, base, legislative and policy context, Isle of Anglesey AONB p4.

¹⁵ Wales Visitor Survey 2013

¹⁶ Valuing Our Environment: The Economic Impact of the Environment of Wales 2003

¹⁷ Watts, G. & Pheasant, R. 2013. Factors affecting tranquility in the countryside, *Applied Acoustics*, 74 (9), pp.1094-1103; Merchan, C.I., Diaz-Balteiro, L. and Soliño, M. 2014. Noise pollution in national parks: Soundscape and economic valuation, *Landscape and Urban Planning*, 123, pp.1-9.

2018) demonstrates that accommodation operators are clearly aware that Anglesey's unique selling point, tourism reputation and brand identity are built around its AONB scenery, spectacular beaches and coastline. This is recognized as their biggest opportunity to generate and build sustainable businesses; any physical and perceptual damage to this would be a significant challenge.

- 3.4.4 As outlined above (section 2.0), the reputation and perception of Anglesey as a leading tourism destination is critically important to the tourism industry and to the economy of the Island. Any risk to this reputation is unacceptable. In addition to the 1 million staying and 700,000-day visitors to Anglesey each year, Anglesey's tourism sector is further boosted by Holyhead's growing significance as a cruise port destination. Holyhead is the UK's second busiest port, processing 2 million visitors travelling between the UK and Ireland. Holyhead is a growing cruise ship destination and Wales' premier cruise port. As such, it is strategically important to Wales' developing profile in the highly lucrative cruise market, itself a central plank in Visit Wales' strategy and the fastest-growing segment of the Welsh product. In 2017 Holyhead received 43 vessels with over 20,000 passengers and a potential cruise tourism impact of over £2m (up 47% in ship numbers and 60% in passenger numbers since 2015). Passenger numbers for 2018 have surged again as cruise ship arrivals have grown to 52 (with almost 32,700 passengers), generating over £3m in visitor expenditure.
- 3.4.4 The Anglesey Visitor Survey (Spring 2018) suggests a significant percentage of existing visitors will be less likely to visit during construction phase. Around 1 in 6 of those staying in hotels or self-catering cottages say the increased volume of traffic will make them less likely to visit, which suggests substantial economic losses in this higher spending sector. These losses are based on current figures and do not consider the strategic growth of the island as a year-round destination.
- 3.4.5 There is also a reputational risk for the island that the presence of large numbers of construction workers will see a rise in anti-social behaviour, prostitution and drug- and alcohol-related incidents.¹⁸ Experience at Sizewell B and Flamenville 3 shows that major construction projects generate increases in anti-social behaviour such as drunkenness, drink driving and minor public disorder offences, together with increases in road traffic accidents.¹⁹ A rise in drunkenness, drug-taking and prostitution, would obviously impact on the local Anglesey communities and on the visitor experience. Negative PR from such incidents could also impact on the Island's place reputation and brand.
- 3.4.6 In addition to the management of the workforce behavior (code of conduct), funding is required (pre-commencement) to allow the IACC to invest in a concerted marketing and promotion campaign to ensure that tourism on Anglesey is promoted (nationally and internationally) throughout the construction stage of Wylfa Newydd. Revenue funding is also required to allow the IACC to appoint Tourism Marketing and Promotion Officer(s) to manage and implement the marketing campaign. That officer will also be responsible for monitoring tourism behavior through annual surveys, analysing emerging trends and suggesting mitigations to address any adverse trends.

3.5 Impact on AONB and Coastal Path

- 3.5.1 The project will lead to the degradation of part of Anglesey's AONB (which covers approximately 95% of the Island's 201km coastline and coastal habitat) and its 125 miles of Coastal Path. The Island's special environments have been acknowledged and designated

¹⁸ Alcohol and drugs in UK construction industry placed under spotlight July 8 2016 SHP Online.

¹⁹ EDF 2016 8:12:47.

nationally and internationally and attract a large and growing number of visitors, who come to enjoy tranquillity and the Island's flora and fauna. The existing Wylfa Nuclear Power Station, Cemaes Bay has been identified as a major degrader to the AONB, with a dramatic visual presence. The development of Wylfa Newydd will augment this visual intrusion whilst the construction phase will generate air, light, waste and noise pollution, all of which will negatively impact on the visitor experience and on wildlife and diminish the likelihood of visitors returning or recommending the Island.

- 3.5.2 This visitor experience will also be degraded due to the inland diversion of the Coastal Path (the diversion will be 4km in length). The Wales Coastal Path (WCP) is a key tourist attraction for visitors to the island and it is recognised as a major contributor to the Anglesey and Welsh visitor economies (£14M on Anglesey). Anglesey and Pembrokeshire are highlighted by other Welsh authorities as examples of best practice in leveraging economic wealth and cultural capital from this asset. Users of the Anglesey section of the WCP exhibit higher socioeconomic profiles than any other path section in Wales with 79% ABC1, particularly in the AB segment (43% of these users are AB) compared to 69% for Wales. The majority of path visitors (54%) stay in paid for accommodation and they correspondingly spend more per night - £85.37 – than the Welsh average of £74.11 and the NW Coast average of £52.63. Additionally Anglesey Path users also recorded a mean additional trip spend of £18.81. Critically, unlike every other section of the WCP, Anglesey users exhibit high levels of path loyalty and correspondingly lower levels of preparedness to substitute their experience and enjoyment with other routes – in Anglesey only 65% would be prepared to walk elsewhere compared to 93% in Carmarthen²⁰.
- 3.5.3 This demonstrates the importance of the WCP to Anglesey and the loyalty of the people who use it to experience the ruggedness, peace and tranquillity of the scenery along the route. Any adverse impact on the WCP and the risk of people not using the WCP (particularly in North Anglesey) because of Wylfa Newydd is wholly unacceptable. The adverse impact on WCP is recognised by Horizon but no specific mitigation is proposed. Horizon's claim that although major and moderate adverse impacts will be felt, some permanently, no specific mitigation is required due to 'no loss in value of the route to the economy'. The IACC does not accept that conclusion. Mitigation is clearly required because WCP is a key part of Anglesey's tourism infrastructure, a significant and growing economic asset in which IACC, Welsh Government and EU have invested heavily to develop as a tourism and recreational resource. Horizon have significantly undervalued the sensitivity and importance of and therefore the impact on the WCP. The accommodation of up to 4,000 workers on the site campus immediately adjacent to the WCP (in addition to the construction of Wylfa Newydd and the MOLF) will also contribute significantly to the adverse impact on the route, which Horizon have also failed to recognise and address.
- 3.5.4 The IACC has invested significantly (£7M+) in the Anglesey Coastal Path to harness the island's unique coastal characteristics to capitalise on trends in leisure, recreation and tourism. This investment is continuing, and the ongoing improvement and enhancement of Anglesey's high-quality coastal and countryside environment is key to its DMP 2016-2020 and its AONB management plan.
- 3.5.5 Mitigation is required in the form of capital funding to improve the WCP and network of PROWs in Anglesey. Funding is also required to support the marketing and promotion of the WCP and AONB and to improve the tourism experience through signage, interpretation boards, boardwalks, disabled access, parking, landscaping, picnic areas, maintenance etc. Annual surveys will be required to establish the views and perceptions of the path users to ensure it is not adversely affected and to inform mitigation where an adverse impact is shown.

²⁰ NRW Survey of the Section of the WCP 2015.

3.6 Maintaining Public Access

- 3.6.1 The IACC has confirmed that public access to the Coastal Path and PROWs needs to be maintained throughout all phases of the development. The DCO application lacks detailed assessment of the impact of the development on existing public access, including the effects of a construction site on the attractiveness of the surrounding area.
- 3.6.2 The IACC considers that the construction and operation of Wylfa Newydd will have a major impact on the Wales Coastal Path. Several major adverse impacts are identified, some of which are irreversible. A section of the path is to be diverted inland, which adds a length of 4km to the path and is sandwiched between the A5025 and site boundary fence. The obstruction, diversion, closure, realignment and disturbance of the Coastal Path (during construction and operation phases) will have a consequential impact on the tourism industry because of a reduction in the attractiveness of the path, which forms an important element of Anglesey's tourism offer and provides access to the AONB, as well as affecting the leisure and recreation offer.
- 3.6.3 The WCP is treated as a single receptor in the Landscape and Visual Assessment that supports the application, which makes it difficult to distinguish between the impacts on different sections of the Path. This is not appropriate as it averages the impacts over too wide an area and thereby substantially under assesses the impact on the lengths of path near the Wylfa site. This approach does not allow location-specific mitigation proposals to be developed and agreed. In addition, photomontages are only prepared for the operational stage and for those prepared the Station Buildings are shown in a grey finish. Significant construction period visual impacts are assessed at all 11 viewpoints sited on the WCP and these should be represented in montages to demonstrate the significant adverse effect at that stage. Significant operational visual effects are assessed at 9 viewpoints sited on WCP.
- 3.6.4 Further consideration is required of the impact of the permanent closure of Cemlyn Road on the Copper Trail (part of the National Cycle Network Route 566), which will be in place from the start of the construction period. Cyclists use this route to visit Cemlyn Bay and it is currently a very scenic route, which attracts visitors. Printing 500 additional leaflets to inform people of this closure as mitigation is inadequate and unacceptable. The IACC would expect to see improved signage (particularly to Cemlyn Bay), additional funding to promote the Cycle Route, ensure interlinkages with other nearby attractions (including promotion of local businesses, facilities and services) and improvements to the alternative route to make it more attractive to visitors (e.g. through additional planting).
- 3.6.5 In terms of visual effects upon recreational visual receptors using the Copper Trail/National Cycle Network Route 566 (including cyclists), for the operational stage the submission confirms significant visual effects at four of the six relevant viewpoints (viewpoints 8, 24, 28 and 31). It is not accepted that, at some of these viewpoints, the adoption of a naturalistic colour scheme for the Power Station Main Site, will be enough to reduce the residual visual effects. The selection of viewpoints underestimates the effects upon recreational receptors using the permanent diversion of the Copper Trail. Significant adverse visual effects will be sustained along most, if not all of the permanently diverted section, the section to the immediate west of the Wylfa Newydd Development Area (WNDA) and the more elevated sections around Mynydd y Garn. Further details of mitigation and compensation proposals are required (e.g. improved planting, together with compensation to offset this impact elsewhere along the route).
- 3.6.6 Several significant permanent and temporary adverse impacts are identified in relation to Public Rights of Way (PROWs) within the WNDA. During the construction phase, all 32

PROWs within WNDA are to be permanently stopped up to enable construction, which is acknowledged as being necessary on safety and security grounds. The IACC notes the intention to create new PROWs following the construction phase, which would link to the coastal path. However, the IACC believe this permanent stopping up of PROWs for up to 10 years without providing an alternative or compensation is unacceptable. The IACC will require compensation for this loss of PROW to ensure adequate improvements and provisions are made elsewhere. The IACC will also require clarity and agreement for the re-instatement of the PROWs prior to the commencement of the operational stage of the power station.

- 3.6.7 The application proposes that these new PROWs are to be created with an intention to improve access for less mobile users, access to beaches and the maintenance of sea views where possible. In addition the application confirms that the length of new PROWs would be similar to those closed during construction. The application currently lacks detail regarding the proposed routes of the PROWs at operation stage, including the exact length, type of new field boundaries and path specification/standards. Although no timetable is provided for implementation, the IACC requires that these will be open to public use by Year 1 of the Operational Stage. The IACC also require compensation/mitigation for the loss of these PROWs during the construction phase through improvements to other PROWs and the Coastal Path as highlighted above.

3.7 Permanent Visitor Centre

- 3.7.1 Although not part of the DCO application, the IACC believe that a new permanent visitor centre would present a significant opportunity for Wylfa Newydd and the Island. This could be a major all-weather visitor attraction and would add to the range of educational facilities on Anglesey, making an ideal stop whilst circumnavigating the coastal path, or visiting the North of the island. Dirnorig 'Electric Mountain' Visitor Centre in Llanberis, for example, attracts 225,000 visitor each year,²¹ whilst the Wylfa Power Station Visitor Centre attracted between 25-30,000 annual visitors. The IACC is disappointed that Horizon have not included a permanent visitor centre as part of the DCO and seek confirmation and a firm commitment that this will be provided, including a timetable for bringing this proposal forward.
- 3.7.2 The permanent visitor centre has the potential to be a state-of-the-art facility that could help inspire and educate people (particularly children) about energy, low carbon and nuclear technology. Such visitor centres enhance visitor enjoyment generally and energy developments specifically and can attract high visitor numbers.²² Furthermore, given the significant archaeological findings on-site, there is an opportunity to 'tell this story' of the site and area and preserve the historical and cultural heritage of Anglesey for future generations.

3.8 Temporary Visitor Centre

- 3.8.1 The IACC believes that a temporary visitor centre during construction is required to cater for tourists and residents, providing an educational and informative hub for local people and visitors during construction. The IACC believe that the amount of construction and energy tourism, which could be attracted to the Island has been underestimated by Horizon, as both have been identified as emerging niche markets.²³ The EDF Visitor Centre in Bridgewater has already attracted over 80,000 visitors since opening in 2012. This should be an opportunity to showcase the construction of Wylfa Newydd and be a high-quality, interactive facility for people

²¹ <http://electricmountain.co.uk/The-Centre>

²² Frantal, B. and Kunc, J. 2011. Wind turbines in tourism landscapes: Czech experience, *Annals of Tourism Research*, 38 (2): pp.499-519.

²³ Frantál, B. and Urbánková, R. 2017. Energy tourism: An emerging field of study, *Current Issues in Tourism*, 20:13, 1395-1412

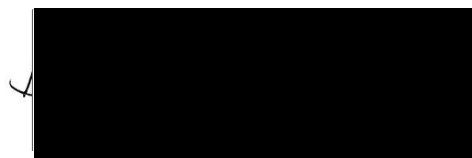
to learn from and appreciate the scale and complexity of the construction project.

- 3.8.2 This should complement the viewing platform to ensure that local people and visitors have a full and informative experience when visiting Wylfa Newydd during its construction. Again, the IACC believe that Horizon are missing an opportunity to maximise the benefits of the project by underestimating the significance of the project (locally, regionally and nationally) and the intrigue and appetite of people wanting to see it being built.

4.0 Conclusion

- 4.1 Although the IACC is supportive of the Wylfa Newydd project and the opportunities it brings, this support does not come at any cost. The tourism sector is the largest economic sector on the Island. Any benefit from Wylfa Newydd must to in addition to, not in place of, the tourism sector. Any stagnation in the growth of or reduction in the tourism sector is unacceptable. The IACC is committed to working with Horizon leading up to the DCO Examination to agree amendment to the proposals and mitigation measures that will make the development acceptable.
- 4.2 Without agreeing a suite of mitigation proposals, which includes up-front capital investment, agreement on phasing and timing, monitoring and resilience funding, the development is not acceptable to the IACC. The current proposal by Horizon to 'monitor and mitigate' as and when impacts arise is unacceptable and substantial further progress needs to be made if we are to reach common ground before the DCO Examination. Horizon's current mitigation package of £2.2M (plus 'inherent' benefit of £7M through Permanent Visitor Centre) hugely undervalues the impacts on tourism. Over the construction period of 8 years, this equates to £275,000 per annum to mitigate against a potential impact on a sector, which is worth £304M per annum to the local economy. The IACC is currently working up mitigation proposals for the impact on tourism and will share with Horizon once available.

Yn gywir / Yours sincerely,



DYLAN J. WILLIAMS

Pennaeth Gwasanaeth – Rheoleiddio a Datblygu Economaidd
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