

From: [PMO](#)
To: [Wylfa Newydd](#)
Subject: RE: IACC Deadline 2 Submission : Local Impact Report - Site Campus (email 26)
Date: 04 December 2018 20:34:23
Attachments: [image001.png](#)
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Please note, a number of emails will follow in relation to the LIR – we will confirm the final email.

Pnawn Da/ *Good afternoon,*

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

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

Cofion/ *Regards,*

Manon

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

Ynys Mon yn cadw a diogelu ei hawliau i fonitro yr holl negeseuon e-bost trwy ei rwydweithiau mewnol ac allanol.

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

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Sent by email

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Dyddiad / Date: 19/09/2018

Dear Kieran,

OFFICIAL SENSITIVE

Review of Horizon's DCO Application (Temporary Worker Accommodation Campus)

1.0 Introduction

- 1.1 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 the on-site temporary campus. The IACC is eager 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.
- 1.2 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. The aim of this letter is to outline these impacts and to define the mitigation measures required to make the development's impact acceptable in planning terms.
- 1.3 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.. 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 Context

- 2.1 There have been significant changes to the project proposal from PAC2 to PAC3 (as recognised by Horizon in the revised SOCC¹). The most significant and fundamental change from the IACC's perspective, was the change to Horizon's Construction Worker

¹ Introduction paragraph - Horizon Statement of Community Consultation (V.3) May 2017 (page 3).

Accommodation Strategy. This resulted in increasing the on-site campus from 500 ‘essential workers’ to up to 4,000 construction workers accommodated on-site in a purpose built temporary campus. Given the rural nature and spatial profile of Anglesey, this is a substantial change which will impact across a number of receptors and areas, and which has been given insufficient recognition by Horizon. If fully utilised, the on-site campus would be the third largest settlement on Anglesey behind Llangefni and Holyhead². However, the facilities and services proposed to service this are not commensurate with the demands of a settlement of this scale, even a temporary one. This demand will inevitably spill over to the neighboring communities, which is not acceptable.

3.0 Summary of Main Issues

Following the IACC’s review of the DCO submission the following points are raised in relation to the Site Campus:

3.1 Site Layout

- 3.1.1 The IACC note that Horizon propose to build the site campus in three stages (Stage 1 - 1,000 bedspaces), (Stage 2 - 2,500), and (Stage 3 - 4,000). These will be built from the west of the site to the east (starting from the amenity building outwards in both instances). From the Amenity Building West and South, there are four 7 storey blocks (each housing 228 workers) and eleven 4 storey accommodation blocks housing 129 workers in each. This provides a total of 2,331 bedspaces West/South of the Amenity Building. The IACC believe that in order to minimise impact on the Tre Gof SSSI and the Wylfa Head Wildlife Site, the site should be further concentrated to the West / South of the Amenity Building. Given the backdrop of the existing Wylfa Magnox power station and Dame Sylvia Crowe’s mound, the proposal would have far less impact (landscape, visual, ecological.) by condensing the development within a smaller area / footprint, but with potentially larger (i.e. taller) accommodation blocks.
- 3.1.2 The IACC propose that if larger accommodation blocks are provided West / South of the Amenity Building, stepping down towards the Amenity Building (i.e. a combination of 7, 6, 5 and 4 storey buildings) Horizon can remove the three accommodation blocks on Wylfa Head and potentially some of the accommodation blocks to the east of the site. This would reduce the footprint of the site campus, which would reduce effects on landscape fabric as well as reducing effects on landscape character, visual amenity, SSSI and the Wildlife Site.
- 3.1.3 Horizon state that *there is opportunity to reduce the overall number of storeys should the Site Campus be built for fewer than 4,000 residents. It would be possible to reduce the minimum number of storeys to three*³. The IACC’s view is that if there is a reduction in construction worker numbers, this reduction should be felt across all accommodation sectors and not just the site campus with minimising of impacts on other housing sectors and tourism provision prioritised before reductions in the size of the campus are proposed. Notwithstanding this position, if there is a reduction in the site campus the IACC believe there should be a reduction in the number of accommodation blocks and not necessarily a reduction in storey height. This will reduce the landscape and visual impacts, particularly on Wylfa Head.
- 3.1.4 Further information and clarification is required from Horizon on the existing proposed site layout, how this position has been reached and what is the scope to amend the size of the accommodation buildings. The IACC will seek to ensure that sufficient flexibility is provided in the DCO parameter plans to allow for the proposed changes and will be asking the

² Amlwch has a population of 3,789 (Census 2011).

³ Design & Access Statement (section 3.3.10)

Examining Authority to consider this point in detail.

3.2 Phasing

3.2.1 The IACC would suggest that the phasing of the site campus be changes from 3 to 4 stages as follows:

- **Stage 1:** 1,000 bedspaces to the West / South of the Amenity Building;
- **Stage 2:** 2,500 bedspaces (i.e. the remaining 1,500 bedspaces to the West/ South of the Amenity Building);
- **Stage 3:** 3,000 (500 bedspaces in the 4 accommodation blocks immediately East of the Amenity Building)
- **Stage 4:** 4,000 (1,000 additional bedspaces from the 6 accommodation blocks to the Eastern side of the site).

3.2.2 This would provide Horizon with greater flexibility to build additional accommodation blocks if required (i.e. 500 bedspaces for phase 3 instead of increasing from 2,500 to 4,000).

3.3 Phasing of Campus Delivery

3.3.1 The Planning Statement and the Workforce Accommodation Strategy refer to Horizon's intention to deliver the campus accommodation in phases to respond to actual demand. As set out in detail in the housing topic letter⁴, the IACC do not accept that a reactive approach to adverse impacts arising is acceptable and require that the campus provision is used and maximised pro-actively to prevent such impacts arising. Suitable mitigation must also be secured for each phase, including the provision of welfare, leisure and ancillary facilities suitable to accommodate the maximum number of residents to prevent (or minimise) overspill to the local communities' services and facilities. This is also crucial in relation to possible effects on the Welsh Language as well as the promotion of social cohesion and community safety. The County Council require that:

- **Phase 1** (1,000 workers) is completed and operational by end of Q2 year 3 (to coincide with start of Unit 1 Construction, Commissioning and Start-Up);
- **Phase 2** (2,500 workers) is completed and operational by Q3 year 4 (to coincide with construction worker profile in Jobs & Skills Strategy – i.e. increase in workers Q4 year 4 from approx. 3,000 to 5,000 workers);
- **Phase 3** (3,000 workers) is completed and operational by end of Q4 year 4.
- **Phase 4** (4,000 workers) is completed and operational by end Q1 year 5 (in accordance with Horizon's Phasing Plan (Figure 2-1).

3.3.2 The delivery of the site campus is essential to minimise impacts on tourism accommodation⁵ and the PRS (especially in the early stages of the project). The IACC require that the Site Campus is built and used in accordance with the phasing strategy as outlined above. Building additional accommodation blocks only if accommodation in other sectors reach unacceptable levels is not an acceptable strategy to the IACC. The above proposed phasing strategy coincides with the workforce profile as outlined in Horizon's Jobs & Skills Strategy. This therefore, should not be objectionable to Horizon as its providing accommodation to meet their demand in accordance with the project programme.

3.3.3 The IACC will seek a DCO requirement that limits the number of construction workers on

⁴ Letter titled "Review of Horizon's DCO Application (Housing)" dated 19/09/2018

⁵ As set out in detail in the tourism letter to Horizon dated 19/09/2018

site until the relevant phase of the site campus is available. The IACC will not accept over reliance on other accommodation sectors due the site campus not being ready and available.

3.3.4 The IACC will also seek to secure the subsequent restoration of the campus site in phases as the use declines to minimise the overall impacts.

3.4 *Building Specification*

3.4.1 Horizon state that the accommodation blocks and amenity building will be category 3 structures per EN 1990 with an operational indicative lifespan of 10 years; general external building materials (e.g. cladding, roofing) would also have a 10-year lifespan. IACC require further clarification on the specification of the buildings. The DAS (section 4.3.35) states that there is potential for legacy re-use however, it is not clear from these specifications that the buildings will be of sufficient quality and remaining life to permit any reuse. Horizon need to provide information on where this potential exists for legacy re-use, for what purpose and whether this is feasible given the specification of the buildings in order to clarify the DAS and the intention for these structures.

3.5 *Parking*

3.5.1 The IACC accept that parking will be provided to the east of the Amenity Building, adjacent the construction compound, for the initial phase (400 spaces for the Stage 1 - 1,000 workers). Horizon state that on completion of the full site, this parking will be removed and 800 spaces would be provided South of the Site Campus. Horizon need to provide further information on whether this parking will be removed prior to the commencement / completion of Stage 2 (i.e. 2,500 workers) or whether this refers to the completion of the whole Site Campus (i.e. following Horizon's Stage 3 for 4,000 workers). IACC would require that the 800-space car park to the South of the Site Campus be completed prior to the occupation of 'Stage 2' (i.e. 2,500 workers). The IACC will also require clarity on whether 800 car parking spaces is sufficient for 4,000 workers. The IACC is concerned that (given the distance from their place of residence) workers will not use the Park and Ride in Dalar Hir which will result in 'fly parking' around the main site and in the communities of North Anglesey. The IACC also require clarity on how Horizon will transport workers around local communities (i.e. shuttle buses) to discourage the use of the private car.

3.6 *On-site Leisure Facilities and Services*

3.6.1 The proposed campus would result in a considerable number of construction workers (up to 4,000) living in close proximity to Cemaes and Tregele. The IACC does not consider that the proposed on-site facilities, which includes leisure and recreational amenities, retail and convenience, bar, restaurant and medical facilities is adequate to meet the day to day requirement of the construction workers. Further information and justification for the on-site provision is required as, the present information IACC considers it to be inadequate and will object to the proposals on that basis. Furthermore, the DAS states that all non-home based workers (i.e. 7,000) can use the on-site campus facilities. If this is the case, then the provision is clearly insufficient. The IACC also question Horizon's assumption that workers living in Anglesey's communities will use these facilities and would like to see the evidence supporting this assumption.

Indoor Spots Hall

3.6.2 Given the lack of indoor sports hall provision, the campus proposals will have a significant adverse impact on existing leisure facilities at Amlwch and Holyhead. There is an estimated shortfall of 4.62 sports hall courts across both Leisure Centres because of Wylfa Newydd.

This deficit is estimated to cost £2.7M⁶ to remedy. This deficit must consider the impacts of the Wylfa Newydd construction workers within the wider context of the existing population as the IACC cannot mitigate to only account for the Wylfa Newydd workers (i.e. without having a separate gym / sports hall). As part of the mitigation, Horizon will either need to provide a sports hall within the site campus to cater for the needs of workers, or will need to provide a financial contribution to the IACC to upgrade existing facilities at Amlwch and Holyhead to accommodate the increased demand. The multi-use area proposed on the campus site is not sufficient for this purpose because of the inclement weather often experienced on the North Anglesey coast and the demand for such facilities by workers (as evidenced elsewhere).

Outdoor Facilities

3.6.3 Although the two 800m² (1,600m² total) outdoor multi use games area (MUGA) are sufficient in size to meet the needs of the on-site and off-site construction workforce⁷, their insufficient quality will mean that demand will increase on existing facilities outside the Main Wylfa Newydd Site. The quality of the MUGA at the Site Campus (i.e. being 2G) will mean that additional pressure will be placed on existing Leisure Centre pitches as they are of a higher standard (3G). Mitigation is therefore required to upgrade existing facilities at Amlwch and Holyhead to provide further 3G standard pitches. This assessment of impact accounts for the on-site campus and Anglesey North / Anglesey West areas only. Impacts may also be felt in Anglesey South (i.e. Llangefni and David Hughes) but these have not been assessed.

3.6.4 To mitigate this impact, Horizon should upgrade the Site Campus MUGA to 3G quality pitches (to avoid impacts on existing 3G sports pitches). There is also a need to upgrade existing sports pitches at Amlwch and Holyhead to meet the need of Wylfa Newydd Construction Workforce, over and above the existing population. For the size of the local population, including on-site workers and Anglesey North off-site workers (with their partners), 0.58 full sized 3G pitches are required. This translates to 4,304m² of 3G pitch required. With the existing 3G pitch at Amlwch providing 628m² of space, this leaves a deficit of 3,676m². Upgrading the existing MUGA at Amlwch Leisure Centre to 3G pitch (which would provide additional 633m² of 3G) would cost £40,250. The need for the remaining 3,043m² of required 3G pitch space should be mitigated to ensure the Wylfa Newydd construction workforce has and the local population retains access to 3G facilities. The cost of mitigating this deficit to 3G pitch space is £222,169⁸.

Swimming Facilities

3.6.5 Horizon are not proposing any swimming facilities for the non-home based workers. This will have an adverse impact on existing facilities (particularly in Amlwch and Holyhead). The lack of any swimming provision at the Site Campus will lead to workers travelling to use local leisure centres for swimming facilities. This will place increased pressure on the existing swimming pools on the Island.

3.6.6 As with the sports hall above, the swimming pool will be used by the Wylfa Newydd construction workers as well as the existing population increasing the current level of demand. The shortfall in provision must therefore take into account the increased demand of the population in Anglesey North and Anglesey West as a result of Wylfa Newydd. Based on the Sports England calculator, the cost to meet this shortfall is £1,072,060. Any increase in adults (e.g. construction workers on shifts) using the swimming pool during the daytime will result in a need for improved, remodelled or expanded changing facilities at Amlwch

⁶ AECOM Assessment of On-Site Leisure Facilities (2018)

⁷ AECOM assessment based on Sports England Facilities Calculator.

⁸ All figures quoted are from AECOM Assessment of On-site Leisure Facilities (2018) unless otherwise stated.

Leisure Centre. This is because schools require the sole use of segregated changing facilities from other members of the public to ensure safeguarding standards are met. Due to the additional demand from construction workers, alterations to changing facilities are required. The cost of undertaking this alteration is £425,250⁹.

Parking at Amlwch Leisure Centre

3.6.7 There is currently insufficient parking space available at Amlwch Leisure Centre to meet any increase in demand. Amlwch Leisure Centre currently offers surface car parking comprising 22 parking bays and four additional bays for disabled leisure centre users at the side of the side of the leisure centre. A further 7 additional parking bays are provided at the rear of the leisure centre. Evidence provided by IACC Officers and reported in recent Health and Safety Report shows that the car park is often full at peak times, leading to vehicles parking outside of designated spaces and on grass verges. Any increase in usage of Amlwch Leisure Centre generated by the temporary construction workforce will only increase these existing capacity issues. This problem could be addressed by both extending parking provision onto an existing tennis court and reconfiguring the existing space. A development proposal for Amlwch Leisure Centre has identified a cost of improving and extending car parking facilities of approximately £50,000.

Recreational / Social Facilities

3.6.8 Further detail is required on the recreational / social facilities to be provided within the Amenity Building (i.e. the Multi Purpose Room). The Multi Purpose Room can accommodate 20 people each (420m²). 4 Multi Purpose Rooms as proposed (i.e. can accommodate 80 people). The IACC consider this to be insufficient to meet the recreational / social needs of 4,000 workers who are away from home and are expected to use on-site facilities for their primary social and recreational needs.

Health Care Facilities

3.6.9 A Healthcare / accident and emergency facility would be located within the Main Power Station Site. Horizon state therefore, that the Site Campus would only require first-aid facilities. The IACC and Bestsi Cadwaladr Health Board require further detail on the timing of the delivery of the on-site medical facility. Horizon must ensure that this facility is available before the occupation of the site campus commences and that provision is made for out of hours demand. The 'Blue Lights' will provide further detail on healthcare and other emergency services provision.

3.7 Communications

3.7.1 Section 4.4.6 of the DAS states that "*key aspect of the design will be the provision of high-speed internet broadband to all residents within the site. It is proposed that the site will be designed to have full wireless coverage within each of the buildings*". The IACC would request that installation of broadband infrastructure be designed and installed so as to improve communications in North Anglesey more generally. The creation of the main site campus together with the construction site will place a demand on such services well in excess of that created by residents. Horizon should ensure that the workers living in the community have access to these services as well, and to protecting existing residents' access these services at an acceptable level of speed and stability from interruption due to the substantial increase on demand on them. With the demand placed on telecommunications and broadband in North Anglesey already high, any adverse impact on existing residents access to these services is unacceptable.

3.7.2 A positive legacy from Wylfa Newydd would be to ensure that North Anglesey has excellent

⁹ Alliance Leisure Report

mobile coverage (3G/4G) with superfast broadband in all communities and that the capacity created for and then released by the site campus is made available to communities.

3.8 Visitor Pressure

3.8.1 The impact of increased visitor pressure and associated disturbance on ecological receptors including foraging chough at Wylfa Head, the Trwyn Pen Carreg Wildlife Site, and other sites locally (including Cemlyn Bay SAC and Anglesey Terns SPA) has not been given adequate or meaningful consideration. Further detail is required on how Horizon will ensure that any impacts on the coastal path, AONB, Heritage Coast, sensitive ecological receptors etc. are managed and mitigated as the current proposals do not detail these sufficiently; (e.g. DAS 3.4.21. *“A minimum of two pedestrian access points must be provided in addition to the main entrance. These should allow access to the Wales Coast Path.”*) As highlighted in the IACC’s letter on tourism matters¹⁰, the Wales Coastal Path is a vitally important tourism asset and visitors should not be put off from using the path due to the real or perceived view that it is occupied by a large number of construction workers.

3.9 Re-instatement

3.9.1 The works to be undertaken to restore the land on which the temporary site campus would be located requires further detail and clarity. This is a very sensitive and exposed location, the land is to be remodelled but there are no details on the foundations of the site campus buildings. Further information is required in order to understand how the land would be affected by the construction and operation of the site campus and the measures that will be necessary to restore the area.

3.10 Emergency Planning

3.10.1 The proposed site campus is located within the emergency planning zone of the existing Wylfa Magnox site. The IACC require further detail on emergency planning arrangements for the unlikely event that the site campus would have to be evacuated. What impacts would this have on the IACC /communities, would these workers have to go home, what would be the impacts on this on the project etc.

4.0 Conclusion

4.1 The change in Horizon’s ‘construction worker accommodation strategy’ has fundamentally changed the focus of impacts of Wylfa Newydd both a spatially and thematically. The concentration of the project to North Anglesey will concentrate and accentuate the environmental, economic and social impacts to a much smaller geographic area, which will exacerbate the impacts on neighboring communities and the surrounding environment. Whilst Horizon highlight the planning benefit of having the worker accommodation campus within the Wyfla Newydd Development Area (i.e. reduced traffic movements)¹¹, the other impacts as outlined above have not been given due consideration which is unacceptable at this stage of the project. Although The IACC recognise that much of the detail will be dealt with by requirement (e.g. design, specification etc.) there are fundamental points of principle which need to be discussed and agreed prior to the DCO Examination to ensure that impacts are appropriately avoided, mitigated or compensated.

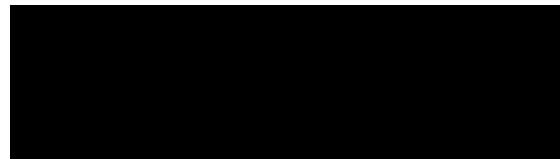
4.2 The IACC is committed to working with Horizon to ensure that a manageable solution for the site campus is agreed (through the Statement of Common Ground) prior to the DCO

¹⁰ Letter titled ‘Review of DCO application (Tourism)’ dated 19/09/2018

¹¹ Temporary Workers Accommodation Site Selection Report (8.24.4) p.50

Examination. Whilst the IACC does not object to the principle of an on-site campus, as currently proposed, the IACC will be objecting to the site campus as we are not satisfied that the adverse impacts have been appropriately addressed and mitigated.

Yn gywir / Yours sincerely



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