

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](#)
[image002.png](#)
[image003.png](#)
[Site Campus.pdf](#)
[Site Campus Annex.zip](#)

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 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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Wylfa Newydd Local Impact Report

Chapter 18: Site Campus

December 2018

PINS Ref: EN010007



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1.0 Site Campus Chapter

1.1 Overview of Impacts

1.1.1 **Size of On-Site Campus** – When fully operational (i.e. 4,000 workers) this would be the **third largest settlement on Anglesey** behind Holyhead and Llangefni¹. The neighbouring village of Cemaes has a population of approximately 1,100 (Census 2011) to put the scale of the temporary workers accommodation into context². Although the site campus is temporary, it will still be required for a number of years and therefore the impacts of a development of this scale will need to be appropriately avoided, mitigated or compensated.

1.1.2 **Phasing of Campus Delivery** - Horizon's proposal of having 1,000 bedspaces available by Q4 Year 4 building gradually up to a peak of 4,000 by Q2 Year 7 **is not acceptable**. This places significant and unjustified stress on the local housing market and tourism sectors, particularly in the early to mid-stages of the project (Years 4, 5 and 6). Horizon must mitigate the impacts of its project by ensuring that the on-site campus is ready and available earlier (4,000 by Y5 Q4) in the construction programme to meet this significant demand for accommodation.

1.1.3 **Affordability and Incentivisation** - As Horizon cannot mandate workers to stay at the site campus, the cost per night must be low to attract workers to the site campus. This should, for example, be set at a figure of 10% less than the median average market rent for a 2 bedroom property on the Island (or in North Anglesey)³ (index linked). In addition, workers will need to be incentivised to live at the site campus to make it the 'accommodation of choice' for the workers (e.g. fast & reliable broadband, quality of food, facilities and services etc.).

1.1.4 **Building Specification** – The IACC require clarity on the proposed building specification. Given that workers cannot be mandated to stay at the on-site campus, it must be 'attractive' to the workers in terms of its design, specification, layout, availability of facilities etc. If this is not up to an acceptable specification then workers may chose not to use the facility and may place additional stress on existing accommodation. Furthermore, detail is required on the potential legacy re-use of the on-site campus.

1.1.5 **Parking** - The IACC require confirmation that 800 parking spaces is sufficient for the 4,000 workers at the site campus. 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.

¹ Population of Holyhead, Llangefni and Amlwch. [\(Link\)](#)

² The population of the community area of Llanbadrig, which includes Cemaes and Tregele, has a population of 1,357 (Census 2011) [\(Link\)](#)

³ For example, median average for 2 bed property on Anglesey is £495 per month. £495 – (10%) = £445.50 / 22 nights (or 2 shift cycles per month) = £20.25 a night.

1.1.6 **On-site Leisure Facilities and Services** - 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. Given the lack of an indoor sports hall, the lack of any swimming provision and the inclement weather often experienced in this exposed part of North Anglesey, the IACC has significant concern that this will adversely impact existing facilities and services.

1.1.7 **Visitor Pressure** - 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.

1.2 Context

1.2.1 Consideration of the Site Campus issues is framed by the Housing Chapter of this LIR, which covers the impacts of Horizon's latest Worker Accommodation Strategy, of which the Site Campus is one element of the proposed temporary worker accommodation provision. Where and how non-home based construction workers are going to stay, be it in purpose-built campus on site, or in private sector accommodation or tourism accommodation, is one of the most important issues for local people and the communities in which they live.

1.2.2 Where workers live determines what the local impacts will be in terms of Welsh language, traffic and congestion, tourism impacts, impacts on local facilities and services etc. Given the scale and potential impact of a proposal of the scale and complexity, this chapter cannot be read in isolation. It must be read in conjunction with almost every other chapters of the LIR (particularly housing tourism, the Welsh language, transport and the Main Site). Due to this cross cutting nature and the concentration of impacts in North Anglesey, the site campus is one of the most contentious issues for local people and stakeholders from the entire Wylfa Newydd project.

1.2.3 In addition to the site campus, Horizon propose that up to 3,000 workers will be accommodated temporarily in private accommodation and tourism accommodation (including caravans). The evidence indicates that the majority of these will be in locations close to the site. This category of workers will also place demands on the local services listed above. Furthermore, Horizon envisage that they will utilise the catering and other facilities on the site campus on a regular basis. This extra demand has not been quantified in the DCO application nor have the effects on-site parking and additional traffic generated on local roads at the end of shifts, adding to the potential cumulative issues facing the host communities of North Anglesey. These and other Cumulative Issues are the subject of a separate LIR Chapter.

1.2.4 The evolution of Horizon's project is outlined in the introduction chapter of the LIR. Of particular relevance to this chapter is the evolution of Horizon's Construction Worker Accommodation Strategy. From PAC1 in 2014, followed by the informal 'project update consultation' in January 2016 through to PAC2 later in 2016, regardless of other changes to the project, the **one constant that remained throughout each of these stages (apart from the power station itself) was that '250 – 500 essential works would be accommodated on-site'**. The IACC had always accepted this position. Apart from questioning the definition of 'essential worker', the IACC had no concerns and therefore no comment to make on this in any consultation response.

1.2.5 Going from a position of 500 'essential workers' on-site to now proposing up to 4,000 construction workers on-site in a purpose built campus is a fundamental shift in position. This late change in position and the concentration of impacts around the main site and in North Anglesey is significant. Horizon have not provided sufficient detail to enable the IACC to make a detailed assessment on the potential impact on North Anglesey (for example a copy of the code of conduct, detail on how the site campus would function, what happens when workers are on their 'down time' etc.).

1.2.6 Whilst Horizon will be able to control the behaviours of the workforce whilst they are on-site, the IACC lack the detail, re-assurance and clarity on how the behaviour of the workforce will be managed (and enforced) whilst they are off-site. This is important for the wellbeing of the Island's communities, residents and visitors.

1.3 Planning Policy

1.3.1 The Joint Local Development Plan⁴ (JLDP) and the Wylfa Newydd Supplementary Planning Guidance⁵ (SPG) contain specific policies in relation to temporary construction workers accommodation for Wylfa Newydd.

Joint Local Development Plan (JLDP) (July 2017)

1.3.2 The JLDP contains a specific section to deal with '*Wylfa Newydd and Related Development*'⁶. Of particular relevance to this chapter of the LIR is *Strategic Policy PS9 – Wylfa Newydd and Related Development*; and *PS10 – Wylfa Newydd Campus Style Temporary Accommodation for Construction Workers* (including the supporting text).

Strategic Policy PS10 - Wylfa Newydd Campus Style Temporary Accommodation for Construction Workers

1.3.3 Policy PS10 states that "*in their role as determining authorities for campus style temporary accommodation for construction workers for Wylfa Newydd, the*

⁴ Strategic Policy PS10, page 87 ([Link](#))

⁵ Guiding Principle GP28b, page 140 ([Link](#))

⁶ Paragraphs 6.3.12 to 6.3.25, including PS9, PS10, PS11 and PS12 of the JLDP ([Link](#))

Councils will require compliance, where appropriate, with the criteria set out in Policy PS 9 and with this Policy". However, as outlined in the introduction Chapter of this LIR, legislative changes brought about by the Wales Act 2017 meant Horizon were now able to include the site campus (and all other associated developments) within the DCO application. Nevertheless, the IACC still require that the site campus proposal conform to local planning policy. This section will outline each criteria of Policy PS10 and assesses whether Horizon are in compliance with this criteria (or not) and the proposal's general compliance with the policy.

- 1.3.4 ***Criteria 1: the developer can firstly demonstrate that the proposal satisfies a demonstrable need for temporary accommodation for construction workers that cannot be met through either existing residential accommodation, or the re-use of existing buildings, or the provision of new permanent buildings capable of being adapted for permanent use following their use by construction workers;***
- 1.3.5 The IACC recognise that given the scale of the project, the use of additional temporary accommodation for construction workers on the Island is required. Paragraph 6.3.18 of the JLDP states that "*given the scale of the anticipated number of construction workers required during the construction phase, it is considered that modular development will be part of the supply of accommodation but will not be first option except for provision for workers on the Wylfa Newydd Project site*".
- 1.3.6 Given the availability / capacity in the various other accommodation sectors (e.g. tourism, PRS, owner occupation etc.), Horizon have demonstrated⁷ that there is a need for temporary accommodation for construction workers that cannot be met either through existing residential accommodation or the re-use of existing buildings. A project of this scale, with 7,000 non-home based construction workers at peak, cannot be absorbed into existing residential accommodation (even with mitigation) without causing catastrophic impact on the local housing and tourism markets. The IACC agree therefore that the use of purpose built accommodation for temporary use is essential.
- 1.3.7 However, although the use may be temporary, the accommodation buildings do not have to be. Construction workers could be accommodated in new permanent buildings capable of being adapted for permanent use. A major leisure and residential development has been granted planning permission⁸ within and adjacent to the development boundary of Holyhead (Land at Penrhos, Cae Glas and Kingsland – "Land and Lakes"). The proposed Land and Lakes development includes, amongst other elements, the provision of 315 holiday lodges at Penrhos and Cae Glas and a residential development of up to 320 dwellings at Kingsland. This development (which has planning consent) could have been used to accommodate Wylfa Newydd construction workers before being converted to its legacy use (tourism and housing).

⁷ Horizon's Workforce Accommodation Strategy (Document Ref APP - 412)

⁸ Planning application reference 46C427K/TR/EIA/ECON.

1.3.8 Land and Lakes was included as an option and part of Horizon's preferred approach for temporary workers accommodation in the informal consultation in January 2016 and in PAC2. However, by PAC3, Horizon has removed the site from its consideration of locations for accommodation and now instead favours a campus of up to 4,000 bedspaces at the main site.

1.3.9 Paragraph 6.3.21 of the JLDP states that "*project promoters must demonstrate that they have fully considered the re-use of existing buildings and/ or the provision of permanent buildings capable of being adapted for permanent use following use by construction workers, proportionate use of the private rented sector and consideration of existing consents, before proposing modular accommodation in temporary buildings*".

1.3.10 Being the only temporary workers accommodation with existing planning consent, Horizon must demonstrate why Land and Lakes is not a suitable option for the temporary workers accommodation. Given that all of the impacts of Land and Lakes have been assessed and (with mitigation) deemed acceptable, it remains the IACC's view that the consented Land and Lakes development is an opportunity to deliver construction worker accommodation⁹. It provides a lasting legacy benefit beyond the construction period of Wylfa Newydd (in the form of housing, major tourism development, employment and community facilities and services) and therefore conforms to planning policy and the wellbeing goals¹⁰.

1.3.11 The Land and Lakes sites was part of Horizon's preferred strategy in PAC2, and was the only site capable of accommodating the numbers required to deliver their Workers Accommodation Strategy. However, in Horizon's Site Selection Report¹¹ they cite commercial viability, cost of transporting the workers, increased allowance to workers (given the greater distance to work), the design of the site not suitable or compatible for workers etc. are cited as the reasons for not pursuing this option. The IACC does not consider that these reasons justify a departure from policy.

1.3.12 The IACC does not believe that Horizon have provided sufficient justification for not using Land & Lakes in favour of the on-site temporary campus in accordance with the requirements of paragraph 6.3.18 of the JLDP.

1.3.13 ***Criteria 2: the proposal is located on the Wylfa Newydd Project site or a site located adjacent to or well related to the development boundary of Holyhead, Amlwch, Llangefni, Gaerwen or Valley and is close to the main highway network where adequate access can be provided without significantly harming landscape characteristics and features, and also takes account of policy preference for use of previously developed land;***

1.3.14 Having undergone public consultation, the JLDP was examined in public during September and October 2016. However (as explained in the introduction

⁹ As outlined in the Wylfa Newydd SPG (May 2018) (section 5.2.26 page 182).

¹⁰ Wellbeing of Future Generations Act 2015. ([Link](#))

¹¹ 8.24.2 Site Campus Site Selection Report (APP - 439)

chapter of the LIR), following the enactment of the Wales Act 2017, Horizon were able to include all associated developments within their DCO application (including the now proposed 4,000 bed space site campus).

1.3.15 Paragraph 6.3.19 of the JLDP states “*in terms of location, accommodation for temporary construction workers should as far as possible be provided within, adjacent to, or well related to the development boundaries of the Centres and Service Villages identified in the Plan’s Settlement Hierarchy (depending on the scale of the development)*”.

1.3.16 Paragraph 6.3.20 goes on to state “*given the scale of the anticipated number of construction workers required during the construction phase, it is considered that modular development will be part of the supply of accommodation but will not be first option except for provision for workers on the Wylfa Newydd Project site. Providing some modular accommodation in temporary buildings on the Wylfa Newydd Project site would be acceptable where it is supported by provision of an appropriate level of community facilities and the transport impact (including workers’ access and parking) can be demonstrated to be acceptable*”.

1.3.17 The JLDP does therefore recognise there would be some modular temporary workers accommodation on-site, but this is not to say that the Wylfa Newydd Site and other settlements in the settlement hierarchy have equal status in policy terms for temporary workers accommodation.

1.3.18 Horizon must demonstrate that they have fully considered the re-use of existing buildings and / or the provision of permanent buildings capable of being adapted for permanent use, use of previously developed land or consideration of existing consents, before proposing modular accommodation in temporary buildings¹².

1.3.19 **Criteria 3: the proposal must include appropriate mechanisms to mitigate any adverse impacts of the proposed development on the Welsh language and culture or a contribution is made towards mitigating those impacts in accordance with Policy PS 1 and Policy ISA 1;**

1.3.20 Detail on the impact on Welsh Language is contained in the Welsh Language chapter of this LIR.

1.3.21 **Criteria 4: Where there is insufficient capacity within existing off-site leisure, recreational, retail and healthcare facilities to meet the needs of occupiers of the site or such facilities are not available within an acceptable distance which facilitates pedestrian or cycle access to them, the proposal must include appropriate mechanisms to mitigate negative impacts which may include onsite provision of ancillary facilities for the use of the occupiers; and**

¹² JLDP paragraph 6.3.21 (page 83) ([Link](#))

1.3.22 Further detail on the proposed on-site campus leisure and recreational facilities (and the compliance of this provision with this criteria) is detailed further in this chapter.

1.3.23 ***Criteria 5: operators will be required to maintain occupancy information to facilitate the monitoring of the impacts of the development, including the number of construction workers accommodated, the duration of occupancy and keep a record of anonymised data of workers (having regard to the requirements of data protection legislation) and make this information immediately available, on request, to the Council.***

1.3.24 The IACC will seek a DCO requirement in order for the operator of the on-site campus to maintain occupancy information for monitoring purposes. Monitoring is of critical importance to the IACC and maintaining a high level of occupancy in the on-site campus is essential to ensure that impacts on other accommodation sectors is minimised.

Wylfa Newydd Supplementary Planning Guidance (SPG) (May 2018)

1.3.25 Following representations received by Horizon on the SPG consultation¹³, for clarity and consistency, the IACC introduced separate 'Guiding Principles' for the on-site campus (GP28b) and any other temporary workers accommodation proposed outwith the main Wylfa Newydd Site (GP10b). The primary reason for this was that any developer could apply for temporary workers accommodation outwith the main Wylfa Newydd site and only Horizon could apply within the Wylfa Newydd site. This meant there were criteria that would apply only to Horizon, which the IACC agreed, could be misleading to include in GP10b. **For the purposes of this LIR chapter therefore, this section focusses on GP28b only as this is the 'Guiding Principle' that deals with the on-site campus.**

1.4 Impacts and Evidence

1.4.1 This section identifies the impact of the on-site campus and the relevant evidence base and planning policy considerations. The IACC sent a letter¹⁴ to Horizon dated the 19th September 2018 outlining its concerns on the site campus. The IACC has a meeting with Horizon on the 18th October 2018 to discuss housing and construction worker accommodation, but is yet to receive a formal response or acknowledgement to this letter. This lack of response by Horizon was raised by the IACC in the Preliminary Meeting on the 23rd October 2018.

1.4.2 A number of impact assessments have been undertaken by specialist officers and consultants to inform this section of the LIR. The IACC has also engaged with Natural Resources Wales, Welsh Government, North Wales Wildlife Trust and a number of other key stakeholders to form this assessment of impact.

¹³ IACC Wylfa Newydd Representations Report

¹⁴ Letter 'Review of Horizon's DCO Application (Temporary Worker Accommodation Campus') (19/09/2018) (Annex 18A)

Phasing of Campus Delivery

- 1.4.3 The phasing and delivery of the on-site campus will have a significant impact on the local housing market and the availability of tourism accommodation. Horizon's proposed phasing and delivery for the on-site campus is unacceptable as it will place significant stress on the local housing market, particularly during the early years of the project. To minimise the pressure on the private market the IACC requires the delivery of 'Phase 1' of the TWA by Year 4 Q4 (or earlier) and the subsequent phases to be delivered earlier, rising to the planned peak of 4,000 by Year 5 Q4 (not Year 7 Q2 as proposed).
- 1.4.4 Horizon's current proposal of having 1,000 bedspaces available by Q4 Year 4 building gradually up to a peak of 4,000 by Q2 Year 7 is **not acceptable**. This places significant and unjustified stress on the local housing market and tourism sectors, particularly in the early to mid-stages of the project (Years 4, 5 and 6). Horizon must mitigate the impacts of its project by ensuring that the on-site campus is ready and available earlier (i.e. the 4,000) in the construction programme to meet this significant demand for accommodation.
- 1.4.5 The IACC also require the on-site campus to be available for longer, declining more gradually from Year 8 Q4 to Year 10 Q1. This will reduce the pressure on the private housing market during Year 9 and the first two quarters of Year 10 as the non-home based workers would otherwise have to be accommodated in the PRS or in tourism accommodation, displacing local residents and tourists. Horizon's current proposals (see Annex 18B¹⁵) of removing all the TWA by Q4 Year 9 will result in a significant increase in the use of PRS and other accommodation sectors in Q1 Year 10, which is **unacceptable**. The removal of the TWA will need to correlate with the decline in construction worker numbers and 'smoothing out' of this decline is required to prevent any adverse impacts on the housing and tourism sectors towards the end of the project.
- 1.4.6 Horizon's accommodation strategy proposes that the TWA will only be fully occupied (i.e. 4,000 workers) for just over 18 months (7 quarters), from Year 7 Q2 to Year 8 Q4. It will then decline quite rapidly the following year to 1,250 by Year 9 Q4 and '0' (zero) by the following quarter.
- 1.4.7 The IACC have discussed the potential to bring forward the delivery of the site campus with Horizon. Horizon have indicated that due to commercial and procurement reasons, and due to the time it would take to prepare the site, bringing forward the delivery of the first 1,000 bedspaces will not be achievable (i.e. before Year 4 Q4). Horizon have however indicated that the subsequent phases could potentially be brought forwards and they are working on a revised Phasing Strategy (The IACC have not seen this revised Phasing Strategy before the preparation of this LIR). The IACC can accept this, **provided that other mitigation is provided to mitigate against the impact on the housing and tourism sectors during these early years (see Housing Chapter of LIR). If not, this would be wholly unacceptable.**

¹⁵ IACC breakdown of Horizon's Construction Worker Accommodation Strategy by number of workers in each accommodation type per quarter of the build period.

1.4.8 In terms of impact, the IACC believe not bringing forward the delivery of the on-site campus will have a significant **negative impact** on the local housing and tourism markets. Not having the TWA in place earlier will result in approximately 1,200 properties (including caravans) being let to incoming construction workers in less than two years at the beginning of the project. **This is clearly unacceptable.**

1.4.9 By Year 4 Q3 (i.e. 1 quarter before the TWA is available) there will be approximately 1,700 non-home based construction workers seeking accommodation in existing accommodation (or caravans). If there is a delay in the delivery of the TWA (as experienced in Hinkley Point C), this impact could be severe. Even a delay on 1 quarter would see an additional 500 workers seeking accommodation in the private market, which again is clearly unacceptable. The IACC will therefore seek a DCO requirement limiting the amount of construction workers on-site until each stage of the TWA is complete and available (thresholds to be agreed). This will ensure that the build-up of workers on-site corresponds with the number of TWA bedspaces available to prevent 'overspill' into other accommodation sectors.

1.4.10 Guiding Principle GP28b (i) of the Wylfa Newydd SPG states that *the delivery of the construction worker accommodation should be in accordance with the submitted Construction Worker Accommodation Phasing Plan to avoid rather than react to adverse impacts*. Horizon have not provided a Worker Accommodation Phasing Plan for the site campus so it is not possible for the IACC to fully assess the potential impacts and agree triggers / thresholds with Horizon for the delivery (and subsequent occupation) of the site campus.

1.4.11 The supporting text following GP28b states “*when responding to proposals forming part of the Development Consent Order, the County Council will request a Construction Worker Accommodation Phasing Plan that sets out the numbers of workers expected to be accommodated within the proposed main site campus and the timescale of its construction, by phase. This plan should also set out how on-site community, health, retail, recreation and leisure facilities will be provided for the campus and how sufficient provision will be made for the number of workers to be accommodated in each phase. This Phasing Plan should also set out the details for phased decommissioning of the facility and provisions for amending the phasing depending upon the actual workforce size once construction commences*”.

Site Layout

1.4.12 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.

1.4.13 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.

1.4.14 The IACC provide further detail on this issue in our Written Representation (Section 14).

Building Specification

1.4.15 Horizon state that the accommodation blocks and amenity building will be category 3 structures in accordance with EN 1990 with an operational indicative lifespan of 10 years; general external building materials (e.g. cladding, roofing) would also have a 10-year lifespan¹⁶. IACC require further clarification on the specification of the buildings. The Design and Access Statement (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 re-use. 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.

1.4.16 Of greater concern to the IACC is the 'attractiveness' of the site campus to construction workers as a place they want to live (i.e. as opposed to living in existing accommodation on Anglesey). The specification and design of the site campus is critically important to influencing the accommodation choice of workers (together with cost). The campus must be of high quality and standard to attract workers and this standard will need to be maintained throughout its operation. Although it is a 'temporary facility', it will be required for a number of years and must be an attractive option for construction workers (in terms of design, amenity, facilities, areas to relax etc.). The site campus should be of good design and of high specification so that it becomes the 'accommodation of choice' for the workers.

1.4.17 Based on existing information, the building specification means that the proposed on-site campus will have a **negative impact** as workers will not be attracted to stay there (as they are not obliged to do so). This may result in overspill into other accommodation sectors, which is unacceptable. The IACC will expect that in accordance with JLDP and SPG policy, the site campus to be of good design and of a quality to minimise impacts on seascape, landscape and visual but also to be attractive to workers as a place they will want to stay.

1.4.18 Given the intended lifespan of the accommodation units (i.e. 10 years) the IACC have concern in terms of their potential legacy re-use. The IACC believe there is an opportunity, through the provision of higher specification units, for legacy re-use in the form of affordable housing, extra care facilities or to provide accommodation for people who are at risk of homelessness. The

¹⁶ 8.2.8 Design & Access Statement (Part 1 of 2) (4.3.47 page 58) (APP – 409)

accommodation blocks could be used as student accommodation in Coleg Menai, for example, or for a number of other used to be defined at the time. However, for this potential to become a reality, the IACC require clarity on the intended specification of the accommodation blocks and the potential to improve the specification in order to provide a legacy benefit for Anglesey post construction.

Parking

1.4.19 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).

1.4.20 The IACC will also require clarity on whether 800 car parking spaces is sufficient for 4,000 workers (plus facilities management staff). If 400 spaces are required for 1,000 workers (phase 1), the IACC require clarity on why Horizon believe 800 is enough for 4,000 workers (i.e. and not 1,600). 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. If these issues are not addressed, and appropriate measures put in place, it will have a significant **negative impact** on North Anglesey.

1.4.21 Guiding Principle GP28b (v) states that "*the proposals plan for sustainable transport including walking and cycling, and mitigate the particular transport and access implications arising from the provision of construction worker accommodation on site, with particular regard to highway safety. The proposed parking provision – commensurate with the phased accommodation proposals – must be included in the Phasing Plan*". The IACC would therefore require that details on parking is submitted as part of the Site Campus Phasing Plan to ensure that impacts can be assessed and appropriately mitigated where required.

On-site Leisure Facilities and Services

1.4.22 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 objects to the proposals on that basis. Furthermore, the Design & Access Statement states that all non-home based workers (i.e. 7,000) can use the on-site campus facilities¹⁷. 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 Sports Hall

1.4.23 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 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

1.4.24 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 workforce¹⁸, 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.

1.4.25 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 in the communities, 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

¹⁷ Design & Access Statement Site Campus (Site Brief, section 1.5.4 bullet 9) (Page 8) (APP – 409)

¹⁸ AECOM assessment based on Sports England Facilities Calculator.

deficit of 3,676m². 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.

Swimming Facilities

1.4.26 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.

1.4.27 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. Any increase in adults (e.g. construction workers on shifts) using the swimming pool during the daytime will result in a need for improved, remodeled or expanded changing facilities at Amlwch 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.

Parking at Amlwch Leisure Centre

1.4.28 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 Report¹⁹ 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 funding to both extending parking provision onto an existing tennis court and reconfiguring the existing space.

Recreational / Social Facilities

1.4.29 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 inadequate 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. The IACC recognize that due to shift patterns not all

¹⁹ Amlwch Leisure Centre Health & Safety Report

workers will occupy the site campus simultaneously, nevertheless the provision is still considered inadequate for a population of this size and profile.

1.4.30 Given the cultural diverseness of the construction workforce, further detail is also required on the different religious requirements of the workforce within the amenity building or accommodation blocks.

Health Care Facilities

1.4.31 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 Betsi 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 Betsi Cadwaladr University Health Board will provide further detail on healthcare facilities.

Amenity Building

1.4.32 The proposed amenity building would be located approximately at the centre of the site, surrounded by the accommodation blocks and next to the main bus access point to the site. The amenity building would be the main entrance to the on-site campus, providing the initial booking-in and reception and then the ongoing catering, leisure and support facilities for the workers. The amenity building would contain a restaurant / canteen, gym, coffee bar, retail shop, laundry, bar, TV room etc. for the use of the workers.

1.4.33 Horizon state that "*the amenity building would play a significant role, providing an area for workers to eat, socialise, relax and keep fit*"²⁰. However, given the size of the building and the proposed facilities within it, the IACC has concerns on its ability to deliver this effectively. Although the external design of the building is acceptable in principle, the size of the facility and the internal configuration is not.

1.4.34 For effectively a new settlement for 4,000 people, the IACC would expect much more space for workers to '*eat, socialise, relax and keep fit*', particularly given the inclement weather in this exposed coastal area of Anglesey. Experience from Hinkley Point C²¹ shows that the restaurant in the site campus in Hinkley is more like your typical budget hotel bar / restaurant (e.g. Premier Inn) than a canteen as they eat in a canteen on the main site two or three times a day already. This is important as otherwise workers may choose not to use the 'canteen' in favour of local takeaways, pubs restaurants etc. This same principle applies for recreational and sports facilities. Although the IACC are not opposed to workers frequenting local facilities and establishments, this however could have significant knock on impacts in terms of traffic, anti-social behaviour and impact on existing resident's ability to use these facilities and services. This

²⁰ Site Campus Design & Access Statement (4.3.67) (APP – 409)

²¹ Sedgemoor Campus ([Link](#))

could have a significant impact on community cohesion and the Welsh language.

1.4.35 In the same way as the IACC want to see workers be attracted to the site campus in the first instance as the 'accommodation of choice', the same applies for the use of the amenity building. If this is not attractive to workers, or is overcrowded due to size of building or availability of facilities, then workers will not use it.

1.4.36 Guiding Principle GP28b (iv) of the Wylfa Newydd SPG states that particular regard must be given to "*the onsite provision of leisure, recreation (including opportunities for education), retail and healthcare facilities to meet the needs of construction workers being accommodated on the main site. Sufficient provision is provided for the social, catering, health, communication, retail, leisure and recreational needs for the approved number of construction workers on the site*". From the evidence as outlined above, the IACC does not believe that the on-site facilities is sufficient to meet the needs of the workers. This will have an adverse impact on existing facilities and services in North Anglesey, which is unacceptable.

1.4.37 In terms of legacy re-use, the same principle applies for the amenity building as it does for the accommodation blocks. The amenity building could potentially be utilised to provide off-site legacy benefit to Anglesey's communities (particularly North Anglesey) in the form of a community building, sports hall, residential use etc. The IACC does not believe that Horizon has provided sufficient detail on the potential legacy re-use of these facilities, which is unacceptable.

IT Communications / Broadband

1.4.38 Section 4.4.6 of the Design & Access Statement 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 huge demand on such services, well in excess of that created by residents.

1.4.39 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. Given the rural nature of North Anglesey, existing residents already have trouble accessing reliable broadband and mobile telephone coverage.

1.4.40 With the advancement in mobile applications (such as 'facetime', 'skype' etc.) workers will be using these to contact home on a regular (if not daily) basis. Workers will also be streaming a number of films and TV programmes through

Netflix, BBC iPlayer, SkyGo etc. which will place a significant demand on broadband and mobile telecommunications. In the same vein as the facilities and services of the site campus needing to be attractive to workers, **access to high quality, consistent and reliable broadband is critical to this ‘attractiveness’**. The broadband speed and the ability of workers to contact their families through these social platforms is essential, as otherwise workers will stay elsewhere which will again place unacceptable demand on existing accommodation.

1.4.41 A positive legacy from Wylfa Newydd would be to ensure that North Anglesey has excellent 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 local communities.

1.4.42 Guiding Principle GP6 (Maintaining and Enhancing Community Facilities and Services) states that *the Wylfa Newydd project promoter and any other applicant must ensure that community services and facilities, including education, healthcare, IT communications/broadband, leisure facilities and emergency services are in place to accommodate the construction and operational phases of the project and its associated and related developments. New services and facilities which are required to service the project or to mitigate impacts therefrom, and which are not located on the main Wylfa Newydd site, should be sustainable, integrated and provide a permanent improvement and a lasting legacy benefit to the Island’s communities*. The IACC would therefore expect that any improvements made to IT communications /broadband would leave a lasting legacy for the people of North Anglesey in particular.

Visitor Pressure

1.4.43 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 Tourism Chapter of this LIR, 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.

1.4.44 Disturbance of chough due to visitor pressure associated with the site campus is not, in IACC’s view, considered to an appropriate extent – particularly in relation to cumulative effects with habitat loss. The ES states that (in relation to Arfordir Mynydd y Wylfa – Trwyn Penrhyn Wildlife Site) *“The potential for workers accommodated in the Site Campus to cause habitat degradation would be controlled through the provisions of the Workforce Management Strategy*

(Application Reference Number: 8.5)...[which] prevents direct access to the Arfordir Mynydd y Wylfa - Trwyn Penrhyn Wildlife Site from the Site Campus". However, the 'Workforce Management Strategy' submitted with the application includes no commitments at all in this regard, only including a rather weak requirement that "All personnel must be aware of nearby sensitive ecological receptors (such as Wylfa Head, Tre'r Gof and Cemlyn SSSIs, Cemlyn Lagoon, and nature reserves)...and ensure no damage or interference of any kind is caused to these areas...").

1.4.45 The IACC therefore has no way of verifying the statements regarding the prevention of 'direct access', nor is there any assessment of what this would mean practical terms within the ES. It is understood that the Workforce Management Strategy has been, or is being, updated but IACC can only base its review on the information provided and, in any case, the mechanisms for workforce management need to be clearly identified and assessed (e.g. how much of a deterrent will the absence of direct access present? What are the provisions for wardening etc.? What is the baseline visitor rate to Wylfa Head? How will effects be monitored?). This aspect is linked to the provisions required for safeguarding the Arfordir Mynydd y Wylfa – Trwyn Penrhyn Wildlife Site (see below). IACC therefore requires more information to be persuaded that the residual effect predicted by Horizon ('minor adverse') is robust.

1.4.46 *Arfordir Mynydd y Wylfa – Trwyn Penrhyn Wildlife Site*: IACC notes that it would be exceptional for a new residential development of this scale to not explicitly and comprehensively consider potential visitor pressure effects on nearby designated sites (and this would include all of the other sites in the vicinity) – and the reliance on the temporary nature of the workers accommodation is not a robust mitigating factor given the damage that can result in relatively short periods of time if behavioural guidance measures are not applied. As with chough, the mitigation proposed (or its predicted effectiveness) is not clear. IACC would therefore wish to see the mitigation relied on in the ES clearly set out in the WMS, and evidence that it is deliverable, with specific measures identified to manage visitor pressure and mitigate its effects. IACC therefore requires more information to be persuaded that the residual effect predicted by Horizon ('minor adverse') is robust.

1.4.47 Guiding Principle GP28b (x) of the Wylfa Newydd SPG states that proposals should pay particular regard to "*minimising and mitigating impacts on recreational assets in the North Anglesey area, including the Wales Coast Path, from increased visitor pressure associated with accommodating workers on site and the displacement of existing users*". The importance of the Wales Coastal Path (WCP) and the impacts on it (real or perceived) is of significant concern to the IACC. This area is a particularly tranquil and remote section of the WCP and ecologically sensitive and any impact on it should be avoided where possible, mitigated or suitable compensated if mitigation is not possible. No detail on mitigation has been provided which is unacceptable.

1.4.48 Note: further detail on this impact on the Wales Coastal Path is provided in the Tourism Chapter of this LIR.

Re-instatement

1.4.49 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.

1.4.50 Guiding Principle GP28b (ix) states that *“proposals should consider how reinstatement to the existing conditions prior to development of the accommodation (through an approved scheme of work) and possible enhancements are to be secured, when the temporary use of the structures has ended, in accordance with an agreed Restoration/Reinstatement Plan”*. Horizon will therefore need to submit a Restoration / Re-instatement Plan to the IACC for approval prior to commencement of the development.

Shift Patterns

1.4.51 The IACC is aware that construction workers will be working 11 shifts in 14 days with 3 days off. If workers decide not to go home for these 3 days (e.g. as they have come from overseas), the IACC require clarity on the provision made for these workers. Horizon have indicated that they will not be able to stay in the site campus (and they will not receive an allowance for the 3 days that they are off) therefore this raised the question of impacts in existing accommodation over and above those assessed at peak. As workers will not receive an allowance, this may encourage workers to live in sub-standard accommodation (e.g. caravans on unlicensed sites, or staying with other workers in the PRS etc.). This is clearly unacceptable and the IACC require further clarity on this issue.

Emergency Planning

1.4.52 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. The IACC has a very limited number of emergency refuge bed spaced available, distributed across a range of locations on the Island. The number is likely to be inadequate to be able to deal with any emergency evacuation of the TWA. The IACC requires further clarification as to what impacts would this have on the IACC /communities, would workers have to go home, what would be the impacts of this on business continuity for the project?

Other Matters

1.4.53 Having reviewed other Relevant Representations (particularly Natural Resources Wales, North Wales Wildlife Trust, RSPB Cymru and the National Trust), the IACC is aware that there are many other environmental and ecological matters of concern with the site campus. The IACC will defer

comment on these particular aspects to the expertise of NRW and other interested parties.

1.4.54 There are equally a number of concerns that have been raised on community safety, crime, impact on health services etc. and the IACC would again defer comment on these to the relevant expertise within North Wales Police and the Betsi Cadwaladr University Health Board.

1.4.55 The IACC will also defer comment on utilities to the relevant utility provider (Dwr Cymru Welsh Water, Wales & West Utilities, Scottish Power etc.) as they have the expertise to comment on the capacity of the existing service / network, the impact Wylfa Newydd will have on these services and what mitigation measures are required.

1.5 DCO Requirements

1.5.1 **Maximising Bed space Delivery (4,000)** – The IACC seeks a DCO Requirement (or secure provision in a full phasing strategy) which commits Horizon to delivering the maximum bed space of 4,000 in the on-site campus (if approved). This will ensure that the maximum use of existing accommodation stock is managed at 3,000 and any reduction in peak construction worker numbers is felt in existing accommodation to minimise impacts on the housing and tourism sectors.

1.5.2 **Detailed Design** – The IACC will require that Horizon submit detailed design of the on-site campus facility to the Local Planning Authority for approval prior to the commencement on-site. This shall include detail on facilities, materials, external finishing, landscaping, layout, lighting, drainage, parking, access etc.

1.5.3 **Phasing Plan** – The IACC requires that Horizon submit a phasing plan (including the phasing of parking and provision and the delivery of on-site amenities / facilities) to the Local Planning Authority for approval prior to commencement on-site or include this in a fuller phasing strategy for the whole development.

1.5.4 **Restoration / Re-instatement Plan** - The IACC requires that Horizon submit an outline Restoration / Re-Instatement Plan to the Local Planning Authority for approval prior to commencement on-site. This shall include details on possible enhancements where possible in discussion with the IACC and Natural Resource Wales.

1.5.5 **Monitoring** – The site campus operator will be required to maintain occupancy information to facilitate the monitoring of the impacts of the development, including the number of construction workers accommodated, the duration of occupancy and keep a record of anonymised data of workers (having regard to the requirements of data protection legislation) and make this information immediately available, on request, to the IACC. The IACC would require that the occupancy of the on-site campus be maintained at a level **above 85%** for each phase of the development and for the duration of its operation. Penalty clauses will need to be implemented for failure to maintain this level of

occupancy to ensure that this impact can be appropriately managed and mitigated.

- 1.5.6 **Nightly Rate** – To reduce impacts on the existing accommodation sectors, and to ensure that the on-site campus is an attractive accommodation to the construction workforce, the IACC will seek a requirement for Horizon to submit to the IACC for approval, a maximum price per night for accommodation at the on-site campus. This should, for example, be set at a figure of 10% less than the median average market rent for a 2 bedroom property on the Island²² (index linked).
- 1.5.7 **Worker Accommodation Management Service (WAMS)** – The IACC will require that every construction worker be automatically registered with the WAMS and this method is communicated to the workers as the most efficient and effective way of seeking accommodation.

1.6 S106 Obligations

- 1.6.1 The IACC are currently in s.106 discussions with Horizon. Details on these obligations will be included in the Statement of Common Ground and draft s.106 Agreement to submitted to PINS in future deadlines.
- 1.6.2 **Leisure Provision** – The IACC will require a financial contribution towards the improvement of existing Leisure Centre facilities on the Island to meet the increased demand as a result of Wylfa Newydd.
- 1.6.3 **Swimming Provision** - The IACC will require a financial contribution towards the improvement of swimming facilities (including changing rooms) at existing Leisure Centres.

²² For example, median average for 2 bed property on Anglesey is £495 per month. £495 – (10%) = £445.50 / 22 nights (or 2 shift cycles per month) = £20.25 a night.

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