

**From:** [PMO](#)  
**To:** [Wylfa Newydd](#)  
**Subject:** RE: IACC Deadline 2 Submission : Local Impact Report - Tourism (email 7)  
**Date:** 04 December 2018 21:27:38  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
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[Tourism Annex.zip](#)

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**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.

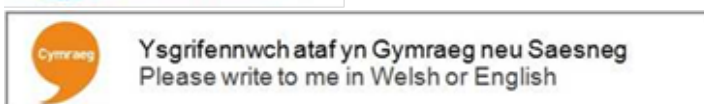
Bydd fersiwn Gymraeg yn cael ei ddarparu cyn gynted a phosib / A Welsh version of the submission will be provided in due course.

Cofion/ Regards,  
Manon

Swyddfa Rhaglen Ynys Ynni /  
Energy Island Programme Office  
01248 752435 / 2431  
[PMO@ynymon.gov.uk](mailto:PMO@ynymon.gov.uk)



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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 Môn. Mae Cyngor Sir

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

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# Ynys Môn

## THE ISLE OF Anglesey

### Wylfa Newydd Local Impact Report

Chapter 5: Tourism

December 2018

PINS Ref: EN010007



CYNGOR SIR  
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## 1.0 Tourism Chapter

### 1.1 Overview of Impacts

- 1.1.1 Tourism is the largest economic sector on the Island generating £304M per annum to its economy. The sector supports approximately 5,600 jobs and the importance of the visitor economy to Anglesey, its residents and its future cannot be over emphasised. The tourism impact in North Anglesey, in particular on Cemaes am Amlwch, during the construction of Wylfa Newydd will be significant. The IACC will seek measures to avoid, mitigate and compensate for these impacts to ensure that tourism continues to grow before, during and after the construction of Wylfa Newydd.
- 1.1.2 The Island attracts 1.71 million visitors per annum (2017) and has a high number of repeat visitors at over 85%. The tourism sector has transformed itself over the past 10 years. This is demonstrated in increased visitor numbers (from 1.39M in 2006 to 1.71M in 2017) and in the value of tourism to the economy (£186M in 2006 to £304M in 2017). This is a significant growth market that needs to be protected.
- 1.1.3 In addition to its 1.71 million visitors, Anglesey's tourism sector is further boosted by Holyhead, the UK's second busiest port, processing two million annual visitors travelling between the UK and the Republic of Ireland. More recently, Holyhead has emerged as Wales' premier cruise port. As such, it is strategically important to this fastest-growing and highly lucrative segment of the Welsh tourism product. In 2018, 52 cruise ships arrived at the port, bringing in 32,700 passengers and generating a cruise tourism impact of +£3M.
- 1.1.4 Visitors come to Anglesey to experience its unique character and very special sense of place, peaceful and tranquil setting, its beaches, seascapes and its dramatic landscapes. Approximately 95% of Anglesey's coastline is designated Area of Outstanding Natural Beauty, it has 50km of Heritage Coast (including North Anglesey) as well as a number of other National and European designated sites.
- 1.1.5 The construction of Wylfa Newydd and its subsequent operation will have adverse impacts on Anglesey's tourism sector. Horizon recognises: *the need to protect the tourism sector; the widespread concerns about Wylfa Newydd impacts on the sector; and the need to mitigate these impacts because of the sector's vital importance to the Anglesey economy*. Impacts will occur during the Site Preparatory works phase; these will continue and worsen throughout the construction period and for a period when operation commences. The Isle of Anglesey County Council (IACC) requires that appropriate avoidance and mitigation measures are implemented to address the likely scale of adverse impacts.
- 1.1.6 Wylfa Newydd's **construction** and **operation** will impact Anglesey's tourism sector and its resilience through:
- a) traffic congestion;

- b) visual, noise and air pollution;
- c) strains on the tourism accommodation stock; its availability and quality;
- d) disruptions to staff and supply chains;
- e) threats to Anglesey's tourism brand, reputation and visitor perceptions;
- f) pressures on Anglesey's tourism offering, including the Area of Outstanding Natural Beauty (AONB), the Wales Coastal Path (WCP) and the wider Public Rights of Way (PRoW) networks and other attractions;
- g) Adverse cumulative impacts.

1.1.7 The avoidance of impacts on the sector and the mitigation of those opportunities that do arise highlights the importance the opportunities to develop and enhance the Island's wet-weather tourism offering through the development of a temporary high-quality, interactive and public information facility and a new permanent visitor centre, which is outwith the DCO application.

## 1.2 Preparation of this Chapter

1.2.1 The preparation of this chapter has been informed by the work undertaken by Professor Nigel Morgan and Professor Annette Pritchard of Swansea University. Following a competitive tendering process in April 2018, the IACC appointed Swansea University to provide specialist tourism expertise to support the IACC in responding to the Wylfa Newydd project. This included reviewing and collating baseline data, assessing the DCO application, identifying impacts and mitigations, drafting the tourism chapter of the LIR and informing IACC position in relation to SOCG discussions with Horizon. A copy of their CV's can be found in **Annex 5A**.

1.2.2 This chapter is based on the Tourism Topic Report prepared by Swansea University<sup>1</sup>. This Topic Report provides the evidence base which has informed the preparation of this chapter. Both should be read in conjunction for the Examining Authority to fully appreciate the importance of tourism to Anglesey and the impact Wylfa Newydd will have on this key sector of Anglesey if measures are not implemented to avoid, mitigate or compensate for this impact.

## 1.3 Context

1.3.1 Growth in Anglesey's economy has been led by its visitor economy<sup>2</sup> and the Island 'depends on a thriving, innovative and profitable tourism sector.'<sup>3</sup> It is the UK's most tourist dependant local authority with one of the highest percentages of employment in the tourism sector as a percentage of total employment.<sup>4</sup> It is also in the top ten of UK areas with main and second job employment in other

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<sup>1</sup> See Tourism Topic Report Prepared for IACC by Swansea University, November 2018. (**Annex 5C**)

<sup>2</sup> Regional Growth Tracker, 2015; online at ([Link](#))

<sup>3</sup> IACC Destination Management Plan, 2016-2020. ([Link](#))

<sup>4</sup> Pritchard, A. 2017. Written Evidence to the Economy, Infrastructure and Skills Committee, National Assembly for Wales, Selling Wales to the World, ([Link](#))

tourism characteristic industries such as culture, sport and recreation.<sup>5</sup> ‘Almost one fifth of employees are in the accommodation and food sectors, almost double the 8.9% Wales level and more than double the UK level’.<sup>6</sup> Tourism is fundamental to sustaining the Island’s economy, environment and culture and has been supported by initiatives and funding programmes designed to capitalise upon the unique cultural, linguistic, historic and environmental assets of North West Wales.<sup>7</sup>

- 1.3.2 In 2016, Anglesey was named the second-best UK holiday destination. Its greatest tourism assets lie in its natural and historic environment, which have been acknowledged and designated nationally and internationally. Most (95%) of Anglesey’s 201km coastline and coastal habitat is a designated AONB and it attracts a large and growing number of visitors to its beaches and 125m Coastal Path. The Isle of Anglesey AONB has ‘one of the most distinctive, attractive and varied landscapes in the British Isles.’<sup>8</sup> It contains many diverse habitats supporting a wealth of marine and terrestrial wildlife, including rugged cliffs, heathland, sand dunes, salt marshes and mud flats.
- 1.3.3 Many of Anglesey’s habitats have statutory protections, including Special Areas of Conservation (SAC), Special Protection Areas (SPAs), a National Nature Reserve (NNR), Sites of Special Scientific Interest (SSSI) and Local Nature Reserves (LNRs). Adjacent to Wylfa Newydd is the Cemlyn Nature Reserve. North Anglesey’s coast is home to internationally and nationally important wildlife. The diverse and frequently endangered wildlife species include: harbour porpoises, European eels, grey seals, silver studded blue butterflies, marsh fritillary butterflies, choughs, roseate and sandwich terns and red squirrels. The AONB is complemented by 50km of undeveloped Heritage Coasts: North Anglesey, Holyhead Mountain, and Aberffraw Bay. These coastal resources have been identified as Anglesey’s Unique Selling Point (USP) for tourism and the protection, enhancement and management of these natural and heritage assets is recognised in the Joint Local Development Plan (JLDP) and the Wylfa Newydd Supplementary Planning Guidance (SPG).<sup>9</sup>
- 1.3.4 Anglesey’s tourism profile is unusual as the past decade has been one of sustained growth, unlike the cyclical patterns experienced by other Welsh and UK destinations. The Island’s tourism sector has increased steadily during 2006-2017 (figure 1), growing by 63.7% from £185.89m in 2006 to £304.23m in 2017. Consequently, Anglesey’s tourism sector out performs the Welsh average and in 2017 grew by 7% whilst the Wales figures fell by 3%.<sup>10</sup>
- 1.3.5 Three of the past five years have recorded year-on-year growth of +7.0%, reflecting the Island’s appeal as a holiday destination. In 2017 staying visitors

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<sup>5</sup> Office for National Statistics, 2016. Tourism Employment Summaries [\(Link\)](#)

<sup>6</sup> Mark Reynolds Consulting, 2018. Proposed Hotel Development Supporting Economic Statement [\(Link\)](#)

<sup>7</sup>Welsh Government 2008. Mon a Menai Action Plan; online at: [\(Link\)](#)

<sup>8</sup> IACC Area of Outstanding Natural Beauty Management Plan Review 2015-2020, p.6. [\(Link\)](#)

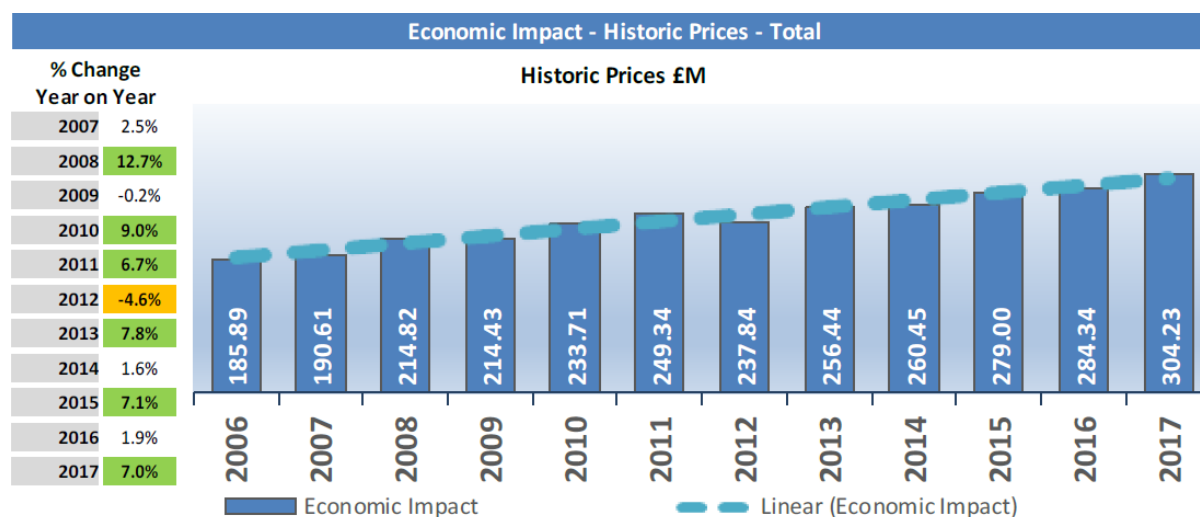
<sup>9</sup> IACC & Gwynedd County Council Joint Local Development Plan, July 2017. [\(Link\)](#)

Wylfa Newydd Supplementary Planning Guidance (May 2018) [\(Link\)](#)

<sup>10</sup> IACC Wylfa Newydd SPG Topic Paper 4, Economic Development., p.49. [\(Link\)](#)

accounted for £272.95m (90%) and day visitors £31.28m (10%) of visitor expenditure. Staying visitors have recorded an expenditure growth rate of +61% on 2006 figures whilst day visitor expenditure has almost doubled (+93%). Critically, staying visitors account for 91% of all tourism employment on the Island.<sup>11</sup>

**Figure 1: Economic Impact - Historic Prices (£m)**



Source: STEAM 2006-2017, Trend Analysis.

1.3.6 Table 1 highlights the sectoral distribution of tourism's economic impact, comparing the 2016 performance with 2017. Accommodation accounts for just under a quarter of this expenditure (23%), shopping for just under a fifth (18.5%), followed by food and drink (17.4%). This table highlights how vital tourist spending is to the economic wellbeing of the Island and its spread across many sectors and businesses. Moreover, tourism activity also accounts for almost 25% of the Island's retail expenditure.<sup>12</sup>

**Table 1: Sectoral Distribution of Economic Impact (£m)**

Sector	% Share 2017	2017	2016	% Change
Accommodation	23.0	56.28	54.01	+4.2
Shopping	18.5	69.83	69.94	+7.5
Food + Drink	17.4	52.86	49.17	+7.5
Transport	8.5	25.97	24.07	+6.9
Recreation	7.0	21.22	19.45	+9.1
Total Direct	74.3	226.17	211.64	+7.4
Indirect Total	25.7	78.06	72.70	+7.0

Source: STEAM Final Trend Report 2006-2017.

1.3.7 Visitor numbers have grown from 1.39m (2006) to 1.71m (2017), recording almost a million additional days over the same period (4.95m to 5.85m), an

<sup>11</sup> STEAM 2006-2017 Trend Analysis p.13. (Annex 5B)

<sup>12</sup> IACC Topic Paper 4, Economic Development, p.49. ([Link](#))



increase of 23.3%.<sup>13</sup> In 2017, staying visitors accounted for 60% of visitor numbers but 90% of visitor expenditure. STEAM data shows similar year-on-year growth in tourism-supported employment. Using the well-established ratio of one full-time equivalent job (FTE) per £54,000 visitor spend puts tourism-related employment on Anglesey at 5,629.<sup>14</sup>

**Table 2: Economic Contribution (£m)**

	Serviced Accommodation	Non-Serviced
2006	27.67	135.82
2017	44.06	220.46
% Change	+59.2%	+62.3%

Source: STEAM Final Trend Report 2006-2017.

1.3.8 Table 2 illustrates the economic contribution of the serviced and non-serviced (self-catering, caravan/camping) accommodation sectors to the Island's tourism economy. Both sectors have recorded very high growth rates between 2006 and 2017 – 59.2% for serviced and 62.3% for non-serviced accommodation. Table 3 illustrates the dominance of the non-serviced sector in Anglesey's tourism profile.<sup>15</sup>

**Table 3: Visitor Numbers (000's)**

	Serviced Accommodation	Non-Serviced
2006	186.85	605.11
2017	214.26	705.71
% Change	+14.7%	+16.6%

Source: STEAM Final Trend Report 2006-2017.

1.3.9 Anglesey attracts many families, extended family groups and couples, who come for short breaks (42%), longer holidays (31%) and secondary holidays (26%).<sup>16</sup> Visitors are overwhelmingly drawn from North-West England and tend to be older, although the Island attracts the highest proportion of families with young children of any destination in Wales.<sup>17</sup> Significantly, two-thirds of visitors are the much sought-after high-value ABC1 market and most come for its natural environment,<sup>18</sup> whilst walking, water-sports and wildlife tourism are key niche sectors. Families take longer caravan-based stays, whilst the high-value short-stay visitors tend to be concentrated in the serviced and self-catering sectors.

1.3.10 In addition to its 1.71 million visitors, Anglesey's tourism sector is further boosted by Holyhead, the UK's second busiest port, processing two million annual visitors travelling between the UK and the Republic of Ireland. More recently, Holyhead has emerged as Wales' premier cruise port. As such, it is

<sup>13</sup> STEAM 2006-2017 Trend Analysis. (Annex 5B)

<sup>14</sup> Deloitte/Oxford Economics, 2013. *Tourism: Jobs and Growth. The Economic Contribution of Tourism*. VisitBritain: London. ([Link](#))

<sup>15</sup> STEAM 2006-2017 Trend Analysis. (Annex 5B)

<sup>16</sup> IACC Destination Management Plan 2012-16 ([Link](#))

<sup>17</sup> Visit Wales, 2016. Wales Visitor Survey: UK Staying Visitors; online at ([Link](#))

<sup>18</sup> Visit Wales, 2016. Wales Visitor Survey: UK Staying Visitors; online at ([Link](#))

strategically important to this fastest-growing and highly lucrative segment of the Welsh tourism product, itself central to Visit Wales' Partnership for Growth Strategy.<sup>19</sup> As a Strategic Gateway to Wales, Visit Wales/Welsh Government are investing £2.8m to upgrade Holyhead's port facilities and tourism-related infrastructure. Cruise tourism provides one of the key avenues to attract greater numbers of overseas tourists to Anglesey and Wales. In 2018, 52 cruise ships arrived at the port, bringing in 32,700 passengers and generating a cruise tourism impact of +£3m.

- 1.3.11 Anglesey has a relatively strong brand image amongst its current visitors, though it has low awareness in the UK as a consumer destination brand, evidenced by its over-reliance on the North-West of England.<sup>20</sup> Anglesey is perceived to be very different to other parts of North Wales and as an island has a strong sense of its own unique identity and sense of self.<sup>21</sup> Islands are 'places apart' with their own personalities and Anglesey is 'a place that inspires, a place that appeals to all the senses... to see, hear, taste, smell and feel... a place to get away from it all. But most of all a place to get out and do.'<sup>22</sup>
- 1.3.12 Clearly, Anglesey's appeal centres around its pristine environment, which inspires people to visit and explore. Anglesey's AONB is characterised by expansive views, the borrowed landscapes of Snowdonia and the Llyn, and the ever-changing seascapes, conveying perceptions of 'exposure, openness, wilderness and a feeling of isolation.'<sup>23</sup>
- 1.3.13 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.'<sup>24</sup> 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. Hearing Welsh spoken adds to the character of the Island but does not act as an inhibitor to non-Welsh speaking visitors as the island is to all practical purposes fully bilingual.
- 1.3.14 The most recent research demonstrates that accommodation operators are acutely aware that Anglesey's USP, tourist reputation and brand identity is built around its AONB scenery, spectacular beaches and coastline.<sup>25</sup> They recognise that this is their biggest opportunity to generate and build sustainable businesses and that disruption and damage to this quiet environment provides the Island's most significant challenge.

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<sup>19</sup> Visit Wales, 2013. Partnership for Growth Strategy 2013-2020, online at [\(Link\)](#)

<sup>20</sup> IACC Destination Management Plan 2012-2016. [\(Link\)](#)

<sup>21</sup> IACC Destination Management Plan 2012-2016. [\(Link\)](#)

<sup>22</sup> IACC Destination Management Plan 2016-2020. [\(Link\)](#)

<sup>23</sup> IACC Summary of Evidence, base, legislative and policy context, Isle of Anglesey AONB p. 4. [\(Link\)](#)

<sup>24</sup> IACC Area of Outstanding Natural Beauty Management Plan Review 2015-2020 [\(Link\)](#)

<sup>25</sup> IACC Anglesey's Accommodation Bedstock Survey (June 2018) (Annex 5D).

1.3.15 Worries over Wylfa Newydd and its associated constructions (such as ‘pylon blight’) are keenly felt and the 2015 Visitor Survey reveals that the presence of these alone could lead to an immediate loss of 10% of overnight visitors and 10% of over-55 visitors - both vital segments for the Island’s tourism economy. It is also likely that such figures under-estimate the actual impact as visitors are being asked to comment on something, which has yet to occur.

### ***Vulnerability of the Tourism Sector***

1.3.16 Anglesey is a peripheral location, dependent on tourism for its economic prosperity. Any loss of visitor spending from its loyal visitor market (largely drawn from the North West of England) would be keenly felt. Other destinations have much wider catchment areas. For instance, Somerset has a 3¼ hour visitor drive-time and a much larger geographic area and population base from which to attract visitors.

1.3.17 Anglesey’s road network is generally poor. As an island, it is accessed by two bridges – The Menai Suspension and The Britannia Bridge. Both offer single lane access to and from Anglesey, the two-lane A55 merges into one on the Britannia Bridge.<sup>26</sup> The bridges are traffic choke points and are regularly congested at peak traffic times<sup>27</sup>. Any disruption causes large tailbacks, as does the port traffic accessing the Holyhead–Dublin Trans-European Route, of which the A55 is part.

1.3.18 Connectivity issues mean travel tolerances are much lower than Somerset’s, with a two-hour limit. Given the close relationship between the destination and its catchment area (and its shared mainstream media), visitors are very familiar with the current road access problems. Increased congestion as a result of Wylfa Newydd is a big concern, as some visitor comments reveal: “There are problems on the Bridge already” (female, NW England); “It will not be attractive if the route here is gridlocked” (male, NE England); “Don’t want to be stuck in traffic when coming on holiday” (female, Liverpool).<sup>28</sup>

1.3.19 There is a clear danger that the Island’s visitor economy will shrink as visitors choose to holiday elsewhere. If this happens, they may well be lost to the Island permanently, destroying its lucrative, returning, multi-generational holiday market (repeat visitors on Anglesey is over 85%). Visitor loyalty to a destination will be quickly transferred if it is perceived to be inaccessible or closed for business and the North-West of England has a large circumference of travel within a 2-hour range. This will have long-term consequences as childhood destinations influence the adult choices of almost half of UK holidaymakers.

1.3.20 The impact of Wylfa Newydd on the tourism sector could significantly impact on a vulnerable sector, overly reliant on one key market already familiar with traffic issues on the Island. Perceptions (whether accurate or not) influence visitor

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<sup>26</sup> The only single lane section of the Euro Route E22, which extends some 3,310 miles from Russia.

<sup>27</sup> Particularly in the mornings (eastbound), late afternoon (westbound) and when the ferry disembarks (lunchtime and late evening).

<sup>28</sup> IACC Anglesey’s Accommodation Bestock Survey (June 2018) (Annex 5D).

choices<sup>29</sup> and notions of Anglesey as ‘one big building site’ will negatively impact on visitor perceptions. If lost to the Island these visitors may not return, ensuring that these negative impacts will have consequences far beyond the 10-year construction period of Wylfa Newydd. If this is not to have a **negative impact** pro-active and pre-emptive mitigation is required in the form of financial contribution for the IACC to undertake a concerted marketing and promotion campaign, and this will be required throughout the construction period. Further detail on proposed mitigation is included in section 1.6).

### ***Joint Working by Horizon and IACC***

1.3.21 The potential impact of Wylfa Newydd on the tourism sector has been identified at the outset of the consultation and the formal consultation phases, which have marked the process.<sup>30</sup> Following PAC2, Horizon made significant changes to the project, including its decision to increase the on-site temporary workers’ accommodation from 500 essential workers to 4,000 housed on a purpose-built campus. The decision not to house workers in newly-built lodges (at Land & Lakes) eliminated the major tourism legacy benefit potential from the Wylfa Newydd project.

1.3.22 Whilst Horizon accepts that Wylfa Newydd will impact on the tourism industry, it assesses its impact as minor and therefore not significant, suggesting that construction worker expenditure will offset any losses incurred.<sup>31</sup> The Tourism Topic Report commissioned by IACC (which should be read in conjunction with this Chapter) clearly demonstrates that this is not the case.<sup>32</sup> Several key impacts have been identified, including: environmental degradation; traffic congestion; visual and noise pollution; worker disruption; damage to Anglesey’s brand and reputation. All of these will last throughout and beyond the construction period. New markets will need to be attracted to offset losses elsewhere and the limited Tourism Fund proposed will not address adverse impacts that will be felt throughout the construction period.

### ***Joint Working with Stakeholders***

1.3.23 As part of the Destination Management Plan, the IACC have been working in partnership with the tourism trade on Anglesey for a number of years. Destination Management Planning is an innovative, integrated approach to sustainable tourism development within Anglesey. The approach enables the public sector, tourism and non-tourism related business, non-profit organisations and the community to collaborate to achieve common objectives, such as increasing the value of tourism.

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<sup>29</sup> Morgan, N., Pritchard, A. & Hastings, E. 2012. Developing a New DMO Marketing Framework: The Case of Visit Wales, *Journal of Vacation Marketing*. 18 (1), 73-89; Selby, M. & Morgan, N. 1996. Reconstruing Place Image: a case study of its role in destination market research, *Tourism Management* (17)4 287-94.

<sup>30</sup> PAC 1, 2, 3; DCO.

<sup>31</sup> Note construction workers will work 11 out of 14 days and are less likely to visit tourism facilities than leisure tourists.

<sup>32</sup> Tourism Topic Report Prepared for IACC by Swansea University, November 2018. (Annex 5C)

- 1.3.24 The Destination Management Plan approach was adopted in 2012 and aligned itself to the National Tourism Strategy for Wales, to ensure brand positioning and marketing synergy on a local, regional, national and international level. Since its adoption the Anglesey Destination Management Plan (DMP) has become the shared statement of intent to manage the destination in the interests of the visitor economy, articulating the agreed roles of the different stakeholders and identifying clear actions that they will taking.
- 1.3.25 The Destination Anglesey Partnership (DAP) was established by the IACC in early 2012 as part of the DMP to formalise and improve communication between the private and public sectors. The DAP also provides a strategic steer to ensure Tourism is managed in a sustainable way, thus maximising the benefits for long-term prosperity and reducing any negative impacts where practicable.
- 1.3.26 The IACC has been working closely with representatives of the DAP on the Wylfa Newydd project for a number of years. This includes regular progress meetings, discussing issues (to inform the Statement of Common Ground and the LIR) as well seeking the view of the DAP on, for example, the Tourism Bedstock Survey 2018.
- 1.3.27 The IACC is aware that the DAP will be signing a Statement of Common Ground with Horizon. It is important that the Examining Authority is aware that the IACC established the DAP, is firmly part of the DAP and the views expressed by the DAP and the IACC are synonymous in terms of the impacts on tourism. The DAP however, brings practical experience and knowledge of the tourism sector on Anglesey (i.e. 'on the ground') which is why their input and views of impacts is essential.

## **1.4 Planning Policy**

- 1.4.1 This Tourism LIR chapter recognises that there are various concerning issues relating to the impact of the Wylfa Newydd development on the tourism sector in Anglesey. Based on the issues raised, the following criteria from the Policies contained within the adopted Joint Local Development Plan (July 2017) and the adopted Wylfa Newydd Supplementary Planning Guidance (May 2018) are considered to be of particular relevance and importance.

### ***Traffic Congestion***

- 1.4.2 Ease of access is key to destination choice with road congestions (including the perceived perception of road congestion) seen as a threat to the sector.
- 1.4.3 *Criteria 12 of PS 9 Wylfa Newydd and Related Development* stipulates that all proposals shall be appropriately serviced by Transport Infrastructure including public transport and shall not have an adverse impact on local communities and tourism; this should be demonstrated through a Transport Assessment. If an adverse impact is predicted, appropriate improvements to the transport network and the provision of sustainable transport options should be provided to mitigate the anticipated impact. The principle of *criteria 12, PS 9* is further supported by

*PS 4 Sustainable Transport, Development and Accessibility and Guiding Principal (GP 5) of the Wylfa Newydd Supplementary Planning Guidance.*

- 1.4.4 Further consideration should therefore be given to the impact of the proposal on the local transport network and the improvement, which should be sought to mitigate those impacts.

***Visual, noise and air pollution***

- 1.4.5 During and post construction of Wylfa Newydd and associated development the Council's assessment recognises that there will be a negative impact upon the WCP, AONB and PRoW, these assets are some of the main attractions of the visitor economy for the region and beyond.
- 1.4.6 *Criteria 8 of Policy PS 9 Wylfa Newydd and related development* states that the scheme layout and design (including open spaces and landscaping) should minimise, mitigate or compensate for visual, landscape and ecological impact on the local and wider area as well as on cultural and historical aspects of the landscape, both in the short and in the longer term. *Strategic Policy PS 19 Conserving and where appropriate enhancing the natural environment* states that measures should be taken to manage development so as to conserve and where appropriate enhance the Plan area's distinctive natural environment, countryside and coastline. Proposals which would have a significant adverse effect on them will be refused unless the need and benefit of the development in that location clearly outweighs the value of the site or area. *Criteria 3 of Strategic Policy PS 4 Sustainable Transport, Development and Accessibility* is also of relevance which stipulates that where possible measures should be taken to safeguard, improve, enhance and promote public rights of way for health, leisure, well-being and tourism benefits. Furthermore, *Strategic Policy PS14 The Visitor Economy* states that the Council will support the tourism industry including preventing development that would have an unacceptable adverse impact on features and areas of tourism interest or their settings.
- 1.4.7 As described in this Chapter, the visual impact of the development will undoubtedly compromise the visitor enjoyment to the area resulting in a negative impact upon the tourist sector. Due consideration should therefore be given to the appropriateness of any mitigation which has been offered and any necessary compensation for the foreseen loss to the visitor economy as a result of the proposal.

***Displacement of workforce***

- 1.4.8 The foreseen employment opportunities arising from the Wylfa Newydd development in isolation present positive impacts for local communities. However, the Council is of the opinion that there are risks that local individuals who currently work in the tourism sector will seek employment opportunities associated with the Wylfa Newydd development, this in turn will result in workforce displacement and a lack of qualified and skilled individuals available to work within the tourism sector.

- 1.4.9 In accordance with *Criteria 9 of PS 9 Wylfa Newydd and Related Development* early engagement by the promoter with the Council in respect of the promoter's procurement, employment, education, training and recruitment strategies, with an objective to maximise employment, business and training opportunities for the local communities both in the short and longer term is required.
- 1.4.10 Due to the lack of opportunities and investment within the education and training facilities for the tourism industry it is considered that the proposal doesn't fully comply with the principles as contained within *criteria 9 of PS9*.

### **General Policy Consideration**

- 1.4.11 As set out in this Chapter, the Council does not consider that full consideration has been given to the impact of the development upon the visitor economy. In accordance with *criteria 13 of PS 9 Wylfa Newydd and Related Development* appropriate packages of community benefits provided by the developer should be sought to offset and compensate the community for the burden and disturbance imposed by hosting the project.
- 1.4.12 Consideration of the impact of the proposal on the visitor economy should also be made against *criteria 5 of PS 14 The Visitor Economy* which states that developments that would have an unacceptable impact of the tourist facilities including accommodation and areas of visitor interest or their setting should be prevented.
- 1.4.13 Detailed advice about the application of the relevant policies referred to above is provided in the Wylfa Newydd Supplementary Planning Guidance, specifically section GP 5: Tourism.

## **1.5 Impacts and Evidence**

- 1.5.1 This section identifies impacts on the Island's tourism sector, which IACC recognises is fundamental to the Island's economy.<sup>33</sup> The JLDP 2011-2026 clearly recognises that new developments such as Wylfa Newydd must not 'result in unacceptable adverse economic, social, linguistic or environmental impacts'.<sup>34</sup> It requires that the 'adverse effects of Wylfa Newydd... are avoided or mitigated and where appropriate legacy benefits are provided'.<sup>35</sup>
- 1.5.2 Horizon's DCO application recognises tourism's vital role in Anglesey's economy and the need to mitigate any negative impacts through the creation of a Tourism Fund (of an unspecified amount) to be spent following monitoring via the CoCP process.<sup>36</sup> However, the IACC does not believe that the proposed Tourism Fund and the mechanisms for spending it adequately mitigates the adverse impacts on tourism. It is essentially reactive, it looks for impacts to be

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<sup>33</sup> IACC Destination Management Plan 2012-2016 and IACC Destination Management Plan 2016-20.  
[\(Link\)](#)

<sup>34</sup> Joint Anglesey/Gwynedd LDP 2011-2026, 2017, p.85. [\(Link\)](#)

<sup>35</sup> Joint Anglesey/Gwynedd LDP 2011-2026, 2017, p.29. [\(Link\)](#)

<sup>36</sup> DCO Application Chapter C1 para 1.3.22 p.5 and para 1.5.99 p.41.

identified from monitoring and then tries to mitigate them. This section will identify what the impact are and what mitigation measures need to be implemented to make them acceptable in planning terms based on the evidence.

### ***The Wales Coastal Path, AONB & PRoWs***

- 1.5.3 The Anglesey Coastal Path has been identified as a major contributor to the Welsh and Anglesey economy (£14m on the Island) and is a major attraction for visitors to the Island.<sup>37</sup> Anglesey is seen by other Welsh authorities as an exemplar in leveraging economic wealth and cultural capital from this asset. Most of the economic impacts attributed to the Path occur away from the coast itself, as it is an enabler of expenditure within local economies, not just in obviously tourist-related activities, but also in sectors such as transport, communications and financial and business services.
- 1.5.4 There are distinct differences between user segments of the Wales Coastal Path (WCP).<sup>38</sup> Users of the Anglesey section tend to be older (average age 55), staying visitors with significantly higher socio-economic profiles than the average (virtually 80% are ABC1). Reflecting this profile, Anglesey's WCP visitors spend more per night (£85.37) than the Wales (£74.11) or North Wales Coast (£52.63) average. Additionally, Anglesey Path users also recorded a high mean additional trip spend of £18.81.<sup>39</sup>
- 1.5.5 Whereas most visitors to the WCP live in Wales (59%) and are on a day trip (61%), Anglesey Path users are much more likely to be staying visitors from England (56%), reflecting its position as a major tourist attraction for the Island. Crucially, Anglesey users exhibit high levels of path loyalty and correspondingly lower levels of preparedness to substitute for other routes – only 65% would be prepared to walk elsewhere compared to 93% in Carmarthen.<sup>40</sup>
- 1.5.6 The overarching appeal of Anglesey and North Anglesey centres around its coastline, all of which (apart from Wylfa Head and Cemaes Bay), lies within the AONB and much of which is also designated as Heritage Coast. The coastline is a popular destination for wildlife watching from the coastal headlands, including birdwatching and porpoise, seal and dolphin spotting. It was recently identified as one of Britain's top locations for shark spotting. Cemlyn Nature Reserve is a year-round attraction for bird-watchers due to its over-wintering birds, its Arctic, Common and Black-headed gulls and especially its sandwich tern breeding colony; it is considered to be 'the jewel in the crown' of Anglesey's AONB.
- 1.5.7 The volume and value of the bird/wildlife watching market is substantial. Up to 40% of all leisure tourists are interested in some form of wildlife watching.<sup>41</sup> UK

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<sup>37</sup> Anglesey Coastal Path [\(Link\)](#)

<sup>38</sup> Beaufort Research, The NRW Wales Coast Path Visitor Survey 2015. [\(Link\)](#)

<sup>39</sup> Beaufort Research, The NRW Wales Coast Path Visitor Survey 2015 [\(Link\)](#)

<sup>40</sup> Beaufort Research, The NRW Wales Coast Path Visitor Survey 2015 and [\(Link\)](#)

<sup>41</sup> The International Ecotourism Society, Maximising the value of migratory birds and wildlife for tourism, online at [\(Link\)](#)



bird/wildlife watching visitors tend to be older and prefer caravan or self-catering accommodation – both of which are markets for Anglesey - and spend on average £68 a night and £379 per trip.<sup>42</sup> This market is likely to be significantly disrupted by the adverse impacts of Wylfa Newydd, which is unavoidable and requires compensation through the Tourism Fund.

- 1.5.8 It is difficult to convey the dramatic impact, which Wylfa Newydd's construction and operation will have on this land/seascape. Some hint is provided by this description of the Magnox Wylfa Power station where the: 'pervading sense of remoteness and tranquillity is interrupted dramatically by the imposing bulk of Wylfa Power Station... a major built feature in a coastline largely devoid of modern influence... in a seascape known for its wild and naturalistic qualities.'<sup>43</sup> Wylfa Newydd and the site campus accommodation (which will become the Island's third largest settlement behind Holyhead and Llangefni)<sup>44</sup> and associated facilities (marine and land) will industrialise this landscape.
- 1.5.9 The AONB has high levels of quietness and tranquillity; it is a quiet area which provides 'respite from noise, ultimately improving quality of life',<sup>45</sup> qualities that are highly valued by visitors.<sup>46</sup> In addition, Anglesey is 'a stargazers' paradise... much darker than in many other places across the UK'<sup>47</sup> and as such, is bidding to join the world's 11 Dark Skies Reserves (to be sited between Wylfa Head and Bull Bay).<sup>48</sup> Wales has the most designations and accreditation for Anglesey would allow it to access the lucrative astro-tourism sector (75% of 60 sites on the Island currently meet the International Dark Sky Association Silver Standard). Since the Brecon Beacons National Park became the fifth International Dark Skies Reserve in 2013, it has seen increased numbers of visitors in the winter and shoulder months and attracted considerable marketing value from associated media coverage.<sup>49</sup> Wylfa Newydd will compromise any bid for International Dark Skies Reserve status during construction.
- 1.5.10 Wylfa Newydd's impacts on access to and use of the WCP and Anglesey's associated Copper Trail will be significant and, in some cases, permanent. These impacts on WCP are recognised by Horizon but no additional mitigation is provided. Horizon claims that, although major and moderate adverse impacts will be felt, some permanently, no additional mitigation is required due to 'no loss in value of the route to the economy.'<sup>50</sup>
- 1.5.11 Mitigation is clearly required. The WCP is a key part of Anglesey's tourism infrastructure and a significant and growing economic asset in which IACC, Welsh Government (WG) and the European Union (EU) have invested multi-

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<sup>42</sup> Visit Scotland Insights Department, 2017. Wildlife Tourism, online at: [\(Link\)](#).

<sup>43</sup> National Resources Wales Marine Character Areas online at: [\(Link\)](#).

<sup>44</sup> Amlwch is currently third largest settlement with population of 3,789 (Census 2011). [\(Link\)](#)

<sup>45</sup> Finding Europe's quiet areas [\(Link\)](#)

<sup>46</sup> The future of tourism [\(Link\)](#)

<sup>47</sup> Anglesey Dark Sky Experience [\(Link\)](#)

<sup>48</sup> Dark Sky Park Report: Economic Impact and Potential [\(Link\)](#)

<sup>49</sup> The Brecon Beacons' Dark Sky Reserve: five ways to see it, [\(Link\)](#)

<sup>50</sup> Letter from IACC to Horizon, Review of Horizon's DCO Application (Tourism). (Annex 5E)

millions to develop as a tourism and recreational resource. Adverse impacts will include: loss of routes; routes diverted away from the very seascapes that underpin the WCP offering (in contrast to other authorities, which are seeking to enhance their seascape offering); significant degradation of the environment, impacts on the visual offering of the WCP around North Anglesey; increased noise, visual, waste and dust pollution. Water pollution and ground water depletion may also damage the environment, nearby watercourses and wildlife.

- 1.5.12 The existing Wylfa Magnox Nuclear Power Station already exerts a dramatic visual influence on the AONB. It will continue to do so in the future, whilst Wylfa Newydd and its associated developments will exacerbate this dramatic visual intrusion.
- 1.5.13 The development of breakwaters, a Marine Off-Loading Facility (MOLF) and marine dredging will impact on the coastline of the area and the AONB. Cooling water discharge will also affect marine and coastal environments. This will result not only in landscape degradation but will also debase those very qualities which are key to Anglesey's unique tourism appeal. There is agreement between IACC and Horizon that this will lead to significant visual intrusion on the landscape, which will not be alleviated by construction devices.
- 1.5.14 Planning Policy Wales underlines the equal status of National Parks and AONBs in terms of landscape and scenic beauty, highlighting how decisions should give great weight to conserving and enhancing the natural beauty, wildlife and cultural heritage of these areas.<sup>51</sup> These apply to activities affecting these areas, whether they lie within or outside the designated area.<sup>52</sup>
- 1.5.15 The IACC has confirmed that public access needs to be maintained throughout all phases of Wylfa Newydd development. The DCO application lacks detailed assessment of this.
- 1.5.16 Several major adverse impacts are identified, some of which are irreversible. A section of the WCP will be diverted inland, adding 4km to the path, which will be 'sandwiched' between the A5025 and the site boundary fence. The **permanent** obstruction, diversion, closure, realignment and disturbance of the WCP (during construction and operation phases) will have a negative consequential impact on the tourism industry, reducing the attractiveness of the path, whilst disrupting its leisure and recreation offer and value. This impact is unavoidable and required compensation through the Tourism Fund.
- 1.5.17 In treating the WCP as a single receptor in the Landscape and Visual Assessment supporting the application, it is difficult to distinguish between the impacts on different path sections. This kind of approach does not allow for location-specific mitigation proposals to be developed and agreed. Consequently, impacts are averaged over too wide an area and substantially under-assessed on the lengths of path near the Wylfa Newydd site. Additionally, significant construction period visual impacts are assessed at all

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<sup>51</sup> National Assembly for Wales, 2011. National Parks and AONBs in Wales, [\(Link\)](#)

<sup>52</sup> National Assembly for Wales, 2011. National Parks and AONBs in Wales, [\(Link\)](#)

11 viewpoints sited on the WCP but are not represented in montages to demonstrate the significant adverse effect during this stage. Currently, photomontages are only prepared for the operational stage where significant operational visual effects are assessed at nine viewpoints sited on WCP.

- 1.5.18 Further consideration is required of the impact of the permanent closure of the scenic Cemlyn Road on the Copper Trail (part of the National Cycle Network Route 566), from the start of the construction period. Horizon's suggestion that 500 additional leaflets to inform people of this closure as mitigation is inadequate and unacceptable.
- 1.5.19 Visual effects will impact on visitors and cyclists using the Copper Trail/National Cycle Network Route 566 once Wylfa Newydd is operational. The proposed naturalistic colour scheme for the site will not be enough to reduce these visual effects. The viewpoints selected underestimate the effects of the permanent diversion of the Copper Trail upon recreational receptors. 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. Mitigation and compensation is required and should consist of: improved signage; additional funding to promote the Cycle Route; the promotion of interlinkages with other nearby attractions (businesses, facilities and services); and improvements to the alternative route proposed to make this more attractive to visitors through enhanced landscaping and additional planting.
- 1.5.20 In addition, several significant permanent and temporary adverse impacts are identified in relation to PRoWs within the WNDA and associated site development locations. During the decade-long construction phase, all 32 PRoWs within the WNDA will be permanently closed to enable construction. IACC accepts this on safety and security grounds. Horizon's intention to create new PRoWs following construction, which would link to the coastal path lacks detail and is insufficient as compensation or mitigation. This could be 10-15 years away which is unacceptable and the IACC require compensation for this loss to upgrade alternative PRoWs to mitigate against this impact.
- 1.5.21 Wylfa Newydd will have a **negative impact** on the WCP, AONB and PRoWs and will lead to cumulative depletion of the Island's tourism and recreational offer, diminishing its tranquillity and the Anglesey brand offer. Tranquillity is the most significant 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.<sup>53</sup> The tranquillity of Anglesey's natural tourism environments will inevitably be compromised during and post-construction. The Tourism Fund should be key to alleviating these long-term

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<sup>53</sup> Watts, G. & Pheasant, R. 2013. Factors affecting tranquillity 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.

brand challenges, but the IACC believe that its scope and scale is not sufficient for this to happen.

### ***Displacement in Local Staff and Supply Chains***

- 1.5.22 The adverse impacts of labour ‘churn’ is of concern as Wylfa Newydd will impact on tourism business, which may struggle to recruit and retain staff, particularly in catering and domestic service roles.<sup>54</sup> Anglesey has low levels of business churn and dynamism, a characteristic of the large number of lifestyle businesses attracted to rural tourism economies. As a result, it exhibits low levels of resilience to adverse economic impact and tourism businesses will struggle to replace a loyal and experienced workforce. The experience of other NSIPs demonstrates staff displacement in local labour markets. Sizewell B recruited 600 employees per annum from other local employers and around 60% of its workforce had been in local employment immediately before its construction.<sup>55</sup>
- 1.5.23 This experience demonstrates a clear and sustained impact on employment turnover levels in existing businesses, which also contributes to wage inflation in the locality. Evidence from other NSIPs demonstrates that their higher salaries will attract employees from local employers and there will be difficulties with staff recruitment, retention and wage inflation. Horizon’s worker campus will absorb local hospitality workers and exacerbate the existing shortage of, for example, qualified chefs and catering staff in North Wales. Moreover, with Anglesey having a ‘tight’ labour market (with a small labour force and low levels of unemployment and economic inactivity) these effects will be magnified.<sup>56</sup>
- 1.5.24 In a restricted labour market like Anglesey, this will impact on tourism providers’ abilities to retain staff and consequently their ability to deliver high-quality visitor experiences in key sectors such as food, catering, hospitality and administration. To redress the loss of experienced staff, education and training will need investment and augmentation. Without a pool of qualified labour, which the tourism sector can draw on, Anglesey’s existing quality tourism offer will be under threat during the construction of Wylfa Newydd.
- 1.5.25 Employment skills and standards will fall because of staff displacement. The need to support local businesses and increase the pool of available talent is recognised in the IACC Wylfa Newydd Supplementary Planning Guidance.<sup>57</sup> A Hospitality and Catering Skills Centre, in partnership with tertiary education providers, is key to delivering this. Funding for just such a facility has been made available from the EDF Community Impact Fund to support training in Minehead (£500k+) and is even more important for Anglesey.<sup>58</sup>
- 1.5.26 Similar displacement in the supply chain could weaken the links between the tourism sector and local producers on Anglesey, undermining the distinctive

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<sup>54</sup> Examination Library APP-[088].

<sup>55</sup> EDF 2016. Consultation Document Sizewell C: para 8:12:54. [\(Link\)](#)

<sup>56</sup> See Local Employment Chapter of LIR for further detail.

<sup>57</sup> IACC Wylfa Newydd Supplementary Planning Guidance 2018. P65. [\(Link\)](#)

<sup>58</sup> Community Impact Mitigation Funds, HPC [\(Link\)](#)

offer and support for farming, fishing and local craft producers, which has been built up over recent years and been further developed by the Anglesey Food Tourism Strategy.<sup>59</sup>

1.5.27 Horizon highlight the jobs and skills strategy and the supply chain charter as good practice mitigation. The former concentrates on mechanical, engineering, construction and decommissioning project management and electrical engineering to meet the project's demands. It does not consider the impact of Wylfa Newydd on the wider economy (tourism, hospitality, catering and leisure), which must be protected throughout the construction phase. Issues of labour churn are only briefly mentioned.<sup>60</sup> The IACC evidence shows that there will be a **negative impact** on the tourism sectors and the quality of the tourism offer, if staff are effectively 'poached' to work at Wylfa. To neutralise this impact, investment is required in education, skill and training across all sectors (particularly in this instance catering and hospitality) to ensure that the local labour pool is sufficient to enable displaced vacancies to be filled by trained and experienced staff. This will ensure that the tourism sector can continue to provide high quality service, which is critical to the tourism offer of Anglesey.

### ***Visitor Behaviour and Visitation***

1.5.28 Horizon utilise the findings of the Anglesey 2015 Visitor Behaviour Survey to argue that visitor behaviour and visitation rates would not be seriously affected by Wylfa Newydd's development and operation, citing these impacts as minor adverse and thereby not significant.<sup>61</sup> This underplays this 10% loss in visitor numbers and the associated loss in visitor expenditure – some £30m annually - (which Horizon do not refer to). As discussed above, the 2018 Survey indicates that this figure is an underestimate.

1.5.29 Research demonstrates that coastal tourism and recreational economies are based on the quality of the natural setting and resources, public perception of the area and its resources and the value people place on those resources. Quite clearly, 'Limiting access to or degrading the natural resources that draw tourists and recreational users will result in negative economic impacts.'<sup>62</sup>

1.5.30 Wylfa Newydd will negatively impact on the North Anglesey coastline and beaches, which are valued for their remoteness as important tourism destinations.<sup>63</sup> It is evident that construction activities (including increased vessel and vehicular traffic and noise, which will dramatically increase because of Wylfa Newydd) change the aesthetics of coastal and offshore areas, affecting both recreational and tourism activities.<sup>64</sup> The international research literature 'generally concludes that the issue of tourism is fundamentally bound to the

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<sup>59</sup> IACC 2014, Anglesey Food Tourism Strategy and Action Plan. [\(Link\)](#)

<sup>60</sup> ARN 8.3. paragraph 3.3.4. and 2.4.2.

<sup>61</sup> Horizon DCO C1. para 1.5.132-133 pC1-51.

<sup>62</sup> Atlantic Region Wind Energy Development: Recreation and Tourism Economic Baseline Data Development: Impacts of Offshore Wind on Tourism and Recreation Garcia et al 2012 BOEM.

<sup>63</sup> Peregrine Energy Group 2008 p3, online at: [\(Link\)](#)

<sup>64</sup> Cape Wind Final Environmental Impact Statement MMS 2009. [\(Link\)](#)

quality of the natural environment... any disturbance to [this] risks an impact upon rural tourism.’<sup>65</sup>

- 1.5.31 The development of Wylfa Newydd will create significant media coverage and its size and scale and the nature of reporting mean it may convey an impression that ‘Anglesey is closed for business’ and one large building site. To mitigate this **negative impact**, a concerted marketing campaign will be required to reassure visitors and build new markets, following good practice from elsewhere.<sup>66</sup> Detail on mitigation proposals is contained in section 1.6 of this chapter.

### ***The Anglesey Brand, Reputation and Visitor Perceptions***

- 1.5.32 Energy production and transmission are specific threats to key aspects of Anglesey’s appeal, including its quality environment, expansive views, peace, tranquillity and air quality. Obviously this poses significant threats not only to its brand but its tourism economy; ‘with its rolling green hills and crystal waters, the Isle of Anglesey is a dream for those in search of peace and tranquillity’.<sup>67</sup> The industrialisation of significant elements of its landscape will compromise this and make it less attractive to tourists. The cumulative effects of Wylfa Newydd’s construction and the highly visible associated development sites will reduce its attractiveness and compromise its brand offering.
- 1.5.33 Drawing on comments already made, during construction some visitors will regard Anglesey as ‘closed for business,’ leading to: i) a short-term diminution of visitors as they holiday elsewhere; and ii) a long-term loss of repeat/return/multi-generation visitors. Visitors may re-evaluate Anglesey’s unique natural and historic environments, especially its natural, unspoilt, rich & diverse coastlines (its greatest tourism assets). There is a real danger that the very tranquillity, which visitors seek on the Island will be negatively impacted. There is a reputational risk for the Island (which relies on older, ABC1 and young family markets) from the presence of large numbers of construction workers, which will see a rise in anti-social behaviour, prostitution and drug- and alcohol-related incidents unless appropriately managed.
- 1.5.34 Wylfa Newydd will **negatively impact** on the Anglesey brand and strategic initiatives to develop and enhance the Island as a year-round, high-value tourism destination. These include: the Wales Coastal Path; tranquillity tourism; dark skies and astro-tourism; wildlife/bird-watching; heritage tourism.
- 1.5.35 Horizon recognises that Wylfa Newydd could adversely affect the brand and reduce visitor numbers and revenues – all of which could continue into the operational phase. It commits to proactive action to protect the Anglesey brand via a Tourism Fund.<sup>68</sup> The proposed operation of this fund is currently

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<sup>65</sup> EirGrid 2015. Your Views, Your Tomorrow: p.2. ([Link](#))

<sup>66</sup> HTAP Strategy, p.3 online at: ([Link](#))

<sup>67</sup> Whelan, Z. & Morris, L. 2017. 17 things you must do when you visit Anglesey, *Daily Post*, 19 August. ([Link](#))

<sup>68</sup> Examination Library APP-[088] paragraphs 1.6.97 and 1.6.99.



retrospective, relying on monitoring surveys (which would not report the views of those who chose to stay away) to establish any adverse impacts, which would then trigger mitigation. This procedure is lengthy and reactive, does not replicate good practice experience elsewhere and threatens to exacerbate problematic issues associated with the development.<sup>69</sup> Apart from these general statements detail is sparse and consideration of the brand impact superficial.<sup>70</sup>

- 1.5.36 It is essential that long-term **proactive** brand measures are put in place to guard against and mitigate impacts. These brand protection measures and actions need to occur pre-, during and post-construction of Wylfa Newydd to guard against serious long-term damage (as is established practice in other NSIPs such as HPC). Destination branding clearly demonstrates the value of proactive campaigns to build strong brand presence and resilience to mitigate against adverse consequences.<sup>71</sup> Protect and prevent is the most effective marketing practice.

### ***Temporary and Permanent Visitor Centres***

- 1.5.37 Horizon has committed to a temporary Visitor and Media Centre, which would be an important addition to Anglesey's attractions portfolio. There are references to a permanent centre five years after the end of construction; however this has not been included in the DCO which is hugely disappointing. It is essential that a high-quality temporary facility is built to cater for construction and education tourism. This requires confirmation from Horizon and would reflect good practice in other NSIPs. It would demonstrate Horizon's presence on and commitment to the Island and cater for tourists and residents alike, providing an educational and informative hub and an ideal resource for those walking the WCP.
- 1.5.38 The EDF Visitor Centre in Bridgewater has already attracted over 80,000 visitors since opening. This development should complement the proposed viewing platform to ensure a quality experience when visiting Wylfa Newydd during construction. Key visitor groups to the facility would include: school trips, higher education/special interest tourists, locals and day visitors.
- 1.5.39 IACC requires confirmation that a suitable visitor centre will be available throughout the construction period and that a high quality permanent visitor centre will be provided during the operation phases (with firm commitments on timescales). Both the temporary and permanent visitor centre should make use of state-of-the-art facilities and could engage people in energy, low carbon and nuclear technology stories. The permanent centre could also tell the story of the archaeological history of the locality, revealed during site preparatory works.

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<sup>69</sup> See Baral, A., Baral, S. & Morgan, N. 2004. Marketing Nepal in an Uncertain Climate: Confronting Perceptions of Risk and Insecurity, *Journal of Vacation Marketing*, 10 (2): 186-192 for an example of the challenges of responding retrospectively to crises.

<sup>70</sup> Examination Library APP-[088] para 1.5.98 p.C1-41.

<sup>71</sup> Morgan, N., Pritchard, A. & Piggott, R. 2002. New Zealand, 100% Pure. The creation of a powerful destination niche brand, *Journal of Brand Management*, 9 (4-5) 335-354.

The development of such facilities is established practice in other NSIPs and a comparable attraction, Electric Mountain in Dinorwig, attracts 225,000 annual visitors, demonstrating the appeal of energy-related attractions in the region.<sup>72</sup>

1.5.40 The permanent Visitor and Media Reception Centre was part of PAC 1 and PAC2, but this has been removed in PAC3 and does not form part of the DCO submission. Although Horizon make a commitment that a permanent visitor centre will be provided once the power station is operational, the IACC have no certainty on this and without being part of the DCO, the IACC has no powers to secure these commitments. Having this high quality visitor centre is critical to attracting visitors back to North Anglesey following the construction period. The visitor centre must be linked with nearby attractions to ensure that 'North Anglesey' is marketed as a 'must go' destination on Anglesey. This will provide a catalyst to the positive transformation of Cemaes and Amlwch in particular as thriving tourist destinations, which would be a positive legacy from Wylfa Newydd.

### ***Cumulative Impacts***

1.5.41 A project of this size and scale must be considered holistically. Thousands of individual impacts, across a wide range of indicators, many individually exhibit minor, medium or major adverse impacts. Cumulatively however, these impacts are substantially magnified. Any perceived impacts and reported incidents and experiences will damage the Anglesey brand, which has done so much recently to augment its reputation through significant investment in the WCP, the development of Anglesey as a quality food tourism destination and its emergence as a Dark Skies destination. These cumulative impacts will:

- a) Reduce visitor spend in the local tourism economy (accommodation, attractions, food and drink, creative sector, etc.);
- b) Impact on the quality of the holiday experience including concerns about safety and contractor use of family accommodation;
- c) Cumulative effects of Wylfa Newydd, together with highly visible associated development sites (e.g. logistics centres, park and ride, MOLF, and highway construction) reducing the appeal and attractiveness of the environment.

1.5.42 Horizon reports the 2015 Visitor Survey, which shows that 90% of visitors indicated that Wylfa Newydd would not impact on their decision to visit. However, even a loss of 10% of visitors from the Anglesey tourism economy, which is currently worth £300m+ would lead to an annual loss of £30m. This is significantly greater than the £10m addition (which assumes that all other things would remain equal), which would be contributed by workers for a 3 ½ year peak occupancy period during the peak construction period.

1.5.43 The worker utilisation of tourism accommodation impact has already been articulated, but it should be noted that this will also directly undermine VW/WG

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<sup>72</sup> Electric Mountain web page ([Link](#))



and IACC stated policy/strategy to grow tourism into a quality year-round industry. This would clearly disadvantage Anglesey vis-a-vis competitors such as the Lake District and Cornwall.

- 1.5.44 Wylfa Newydd is a long-term project, which will take at least 10 years to complete, though similar projects have overrun significantly and required much more labour than initially estimated.<sup>73</sup> Its scale and duration will magnify the adverse impacts, which are cumulative rather than individual/singular. International Labour Organisation research shows that, whilst tourism is more resilient to economic downturns than some other sectors (opting for increased productivity or reductions in hours instead of staff layoffs), 'the longer the crisis lasts, or the slower the industry recovers, the more jobs are lost irretrievably.'<sup>74</sup>
- 1.5.45 A 10% visitor loss (which Horizon acknowledge) would result in a minimum annual loss to the Island of £30m - but the cumulative impacts of this would be worse. Taking the widely accepted figure of £54,000 visitor expenditure to create one tourism job<sup>75</sup> (although Horizon use £22,000 to assess job impact), this downturn would threaten 550 jobs in the sector annually.
- 1.5.46 The 2018 Anglesey Visitor Survey paints a worrying picture. The construction phase will exert significant strain on the visitor economy through increased traffic, infrastructural developments and increased noise, visual and dust pollution and disturbance. Road dominates travel to Anglesey and there is little scope to change this. Numerous surveys indicate that tourist tolerances of increased journey time are limited with almost a quarter (23%) of visitors less likely to visit in these circumstances.<sup>76</sup> Whether real or perceived, congestion will lead to visitor losses.
- 1.5.47 Around one in six of those staying in hotels or self-catering cottages (16%) say that the increased volume of traffic will make them less likely to visit Anglesey. This indicates much greater losses, particularly in this higher spending sector and do not reflect Wylfa Newydd's impacts on the growth of the Island as a year-round destination. Tables 5 and 6 provide a detailed breakdown of the estimated losses, modelling a 16% loss in tourism accommodation and a 13% loss in staying with friends and relatives (SFR) and day visitors. These tables show an overall loss of £49.26m in visitor expenditure and a loss of 410,000 visitors. Critically, these losses do not consider the significant impacts, which would occur if portions of the tourism accommodation stock transfer into private rental sector.

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<sup>73</sup> Hay, A., Meredith, K. and Vickerman, R. 2004. The Impact of the Channel Tunnel on Kent and Relationships with Nord-Pas de Calais. Final Report by Centre for European, Regional and Transport Economics, University of Kent, [Online].

<sup>74</sup> Belau, D. 2003. *The Impact of the 2001-2002 Crisis on the Hotel and Tourism Industry*. International Labour Organisation, Geneva.

<sup>75</sup> Oxford Economics, 2013, *Tourism Jobs and Growth*, Visit Britain. ([Link](#))

<sup>76</sup> South West Research Company, 2011. Visitor Survey. ([Link](#))

**Table 5: Breakdown of Sectoral Impact 2017 – Visitor (£m)**

	Total (£m)	-1/6 <sup>th</sup>	Adjusted Total (£m)
Serviced Accommodation	44.06	7.343	36.7
Non-Serviced Accommodation	220.46	36.74	183.72
Total Value	264.52	44.1	220.42
	Total (£m)	-13%	Adjusted Total (£m)
SFR Total Value	8.43	1.095	7.33
	Total (£m)	-13%	Adjusted Total (£m)
Day Visitors	31.28	4.066	27.214

Total losses of £49.26m

**Table 6: Breakdown of Sectoral Impact – Visitor Numbers**

	Visitor Numbers (000s)	-1/6 <sup>th</sup>	Adjusted Total (000s)
Staying Visitors			
Serviced Accommodation	214.26	35.71	178.55
Non-Serviced Accommodation	705.71	117.62	588.09
Total Value	919.97	153.33	766.64
	Visitor Numbers (000s)	-13%	Adjusted Total (000s)
SFR Total Value	107.68	140	93.68
	Visitor Numbers (000s)	-13%	Adjusted Total (000s)
Day Visitors	683.87	88.9	594.9

Loss of 410k visitors.

- 1.5.48 These surveys show that, as the project draws closer, there is a proportion of people who will be deterred by the construction process. Given the Anglesey visitor market, its shared media, and the fact that Wylfa Newydd stories will increase as the project progresses, this will cause more people to reconsider their holiday choices. A conservative estimate of a visitor loss of 16% or one sixth during construction would generate losses of £50m from the Island's tourism economy. The years of roadwork construction to facilitate access to Wylfa Newydd will exacerbate this. Although this roadworks will be time-limited, once visitors have been lost to a destination, they are much less likely to return.
- 1.5.49 These scenarios pay no regard to Wylfa Newydd's damage to the Anglesey brand, the degradation of its WCP and coastline, tranquillity, landscape, culture and wildlife. Horizon commits to proactively protecting the Anglesey brand, although detail is limited. Protection of the brand is essential to combat the physical and perceptual changes, the wider negative perceptions of hosting a nuclear site and the real or perceived traffic congestion. At the same time, the costs to the industry of visitor and staff displacement, labour churn and disruption to local supply networks will exert further cumulative impacts and

strain on the tourism sector. These strains may not be evident in visitor surveys, but their consequences will exert huge impact on the tourism sector's quality and profitability. Without interventions, these impacts will lead downturns in quality and a 'vicious circle' of decline and job losses or a 'race to the bottom.'

- 1.5.50 There are also cumulative impacts with other major project (e.g. National Grid North Wales Connection Project, Bluestone holiday village, the 'third crossing' etc.) all of which are likely to be constructed at the same time as Wylfa Newydd. Cumulatively this could be severely detrimental to Anglesey's tourism sector (i.e. accommodation, brand, perception, traffic congestion etc.) and requires careful management, monitoring and mitigation where necessary.

## **1.6 DCO Obligations and Requirements**

- 1.6.1 Clearly, there are several substantive impacts which will adversely affect the Island's tourism sector - as the examples of other NSIPs demonstrate. There is a clear evidence-based requirement for a package of tourism related mitigation to ensure that any negative impacts on the sector are minimised. The constitution of Anglesey's economy, its key reliance on the tourism sector and its geographical peripherality underline the need for this mitigation programme to be agreed prior, during and after the construction period, continuing into the operational period.
- 1.6.2 Under no circumstances should a 'monitor, manage and mitigate' approach be adopted. Effective brand-building and damage limitation within tourism is founded on early, sustained implementation to address potentially problematic issues.<sup>77</sup> In this way, the destination is far more able to manage issues in a much more cost-effective manner; retrospective action is far costlier and much less effective.
- 1.6.3 Comparative mitigation packages show significant compensation for host communities, reflecting the no-net-loss commitment.<sup>78</sup> For example, Japan's Agency for Natural Resources and Energy has simulated the value of compensatory subsidies for local communities hosting a nuclear reactor. These totalled 44.9 billion yen (£301,891,498) during the 10-year preparation and construction period, with a further 76.6 billion yen to be paid in compensatory mitigation over the 35-year operation (£515,630,930).<sup>79</sup> Compensations by nuclear utility companies 'averaged' £89m per site (worth £103m at 2017 prices).<sup>80</sup> In the UK, EDF has already committed to almost a £100m mitigation funding package for Somerset for HPC (including the site preparatory works

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<sup>77</sup> Morgan, N., Pritchard, A. and Pride, R. 2012. *Destination Brands: Managing Place Reputation*, Elsevier: Oxford.

<sup>78</sup> Kerr, S., Johnson, K. & Weir, S. 2017. 'Understanding Community Benefit Payments from Renewable Energy Development' *Energy Policy* June Vol 105 pp.202-211.

<sup>79</sup> Kato, T., Takahara, S., Nishikawa, M. & Homma, T. 2013. 'A Case study of economic incentives and local citizens attitudes towards hosting a nuclear power plant in Japan: Impacts of the Fukushima accident' *Energy Policy* 59, pp. 808-818, online at: [\(Link\)](#)

<sup>80</sup> Kato, T., Takahara, S., Nishikawa, M. & Homma, T. 2013. 'A Case study of economic incentives and local citizens attitudes towards hosting a nuclear power plant in Japan: Impacts of the Fukushima accident' *Energy Policy* 59, pp. 808-818, online at: [\(Link\)](#)

s.106 agreement). As part of this, substantial funding has been made available to support the tourism sector. Much of this funding is through a dedicated Tourism Fund, supporting Hinkley Tourism Action Partnership (HTAP). This means 'a total of £1.12m of tourism contributions will be provided on an annual basis spread over a six-year period.'<sup>81</sup> Funding for tourism officer posts (4/5 posts) and tourist information centres (7) is also provided. Substantial sums have also been drawn down from the Community Impact Mitigation Fund (CIM Fund), with £2.4m secured to date. A further £1.1m has supported the tourism infrastructure (including heritage, landscape and PRoW improvements). Significantly, these funds have been able to attract match funding from other sources.<sup>82</sup> It is of note that accommodation and food is Somerset's fifth most significant sector (significantly behind health, manufacturing, retail and education), whereas tourism is Anglesey's most important.

- 1.6.4 Horizon's acceptance of the creation of a Tourism Fund<sup>83</sup> is welcomed and follows established practice elsewhere and will be vital to protect the Anglesey brand and the tourism industry it supports. This reflects the importance of tourism to the Island and universal agreement that tourism is 'vital to the economy of Anglesey'.<sup>84</sup> This will be secured through planning obligations which will 'seek to ensure that the perceived impacts on the local tourism sector can be moderated using positive mechanisms to develop existing and new forms of tourism.'<sup>85</sup> This commitment to developing new forms of tourism products and experience is welcome. However, the value of this fund is not reflective of the importance of the tourism sector to Anglesey, and the scale of the impacts Wylfa Newydd will have on this key sector.
- 1.6.5 It would be expected that this Fund would operate in a similar way to that agreed for the HTAP, underpinned by a commitment to enhance, protect and prevent rather than monitor and mitigate and would be guided by the good practice principles of this and similar NSIPs, including:
- a) Fostering positive perceptions and awareness;
  - b) Evidence based, targeted marketing campaigns;
  - c) Creating a welcoming and informed travel experience;
  - d) Monitoring impacts on visitors and businesses;
  - e) Evolving new products for changing customer needs;
  - f) Capitalising on digital trends and partnerships;
  - g) Building long-term capacity of the industry;
  - h) Encouraging high-value, sustained growth;
  - i) Supporting local distinctiveness and action.

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<sup>81</sup> HTAP Strategy, p.3 online at: [\(Link\)](#)

<sup>82</sup> HTAP Strategy, p.3 online at: [\(Link\)](#)

<sup>83</sup> Examination Library APP-[088]

<sup>84</sup> Examination Library APP-[088]

<sup>85</sup> Examination Library APP-[088]

### ***DCO Requirement***

- 1.6.6 In section 9.2 of Horizon's Workforce Accommodation Strategy (APP- 412) they outline their approach to managing the impact of construction workers on local accommodation through the implementation of a Worker Accommodation Management Service (WAMS). In principle, the IACC is fully supportive of the WAMS and has been in discussion with Horizon over a number of years on how this service may operate. However, the IACC has concerns that the use of this WAMS is not mandatory for workers and workers may chose not to use the WAMS. This may cause difficult in monitoring and managing impacts (particularly on the tourism and caravan sector) and will be virtually impossible for the IACC to take enforcement action where necessary (e.g. use of caravan sites all year round, conversion of tourism accommodation to all year round lets etc.).
- 1.6.7 Although the IACC fully recognise and appreciate the workers freedom to choose wherever they want to live, this nevertheless does make it difficult to mitigate impacts on specific accommodation sectors or locations. The IACC want to work with Horizon to ensure that the WAMS is as successful as possible. The IACC therefore seek a DCO Requirement for Horizon to submit detail of the WAMS to the IACC to be agreed prior to its implementation. The IACC will also require Officers to monitor the impacts on the tourism sector and take enforcement action where necessary. This is detailed in the housing chapter of this LIR to prevent duplication.
- 1.6.8 The inability of Horizon to mandate workers to use the WAMS however, remains a concern. This provides significant justification in itself for DCO Obligations to actively promote and market tourism on Anglesey to ensure that we remain 'open for business'. A significant contingency fund (Community Resilience Fund) is also required to address unidentified, unquantifiable impacts which may arise through monitoring.

### ***DCO Obligations***

- 1.6.9 This section sets out a package of measures that will help to address the adverse impacts discussed herein. These measures will cover both the construction and early operation phases of the project. All measures should be index linked and sit under a Tourism Fund. Horizon have committed to a Tourism Fund and measures to protect the tourism industry. However, many of the mitigation measures come in the form of 'embedded mitigation' and Horizon's preferred monitor and mitigate approach is unacceptable.

### ***Council's Proposed Obligations***

- 1.6.10 The IACC's proposed obligations in respect of tourism are listed (a) – (j) below. Obligations relating to education and skills, accommodation, monitoring, management and enforcement are elsewhere in the report.

- a) Tourism strategy and action plan to underpin the industry's development over the preparatory and construction period. This should be commissioned as soon as the DCO is granted.
- b) Strategic Tourism Officer to: provide strategic leadership to the implantation of the Tourism Action Plan (TAP); inform and participate in the implementation of TAP; liaise with the sector on the implications of Wylfa Newydd.
- c) Ongoing funding for two local tourism officers to: deliver activities under the TAP; support businesses; coordinate business training; support SMEs in the sector to adapt to the impacts of Wylfa Newydd.
- d) An annual contribution to underpin tourism sector marketing, promotion and branding. This will encourage existing and attract new markets to the Island.
- e) A Discover Anglesey Development Fund, specifically designed to enhance and develop new products, tourism routes and experiences to ensure a robust visitor economy. This will run for a period of six years and at its close these will be embedded in the Anglesey product experience and marketing offer.
- f) An annual contribution for visitor survey work to monitor impacts on the visitor economy. The IACC propose that there surveys continue for 2 years into the operational period to monitor the impacts post-construction.
- g) The provision of a high-quality temporary and permanent Visitor and Media Centre at Wylfa Newydd both need to be confirmed and costed.
- h) The loss of PRoW will require route development elsewhere and should be compensated.
- i) The re-routing of the Wales Coastal Path and the investment of the IACC, WG and EU should be compensated.
- j) Once operational, Wylfa Newydd should continue to support the industry for a period of five years. Support should focus on reduced marketing and promotion and one tourism officer for five years

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