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Subject: Wylfa Newydd Examination Deadline 2: NACP responses
Date: 04 December 2018 20:15:38
Attachments: [image001.png](#)
[NACP Construction working hours.pdf](#)
[NACP Local Opportunities.pdf](#)
[NACP Residential Amenity.pdf](#)
[NACP Suggested site visit locations .pdf](#)
[NACP Temporary workers accommodation.pdf](#)
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On behalf of the North Anglesey Councils Partnership (NACP), please find within this email and attached their responses to the Deadline 2 requests of the Wylfa Newydd examination.

The responses include the following:

- Written Representations on:
 - Temporary Workers Accommodation
 - Tourism and Recreation
 - Local Opportunities
 - Construction working hours
 - Residential Amenity
 - Traffic and Transport: A5025 Treglele
 - Traffic and Transport: Cross country routes
 - Traffic: other matters
- Recommendations on locations for site visits

In response to the Written Questions posed, two questions were specifically posed to the NACP (referred to as NAP in the WQs):

Q7.0.5: The NACP are surprised that no photomontages have been produced to show the Construction Phase activities at WNDA and request that photomontages are provided from this phase of works. Not showing the predicted impacts from such a major construction exercise, lasting for 9 years, is considered to be a significant omission which risks underplaying the landscape and visual effects from these works in the examination.

Q14.0.10: The NACP have concerns around the focus of temporary worker accommodation on a single campus in the WNDA. Whilst this primarily is due to reasons of worker numbers on one site, and the loss of legacy benefits from using other site(s), the concentration of development in this environmentally sensitive area is also a concern. A smaller scale of development would be less intrusive from an environmental perspective and a better option. Due to the lower numbers of temporary workers which would be able to be accommodated on the WNDA site because of this approach, additional development will be needed elsewhere and can be provided on other site(s) such as Rhosgoch.

Regards

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Wylfa Newydd Nuclear Power Station:

NACP Written Representation: Tourism and recreation

Summary

Tourism is of vital importance to Anglesey and the WNDA is important for both tourists and for local recreation purposes. The proposed works would see lengthy diversions to the Welsh Coastal Path and to the Copper Trail (Cycle Route 566), particularly in the operational phase. The NACP are concerned that there has not been sufficient focus on keeping the Welsh Coastal Path running close to the coastline during the development of the proposals and that opportunities are being missed to provide permanent enhancements to the tourism and recreational offer and to avoid long-lasting negative effects on local businesses.

1. Introduction

- 1.1.1 The NACP support in principle the Wylfa Newydd project and recognise that the development of this project will require a large-scale construction project which will have impact on tourism and recreation. The NACP have concerns over the nature of some of these impacts and their effect on tourism in the area.
- 1.1.2 This Written Representation will be useful in the consideration of the following Written Questions which all relate to the Wales Coastal Path and public rights of way (PRoW).
- ▶ **Q6.0.17,**
 - ▶ **Q11.1.27,**
 - ▶ **Q11.1.29,** and
 - ▶ **Q11.1.30**

1.2 Context

Existing

- 1.2.1 The tourism sector is of vital importance to Anglesey, with Horizon's ES (APP-095, Document 6.3.8) acknowledging this fact (para 3.3.3). The area around the WNDA has a number of tourist attractions, including the Welsh Coastal Path, Copper Trail cycle route, Cemlyn Bay, Copper Kingdom and Cemaes's heritage centre and maritime museum.
- 1.2.2 The proposed WNDA contains approximately 4.4km of the Wales Coastal Path, 1.5km of National Cycle Route 566 (the Copper Trail) and a number of PRoWs. (APP-237, Figure D4-2). Information provided by IACC and quoted in the ES (APP-123, Doc 6.4.4 para 4.3.10) states that in 2013, 12,492 people were using the Wales Coastal Path at the closest count point (Llanbadrig).

Construction

- 1.2.3 Horizon's proposals for accommodating temporary workers includes the use of tourist accommodation in caravan sites or bed and breakfast/hotel accommodation.
- 1.2.4 The construction phase would see approximately 2.5km of the Wales Coastal Path closed within the WND, and a diversion put in place which measures approximately 6.9km. The remaining length of the Wales Coastal Path within the WND which is not closed will no longer form part of the linear route, instead being left as a 'dead-end' spur to Wylfa Head. The diversion would take the main route of the Coastal Path away from the Cemaes Bay coastline and Wylfa Head (APP-237, Figure D4-5).
- 1.2.5 The full length of the Copper Trail within the WND would be closed during construction (1.5km) and although ES Figure D4-5 is not clear, it appears that another 2.8km would be closed outside of the WND. ES Figure D4-6 (APP-237) indicates a diversion would be provided measuring approximately 4.8km. The diversion would take the Copper Trail away from Tregele and include an approximate 500m section alongside the A5025.
- 1.2.6 The construction phase would also see a number of PROs which provide links between individual properties, settlements and the coast closed.

Operation

- 1.2.7 Once operational, the Wales Coastal Path would be re-diverted to a permanent route that links in to the retained element of the Coastal Path near to Wylfa Head. This permanent diversion would measure approximately 5.7km (Figure D4-6).
- 1.2.8 The Copper Trail would remain diverted on the same route as during the construction phase.

2. Use of tourist accommodation

- 2.1.1 Horizon advise that up to 9,000 temporary workers will be required during the construction phase and that approximately 7,000 of these will be workers coming from outside of the local area and therefore looking for accommodation. 4,000 are proposed to be housed in the temporary worker's accommodation campus on the WND, leaving 3,000 to find accommodation elsewhere. Horizon have assessed the availability of bedspaces in existing tourist accommodation and identify that over 6,000 spaces are available in tourist accommodation within the Key Study Area, against a demand of 1,100 spaces from temporary workers (APP-412, Document 8.4). Horizon acknowledge that IACC however have a different view of the available numbers, identifying 532 available spaces (in Anglesey). IACC are reviewing their assessment of this availability and the NACP wish to see the results of this before commenting further. However, the NACP are concerned that there will be an uptake in tourist accommodation bedspaces by temporary workers, which will restrict the amount of availability for tourists. Any downturn in tourist visits and resulting spend in the local economy could take many years to recover from, especially if this take-up goes on for lengthy periods throughout the 9-year construction phase.

3. Wales Coastal Path

- 3.1.1 The NACP acknowledge that the Wales Coastal Path already comes inland from the coast between Wylfa Head and Cestyll, due to the presence of the Wylfa A power station immediately adjacent to the coastline. With the closure of this power station, and the proposed location of Wylfa Newydd

further inland, it had been hoped that the Wales Coastal Path would be able to be re-routed to follow the coast more closely in this location. Horizon's Stage 2 consultation suggested that this option was being considered, although in the Stage 3 consultation it was ruled out due to the need for a large (250m long) footbridge across the water intake area on the coast.

- 3.1.2 Horizon have committed to provide a document to NACP to provide more detail on the reasoning why the diverted Coastal Path, at both construction and operational phases, is required to take the route it has and cannot be located closer to the coast. This document has not yet been supplied however and the NACP has the following concerns.

3.2 Construction

- 3.2.1 During the construction phase it is acknowledged that there could be significant health and safety issues from the Wales Coastal Path running through the WNDA but the NACP are concerned with the length of the diversion proposed, both in terms of the additional length created for walkers and the amount of time the diversion would be in place for. Walkers travelling between Cemaes and Cemlyn Bay would presently cover a distance of approximately 6.4km, of which 3.7km could be described as being adjacent to the coast. The proposed diversion would be 6.9km long, none of which would be adjacent to the coast. A spur to Wylfa Head would still be available, but any walker wishing to visit this location would need to walk approximately 4.2km, in addition to the 6.9km diversion. This diversion for the construction phase would be in place for 9 years.
- 3.2.2 Whilst walkers who are completing long-distance sections of the Wales Coastal Path may not consider this to be an overly restrictive diversion, or dissuade them from completing the long distance as a whole, walkers who are completing day visits to the area and shorter walks may be discouraged from visiting. In addition, Horizon themselves acknowledge the high use of the Wylfa Head area by local people for recreational purposes with many using the Fisherman's Car Park rather than walk from Cemaes out to Wylfa Head (APP-123, Doc 6.4.4, para 4.3.53). Businesses in Cemaes who would benefit from passing trade, or local people dropping in after visiting Wylfa Head, may be negatively affected by this, as day visitors avoid this section of the Path.
- 3.2.3 Further information on this matter is still awaited from Horizon and the NACP would wish to make a final consideration on this matter once this information is received. If an inland route is required however, the NACP believe more should be done to follow the phased approach to construction with the diversion to the Wales Coastal Path being amended during the construction in response to areas of land being moved out of construction use and into their restored state. The two most obvious areas of land would be around Mound A and Tre'r Gof SSSI in the north east of the WMNDA and around Mound E and along the Afon Cafnan in the west.

3.3 Operation

- 3.3.1 Once operational, the construction diversion would be replaced by a permanent diversion. This would reconnect the Wylfa Head spur with the linear route of the Wales Coastal Path, but then provide a route that runs inland to Tregele before taking a winding route to the south and west before re-joining the existing Wales Coastal Path at Cestyll. This inland section would run for approximately 5.7km.
- 3.3.2 The NACP is disappointed that a coastal route for the permanent Wales Coastal Path is not being pursued with the decommissioning of Wylfa A and the cessation of construction activities around Porth-Y-Pistyll providing a seemingly good opportunity for this to occur. The NACP await further information (which has been promised by Horizon) on this subject and would wish to make a final consideration on the matter once this information is received. However, should the proposed inland

route be necessary, it does appear to be longer than is necessary and the NACP do not believe that Horizon have placed sufficient importance on the Wales Coastal Path in the restoration proposals and improvements could be made to the proposed route. For example, it appears that a route for the Wales Coastal Path could be closer to the eastern side of the Power Station Site and also across the eastern side Mound D to reduce the length of time and distance walkers would be away from the coast. This shorter route was presented in Horizon's Stage 3 Consultation (Figure 2.8 of the Main Consultation Document) and no explanation appears to have been provided as to why a longer route has been proposed in the submission documents.

4. Copper Trail

- 4.1.1 The current route of the Copper Trail, part of the National Cycle Route network, runs along a local road through the centre of the WNDA. This road will be closed during the construction works and it is proposed to divert the Copper Trail around the WNDA. Presumably to avoid a lengthy stretch of the route being diverted alongside the A5025, the diversion has been proposed to start well outside of the WNDA, at Llanfechell in the east passing around the western edge of the WNDA to Cemlyn in the west. The diverted route would be approximately 4.8km in length, compared to around 4.4km of the exiting trail which would be closed. Given the location of the WNDA and the construction activities, it is considered that the diversion is appropriate for the construction phase.
- 4.1.2 Once operational, it is proposed that the Copper Trail diversion will remain in the same position, and there does not appear to have been any consideration of providing cycle paths through the restored WNDA land and taking the Copper Trail away from the local road network. There appears to be land where a cycle route could be developed from Tregele and around the south-east corner of the Power Station site and then past the eastern side of Mound D. The Stage 3 Consultation also mentioned the provision of a dual cycle and footpath route into Cemaes (via Penrhyn on the north west corner of Cemaes, paragraph 2.7.2 of Main Consultation Document¹) but this does not appear to be included in the submission documents. The NACP believe that these options would improve the Copper Trail experience, and encourage cycling in the local area, by offering off-road cycling routes between Cemaes, Tregele and Cemlyn. The options could also support the shop at Tregele filling station by increasing passing trade.

5. Conclusion

- 5.1.1 Despite earlier proposals being put forward at consultation which more closely aligned with NACP's concerns no explanation has been provided as to why Horizon has not chosen to progress them. The NACP is therefore concerned that the diversions as proposed will reduce the attractiveness of the footpaths and lead to a consequential reduction in visitor spend within the shops and business of North Anglesey. The NACP has suggested alternatives to the routes as proposed and would like to see routes amended to reduce their length and their distance away from the coastline as far as possible. Whichever routes are chosen, the NACP would wish to see Horizon required to fund tourism initiatives in North Anglesey, to promote the area through funding for publicity and to develop a footpath network that is of a high standard, accessible and provides a measurable improvement over the quality of the existing network.

¹ <https://consultation.horizonnuclearpower.com/stage-3/documents>, accessed 28 November 2018

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