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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](#)
[NACP Tourism and recreation.pdf](#)
[NACP Traffic and Transport A5025 Treglele.pdf](#)
[NACP Traffic and Transport crosscountry routes.pdf](#)
[NACP Traffic and Transport other matters.pdf](#)

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: Temporary Construction Workers Accommodation

Summary

The NACP support the provision of temporary workers accommodation to help ease the pressure on tourist accommodation and housing stock in Anglesey, and in north Anglesey in particular. However, they do have concerns over the proposed provision of a single temporary worker's accommodation campus on one site, in the WNDA. They do not believe that this approach provides the correct balance between allowing local businesses to benefit from the temporary workers' presence and seeing local communities overwhelmed by the numbers of workers. The NACP also believe that the proposed single campus at the WQNDA will not bring about any direct legacy benefits, which was a key feature of Horizon's early consultations. The NACP support the use of the Rhosgoch site for temporary worker's accommodation in order to balance temporary workers across different communities, and to provide direct legacy benefits by leaving a serviced site at Rhosgoch ready for future development.

1. Introduction

- 1.1.1 The NACP area has hosted a Nuclear Power Station for over 40 years, with a 9-year construction project preceding this. In that time Wylfa A has been a good neighbour employing significant numbers of people and utilising many local businesses. The local population do however recall the building of Wylfa A and the influx of temporary workers and how that impacted on their community. The NACP support in principle the Wylfa Newydd project and recognise that the development of this project will require a large-scale construction project with many workers involved. The NACP also support the provision of temporary workers accommodation during the construction phase but have concerns over the placement of so many workers in a single location, and that legacy opportunities are being lost by not utilising other locations.

1.2 Context

- 1.2.1 The construction phase of the Wylfa Newydd project is estimated to require up to 9,000 temporary workers at the peak of activities. The provision of these numbers would require the use of workers travelling into the area as the local population could not provide all of the numbers or skills required. Horizon estimate that 2,000 of these workers would be local workers, and 7,000 would come from elsewhere. Of this 7,000, 3,000 would be housed within existing accommodation (tourist accommodation, rented bedspaces) and 4,000 would need to be housed in temporary workers accommodation.

- 1.2.2 In early stages of Horizon's public consultation exercises, their plan for temporary worker accommodation was to provide a number of campuses where accommodation would be developed for the temporary workers, including an on-site campus at the WNDA. For the off-site campuses, as well as providing appropriate temporary accommodation for construction workers, Horizon's approach was also to leave a direct legacy benefit in terms of permanent housing or tourism provision, or by improving infrastructure on the sites to facilitate future development.
- 1.2.3 The proposals changed significantly however between the Stage 2 and Stage 3 consultation exercises with the proposals for temporary workers accommodation changing from:
- ▶ 500: onsite at the WNDA
 - ▶ 3500: Kingsland/Cae Glas, Holyhead
 - ▶ 200: Madyn Farm, Amlwch
 - ▶ 1500: Rhosgoch
- 1.2.4 To the proposal for:
- ▶ 4000: onsite at the WDNA
- 1.2.5 Horizon state that the proposals for the 4000 staff at the WDNA would be incrementally constructed and then removed, so that the capacity provided matches the number of workers on site at any time. The proposals also include the provision of health, leisure and welfare services to support all 4000 potential workers.
- 1.2.6 This Written Representation will be relevant in the consideration of the following Written Questions:
- **Q10.1.5**
 - **Q10.1.16**
 - **Q10.1.22**
 - **Q10.1.26**

2. Impact of single campus

- 2.1.1 The provision of a single temporary workers campus, at the WNDA site, is acknowledged to bring benefits to Horizon. Workers will be located closer to the construction site, only one site will need to be prepared for development and there will be economies of scale in building a single campus in one location. However, the provision of a single campus also raises concerns with the local community due to the number of temporary workers involved. Figure 1.6 of the Community Impact Report (APP-435, Document 8.23) shows that for over 5 years during the construction program there will never be less than 1000 temporary workers staying within the site campus, and there will potentially be 4000 temporary workers for a period of 2 years within this time. This compares with the surrounding area where there are only 1,357 people resident in the Llandbadrig ward, and 1,545 people in the Mechell Ward (2011 Census data¹), which cover an area of 5,151 hectares (51.5 square kilometres) between them.
- 2.1.2 Information is supplied by Horizon on how it would be possible to manage up to 4000 temporary workers at the single campus. However, this approach places great emphasis on providing facilities on site to provide services and entertainment for all workers. If this approach was successful it

¹ UKCensusdata.com, viewed 22 November 2018.

would see minimal benefit for local businesses as temporary workers would be fully catered for in-campus. If the approach was not successful however, a single campus would see a large concentration of temporary workers all looking to the local community for entertainment, services and provisions. NACP's view is that there therefore needs to be a balance between the provision of services in-campus, and the need for local communities to benefit from the temporary workers in the area. One way to help achieve this would be to utilise more than one campus site and spread workers across different areas. This was what was proposed in the Stage 2 consultation, with temporary worker accommodation split between the WNDA, and three other ward areas. Different campuses would then see different local communities gain the benefit of the temporary workers, but the numbers looking to use each local community would be reduced avoiding them being overwhelmed. This is the principle which has adopted in the Hinkley Point C proposals which include one on-site campus and two in a nearby town.

3. Legacy benefits

- 3.1.1 The proposed use of a single temporary worker campus on the WNDA site would not bring about any direct legacy benefits to the local area. All elements of the campus would be removed from the site towards the end of the construction period, and the site's remote, undeveloped and environmentally sensitive nature would not be suitable for permanent development in any case.
- 3.1.2 From the Stage 1 consultation, Horizon presented a case where they promoted the potential for legacy benefits once temporary worker accommodation was no longer required. The Stage 2 consultation continued this theme with the legacy for each of the off-site campuses being identified as a key matter for consultation with "*considerable scope for influence*" being available (Table 1.3, Main Consultation Document²). The locations of the off-site campuses however were presented in the same table as being 'preferred sites' with a limited scope to influence the choice of sites. The NACP understood this to mean there was a good degree of certainty that these off-site campus locations would be used. This document identifies that buildings at Kingsland and Madyn Farm could be retained for permanent residential development and the buildings at Cae Glas could be used for holiday accommodation. Rhosgoch is not identified for any specific use but a legacy benefit was identified through the provision of a serviced site which would be available for future development once the temporary worker accommodation was removed (para 4.94 of Stage 2 Main Consultation Document).
- 3.1.3 Horizon's approach then changed completely in the Stage 3 consultation, with all of the off-site campus options being dropped and the single campus at WNDA proposed. Legacy benefits have changed to the provision of community benefit funds which could be used to support capital investment in the building of new housing provision. The Stage 3 consultation document also acknowledged that legacy benefits of local spend, and the leaving of a serviced site for Rhosgoch would not occur. The NACP are disappointed in the decision to drop the off-site campuses and concentrate development within the WNDA for the reasons outlined above. We understand from other submissions made to the Examining Authority that similar concerns have been raised by others, including the Isle of Anglesey County Council and Land and Lakes.

² <https://consultation.horizonnuclearpower.com/stage-2/technical-documents>, accessed 28 November 2018

3.2 Rhosgoch

- 3.2.1 The NACP are particularly disappointed in the decision to drop the Rhosgoch site from the proposed campus locations due to its location within the NACP area and the length of time which has passed since Shell left the site and it became available for redevelopment.

Background

- 3.2.2 The site is a 192 hectare brownfield site, formerly used by Shell as a transfer site for oil being delivered by shipping tankers. The oil was pumped from the tankers via an offshore connection, up to Rhosgoch, before being pumped through pipelines to the Stanlow refinery at Ellesmere Port. The site was closed in 1990 when it became possible for Shell to utilise an oil terminal at Tranmere, closer to Stanlow. Since that time, the site has been promoted as available industrial land but has remained unused. NACP believe that is inappropriate to continue to try and promote the site for industrial uses given the lack of success in this regard since 1990. As discussed further below, there is plentiful industrial land available in existing and allocated industrial plots and the use of Rhosgoch for an alternative use would not impact on supply of industrial land required in Anglesey. The opportunity to be provided by Horizon for the site was seen by the NACP to be key to regaining momentum in the re-use of the site following 28 years without any proposals being realised.

Policy situation

- 3.2.3 Rhosgoch is allocated within the JLDP and the Wylfa Newydd SPG as a reserve site for industrial uses and these reserves sites are identified primarily to assist with Wylfa Newydd or Energy Island developments. The wording of the policy indicates that they could also be used for non-Wylfa Newydd/Energy Island developments, if other allocated sites weren't appropriate, or after a Wylfa Newydd/Energy Island use had finished. Any use, whether Wylfa Newydd, Energy Island or other, would have to in one of the B1 (general industrial), B2 (light industrial) and B8 (storage) categories to comply with the policy.
- 3.2.4 This allocation was based on background work contained with the 'Economic and Employment Land Review) report undertaken by URS/Scott Wilson in 2012, and 'North Wales Regional Employment Land Strategy' by Over Arup in 2014. The 2012 report identifies that there is insufficient evidence available for Rhosgoch to be allocated as anything other than a reserve site, and that more detailed feasibility and viability studies would be needed to allow a different allocation, other than reserve employment, to be taken.
- 3.2.5 The 2014 report identified Rhosgoch as one of 23 shortlisted sites for strategic (large scale) industrial development. These sites were marked under a high-level assessment process and Rhosgoch scored the lowest. The site was also identified as being of interest to Centrica as a location for a converter station linked to the Rhiannon Offshore Wind Farm proposals (which has not been taken forward). With a low score, and a potential commitment to development at the time, it was considered that anything higher than a reserve allocation would be inappropriate (as it would be unlikely to come forward for development).
- 3.2.6 The 'reserve' allocation in the JDLP and SPG shows that the site is not as important to the supply of industrial land as other sites are, with the JDLP also showing that there is 417ha of land allocated across 14 other sites in Anglesey for industrial development. The lack of information about the site identified in the background reports, and the low score received on the regional study, suggests that an industrial allocation has little basis. Horizon's submissions show that the Rhosgoch site is not being considered for other uses connected with Wylfa Newydd and therefore the site is reliant on Energy Island developments if it is to be developed in line with policy. This situation puts

Rhosgoch in a very restricted position, as there is a very limited set of circumstances where the site could be developed in line with policy:

- There is no timescale put on Rhosgoch's reservation for Energy Island use, meaning the site could be held indefinitely;
- If not proposed for Energy Island use, 14 other industrial sites (or 417ha of land) in Anglesey would need to be unavailable or inappropriate before policy would support an industrial proposal;
- The background documents show the site scores lowly for potential industrial use, but policy does not support any other type of use.

3.2.7 The JLDP also looks at allocations for other types of development (tourism, housing, etc) but Rhosgoch does not appear anywhere else in the plan and it also does not appear in any of the background topic papers produced as evidence for the JLDP. In conclusion, although Rhosgoch is not allocated for other uses, it does not appear that it has actually been assessed and found inappropriate.

NACP position

3.2.8 The NACP believe that the use of Rhosgoch as a temporary workers accommodation campus would provide the following benefits:

- Temporary workers would be located in more than one location, meaning that businesses across a wider range of communities have more chance of benefiting from their presence, but with less chance of being overwhelmed. For example, Treglele, Cemaes, Llanfechell, Amlwch and Rhosgoch could all benefit from campuses at Rhosgoch and the WNDA.
- The clearance of the existing site, and infrastructure improvements needed to accommodate temporary workers (access point upgrades, and power, communications, water and sewage connections) would see the site become more attractive to prospective developers (for a number of different uses). This would provide a real legacy benefit for the area.

3.2.9 One example of an alternative use could be as a 'destination holiday village' development. A prior use as a temporary workers campus would mean that the site is cleared and ready for this type of development, and appropriate levels of services would be in place on site to accommodate the subsequent holiday village development. Subject to the accommodation design used in the temporary workers campus, it could also be possible to re-use the original buildings and avoid unnecessary demolition and construction impacts.

3.2.10 Tourism policy in the JLDP does not specifically address this type of development proposals, which could be both a tourist attraction in its own right, and a large scale un-serviced tourist accommodation site, although certain elements of the policies which are in place would be relevant. Strategic Policy PS14, states that support will be given to proposals which help achieve a year-round tourist provision, and in doing this large scale, active and sustainable tourism development should be focused on the sub-regional, urban and local services centres, but also that new tourist provision would be supported in sustainable locations in the countryside, particularly where they would also benefit local communities and economy.

3.2.11 Policy TWR1 goes on to state that new visitor attractions and facilities will be encouraged within the development boundary (town and village limits) but where there are no suitable opportunities here, proposals will only be granted where they involve:

- The re-use of a previously used site; and

- They comply with the following criteria:
 - ▶ Scale, type and character of development is suitable for its location;
 - ▶ A high quality of design, layout and appearance;
 - ▶ The support and extension of a large range of facilities within the area; and
 - ▶ It is supported by evidence to demonstrate there would be local employment opportunities.

3.2.12 Rhosgoch would be using a previously used site and could be designed so that it meets the first 2 criteria. It would also be likely to provide additional leisure facilities not available in the area and support long-term, stable, local employment.

3.2.13 Policy TWR3, which relates to the chalet sites, is also likely to be relevant given the expected type of accommodation that could be provided. This policy states that new sites for this type of development would be refused within AONBs or Special Landscape Areas, neither of which is relevant to Rhosgoch.

3.2.14 In other locations, proposals would be granted where:

- It does not intensify this type of accommodation provision in the locality;
- It is of a high quality design, in a unobtrusive location and can be readily assimilated into the landscape;
- It is close to the main highway network and adequate access can be provided.

3.2.15 A development of this nature at Rhosgoch would offer a different type of tourism and accommodation offer than anywhere else on Anglesey and as such could not intensify this type of provision in the locality. Notwithstanding this, there are only a few caravan parks nearby, with small sites at Llanfechell, Capel Parc and Llanellian.

3.2.16 The Rhosgoch site is also relatively unobtrusive, with the land set in a valley feature restricting visibility. The entrance to the site is well screened with existing tree cover and visibility is restricted to a few isolated properties and some local public rights of way. It would be expected that any development would be accompanied by a landscaping scheme which would further assimilate the proposals into the local landscape.

3.2.17 The site is not located far from the main highway network, just a few minutes' drive from the A5025. However, the roads leading to Rhosgoch are small, rural roads and work would be needed on some road and junction improvements and a traffic management plan.

4. Conclusion

4.1.1 The NACP believe that there is reasonable policy support for a potential tourism development at the Rhosgoch site, and that the site is generally appropriate for a project of this nature. This would increase the tourism offer in North Anglesey and provide permanent employment opportunities. NACP therefore believe that the previous proposals provided by Horizon to utilise the Rhosgoch site would help to deliver real legacy benefits to the local area and without this support an opportunity of this scale is likely to be lost. NACP requests that Horizon revisit their temporary worker accommodation plans and take the points made above into account.

Issued by**Neil Marlborough****Approved by****Sue Birnie****Copyright and non-disclosure notice**

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