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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 Tregele.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 Tregele
 - 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: Local economic opportunities

1. Introduction

1.1.1 The NACP area hosted the Wylfa A nuclear power station for over 40 years, with the construction phase adding a further 9 years on to this. In that time Wylfa A has been a good neighbour employing significant numbers of people and utilising many local businesses. The NACP support in principle the Wylfa Newydd project and the opportunities this should provide to local people. They believe that local people and businesses should be prioritised wherever possible in order to maximise the benefits to the local area.

1.1.2 This Written Representation will be useful in the consideration of the following Written Questions which all relate to local employment and supply chain opportunities.

- ▶ **Q10.2.4**
- ▶ **Q10.2.5**
- ▶ **Q10.2.16**
- ▶ **Q10.2.22**
- ▶ **Q10.2.23**

1.2 Context

1.2.1 Wylfa A is seen as a great success in terms of providing employment for local residents, with Horizon's Socio-Economic work identifying that around 97% of operational employees for Wylfa A lived in Anglesey (APP-096, Doc 6.3.9 App C1-2, para 2.3.4). No information appears to be available regarding the construction workforce for Wylfa A, although anecdotal accounts from the local community describe a large number of migrant workers coming into the area and taking up employment.

1.2.2 The same document also includes details of the construction employment for Sizewell B. Although a different reactor type with different construction requirements, it is the most recent nuclear new build scheme in the UK to be completed. Paragraphs 2.3.14 and 2.3.15 of the document explain that Sizewell B's peak construction employment in 1992 was around 5000 staff, and 2,000 of these were recruited locally. It also states that peak construction accounted for around 10% of total employment in the Suffolk District area. It is explained how conditions were attached to the consent document, requiring a proportion of employees to be recruited locally and that local firms should benefit from the construction project. These conditions were considered to be key to maximising local benefits.

2. Local opportunities

2.1.1 The main reason for the NACP's in-principle support for Wylfa Newydd is the economic opportunities that would result, and the benefits that could accrue for local communities from these opportunities. However, if this is to be realised it must be possible for local people and businesses to maximise the take-up of these opportunities so that the economic benefits do not leach away from the local area.

2.1.2 The proposed construction workforce of up to 9,000, is far higher than the proposed construction workforce required for Hinkley Point C (5,600), than was used at Sizewell (5,100 APP-096, Doc 6.3.9 Table 2-3) or proposed for Moorside (6,500, Moorside PEIR para 2.3.2). The NACP understand that Horizon are proposing different nuclear technology than at other sites, but the difference in construction worker numbers is significant. If the actual worker numbers were to be lower than estimated, the local employment opportunities would also be lower.

2.1.3 The NACP is also concerned that the present proposals within the Jobs and Skills Strategy, for employment and training purposes, do not provide a focus on local employment or the training of local people to be in a position to take the jobs created. The proposals that are included seem to focus more on education and training for young people, rather than adults; All of the information contained is very generic and whilst it does mention providing for local people, it does not appear to give any actual priority or urgency to the promotion of local employment.

2.1.4 The NACP has not been able to find information within the submission about how the supply chain for Horizon would be developed and how the promotion of local companies within this would be prioritised. We note the IACC's comments in the Relevant Representation that a Supply Chain Action Plan is being developed by Horizon, but that it was not submitted with the DCO application and the draft versions IACC had seen were not very well developed.

2.1.5 The matter of labour displacement is briefly mentioned within the DCO submission, but appears to be given relatively low importance. There is a small section on the issue in the Jobs and Skills Strategy, where all emphasis is placed on the Wylfa Newydd Employment and Skills Service being opened up to any employer facing this situation. The NACP note that IACC has also raised this issue as a concern. The matter does not properly address other sectors outside of the construction sector, and the likelihood that people will see jobs at Wylfa Newydd as more secure and well-paid in comparison to other positions in sectors such as administrative, support services and health and social care. The NACP do not feel confident that the matter has been given appropriate weight in the DCO application, and that this situation leaves local employees at potential risk of losing staff they have trained and developed themselves.

2.1.6 If local people and companies are not able to maximise the opportunities available, the economic position of local residents is likely to be at odds with the temporary worker population leading to negative indirect effects. Horizon identify that over 1,500 temporary workers will seek accommodation in the private rental sector or by buying properties (APP-412, Document 8.4). The average full-time salary on Anglesey is £26.4K and in Gwynedd £28.6K (2017 figures ONS) with the UK average being £35.4K. Anglesey also has a far lower GVA per head than neighbouring Welsh regions, Wales as a whole or the UK, at £13,411 per head (Wales is £18,002 per head) (APP-095, Document 6.3.8). The NACP are therefore concerned that well paid construction workers will be competing with lower paid local people for accommodation and local people will lose out. The NACP do not consider the current mitigation proposals to have addressed this issue adequately.

3. Conclusion

3.1.1 The NACP are concerned that there is not sufficient focus upon local people and companies in the current submitted documentation, which may mean that benefits to the local communities are not fully realised. The NACP would like to see the Jobs and Skills Strategy revised to show more focus on local people, and for the Supply Chain Action plan to be submitted as part of the DCO process for examination.

Issued by



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Approved by



Sue Birnie

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