

Statement of Local Impact Report by Gwynedd Council

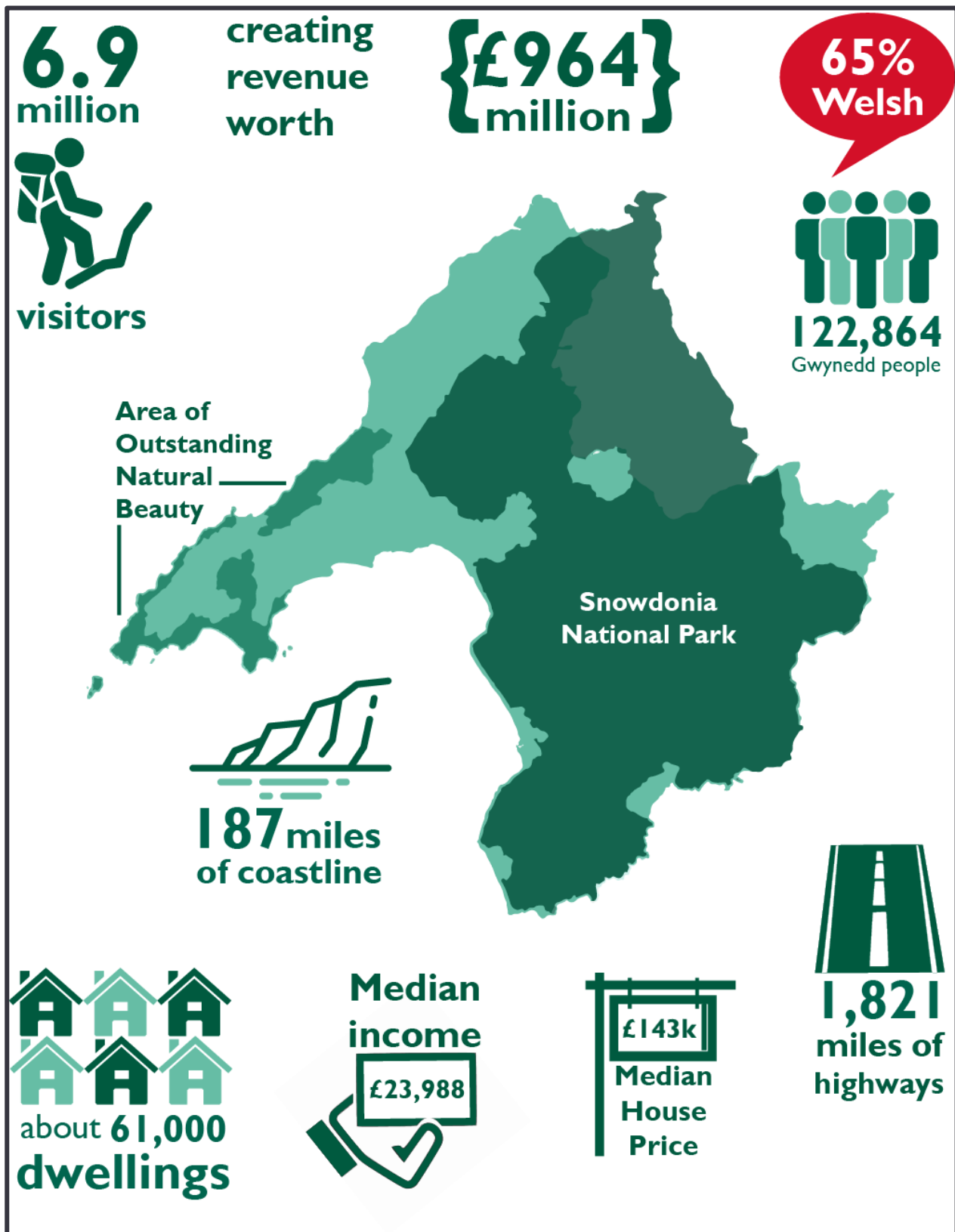
1. Introduction

- 1.1 On 28 June 2018 The Planning Inspectorate confirmed that Application ref. EN010007 by Horizon Nuclear Power (Horizon) for Wylfa Newydd Nuclear Power Station had been accepted for examination.
- 1.2 Gwynedd Council (GC) has also been notified that as a local authority it does not fall within the categories of S102(6&7) of the Planning Act 2008 given that the application site is not within its boundary nor, in the opinion of the Planning Inspectorate, is Gwynedd considered to have part of a boundary with the host authority.
- 1.3 Irrespective of its status under S102 (6&7) GC, based on its local knowledge and the information contained in the Development Consent Order Application, has considered the local impacts of the application upon the county, which are set out within this Statement of Impact Report dated 4 December 2018.
- 1.4 It is noted that GC acknowledges the potential for the Power Station to bring positive economic and social benefits to Anglesey, Gwynedd and the wider area. However, GC has consistently identified areas of concern over certain aspects of the development, which will require mitigation and/or a precautionary approach requiring further discussion and agreement with relevant bodies reflected in the final proposals. In discussion with our partners, we are not confident that significant issues related to accommodation, transport, skills and employment, the Welsh language and public services have been adequately examined and addressed.

2. Gwynedd

A profile of Gwynedd

- 2.2 Taken from the Council's 2017 – 2018 Strategic Plan, the diagram on the next page provides an 'at a glance' statistical profile of the County.



A snapshot of resident's views

The following table provides a taste of what Gwynedd's residents stated during recent public consultation workshops undertaken to prepare the Gwynedd and Anglesey Well-being Plan 2018:

What makes the area a good place to live:	What's not so good:
<ul style="list-style-type: none"> • The natural environment around us • The views • Welsh area and being able to use the language • A good feeling of community spirit • Feel that the area is safe 	<ul style="list-style-type: none"> • Lack of good quality jobs • Public transport • Distance from services and facilities • High cost of local housing • The appearance of the streets
What improves well-being in your area and contributes towards your quality of life:	What would you change about your area to make it a better place to live:
<ul style="list-style-type: none"> • Opportunities to do activities in the open air • The community spirit of the area • Family / Friends / Neighbours • Natural environment • Local facilities 	<ul style="list-style-type: none"> • More jobs with higher salaries • Better public transport • More local activities • Improve local facilities • Improve the appearance of the streets

GC's well-being objectives as set out in its Well-being Statement (2018) are to ensure that Gwynedd residents can –

- i. Enjoy happy, healthy and safe lives
- ii. Live in quality homes within their communities
- iii. Earn a sufficient salary to be able to support themselves and their families
- iv. Receive education of the highest quality which will enable them to do what they want to do
- v. Live with dignity and independently for as long as possible
- vi. Live in a natural Welsh society
- vii. Take advantage of the beauty of the County's natural environment.

3. Project Proposals

3.1 The Applicant seeks a DCO to authorise the construction and operation of Wylfa Newydd, a new nuclear power station on Anglesey with a capacity of up to 3100 megawatts, and associated development ('Wylfa Newydd DCO Project'). The principal components of the Wylfa Newydd DCO Project are:

- a. The Power Station which includes two UK Advanced Boiling Water Reactors, the Cooling Water System, supporting facilities, buildings, plant and structures, radioactive waste and spent fuel storage buildings and a connection to the national grid.
- b. Other on-site development including landscape works and planting, drainage, surface water management systems, public access works including temporary and permanent closures and diversions of public rights of way, new Power Station Access Road and internal site roads, car parking, construction works and activities including construction compounds and temporary parking areas, laydown areas, working areas and temporary works and structures, temporary construction viewing area, diversion of utilities, perimeter and construction fencing, and electricity connections.
- c. Marine Works comprising:

- Permanent Marine Works including the Cooling Water System, the Marine Off-loading Facility, breakwater structures, shore protection works, surface water drainage outfalls, waste water effluent outfall (and associated drainage of surface water and waste water effluent to the sea), fish recovery and return system, fish deterrent system, navigation aids and dredging.
- Temporary Marine Works including temporary cofferdams, a temporary access ramp, temporary navigation aids, temporary outfalls and a temporary barge berth.

d. Off-site Power Station Facilities: comprising the Alternative Emergency Control Centre, Environmental Survey Laboratory and a Mobile Emergency Equipment Garage.

e. Associated Development comprising:

- the Site Campus for worker accommodation within the Wylfa Newydd Development Area;
- temporary Park and Ride facility at Dalar Hir for construction workers;
- temporary Logistics Centre at Parc Cybi;
- the A5025 Off-line Highway Improvements;
- Wetland habitat creation and enhancement works at Tŷ Du, Cors Gwawr and Cae Canol-dydd.

3.2 The DCO application also seeks various other powers including provisions permitting the compulsory acquisition of interests and rights in land, the temporary use of land, interference with rights and the closure or diversion of streets and other public rights of way including the permanent closure of Cemlyn Road.

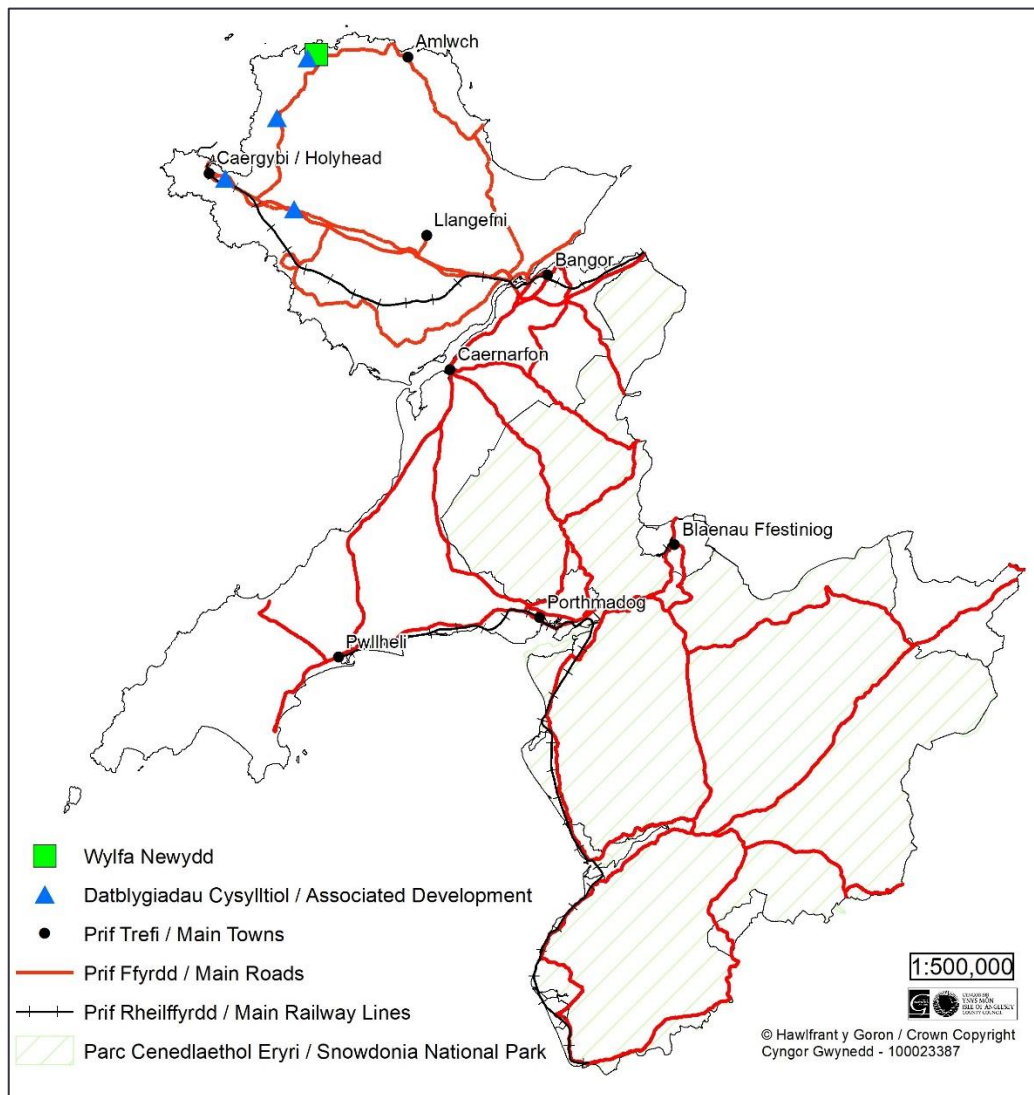
4. Power Station location in relation to Gwynedd

4.1 The Wylfa Newydd Power Station site and its associated development sites (described in 3 above) are located in the adjacent administrative area of the Isle of Anglesey County Council. The Power Station site is on land on the northern coast of the Island and is within the control of Horizon. The associated development sites are located at various locations on the Island.

4.2 The Menai Straits forms the boundary between the north- eastern boundary of the administrative area covered by Gwynedd Council and the southern boundary of the administrative area covered by the Isle of Anglesey County Council. The Power Station site is about 51km from Bangor, which is Gwynedd's main Service Centre and located on the Menai Strait. Currently, vehicular access between the Counties is provided by Britannia Bridge and the Menai Suspension Bridge, with the former also providing a rail link. Map 1 below shows the spatial relationship between the Power Station Site, its associated development and Gwynedd.

4.3 The development area and its associated development will not directly impact upon Gwynedd although it is considered that there could be positive, neutral or negative indirect effects upon the County in respect of:

- Impacts upon the general economy with particular reference to the tourist economy;
- Social and community impacts including upon the Welsh language;
- Impacts upon the demand for housing for the workforce associated with the construction and operation of the power station; and
- Transport and traffic impacts upon the highway network
- Impacts on public services



5. Appraisal of planning policies and documents applicable to Power Station proposals

- 5.1 GC acknowledges the nationally important role that low carbon energy generation plays as outlined in NPS EN-1, and that no part of the proposed Power Station or its associated development would be physically located inside the administrative area of Gwynedd. It therefore also acknowledges that the impacts of the scheme fall entirely on the local communities of Anglesey, provided that the assumptions made by Horizon and their suggested mitigation and compensation measures are correct. EN-1 states that consent shouldn't be granted unless the Examining Authority is satisfied that the project will avoid significant adverse impacts on, for example, health and quality of life of communities. Based on concerns around matters highlighted in 4 above it is considered by GC that the adopted development plan as well as other documents and strategies produced by GC and partners should be included as material considerations when considering this application.

National Planning Policy

Planning Policy Wales

- 5.2 It sets out the land use planning policies of the Welsh Government. It translates the Government's commitment to sustainable development into the planning system so that it can play an appropriate role in moving towards sustainability. PPW, the TANs, circulars and policy clarification letters comprise national planning policy. National planning policy should be taken into account in the preparation of development plans. It may be material to decisions on individual planning applications and will be taken into account by the Welsh Ministers and Planning Inspectors in the determination of called-in planning applications and appeals.
- 5.3 Of particular relevance, PPW, underpinned by the Well-being goals, confirms the presumption in favour of sustainable development. It promotes places that promote economic, social, environmental and cultural well-being by:
- providing well-connected employment and economic development in pleasant surroundings. These places are designed and sited to promote healthy lifestyles and tackle climate change by making them easy to walk and cycle to and around, access by public transport, minimising the use of non-renewable resources and using renewable and low carbon energy sources;
 - providing well-connected cohesive communities for all sectors of society, allowing everyone to have a good quality of life by living in strong and safe communities, improving access to services, cultural opportunities and recreation facilities to support people to adopt healthy lifestyles, securing socially inclusive development and more cohesive communities; and
 - valuing the quality of landscapes and historic environment, future proof economic assets both in response to the challenges presented by climate change and in promote low carbon solutions, protecting landscapes and habitats, enabling opportunities for connecting with the natural environment and encouraging healthier lifestyles with the benefit of improving physical and mental well-being.

Technical Advice Notes

- 5.4 As described above, TANs form part of national planning policy, and therefore may be material to decisions on planning applications. From GC's perspective, of particular relevance are: TAN 2: Planning and affordable housing; TAN 18: Transport; TAN 20: Planning and the Welsh language; TAN 23: Economic development

The adopted Joint Local Development Plan:

- 5.5 The following policies of the Anglesey and Gwynedd Joint Local Development Plan 2017 are considered to be of relevance to Horizon's proposal from the perspective of the Council. The full wording of the policies referred to below are in Appendix A.

Strategic Policy PS 1: Welsh Language and Culture

- 5.6 Of particular relevance here is criterion 2, (which is linked to criterion 4 of Strategic Policy PS 5), *'Requiring a Welsh Language Impact Assessment, which will set out how the proposed development will protect, promote and enhance the Welsh Language, where the proposed development is on an unexpected windfall site for a large scale housing development or large scale employment development that would lead to a significant workforce flow'*

Strategic Policy PS 2: Infrastructure and Developer Contributions

- 5.7 Of particular relevance here is *'The Councils will expect new development to ensure sufficient provision of essential infrastructure (either on-site or to service the site) is either already available or*

provided in a timely manner to make the proposal acceptable, by means of a planning condition or obligation’... and...

‘Where the essential, enabling and necessary infrastructure is required as a consequence of a scheme and cannot be provided on site, financial contributions will be requested, within limits allowed by legislation, to get essential investment off site’.

Policy ISA 1: Infrastructure Provision

- 5.8 Of relevance here is *‘Proposals will only be granted where adequate infrastructure capacity exists or where it is delivered in a timely manner. Where proposals generate a directly related need for new or improved infrastructure and this is not provided by a service or infrastructure company, this must be funded by the proposal. A financial contribution may be sought to secure improvements in infrastructure, facilities, services and related works, where they are necessary to make proposals acceptable. Where appropriate, contributions may be sought for a range of purposes, including: 1. Affordable housing...4. Employment and training facilities..6. Transport infrastructure including public transport’..12 Welsh language measures.*

Strategic Policy PS 4: Sustainable Transport, Development and Accessibility

- 5.9 Of particular relevance here is Part 2 in relation to Transfer between Transport Modes. Part 2 ii. states *‘Strategically located permanent park and ride facilities within or adjacent to Centres or in other locations close to the main highway network when it can be demonstrated that no alternative sites closer to the Centres are suitable, where customers are supported by frequent bus services between the facility and the destination’...and...*

Part 2 v. states *‘Facilities for park and share in appropriate locations within or adjacent settlements on the strategic highway network’.*

Policy TRA 4: Managing Transport Impacts

- 5.10 This policy seeks where appropriate that *‘proposals should be planned and designed in a manner that promotes the most sustainable modes of transport having regard to a hierarchy of users’ and that...*

‘Proposals that would cause unacceptable harm to the safe and efficient operation of the highway, public transport and other movement networks including pedestrian and cycle routes, public rights of way and bridle routes, will be refused. The degree of unacceptable harm will be determined by the local authority on a case by case basis’.

Strategic Policy PS 5: Sustainable Development

- 5.11 Of relevance here is *‘Development will be supported where it is demonstrated that they are consistent with the principles of sustainable development. All proposals should...4 ‘Protect, support and promote the use of the Welsh language in accordance with Strategic Policy PS 1’...6. ‘Protect and improve the quality of the natural environment, its landscapes and biodiversity assets, including understanding and appreciating them for the social and economic contribution they make’...and*

‘Proposals should also where appropriate: 9. Meet the needs of the local population throughout their lifetime in terms of their quality, types of tenure and affordability of housing units...11. Support the local economy and businesses by providing opportunities for lifelong learning and skills development in accordance with Strategic Policy PS 13... 12. Reduce the need to travel by private transport and encourage the opportunities for all users to travel when required as often as possible by means of alternative modes, placing particular emphasis on walking, cycling and using public transport’.

Strategic Policy PS 9: Wylfa Newydd and Related Development

- 5.12 This policy is particularly relevant in GC in that it states that it will take a number of matters included in this Policy into consideration in preparing their Statement of Local Impact. The relevant considerations include criteria 3, 5, 7, 9, 12 and 16:

'3. Highways and transport proposals for the Wylfa Newydd Project form part of the integrated traffic and transport strategy that has regard to Strategic Policy PS 4 and any relevant detailed Policies in the Plan and minimises adverse transport impacts to an acceptable level, including those arising during the construction, operation and decommissioning stages, and any restoration stages.....

5. The accommodation requirements of construction workers should be met in a way that minimises impact on the local housing market, including the ability of those on low incomes to access the private rented sector, affordable housing and other housing services (taking account of the published Local Housing Market Assessment), and not result in unacceptable adverse economic (including the tourism sector), social, linguistic or environmental impacts.....

7. Proposals for campus style temporary workers accommodation, logistics centres and park and ride facilities will also be assessed against the criteria set out in Policies PS 10 - 12;

9. 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.....

12. All proposals shall be appropriately serviced by transport infrastructure including public transport and shall not have adverse impacts on local communities and tourism and this shall be demonstrated in a transport assessment. Where there is insufficient transport linkage or the road network does not have sufficient capacity to accommodate the level of traffic which will result from any development or an adverse impact is predicted, appropriate improvements to the transport network and the provision of sustainable transport options shall be provided to mitigate the impacts;

16. It is possible that as the project develops, due to unforeseen consequences resulting from the construction and operation of the Wylfa Newydd Project, the Councils may require additional information from, or works to be carried out by the developer in order to off-set any additional impacts or burdens borne by the community affected. The developer should build in review mechanisms in order to monitor the full range of impacts, to review the adequacy of mitigation or compensation measures and to make adjustments as necessary.

Strategic Policy PS 10: Wylfa Newydd – Campus Style Temporary Accommodation for Construction Workers

- 5.13 This policy is concerned with the adequacy of proposed temporary accommodation and is particularly relevant to GC in respect of the criteria 1, 2, 3 and 5 and will require that:

1. the developer can firstly demonstrate that the proposal satisfies a demonstrable need for temporary accommodation for construction workers that cannot be met through either existing residential accommodation, or the re-use of existing buildings, or the provision of new permanent buildings capable of being adapted for permanent use following their use by construction workers; and

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

3. the proposal must include appropriate mechanisms to mitigate any adverse impacts of the proposed development on the Welsh language and culture or a contribution is made towards mitigating those impacts

Strategic Policy PS 12: Wylfa Newydd - Park and Ride and Park and Share Facilities

- 5.14 Of particular relevance in minimising travel by private car through a location:
- i. within or adjacent to development boundaries of Centres located along or close to the A5/ A55; or*
 - ii. in other locations along the A5/A55 where the site is part of a comprehensive approach to mitigating the transport effects of the Project, takes account of the Councils' preference to consider sites closer to Centres*

Strategic Policy PS 14: The Visitor Economy

- 5.15 Particularly relevant is part 5: *'Preventing development that would have an unacceptable adverse impact on tourist facilities, including accommodation.....'*

Policy TAI 14: Residential Use of Caravans, Mobile Homes or Other Forms of Non-Permanent Accommodation

- 5.16 Of particular relevance here are criteria 1, 4 and 6. *'1. The siting is for a limited period of time, and is required to accommodate temporary workers during construction.....or ii. the site is located so as to minimise the need to travel and promotes the use of sustainable transport modes.....*
- 4. The site is located so as to minimise the need to travel and promotes the use of sustainable transport modes*
- 6. It can be demonstrated that the proposal would not have a significant detrimental impact on the tourism industry;*

Other material documents and strategies

- 5.17 **Gwynedd Council Plan 2018 – 2023**, which sets out the GC's vision and priorities for the period between April 2018 and the end of March 2023. There are several elements to the Plan:
- **Improvement Plan**, which outlines GC's Improvement Priorities and 7 Well-being Aims
 - **Departmental Plans**, which describes all GC's day to day work; and lastly GC's
 - **Well-being Statement**, which expands on GC's Well-being Aims in accordance with Well-being of Future Generations Act 2015.
- 5.18 Of particular relevance:
- i. Gwynedd faces several challenges in the housing field including an ageing population and changes in benefits, but opportunities also exist, and therefore intends to target areas where different types of houses need to be developed particularly for older people and young people;*
 - ii. There is a high number of HMOs in Bangor, which negatively affect the appearance of the city, higher number of empty homes outside term time, and reduction in housing stock available for local residents;*
 - iii. One of the priorities in the associated Improvement Plan is to improve conditions to create a viable and prosperous economy, whilst aiming to secure more jobs offering good salaries;*

- iv. Another of the priorities is to ensure that GC encourages and promotes the ability of the people of Gwynedd to live their lives through the medium of Welsh.
- 5.19 **Gwynedd Well- being Assessment**, which is sub- divided into sub- areas, including Bangor and Caernarfon that lie within the KSA. Having considered the data and the views of local people, the Gwynedd and Anglesey Public Services Board concluded that the key messages of the assessment were as follows:
 - 1. The need to maintain a healthy community spirit
 - 2. The importance of protecting the natural environment
 - 3. Understanding the effect of demographic changes
 - 4. Protecting and promoting the Welsh language
 - 5. Promoting the use of natural resources to improve health and well-being in the long-term
 - 6. Improving transport links to enable access to services and facilities
 - 7. The need for good quality jobs and affordable homes for local people
 - 8. The effect of poverty on well-being
 - 9. Ensuring an opportunity for every child to succeed
- 5.20 **Gwynedd and Anglesey Well- being Plan 2018**, see section for the Plan’s objectives.
- 5.21 **Emerging Gwynedd Local Housing Market Assessment 2018**, describes socio- economic conditions prevalent in the County, provides information about the cost and affordability of housing, provides recommendations about measures to improve housing market balance in the long – term, specifies the housing need in the County, etc.
- 5.22 **Welsh Language Promotion Plan 2018** has been developed in response to the statutory obligation to publish a language strategy that explains how the Council intends to promote and encourage the use of the Welsh language in the county. It sets out the current opportunities available to promote and increase use of the Welsh language as a natural part of everyday life in the county, and also reflects the Council’s wider commitments in relation to the Welsh language, in areas such as education, planning and care and social services, and complements the priorities noted in the **Gwynedd Council Plan** and the **Gwynedd and Anglesey Well-being Plan**. Of particular relevance are the factors that have been identified that need to be counteracted to increase the opportunities available to people in all parts of the county to use and feel a connection with the language. These factors are: Geographical challenges; Mobility and migration; Transferring the language within the family; Losing Welsh-speakers after 16 years of age; The status of the Welsh language as a language of business; Opportunities and support for learners; Technological influences; People’s confidence in their own ability and skills.

6. Potential Local Impacts

6.1. Highways and Transport

Context

- 6.1.2 The Wylfa Newydd Project is located on the Isle of Anglesey and, as such, a proportion of vehicular traffic will have to travel through GCs area of the highway network to access the site. This vehicular traffic will comprise:
 - ▶ A proportion of the anticipated worker traffic during construction;
 - ▶ Heavy Goods Vehicles (HGVs) and Abnormal Indivisible Loads (AILs) during construction; and

- ▶ A proportion of the anticipated operational traffic.
- 6.1.3 Of particular concern to GC are the flows of traffic during the construction period travelling through the area and associated, related effects.
- 6.1.4 The main areas of the highway network of concern to GC are:
- ▶ The A55 is a trunk road linking Holyhead with the North Wales coast via the Menai Straits Bridges. The A55 has two lanes in each direction except at the Britannia Bridge which has a single lane in each direction;
 - ▶ The two Menai Strait Bridges. The Britannia Bridge has existing periods of congestion; the Menai Bridge is unsuitable for HGVs, and both close due to bad weather on occasion; and
 - ▶ Local Highways in the County and roads in towns, such as Bangor and Caernarfon. The A487 through Caernarfon can suffer congestion in summer periods with tourism traffic. Some areas of the local highway network suffer from fly-parking.
- 6.1.5 There are two road bridges that link Anglesey to the mainland. The Britannia Bridge provides the strategic route onto the island carrying the A55. The Menai Bridge provides an alternative link to the island carrying the A487 and is located to the northeast of the Britannia Bridge. Both bridges can suffer from traffic delays during peak periods, which include the main holiday season as well as typical commuting peaks. The Britannia Bridge is a double-deck structure, providing a single carriageway with one lane in each direction on the upper deck and a single-track railway line on the lower deck. The dual carriageway approaches of the A55 on either side of the bridge have two lanes in each direction, which reduce to a single lane in each direction for the crossing. This leads to reduced capacity over this short section of the A55.
- 6.1.6 Traffic delays can occur in the morning and evening peak periods across the Britannia Bridge. These delays are generally tidal in nature, towards the mainland in the morning and towards Anglesey in the afternoon. Delays increase during summer holiday periods and when ferries from Ireland dock at Holyhead and large numbers of vehicles disembark and travel eastwards towards the mainland.
- 6.1.7 Morning peak queuing near the Britannia Bridge commences eastbound around 08:00 and continues until after 09:00. At its peak, eastbound queuing reaches midway between Junction 8a and Junction 8. In the evening peak, westbound queuing commences around 17:15 (with short period queuing after 16:30) and continues until 18:00. At their maximum, these queues can extend back to Junction 9 on the A55, with further queuing on the A487 on-slip back towards and occasionally onto the roundabout at the bottom of Faenol Hill (A487/A4087/B4547).
- 6.1.8 The A487 via the Menai Bridge provides an alternative route between the mainland and Anglesey. It is a single carriageway road with one lane in each direction and is not appropriate for use by HGVs given the limited overhead clearance between the carriageway and the bridge structure.
- 6.1.9 Both bridges can be closed in bad weather conditions, both to all vehicles or just high-sided vehicles
- 6.1.10 GC is also concerned that because of workers gaining access to the site and the proposals to encourage use of shuttle buses and car-share, there could be an increase in fly-parking adjacent to the main routes through the County and in the main towns of Bangor and Caernarfon. Fly-parking is already a concern on the county highway network in locations such as the A4244, Llys y Gwynt; the Class 3 Road off Junction 12 on the A55; Ty Mawr roundabout A4244/B4547/B4366; the A4086, Caernarfon Road, Bangor and the A4244, Felin Hen. Because of its concerns, GC has applied for, and has been successful in gaining, planning approval for Park and Share facilities in both the Bangor and Caernarfon areas.
- 6.1.11 In the Horizon Transport Assessment (Application Reference Number: App-101) it states that an analysis of existing accident data was undertaken based upon the average of the last five years of available STATS19 data (i.e. 1 January 2011 to 31 December 2015 inclusive). Accident clusters were identified on the following assessed road sections relevant to GC:

- ▶ A55 Junction 12 to Britannia Bridge;
- ▶ Britannia Bridge to A55 Junction 6;
- ▶ A5 Rhostrehwfa to A5 Menai Bridge; and
- ▶ A55 Junction 9 to A487 Y Felinheli Bypass (two clusters).

6.1.12 The increase in traffic flows associated with the Wylfa Newydd Project could change the risk of accidents occurring on the road network and impact upon the safety road users.

Positive Local Impacts

6.1.13 GC appreciates the mitigation proposed to reduce traffic flows at source. It is considered that the following measures, if implemented and managed properly, may have positive benefits in reducing the potential traffic flows through the Gwynedd Council area generated by the construction of the Wylfa Newydd facility:

- ▶ The Marine Off Loading Facility (MOLF), to reduce HGV traffic during construction;
- ▶ Shuttle Bus services for workers to / from Bangor and Caernarfon, to reduce construction worker traffic. Operational from start of construction;
- ▶ On-site workers campus, for 4,000 workers (at peak of construction when 9,000 workers forecast in total); and
- ▶ Car sharing through a programme of incentivising and management.

6.1.14 However, whilst the above measures will potentially reduce the development-generated traffic, they will not remove additional traffic completely. Therefore, there should be DCO obligations set out in the Code of Construction Practice (CoCP) (Application Reference Number: App-414), or other appropriate documentation, to ensure the traffic flows modelled in the TA (Application Reference Number: App-101) and set out in the Environmental Statement are not in excess of those modelled or last for a longer period of time than that set out in the construction programme and therefore cause prolonged / higher impacts than those forecast.

6.1.15 There should be further detail set out in any phasing of the development to ensure that facilities, such as the MOLF are built to the modelled programme timescales and, if not in place when set out, mitigation measures introduced to ensure that any early years impacts from the lack of the MOLF or any extensions to any construction programme are addressed and traffic flows limited.

Neutral Local Impacts

6.1.16 GC considers that the following elements of the scheme does not affect the County either positively or negatively and therefore could be considered as neutral:

- ▶ the implementation of the Park & Ride will not result in any benefits in reducing traffic flows on the GC highway network. There could be negative impacts for GC whilst the facility is being built, due to construction traffic accessing the site, the effects of which have not been assessed. The actual operation of the Park & Ride site does not affect the GC highway network;
- ▶ the A5025 off-line improvements will not affect the GC highway network. There could be negative impacts for GC whilst the off-line works are being built, due to construction traffic accessing the site, the effects of which have not been assessed.

Negative Local Impacts

6.1.17 Horizon have made assumptions around the following items, which underpin the Transport Assessment (Application Reference Number: App-101) work:

- ▶ Workers accommodation locations, and hence route(s) they take to / from the Wylfa Newydd site;
- ▶ The split of workers that will be mainland based or Isle of Anglesey based, therefore providing a traffic flow volume from the mainland crossing the Britannia bridge;
- ▶ Level of car share assumed;
- ▶ Level of workers utilising the shuttle buses (Horizon have stipulated that workers have to live within 600 metres of a shuttle bus stop to qualify) and general shuttle bus strategy unclear;
- ▶ Shift patterns and hence travel times;
- ▶ Lack of Park & Ride and Park & Share on the mainland;
- ▶ Trip distribution; and
- ▶ Stock Piling at the Wylfa Newydd site as the only contingency for delays to deliveries.

GC has concerns related to the above assumptions, which include:

- ▶ Fly-parking, of workers vehicles and HGVs;
- ▶ Shuttle buses. Frequencies, routes and management strategy and potential associated fly-parking;
- ▶ Migration of workers, therefore changing the assumptions in the modelling work;
- ▶ Congestion exacerbated on sections / junctions on A55;
- ▶ Congestion exacerbated on Britannia Bridge; and
- ▶ Early years assessment and late delivery of these measures.

Fly-Parking

- 6.1.18 GC is concerned that fly-parking will occur because of the development. Whilst the proposed steps to reduce single-occupancy car trips are welcomed, the resulting potential fly-parking will be an unacceptable consequence. GC is concerned that workers car-sharing or catching shuttle buses will park cars on local roads, thus causing severance and stress to local communities and may impinge upon free-flow of traffic in some instances.
- 6.1.19 Transport issues arising during Hinkley Point C (managed by EDF Energy) have been reviewed given the similarities between this project and Wylfa Newydd, i.e. the use of Park & Ride shuttle buses to transport construction workers to site; the use of a freight management facility to manage road freight entering the road network, and a marine facility to bring in large quantities of bulk materials by sea.
- 6.1.20 With regard to fly-parking, EDF have a similar policy to that proposed by Horizon in which employees are required to sign a code of conduct acknowledging that fly-parking will not be tolerated. Those found not observing this facing disciplinary action. Workers are also required to travel only by their allocated route.
- 6.1.21 During the Hinkley enabling works period, it was noted during Transport Forum meetings in July 2016 and April 2017 that fly-parking was being observed in local areas generally and where workers board the buses. EDF acknowledged that only one of their planned Park & Ride facilities was open at this

time ('J24') resulting in limited parking options available to workers. They anticipated this would improve with the opening of the other park and ride sites later in the year. EDF started monitoring the fly-parking, with a three-strike policy for those observed fly-parking. Additional bus controllers have been strategically placed at key bus boarding locations to challenge employees who may not be boarding at their allocated stop.

- 6.1.22 In a later Transport Forum (November 2017), targeting fly-parking had been a key priority with the appointment of a new parking manager and trials for a new mobile vehicle registration number scanning system.
- 6.1.23 During Community Forums in February 2017, July 2017 and November 2017, fly-parking was also raised. Attendees were asked to report any inappropriately parked vehicles to EDF and it was noted that a police team had also been monitoring the problem.
- 6.1.24 People were reporting fly-parking incidents, which were being investigated and campaigns run by the Hinkley Point C team whilst continued regular checks were also being made. A fly-parking notice was being circulated to all Hinkley Point C workers to reinforce the message that fly-parking would not be tolerated and was against the code of conduct to which all employees are signatories. It was also noted that the reports of fly-parking were reducing but the awareness campaign would continue. Despite there being mitigation against fly-parking included in the Code of Conduct for Workers at Hinkley, and with the construction personnel numbers not been at their maximum, fly-parking became an issue for many villages near the site.
- 6.1.25 There are no Hinkley Transport or Community Forum records beyond November 2017 to indicate whether the introduction of the EDF measures, or Park & Ride at Cannington, have stopped the fly-parking. However, it is noted that in June 2018, 168 fly parking incidents were reported via the HPC Helpline of which nine (5%) were HPC workers.
- 6.1.26 For the Wylfa Newydd development, measures and monitoring need to be in from day one to stop fly-parking early and before it becomes an issue. HNP should set this out. As shown at Hinkley Point C, the lack of the timely delivery of some parking sites as well as poor enforcement has resulted in fly-parking.
- 6.1.27 Park and Ride facilities would alleviate this at shuttle bus stop locations.

Shuttle Buses

- 6.1.28 It should be a DCO obligation, set out in the CoCP (Application Reference Number: App-414) or other appropriate documentation, that the shuttle buses should be operational at the start of any construction activity including the construction of the mitigation measures in the early years, such as the logistics centre, Park & Ride, A5025 off-line improvements and the MOLF.
- 6.1.29 More detail is required of the duration of the services, the number and location of stops, the exact routes and how the catchment areas for bus stops intend to be set out.
- 6.1.30 It is stated in the Horizon Transport Assessment (Application Reference Number: App-101) that "*The shuttle bus service is expected to commence, subject to worker demand, from the start of construction activities.*" The Council is of the opinion that the provision should not be subject to worker demand; it should be enforced to ensure good practice is inherent from the start.
- 6.1.31 The shuttle buses should be established from the start, with fixed routes and stops that are regularly reviewed to capture as many workers as possible. There are concerns that the restriction of only workers allowed to get the buses if they live within 600 metres of a shuttle bus stop could cause issues such as fly-parking to occur adjacent to these bus stops as a result of workers not within the 600m radius wanting to utilise this form of transport to access the site.

- 6.1.32 It is recommended that there is a mixture of direct express services to / from the mainland and to / from Wylfa Newydd. However, there should also be some limited stop services to ensure that as many workers as possible live within the expressed catchments of 600 metres of a shuttle bus stop.
- 6.1.33 It is recommended that the shuttle bus services need to be regularly reviewed and the approach amended if the uptake is not as high, or demand exceeds that as assumed in the Transport Assessment (Application Reference Number: App-101).
- 6.1.34 GC has concerns that local bus operators will be attracted to provide these shuttle bus services and it will result in shortages to other services that are required for services, such as school transport.

Worker Locations

- 6.1.35 There are concerns that workers will not be able to find accommodation within the areas assumed within the Transport Assessment (Application Reference Number: App-101) analysis work. Consequently, the assumptions on mainland / island split, and mode of travel will not be consistent with the modelling undertaken. GC recognises that a sensitivity test has been run in the model, which doubled the amount of construction worker traffic from the mainland. However, GC still has concerns about the baseline assumptions made by Horizon and potential changes to this resulting in negative impacts in the area that do not have a management nor mitigation strategy agreed and set out in the DCO obligations.

Britannia Bridge

- 6.1.36 Much of additional traffic flows on the Britannia Bridge are forecast to avoid the most congested times of day due to the scheduling of shift start and end times. Some additional delays are forecast, albeit these are forecast to be relatively small. There should be vehicular limits and the hours of travel dictated in a DCO control document to ensure that unacceptable travel scenarios do not occur.

“The principal road routes which are likely to be used to access the main Wylfa Newydd site are the A5, A55 and A5025. The main existing road congestion issues relate to the two bridges which provide access to the Island across the Menai Straits (A55 Britannia Bridge and A5 Menai Bridge) both of which are single carriageway and operate at close to existing capacity in the peak hours and experience the highest traffic volumes during the summer holiday season.”

- 6.1.37 Whilst traffic movements are anticipated to be outside of the “normal” peak hours for the construction traffic, there is concern that due to the nature of the traffic flows there will be peak spreading. The construction traffic flows are anticipated to be at the Britannia Bridge very close to these peaks and the traffic flow totals become very similar; therefore not giving much spare capacity or contingency should there be events that cause delays on here and elsewhere on the road network.
- 6.1.38 A DCO application for the National Grid North Wales Connection is expected in 2018 and construction works are expected to begin in 2020 and last for four to five years. The construction of the National Grid North Wales Connection will generate construction vehicle movements, including over the Britannia Bridge. Therefore, adding additional pressure to this highway link.

Early Years Assessment

- 6.1.39 GC is concerned that the local traffic impacts from the construction of the MOLF, Park & Ride, Logistics Centre, On-Site Campus and A5025 off-line improvements could have local effects on highways that have not been assessed. Therefore, any impacts that may arise are unknown and have no mitigation measures proposed should unacceptable impacts occur because of the works. Whilst it is accepted that the overall impacts may not be of as great a magnitude as the peak of the peak construction for the main Wylfa Newydd development, locally they could be perceived to be negative.
- 6.1.40 If the above measures are not delivered and operational when they are programmed to be, there need to be measures to address this. For example if the MOLF is late, then this will not remove 60% of

HGV delivery traffic from the network. Consequently, the implications of this need to be set out, understood and addressed.

Bad Weather

- 6.1.41 The bridges across the Menai are subject to closure when there is bad weather. It is also likely that the weather will not always allow use of the MOLF for deliveries. Whilst GC accepts that Horizon have indicated they will have a contingency stockpile of materials on-site to last for two weeks, there needs to be further emergency contingency plans set out should the conditions result in bad weather (or other circumstances) that stops deliveries via the bridges or the MOLF for more than this two weeks. It would not be acceptable to GC if HGVs or workers were loitering on mainland highway routes or remaining in towns awaiting the bad weather to pass.

Measures

- 6.1.42 Although GC accepts that a sensitivity test has now been undertaken to assess the impacts of doubling the construction worker traffic from the mainland, it is considered that there should be:
- ▶ limits of traffic flows, both for HGVs and worker vehicles (set out in the DCO control documents);
 - ▶ agreements on the roads that Wylfa related traffic can travel on, with traffic flow limits on these roads;
 - ▶ agreements on the time when vehicles can travel that are associated with the Wylfa Newydd project;
 - ▶ monitoring should be undertaken at key sensitive locations, such as the Britannia Bridge, in both directions to ensure that vehicle flows are not exceeding the limits that should be set out within the DCO control documents such as the CoCP.

Adequacy of the DCO, including requirements and obligations

- 6.1.43 GC requests that the following elements are set out and are committed to in the DCO control documents, e.g. the CoCP (Application Reference Number: App-414) as follows:
- ▶ limits on all vehicular traffic in terms of volumes, timings, restricted hours and duration of movements;
 - ▶ detailed Phasing Strategy of the project;
 - ▶ traffic monitoring and management details, with penalties and mitigation set out for exceeding limits;
 - ▶ travel planning details to manage traffic and set out measures of control.
- 6.1.44 The CoCP (Application Reference Number: App-414) is currently lacking in a lot of detail that would be expected for a project of this type.
- 6.1.45 HGV traffic volumes have a limit overall set out in the CoCP (Application Reference Number: App-414) to date, but there should be limits on all vehicular traffic movements and measures to adhere to these.
- 6.1.46 It is also requested that more detail is provided of construction phasing linked with a construction traffic management strategy setting out in full a detailed Construction Traffic Management Plan, including, but not limited to, traffic flow limits, duration limits, time periods limits and route limits to ensure that all reasonable efforts are made to adhere to the parameters assumed in all the assessment work undertaken which indicates moderate to minimal impacts.

- 6.1.47 Travel Plans should be detailed, and completed prior to any work being undertaken to ensure the enforcement action and limits of traffic are set out clearly ahead of any start on any site associated with the Wylfa Newydd development. These, for example, should clearly set out how the car share of 2 people per car, or workers utilising the shuttle buses, is going to be achieved throughout the duration of construction of the development, which are fundamental parameters underpinning the Transport Assessment (Application Reference Number: App-101) work.
- 6.1.48 Traffic monitoring should be undertaken at key points, such as the Britannia Bridge, to ensure that HGVs and workers traffic are not arriving outside of the specified modelled hours and that they are not exceeding the maximum number of vehicles as set out in the CoCP (Application Reference Number: App-414).

Planning policy observations

- 6.1.49 Criterion 3 of Strategic Policy PS 9 advises that the scheme should minimise adverse transport impacts to an acceptable level, include multi modal solutions and investment that encourages travel by public transport, walking and cycling and other sustainable forms of transport. When assessments demonstrate insufficient transport linkage or the road network does not have sufficient capacity or an adverse impact is predicted, Criterion 12 of Strategic Policy PS 9 advises that appropriate improvements to the transport network and the provision of sustainable transport options should be provided to mitigate the impacts. Criterion 6 of Strategic Policy PS 9 acknowledges that unforeseen consequences may arise as the project develops, and therefore it would be reasonable to provide the affected Councils with additional information from or works to be carried out by the developer. Based on this premise, review mechanisms should be set up in order to monitor the full range of impacts, to review the adequacy of mitigation or compensation measures and to make adjustments as necessary.
- 6.1.50 The local positive, neutral and negative potential impacts described in the above sections trigger the need to consider the above- mentioned criteria in Strategic Policy PS 9.

6.2 Economic development including tourism

Context

- 6.2.1 The promotion of well-being, including the promotion or improvement of the economic well-being of their area ([Local Government Act 2000](#)), is a key part of a Local Authority's work, as underlined by the [Well-being of Future Generations \(Wales\) Act 2015](#).
- 6.2.2 Gwynedd Council's commitment to increase the prosperity of its citizens is articulated in the '[Gwynedd Council Plan 2018 – 2023](#)', where the first Improvement Priority is to 'improve conditions to create a viable and prosperous economy, aiming to secure more jobs which offer good salaries'.
- 6.2.3 Economically, the picture in Gwynedd is mixed; historically the county has average levels of unemployment and economic inactivity (excluding students) as a result of its constrained labour market, but productivity and wages are among the lowest in the UK due to the prevalence of part time and seasonal work, high levels of self-employment and dependence on lower value sectors; especially in the less developed southern and western parts of the county:
- Population aged 16 to 64 was 60.6% in 2017 2.3% below the proportion for Great Britain ([Nomis](#));
 - Inactivity (excluding students) in the year ending 30 June 2018 was 19.3% compared to 20.1% in Wales and 17.8% in the UK ([StatsWales](#));

- The ILO unemployment rate in the year ending 30 June 2018 was 4.1% compared to 4.8% in Wales and 4.2% in the UK ([StatsWales](#));
- The part-time employment rate in the year ending 30 June 2018 was 32.8%, 4.6% higher than across Wales and 6.2% higher than in the UK as a whole ([StatsWales](#));
- 13,100 workers commute daily into Gwynedd including 7,000 from Anglesey ([StatsWales](#));
- Average gross weekly pay in Gwynedd is among the lowest in Great Britain at £478.40, 84% of the GB average ([Nomis](#));
- Gross Value Added (GVA) per filled job in Gwynedd is only 70% of the UK average one of the lowest in the United Kingdom ([ONS](#)).

6.2.4 Although Wylfa Newydd and its associated developments are located on the Isle of Anglesey; given the scale of the investment and employment to be generated and the integrated nature of the Gwynedd and Anglesey economy and labour market; Gwynedd Council has, from the outset, welcomed the opportunities for economic development which may arise and expressed a desire to engage with Horizon Nuclear Power to maximise the positive impacts.

6.2.5 The Council has also been mindful of and highlighted the potential for some negative consequences and has asked to work with Horizon Nuclear Power to minimise any negative impacts.

6.2.6 The relevance of Gwynedd to Wylfa Newydd's development is reflected in the inclusion of the vast majority of the county within the Socio-economic Key Study Area (KSA) and Daily Construction Commuting Zone (DCCZ).

6.2.7 Gwynedd Council is also a proactive member of the North Wales Economic Ambition Board and is mindful that the development of Wylfa Newydd may occur in parallel with a number of other major projects as part of the [Growth Deal for North Wales](#) which may enhance the positive impact of Wylfa Newydd or compound any negative impacts; in particular the Council believes opportunities may arise as the development of the Trawsfynydd Nuclear Decommissioning Site as a location for a Small Modular Reactor and associated R&D developments progresses.

Positive Local Impacts

6.2.8 Gwynedd Council has consistently held the view that the development of Wylfa Newydd has the potential to achieve significant positive local impacts and, as noted previously, wishes to work proactively with Horizon Nuclear Power and other partners to ensure these are fully realised.

Labour market

6.2.9 There are clear opportunities for the residents of Gwynedd to benefit directly from the job opportunities generated by Wylfa Newydd during its construction and subsequent operation.

6.2.10 Gwynedd Council welcomes Horizon Nuclear Power's target that 85% of the operational workforce of Wylfa Newydd should be recruited from the local area including Gwynedd and would seek to work with Horizon to ensure that this target is reflected in all roles, including in managerial, technical and

scientific posts. The Council seeks to work with Horizon and partners to ensure long term investment in engaging children and young people in Science, Technology, Engineering and Mathematics (STEM) and providing a clear learning and career path into the nuclear industry (including Wylfa Newydd and other relevant developments such as nuclear decommissioning at Trawsfynydd and Wylfa and a potential SMR in Trawsfynydd), and would like to see a clear commitment to this by Horizon as part of the consenting process and an increase in the scale and intensity of activity as soon as possible to progress the agenda.

- 6.2.11 In relation to the construction of Wylfa Newydd, Gwynedd Council welcomes Horizon Nuclear Power's forecast that 2,000 direct posts should be taken up by home based workers with a further 1,800 generated indirectly (subject to the comments below on the potential risks). The Council notes that this is a worst case (i.e. minimum) forecast; this may be an appropriate approach for the purpose of anticipating demand for accommodation etc., but is not helpful in anticipating and planning the demands of the construction phase on the local labour market. Gwynedd Council would like to work with Horizon Nuclear Power and partners such as the Welsh Government, the Isle of Anglesey County Council and the North Wales Economic Ambition Board to determine an optimal target for local employment – with a focus on higher value posts - which maximises local benefit and minimises any potential risks.

Supply chains

- 6.2.12 There are also clear opportunities for local companies to benefit directly from Wylfa Newydd by supplying goods and services. Given the volume and range of materials required to support the construction of Wylfa Newydd, Gwynedd Council accept that there will be limits in the ability of the local (Gwynedd and Anglesey) and regional (North Wales) economy to meet the need. However, the Council wishes to see far greater engagement from Horizon Nuclear Power to define the opportunities for local suppliers, particularly in relation to higher value goods and services; set ambitious targets for local procurement for Horizon and its contractors and support local businesses to take advantage of the opportunities.
- 6.2.13 Again, Gwynedd Council would wish to see the development of local supply chains for Wylfa Newydd considered in the context of other developments in North Wales, which may make the provision of support to develop local suppliers of more specialist requirements viable.

Neutral Local Impacts

- 6.2.14 With the exception of potential job and supply chain opportunities associated with their construction and operation (as noted above), the potential indirect opportunities generated by the off-site power station facilities /developments such as Dalar Hir Park & Ride, the Logistics Centre and A5025 off line improvements will not impact upon Gwynedd.

Negative Local Impacts

- 6.2.15 As noted, Gwynedd Council has from the outset been of the view that the development of Wylfa Newydd has the potential to generate significant positive local impacts for the locality and the wider region.
- 6.2.16 The Council has also been mindful that a development of this scale has the potential to generate some negative impacts upon the local economy. Gwynedd Council would like to work proactively with Horizon Nuclear Power and partners such as the Welsh Government, the Isle of Anglesey County Council and the North Wales Economic Ambition Board to identify, monitor and minimise / mitigate the risk of negative local impacts.

Labour market

- 6.2.17 The potential direct benefit of the local employment to be generated by the construction and operation of Wylfa Newydd have been noted above.
- 6.2.18 The large number of posts to be created in the local labour market, particularly during the construction phase does pose a risk to the local economy should there be an insufficient supply of available labour to meet the demand. The ES Volume C – Project Wide Effects C1 – Socio-Economics (Wylfa Newydd Nuclear Power Station Examination Library APP-088), and accompanying documents suggests that 2,000 (or possibly slightly more) jobs will be created for workers who are home-based and live in the DCCZ (with an additional 1,800 indirect and induced jobs generated in the DCCZ) with 63% coming from Anglesey and a further 13% from the ‘Menai Mainland’ area of the KSA.
- 6.2.19 An insufficient labour supply will lead to the displacement of posts from local businesses to Horizon Nuclear Power and its contractors and / or a degree of upward pressure on wages which may undermine the sustainability of local enterprises. Both these impacts would have a negative consequence on the local economy. Gwynedd Council also believes the fluidity of labour movement between Anglesey and the mainland has been underappreciated, the high levels of commuting between Anglesey and Gwynedd adds to the complexity of the issue and has the potential to increase the negative impacts on Gwynedd.
- 6.2.20 Horizon Nuclear Power’s Jobs & Skills Strategy (Wylfa Newydd Nuclear Power Station Examination Library APP-411) suggests that sufficient labour supply exists within the KSA / DCCZ to meet the anticipated demand. However the ‘The Potential Displacement Impact of the Construction of Wylfa Newydd on Gwynedd’ report commissioned by Gwynedd Council from Hardisty Jones Associates (see Appendix 2) suggest that there is a significant shortfall in the number of available workers to meet Wylfa Newydd’s requirements for more highly skilled posts. The report notes the anticipated demand for Civils Operatives and M&E Operatives from Gwynedd far outstrips the available labour (i.e. job seekers in these fields) and represent a not insignificant proportion of the total number of existing workers in these fields. The report also highlights that there is insufficient labour to meet the anticipated demand in Anglesey. Both these factors could lead to workers in these fields leaving local companies to work at Wylfa Newydd. Given its proximity to Wylfa Newydd, the Gwynedd is particularly vulnerable to these impacts.

- 6.2.21 In the Council’s judgement, the risk of displacement may compounded by the relatively low numbers of unemployed in the local labour market which suggests that a high proportion of those currently out of work require significant support if they are to enter employment; the high standards and particular requirements of the nuclear industry (vetting etc.) may preclude many of these individuals from gaining employment at Wylfa Newydd. It should also be noted that a lack of workers has already been cited by sectors such as tourism as a concern, particularly post-Brexit; the demand for workers generated by Wylfa Newydd will increase the challenge employers face in recruiting suitably qualified staff.
- 6.2.22 In light of the significant risks noted above, Gwynedd Council would wish to see efforts to minimise and mitigate the risks to the local labour market prioritised with sufficient resources allocated to monitor the impact of Wylfa Newydd and respond appropriately, including support for local businesses to ‘backfill’ posts where staff have been lost.
- 6.2.23 The Council supports proposals for the establishment of the Wylfa Newydd Employment and Skills Service (WNESS), provided the scope of its activities and geographical coverage is sufficient. Gwynedd Council wishes to be fully involved in the development and delivery of WNESS.

Tourism

- 6.2.24 Tourism is a major sector in Gwynedd and across the Wylfa Newydd DCCZ. Research by the Welsh Government (analysis of STEAM data by GTS (UK) - see Appendix 3) estimates that the total impact of Tourism across DCCZ is £2.2Bn and that the sector supports over 31 thousand jobs. Within the KSA alone the data suggests the impact of tourism is £703M and supports over 9,500 jobs. A significant proportion of the value of tourism lies in the section of Gwynedd within the KSA / DCCZ:

	<u>Total</u>	<u>Gwynedd</u>
KSA	£703M 9,754FTE	£250M (36%) 3,611FTE (37%)
DCCZ	£2.26Bn 31,120FTE	£683M (30%) 10,144FTE (33%)

A minor negative effect upon the sector by Wylfa Newydd will therefore have a major economic impact.

- 6.2.25 The potential risks to tourism from Wylfa Newydd relate to a potential adverse effect on the perceptions of the area as a destination and a potential impact on the availability of visitor accommodation if bed spaces are occupied by workers during the construction phase.
- 6.2.26 Research by Horizon Nuclear Power has already suggested that 9% of visitors would reconsider visiting Anglesey during construction (section 1.5.92 of ES Volume C – Project Wide Effects C1 – Socio-Economics [Wylfa Newydd Nuclear Power Station Examination Library APP-088]) and there is risk that Gwynedd will be impacted to a lesser degree. Horizon should ensure that sufficient

resources are available to mitigate these risks including upfront investment to market the area to tourists.

- 6.2.27 The Council considers that the availability of visitor accommodation to house temporary workers from Wylfa Newydd has been overstated and is based on dated information (Gwynedd Council is currently undertaking research to quantify the accommodation currently available). Furthermore, the Council considers that the utilisation of this accommodation by temporary workers is incompatible with maintaining their use for tourists due to the differing needs of both groups. Gwynedd Council would ask that Horizon Nuclear Power ensure the availability of alternative accommodation and discourage the use of visitor accommodation.
- 6.2.28 Gwynedd Council requests that the authority is fully involved in the development and delivery of monitoring and mitigation measures relating to tourism.

Supply chains

- 6.2.29 As noted previously, Gwynedd Council believes that the opportunities for local businesses to supply goods and services to Wylfa Newydd should be encouraged and supported.
- 6.2.30 However, the Council also recognises that that there is potential for a negative impact if the costs of goods and services in the region increase due to the additional demand generated, however due to the lack of information currently available on the requirements, the potential impact cannot be quantified.
- 6.2.31 Again the Council would request that it is fully involved in the structures to be developed to monitor and mitigate any impacts.

Adequacy of the DCO

- 6.2.32 The DCO documentation is currently lacking in a lot of detail that would be required to allow Gwynedd Council to be satisfied that its concerns have / will be addressed. Notably, key documents such as the Supply Chain Action Plan are yet to be received.
- 6.2.33 Gwynedd Council requests that the following elements are set out and committed to in the DCO control documents e.g. the CoCP, as follows:
- That Gwynedd Council be fully involved in the Programme Board and all relevant Monitoring and Engagement Sub Groups
 - That monitoring is undertaken early and is ongoing throughout the construction period
 - That mitigation should be undertaken proactively where appropriate
 - That mitigation should follow impact and consider direct, indirect and induced impacts.
 - Ongoing monitoring of the cumulative effects of Wylfa Newydd in view of the large volume of major projects potentially being implemented in North Wales as a result of the North Wales Growth Bid

Planning Policy Observations

- 6.2.34 Criterion 9 of Policy PS 9 requires a pro- active approach to procurement, employment, education, training and recruitment in order to maximise employment, business and training opportunities for

local communities. Issues raised above in relation to the impacts on the labour market, supply chain and the wider economy suggest that additional information and measures are required in order to better align with the expectations set out in criterion 9.

- 6.2.35 Failure to maximise opportunities locally would not align with Gwynedd Council's Plan (2018 – 2023) and would have a negative impact on the Joint Local Development Plan's strategy, which supports an anticipated transformational economic change linked to Wylfa Newydd and other development in the Plan area as a means to enable local households to look after themselves and to begin to reverse past trends by retaining and attracting working age households into the Plan area, to maintain and create more sustainable communities.

6.3 Community Impact / Welsh Language

Context

- 6.3.1 According to the 2011 Census, 65.4% of Gwynedd's population are Welsh speakers, and 40 of its 71 wards still have over 70% Welsh speakers. GC has a longstanding commitment to safeguard and promote the Welsh language in Gwynedd but it is, however, a county of extreme diversity that produces many challenges in trying to fulfil this commitment. The main challenges are in the 11 wards where there are less than 50% Welsh speakers. Bangor, which is an area of particular concern to GC in regards to this development, has two of the wards with the lowest percentage of Welsh speakers in Gwynedd. On average, Bangor has only 39.3% Welsh speakers, which means it is an area that is already in a sensitive position linguistically. This stark contrast to neighbouring areas of Gwynedd can be attributed in part to the large number of students and two major employers in the form of the university and Ysbyty Gwynedd. CG has reacted to the challenge seen in Bangor in particular by opening a Language Promotion Centre and a Language Development Officer is employed by GC, and funded by the Welsh Government Language Promotion Grant, to work specifically on promoting more use of the language in the city. There is a concern, however, that the Horizon development will add further to the general population in Bangor, as well as to the number of non-Welsh speakers, and so put a strain on already scant resources and capacity in the area.
- 6.3.2 Gwynedd has seen a steady increase in the population over the last couple of decades, with the population rising from 112,800 in the 2001 Census to 117,789 in the 2011 Census. There was an increase in the area of Arfon in the same period, from 54,501 to 58,427. But at the same time there has been a steady decline in the percentage of Welsh speakers across the county. This decline is due to many complex factors, but it is widely agreed that the two main factors are the outward migration of the younger generation - moving out of the county to go to university and to seek job opportunities - and an inward migration of the older generation from outside of the county. As a result, a particularly steep decline can be seen in the number of Welsh speakers when they reach the 16-24 age group. Again, CG has recognised the need to work proactively to steady the decline in this age group, as seen in its strategic document - the ***Welsh Language Promotion Plan for Gwynedd 2018-2023*** – and in the implementation of the Secondary School Language Strategy, but any large scale development that brings an unknown number of people to the county poses a threat to the efforts of GC and other partners in this area, and to the linguistic balance in the area.
- 6.3.3 Gwynedd produces a large number of Welsh speakers through its education system, with 90% of school age children noted as being Welsh speakers. All of Gwynedd's primary schools are Welsh medium, and as a result, all children attending would be expected to speak and participate in school life through the medium of Welsh. An effective immersion service is implemented by the Education Department, and the academic achievements of schools testify this, but the effectiveness of the service does not mean there is no linguistic effect when a non-Welsh speaking pupil arrives in a Welsh medium school. Evidence collected through the Welsh Language Charter (Siarter Iaith) scheme shows that the arrival of even a small number of non-Welsh speaking pupils in a school can have a negative impact on the overall social language of the school. The Siarter Iaith scheme was established in Gwynedd

some years ago to try and counteract the worrying and ever increasing use of the English language in social settings and as a language of play amongst children.

- 6.3.4 Even though the Wylfa Newydd Project is based on the isle of Anglesey, there will certainly be an impact on the mainland, and in particular the North of Gwynedd, as a result of the development. GC therefore has particular concerns about the community and linguistic effects on Gwynedd, and in particular on the north of Arfon and the area surrounding Bangor.

Positive Local Impacts

- 6.3.5 Considering that the main reason for the outward migration of young people from rural areas is due to the lack of economic opportunities, GC cannot ignore the fact that the proposed development could bring many job opportunities to the area and could have a positive impact on the community and Welsh language as a result by allowing people to stay in their local areas, and continuing to contribute to their local communities. There is a great need for local, quality jobs, and so although it is unclear how many jobs would be available to local people and companies, it is a possible positive impact if chances are given and the commitment to develop skills of young people in preparation for the development is implemented in full.
- 6.3.6 Mitigation proposed to reduce impact on the locality, like the on-site accommodation for workers, could also be considered a positive impact for Gwynedd, but this is regarded with caution. GC believes that it is near impossible to predict where the 9,000 peak number of workers will live and reside, and therefore the effects they will have is very hard to assess.
- 6.3.7 Our professional experience shows us that the prosperity of a language is dependent on many complex factors and elements and that it is often a case of personal choice or circumstance. We cannot predict personal choices and therefore cannot say for certain where workers will live and reside.
- 6.3.8 Effective monitoring of worker data and sharing of information with key partners will therefore be essential in order to take proactive measures to counteract possible effects wherever the workers might settle.

Neutral Local Impacts

- 6.3.9 Many aspects of the development, mainly relating to infrastructure – changes to A5025, and the site itself – are not likely to have any direct effects, negative or positive, on the community and language of Gwynedd.

Negative Local Impacts

- 6.3.10 GC is of the opinion that there will be a significant impact on Welsh culture and language across the KSA, and in particular on the area of Bangor in Gwynedd. In this respect, CG is worried about the lack of attention given to the possible impact on Gwynedd in the WLIA and mitigation strategy (APP-432).
- 6.3.11 The main area of concern for GC is the effects that the inward migration of workers will have on the area beyond the island of Anglesey, and especially so the community and educational impact in the Bangor area.
- 6.3.12 Horizon have in the WLIA (APP-432) identified a negative impact on community and the Welsh language as a direct result of the possible placement of workers. However concern remains that the possible impact has been considered for too small a geographical area and that Horizon have not fully considered the possible impact on the mainland of Gwynedd. As a result the current mitigations proposed fail to deal with this negative impact effectively.

- 6.3.13 As mentioned above, GC has provisions in place to try and safeguard the language, but there is a worry that the extra impact from the development will stretch those services beyond their capacity.
- 6.3.14 GC is concerned that many of the mitigations proposed, like Measure 16, which refers to the funding of peripatetic teachers, have thus far only referred to implementation in Gwynedd “potentially” and “if needed”, and would therefore suggest a reactive mitigation action if assessment of the collected workforce data would show a need, rather than proactive action to try and reduce any possible effect.
- 6.3.15 GC would like to see a stronger assurance that the negative social and linguistic impact on the mainland would be limited by Horizon.

Possible negative impact on the communities of Bangor and the mainland

- 6.3.16 The mitigation proposed by Horizon to place most of the workforce in on-site accommodation is welcomed, but will not eliminate the wider impact completely. The baseline assumes to some degree that the rest of the workforce would be residing on the island, but GC is aware that there are concerns that workers will not be able to find accommodation within the areas assumed within the analysis work and therefore, the assumptions on mainland / island split will not be consistent with the modelling undertaken.
- 6.3.17 Bangor is the regional centre and will therefore be an appealing area for residing, as well as being an attraction for retail and leisure and access to public services like health. The possible impact of any transport arrangements, and park and ride facilities, could also mean more workers living and travelling from the mainland. All this means a negative impact on community and language.
- 6.3.18 Furthermore, GC believes there is likely to be some degree of displacement within the county, and that this could have a negative impact on the linguistic demography of many wards and communities. The possible impact of workers moving from one area of the county to another could leave communities beyond the Menai Mainland assessment area vulnerable.
- 6.3.19 Even if Horizon implemented all the proposed mitigation measures regarding workforce accommodation and data collection, there is still a great element of the unknown. This is impacted by the fact that Horizon cannot ensure accurate and full data on all the workforce, as data regarding dependants and family members moving with the workers would be provided voluntarily (Measure 12-13 WLIA). The sharing of information, and the ability of Horizon to respond to data collected by key partners, as well as by themselves, will be essential. So far, not enough information has been provided about how the data will be assessed and shared, and who will be responsible for assessing any negative impacts on particular areas, and determining the need to target mitigation measures.

Impact on schools and pupils

- 6.3.20 The main worry by far by CG is the possible impact of the development on schools, and as a result the influence on the language use of other children in the community. The baseline used in the socio-economic assessment (APP-067 and 088) to assess the effect on local schools is based on the number of empty places in said schools. While this is an adequate way of assessing the effect on the school as a spatial resource, it does not serve as well in trying to assess the effects on the community and language of the school and on the other users of the service and the community. Increasing or decreasing the immersion service in response to demand cannot work as we need the service to be ready to respond to the potential impact, rather than be reactive.
- 6.3.21 GC believes that there will be a particular impact on schools in the Bangor area, and is concerned about the lack of attention given to this threat so far by Horizon. The baseline also relies solely on an assessment of the situation on Anglesey

- 6.3.22 GC has evidence that shows many pupils travel from a wide geographical area, including parts of Anglesey, to Bangor schools, and that even a small number of pupils can have a negative effect on the language use of the pupils and school (and as a wider effect, the community). Data collected by the Siarter Iaith scheme often shows a dip in the language use and tendencies of pupils when a new, non-Welsh speaking pupil has arrived at the school mid-term.
- 6.3.23 A Language and Community Impact Assessment was recently conducted by GC on the school community in Bangor in response to reorganisation proposals for the primary education provision (CG Cabinet Meeting Papers, March 2018 -Item 6, Attachment 2): <https://democracy.cyngor.gwynedd.gov.uk/ielistdocuments.aspx?cid=133&mid=2237&ver=4>
- 6.3.24 This assessment shows that many of Bangor's primary schools are already beyond their capacity (based on pupil numbers in September 2017) and that the social use of the Welsh language amongst pupils is already in a delicate situation. The possible addition of pupil numbers as a direct result of the Horizon development is certain to have a negative impact.
- 6.3.25 As mentioned, language immersion services are currently provided by GC, but there is a question as to how those services will cope with the possible extra pupil numbers in the Bangor area, and how the extra demand in that area of the county will impact the service provided in other areas of the county due to prioritising. GC has already identified an increased demand for the immersion service from the Bangor area, and the need to respond to that demand. GC recently secured funding to establish a new language immersion centre in Bangor. Welsh Government approved the funding in part because they recognize the increased demand and negative impact posed by the Horizon development. There is however concern about the funding available to staff the proposed centre.
- 6.3.26 There is no evidence thus far that Horizon have discussed the current situation with GC Education Department (as they have with IACC) , and therefore GC is concerned that the possible cumulative effects of the Horizon development, alongside current reorganisation proposals and the general increase in demand on the education service will not be mitigated.

Adequacy of the DCO

- 6.3.27 Given the issues raised in respect of the potential impacts on Communities and the Welsh language, the following points are made in relation to the adequacy of the DCO:
- Insufficient information with regards to the impact of the proposed development on Gwynedd and in particular the Bangor area in terms of impacts on the Welsh language, local education service and communities.
 - The mitigation proposed therefore fails to deal with the negative impacts on the Welsh language, education services and therefore communities in Gwynedd
 - Gwynedd wishes to have an input into the provision and management of a robust monitoring framework as well as input into ensuring appropriate mitigation measures through section 106 agreement to ensure that mitigation is provided where there is negative impact.

Planning Policy Observations

- 6.3.28 Based on the local issues highlighted above and in the sections dealing specifically with workers' accommodation and local employment, skills, and supply chain, particularly the concerns about the assumptions made with regard as to how and where the large temporary workforce will be accommodated, criterion 5 of Policy PS 9 is of particular relevance. This criterion expects that the accommodation requirements of construction workers, a projected 75% of which will come from outside the area (i.e. 7,000 workers), will not result in unacceptable adverse economic....., social, linguistic impacts.

- 6.3.29 From a Welsh language and culture perspective, criterion 10 of Policy PS 9 is also of particular relevance. This criterion is relevant in that it requires consideration of the capacity of local community facilities, which, although not included as an example in the Policy wording, includes the capacity of local schools, Welsh language immersion centres and local facilities that provide Welsh language courses for adults. In line with Policy PS 2 and Policy ISA 1, should the development result in additional impacts or demands on existing community facilities, provided that statutory tests are satisfied, it is expected that contributions will be made to upgrade existing facilities in order to mitigate impacts. This approach aligns with criterion 4 of Policy PS 5 and expectations set out in Policy PS 1.
- 6.3.30 Additionally, criterion 16 of Policy PS 9 is also of particular relevant in that it would expect robust thresholds for reporting and monitoring the spatial distribution of workers in order to minimise the potential effects of a large temporary workforce on the use of the Welsh language within local communities in Gwynedd.

6.4 Housing

Context

- 6.4.1 The level of impact which Wylfa Newydd will have on the demand for housing in Gwynedd will be dependent upon the ability to absorb demand on Anglesey and or the containment of demand in close proximity to the site especially within the Temporary Workers Accommodation (TWA). Workforce Accommodation Management Strategy (APP-412) highlights how it is intended to manage the demand for accommodation and mitigation measures are set out in [APP-088). The mitigations relevant to housing are referenced between paragraph 1.6.8 to 1.6.15 and they cross-refer Workforce Accommodation Management Strategy (APP-412) to the Workforce Accommodation Management Services and to the Housing Fund. In principle, Gwynedd Council welcomes the intended provision of the three elements of accommodation mitigation. However there are residual concerns regarding the need to monitor the impact arising from accommodation choices and Gwynedd's position and participation on the Board.
- 6.4.2 Wylfa Newydd is located close to the most Northerly point on Anglesey and Wales and has a significant exposure to the Irish Sea. The rurality and low population density may influence the distances people have to travel to reach their place of work and journey times. There is also a need to take account of local nuances and patterns of delivery. The level of existing latent housing capacity in the North West quarter of the island is insufficient to meet demand and will result in the distribution of demand to other communities. Given North Gwynedd's proximity to the A55 and thereby connection to the main park and ride facility in Dalar Hir then Bangor as a regional service centre with its good connections to other centres of population may be viewed as an attractive proposition to some worker groups .
- 6.4.3 The scale and length of the construction period of Wylfa Newydd and the level of preparatory works are unprecedented and there are no meaningful comparators, which leads some nervousness and uncertainty. Experience at Hinckley may help highlight demand patterns and identify good practice. Preliminary analysis suggests that people have initially favoured locations in close proximity to the build site however; patterns may evolve when demand becomes saturated. We are conscious that Hinckley is located much closer to Bridgewater and Taunton, which are able to offer support services. In light of this it is important there is sufficient contingency within existing arrangements to help respond to need and we will require reassurance that mitigation should follow demand. It is also necessary to ensure there is additional support or penalty if there is any deviation from the central business case presented by Horizon to ameliorate any negative housing impacts upon the residents of Gwynedd.
- 6.4.4 Even with a maximum provision of 4000 TWA there will be significant demand on local provision. North West Wales is predominantly a rural area with a sparse population and demand is focused on a

very limited area. The business case presented by Horizon claims that it will be possible to meet demand and that it will be possible to minimise local impact. Challenges will arise if they are unable to adhere to the central business case and any the degree of variance from that case. It is unclear as to the level of influence and control that Horizon will be able to exert on large number of sub-contractors and how behaviours can be controlled modified or influenced via inducement. There is greater scope to monitor on site workers however, some support and contractor's roles may be more difficult to manage.

- 6.4.5 Our analysis of demand has been informed by preparatory work for **Gwynedd Local Housing Market Impact Assessment** and the Gwynedd Homeless Strategy these highlight existing pinch points, challenges and opportunities within the housing markets. Gwynedd have following the publication of the Homeless Strategy (see Appendix 4) reviewed potential impact on homelessness which are outlined in a specific report prepared by ARC4 (see Appendix 5) and would wish to see monitoring of homelessness, displacement, average house and rental prices.

Positive Local Impacts

- 6.4.6 **MITIGATION** – The level and extent of mitigation available may have a positive influence on housing and could help improve the availability and standard of housing supply and stock thereby providing a positive legacy for the future. However, it is difficult to reach a firm conclusion about the extent of benefit until the scale, or targeting of mitigation is clarified and we expect there will be a need for contingency to cover the construction period in full. There has been some mention of focus on particular mitigation measures, which we would endorse, however the level and scale is a concern and, it is important that mitigation is sufficient to span the duration of the construction period and mitigation needs to be able to respond quickly to change. The workforce profile projects very high numbers of staffing levels of in excess of 6,500 for 3.5 years and high demand over 7 years. Attention has focused on addressing the peak demand; however, from a housing perspective increased levels of occupation over an extended period may have a more adverse impact due to the stranglehold on supply.
- 6.4.7 **LEGACY** - The extent and nature of the housing legacy, which could be available, is yet unconfirmed and it is difficult to judge what contribution could be made locally however any additional investment which helps improve the quality, range or supply could have a lasting positive impact. Local Authorities in North West Wales have been working with Welsh Government to identify the level of mitigation and contingency, which we believe, is required to prepare and manage demand.
- 6.4.8 **EMPLOYMENT** – The level and breadth of quality employment opportunities, can provide sustainable employment for local families. This will help support local communities and ensure young local people are able remain locally and compete in the housing market. The emphasis on recycling opportunities locally is particularly as it can extend employment opportunities however it would be useful to confirm the definition of a local worker and to distinguish between visitor and worker. Maximising home based workers can reduce the need to identify accommodation option conversely challenges in securing a local workers will lead to increased number of non-home based workers and pressure on accommodation.
- 6.4.9 **MITIGATION AND CONTINGENCY FUNDING** - The fund needs to have flexibility and needs to focus on areas which are impacted. Gwynedd is likely to experience increased demand and displacement if supply is delayed or does not materialise in the expected manner. This could arise from workers being unable to source suitable accommodation on the island and local people facing higher accommodation costs and who are unable to compete. Given the timeframe to deliver housing supply early confirmation of funding will maximise impact and benefit. [APP-414] paragraph 3.2.15 lists a number of socio-economic impacts that the Applicant considers will need monitoring. We are believe that this list needs to be extended.

Neutral Local Impacts

- 6.4.10 **WORKFORCE MANAGEMENT AND ACCOMMODATION** - A lot of emphasis is placed on establishing a system to actively manage the workforce. Such an approach is welcomed as it allows an opportunity to respond adjust and guide workers to certain types of accommodation or to different communities. The opportunity to participate is supported and it is hoped that Gwynedd can influence in a positive manner. The unknown element is whether it will be possible to identify and variances in demand patterns early and adapt quickly based on agreed triggers- ahead of an adverse community or market impacts. The proposed model will be constrained if there is insufficient or limited capacity within the housing market, given that housing capacity has to be developed and planned well in advance and ramped up over time. There may be potential to deploy some tourist provision to assist at certain points however supply may be limited to certain months.
- 6.4.11 **LATENT CAPACITY** – Analysis suggest there is some latent capacity within the housing market however we are not convinced that it is available at the levels set out by Horizon and we are unsure whether all of the latent capacity is suitable (of sufficient quality) and available. Whilst some new opportunities may materialise prior and during construction it does not follow that the latent capacity identified will be released, and it is likely that significant investment will be required to upgrade some of the capacity to a required standard. Work undertaken by ARC4 on behalf of the 3 local authorities and Welsh Government questions the extent of local supply.
- 6.4.12 **BANGOR** - The impact upon Bangor, being the regional service centre needs to be considered. Given the demography of the projected workforce, the availability of certain support facilities, proximity to educational, shopping and entertainment offerings and transport networks the city and its neighbouring communities is likely to be perceived as an attractive and convenient location. Although there may be challenges due to pressures from a large student population Bangor it does have a higher proportion of rental properties and HMO and subsequently more capacity to absorb and it may also be possible to deliver accommodation options at a beneficial cost.
- 6.4.13 **BASELINE** - The lack of recent comparators to establish a baseline to model demand creates challenges. It is unknown whether the length and scale of the development will impact on behaviours therefore additional contingencies or safeguards may be required. Will the workforce given the length of the build be more likely to bring dependents or settle locally as relationships form and impact on relocation decisions? Is there a correlation between the length of stay and resettlement? As a popular tourist destination there is also possibility that families may be inclined to visit on an extended basis which could influence the choice of accommodation considered by construction staff. Will the remoteness of the location and the fact that property prices are generally lower than other parts of the UK influence decisions about the type and location of accommodation. As behavioural factors cannot be predicted at the onset, it will be important to monitor experiences in Hinckley and to ensure that sufficient contingency to cover the duration of the project.

Negative Local Impacts

- 6.4.14 **CAMPUS** – The development of an onsite campus is intended to contain and limit the impact of workers but is an acknowledgement there is insufficient capacity locally to meet demand. Whilst the development of the TWA is viewed as an essential mitigation measure there are questions about the ability to deliver 4000 units of Temporary Workers Accommodation (TWA) on site and that these units will be available in advance of demand. Failure or a delay in secure such a supply could result in patterns of behaviour, which once established may be difficult to reverse. The delivery timeframe presented for the (TWA) is extremely tight and provides a minimal margin for adjustment and should be bought forward to ensure capacity is ready in advance of need. It appears that the first tranche of TWA will not be available for occupation until Q1 2021, when workforce numbers will have exceed 5,000 and at a level which may potentially have significant local impacts. Whilst the campus accommodation as

proposed is likely to appeal and be favoured by certain groups of workers, especially those resident for short periods, it is important to confirm how workers will be attracted and encouraged to use the facility and whether the level of occupancy can be maintained for the duration of the build. Consolidation on site will make it easier to manage certain elements, however there are questions as to the amount of units which will or can be delivered and that it will not be possible to constrain workers in one location. The type of accommodation also reduces the potential legacy to the region.

- 6.4.15 **DISPLACEMENT** - Gwynedd Council has over 1900 individuals/families waiting on the social housing register and the homelessness service are already experiencing problems identifying affordable private accommodation. The affordability is more acute in the Bangor area where the Homeless Service are already unable to source properties within the Local Housing Authority rates. Even a minimal increase in demand is likely to exacerbate the problem and areas outside Bangor are likely to witness an uplift in rental values which will make it more challenging to identify and safeguard accommodation for vulnerable groups. There are also concerns that vulnerable families and individuals resident on the island could be displaced which would result in increased demand in Gwynedd there could also be an internal drift within Gwynedd. The Gwynedd Homelessness Strategy highlights key pressure points within the existing market and the type and level of accommodation required to address the balance. Further competition and a reduced supply will exacerbate the challenge.
- 6.4.16 **HOUSING AFFORDABILITY** - The documents reference that workers will be able to claim a disturbance allowance of approx. £38 per night (at current rates) which would equate to around £266 a week. The existing Local Housing Allowance for Ynys Mon and North Gwynedd (Key Study Area) is £110 per week for a 3 bed family house which would mean that local people would find it impossible to compete as individual workers would be able to claim 241% more per week. There is a danger that this could significantly inflate the market and impact the availability of rented accommodation for local people. Information has been forthcoming as to the level of rents payable at the Campus accommodation (will the TWA be provided below the daily allowance) nor have we seen unit cost of building the units to help compare with other alternatives which could potentially be delivered at a more economical cost or provide a long term legacy.
- 6.4.17 The Planning Statement (APP-406) provides limited information and includes reference to the management of the mitigation fund by a committee consisting of representatives from Horizon, IACC, Welsh Government and the emergency services. Gwynedd Council would wish to have a place on the committee. Section 9.3 [APP-412] makes a number of statements as to what the Housing Fund ‘could’ do but Gwynedd not been party to any information as to the extent of the fund how it could be access what it could be used for or how it would be proportioned to respond to demand. Gwynedd Council has contributed to discussion with Welsh Government re potential measures which could help alleviate impact which will be submitted within a report prepared by 3 Dragons Consultancy .

Adequacy of the DCO

- 6.4.18 **ADHERANCE** – The central business case indicates that local impacts can be managed, however minor variances from that case, arising from a range of factor e.g. an increase in staff numbers, delays in delivery or inability to employ locally can have disproportionate negative impacts and will need require for contingencies. It is essential that Horizon affirm the commitment to ensure that building work on site is conditional on securing an adequate supply of housing, in readiness and in advance of need.
- 6.4.19 **TURNOVER** – Information presented suggest that there will be around 30,000 different roles during construction this will involve significant churn of individuals within the housing markets and level of turnover needs to be factored into the housing assumptions.

- 6.4.20 **LEVEL OF LATENT CAPACITY** – There are questions as to whether the latent capacity exists at the levels highlighted by Horizon which would impact on gravity models. Consideration needs to be given as to what triggers will be used to identify change in demand patterns and how additional supply will be delivered quickly.
- 6.4.21 **STAFF NUMBERS** - Alongside the construction staff it is expected that there will be additional roles associated with, or required to serve the workforce, these roles may be involved in building the TWA or off site roles e.g. in service industries and could have a bearing on the demand for housing
- 6.4.22 **Cumulative Demand** – Information provided by Horizon suggest that an additional 500 people will be seeking accommodation options in Gwynedd. There is a need to monitor demand levels and consideration could be given to the distribution of existing Wylfa staff. Given that, other developments are expected to run concurrently with Wylfa Newydd it will also be necessary to consider the cumulative impact of National Grid upgrade, the key infrastructure projects associated with Wylfa Newydd also needs to be taken into consideration.

Planning Policy Observations

- 6.4.23 Criterion 5 of Strategic Policy PS 9 expects that the accommodation requirements of construction workers be met in a way that minimises impact on the local housing market and does not result in an unacceptable adverse economic or environmental impacts. Individually or cumulatively, these adverse impacts could have a negative impact on the linguistic character of communities.
- 6.4.24 Criterion 7 links Policy PS 9 with the requirements of Policy PS 10. Of particular relevance are criteria 1 and 2 of Policy PS 10. The Policy supports the provision of campus style temporary accommodation, but applies a sequential approach, in that this type of accommodation should be provided when existing properties or new properties that could be adapted for permanent use cannot satisfy the identified need.
- 6.4.25 Issues described above and by some other parties who have submitted representations suggest that the potential for the provision of new buildings in sustainable locations on the Island occupied by construction workers before an alternative legacy use may not have been sufficiently explored by Horizon.
- 6.4.26 Notwithstanding the previous comment, issues raised regarding difficulties in delivering the temporary accommodation at Wylfa Newydd on time and in advance, or to respond to variations within the pattern and distribution of the workforce trigger concerns whether criteria 5 and 16 of Policy PS 9 is satisfied from Gwynedd Council's perspective. The latter criterion recognises that pre- construction assumptions made during the scheme's development may not be realised and therefore more information will be required to identify additional or alternative mitigation measures.
- 6.4.27 A DCO requirement to commit Horizon to construct all 4,000 bed-spaces is required. This needs to be linked to either phases in construction programme and/ or number of workers employed, with clear enforceable triggers.
- 6.4.28 Failure to satisfy criterion 5 of Policy PS 5 could result in development that may not align with Criterion 5 of Policy PS 4 and Policy TAI 14, which seek to safeguard tourist accommodation and manage the use of static caravans, chalets, etc for temporary residential use by construction workers. Additionally, failure to monitor and respond to changing circumstances as required by criterion 16 of Policy PS 9 could have a detrimental impact on the Joint Local Development Plan's Settlement Strategy (Policy PS 17) as the market is left to react to the demand. A DCO requirement to construct all 4,000 bed- spaces in a timely manner and monitoring and review measures would ensure better alignment with criterion 16 of Policy PS 16.

6.5 Service provision

Context

- 6.5.1 Gwynedd Council is statutorily responsible for the provision of certain community services within its area. In addition, residents of Gwynedd rely upon the services of other public providers which include the local health board and the emergency services. Gwynedd's role and interests as local housing authority has been addressed in section 6.4.
- 6.5.2 Evidence gathered to inform the preparation of the Joint Local Development Plan (Topic Paper 13: Infrastructure 2015) has been used to inform this section as well as information provided on service providers' websites.

Education

- 6.5.3 There are 86 primary schools, 13 secondary schools, 1 all through school (3 – 16), 2 private schools (3 -11 & 3 – 18) and 2 special needs schools in Gwynedd. In 2015 the Council was experiencing high levels of surplus capacity in its primary schools with 21 schools significantly below and 10 schools above capacity levels. A number of the Council's school buildings were in a poor condition.
- 6.5.4 To address capacity issues Gwynedd has implemented school reorganisation programmes in the Gader (Dolgellau), Berwyn (Bala) and Tywyn catchments. The three catchments lie outside of Horizon's KSA. Current projects, which lie within the KSA, include increasing the capacity of Ysgol y Faenol (Bangor) and also reviewing education provision currently provided at Ysgol Glanadda, Ysgol Coedmawr and Ysgol y Garnedd (Bangor).

Health

- 6.5.5 There are 29 GP practices, 16 dental practices 30 pharmacies and 12 opticians in Gwynedd (see <http://www.wales.nhs.uk/ourservices/directory>). Ysbyty Gwynedd in Bangor is a large hospital covering a geographical area which extends from Amlwch (Anglesey) to Tywyn in the south, Pwllheli in the west and Llandudno in the east. Community hospitals in Gwynedd can be found in Caernarfon, Tywyn, Blaeneau Ffestiniog, Dolgellau and Tremadog.

Community Centres, Cultural and Sports Facilities

- 6.5.6 There are 13 libraries in Gwynedd as well as a mobile library in addition to 2 museums, which are located in Bangor, Llanystumdwy a Dolgellau. Gwynedd has a good provision of purpose-built sports facilities yet whilst the Council is satisfied with the current level and framework of provision it does not mean that all of the area's recreational needs are satisfied. At present the Council operates 11 leisure centres, 7 of which have swimming pools. It also operates the Treborth Athletics Track and full-size and five-a-side synthetic football pitches in some settlements.

Emergency Services

- 6.5.7 Gwynedd is covered by the North Wales Police Western Division whose headquarters are in Caernarfon. There are two custody centres in Gwynedd at Caernarfon and Dolgellau with 9 police stations/offices.
- 6.5.8 There are 14 fire stations and two area safety offices. They are located at Bangor, Caernarfon, Dolgellau, Aberdyfi, Abersoch, Bala, Blaenau Ffestiniog, Barmouth, Harlech, Llanberis, Nefyn, Porthmadog, Pwllheli and Tywyn.

Positive Local Impacts

- 6.5.9 The Council does not consider that there will be any significant, positive impacts upon local services within Gwynedd.

Neutral Local Impacts

Education

- 6.5.10 Horizon's project-wide socio-economic assessment suggests that at peak, construction workers would bring 285 partners and 220 dependants (paragraph 1.5.50 Chapter C1 Socio-economics [APP-088]). Horizon estimates a worst case whereby there would be a 2% increase in demand across the KSA leaving 12% surplus capacity. Horizon has recognised that there might be areas where demand could result in capacity constraints and consequently have distributed the assumed number of dependants across the KSA Sub-areas in line with gravity modelling. Reference is made to potential effects upon Anglesey schools (primary and secondary), but no explicit reference is made to Gwynedd. The council would wish to receive confirmation that the mitigation measures which are referenced, such as language support and immersion will extend to the council area.

Emergency Services

- 6.5.11 Horizon estimates that 93% of the 7,500 additional workers required at peak construction will be resident on Anglesey [paragraph 1.5.63]. This breakdown is under-written by a number of assumptions. Gwynedd Council wishes to see a recognition that should a greater number of workers seek accommodation within its area, or should the effects upon emergency services be greater than those which have been referenced from Horizon's Project-wide Socio-economic chapter, that mechanisms are in place to address any impacts that may arise.

Policing

- 6.5.12 Horizon suggests that the effects upon policing in Gwynedd would be negligible (Horizon estimates 20 incidents per year [paragraph 1.5.64]) with the majority of any incidents likely to occur on Anglesey. The council is concerned that the additional demand for policing on Anglesey may reduce provision within its area as both council areas are covered by the same police force. Horizon needs to reach agreement with North Wales Police to ensure that it has sufficient resources to police both council areas.

Ambulance

- 6.5.13 Horizon estimates that there might be a 10% increase in ambulance calls on Anglesey during construction of the project and recognises (paragraph 1.5.69) that the services is already currently under pressure. The effects upon Gwynedd are considered to be negligible – and in the HIA. Whilst the council accepts that demand for ambulance provision in its area may not be significant it is concerned that increased demand on Anglesey may have a knock-on effect in its area. The council would support the North Wales Ambulance Service in ensuring that it has sufficient resources to accommodate the proposed workforce whilst at the same time maintaining (and perhaps improving) the service it provides to all resident in the KSA.

Fire

- 6.5.14 Impacts upon the North Wales Fire Service are considered by Horizon to be negligible. Horizon notes however (paragraph 1.5.77) that stakeholders have raised concern over potentially greater demand for fire service inspections of PRS and the potential fire risks arising from the greater use of latent accommodation. The focus of Horizon's assessment is upon Anglesey and whilst Gwynedd accepts that impacts will be greatest on the island it does require assurance that the fire service across the KSA will be sufficiently resourced.

Leisure and Community Services

- 6.5.15 Horizon recognises (paragraph 1.5.80) that current usage of facilities is higher in Gwynedd than Anglesey and that some increased demand may be realised from non-home-based workers. Additional mitigation in the form of the Community Impact Fund is proposed to address potential impacts. Paragraph 7.4.67 of the Planning Statement (8.1) [APP-406] states that *'The fund will be managed by a committee consisting of representatives from Horizon, IACC, Welsh Government and the emergency services'*. Gwynedd would wish to be party to this committee.

Health

- 6.5.16 The project-wide socio-economic assessment does not address the potential impacts upon existing health services as a result of the construction and operation phases. This is found within the Health Impact Assessment. The Impact Assessment (8.19)[APP-429] identifies the location of health services provision across the KSA (including Menai Mainland) at figures L6 and L7. An assessment of potential effects is reported in section C.6. The council is supportive of the mitigation measures proposed which suggest close working with PHW and BCUHB whose remit will cover the whole of the KSA.

Negative Local Impacts

- 6.5.17 Gwynedd Council agrees that there are unlikely to be any significant local impacts based upon the assumptions developed by Horizon but remains concerned for the reasons stated above that should these assumptions prove unrealistic that local impacts upon public services may arise. It would therefore wish to see explicit reference to Gwynedd Council as a Community Impact Fund committee member. The involvement of the public sector in this project will have provided the basis for

identifying issues and anticipating the increased need and pressures, placed upon those organisations. This is clearly a vital part of such a development. However, in relation to the preparations being made for a “temporary” possibly isolated and mainly male dominated workforce within existing (and temporary housing) other sectors, particularly the third sector need to be included in future planning. There are certain types of criminal activity, such as domestic abuse, sexual offences and substance misuse, where individuals, both victims and misusers / offenders are mainly supported by the third sector. Therefore, the capacity of our third sector providers may be affected by the anticipated increase in future need, and they therefore need to be addressed at the planning stages. The need for a developer to address the infrastructure requirements arising from its development proposal is set out within JLDP Policy PS2 Infrastructure and Developer Contributions and Policy ISA 1 Infrastructure Provision (see Appendix 1 for detailed policy wording). Additionally, PS 9 Wylfa Newydd and related development requires at criteria 10 that:

Where there would be additional impacts or demands on existing community facilities the Council will seek either appropriate contributions for off-site facilities or upgrading existing facilities. Legacy use of any additional facilities provided should be considered where that is appropriate.

Adequacy of the DCO

Obligation

- 6.5.18 Gwynedd Council has not had sight of the proposed Development Consent Obligation. It has however read the heads of terms presented within section 7.4 of the Planning Statement and would wish to make the following observations, which mirror the Council’s response to the ExA on “Action points raised from the draft DCO hearing held on Tuesday 24 October 2018”:
- Community Impact – The HoTs reference a management committee consisting of HNP, IACC, WG and the emergency services. GCC would also wish to be party.
 - Health and wellbeing – Reference is made to a sub-group and the implications made further on suggest this would include health bodies and emergency services. Gwynedd would wish to be represented on this group given our responsibilities under wellbeing and wider community health. The text also refers to housing market pressures which would be of concern to the Council.
- 6.5.19 In conclusion, the Heads of Terms to the S106 would benefit from an over-arching comment that the measures contained within the obligations would follow the impacts and in principle, be available throughout the KSA. As currently drafted, there is almost no reference to Gwynedd despite it forming a significant element of the study area. The Council will await sight of the draft S106 agreement at deadline 3.

Planning Policy Observations

- 6.5.20 The issues set out above mean that criteria 5, 10 and 11 of Policy PS 9 are of particular relevance, as well as criterion 4 of Policy PS 10.
- 6.5.21 Criterion 5 expects that the accommodation requirements of construction workers, a projected 75% of which will come from outside the area (i.e. 7,000 workers), will not result in unacceptable adverse social impacts.

- 6.5.22 Criterion 4 of Policy PS 10 seeks to ensure that campus style temporary accommodation (e.g. the Wylfa Newydd Temporary Construction Workers Accommodation) provide facilities, such as healthcare facilities, where there is insufficient capacity within off- site facilities to address the demands from construction workers.
- 6.5.23 When any provision provided by Horizon cannot satisfy demand and therefore causes additional impacts and demands on local communities, criterion 10 expects Horizon to provide appropriate contributions or upgrading existing facilities.
- 6.5.24 Linked to these criteria, criterion 11 of Policy PS 9 sets out an expectation that there are appropriate measures for promoting social cohesion and community safety.
- 6.5.25 Similar to other local impacts set out in this Statement, the expectation that a review mechanism is set up in order to monitor the full range of impacts (criterion 16 of Policy PS 9) is critical.
- 6.5.26 When impacts are identified Policy PS 2 and Policy ISA 1 are of particular relevance. Subject to meeting the statutory tests, these Policies allow for contributions to secure sufficient infrastructure required to accommodate new development.

7. Conclusions

Overview of planning policy observations

- 7.1 GC acknowledges that construction and operation of Wylfa Newydd have the potential to bring positive economic and social benefits to Anglesey, Gwynedd and the wider area. GC broadly agrees that there are unlikely to be any significant local negative impacts based upon the assumptions developed by Horizon. However, GC has highlighted its concerns about these assumptions in Section 6 above, which relate to the following topic areas: construction workers' accommodation, transport, skills and employment (including the tourism sector), the Welsh language and public services. These topics are inter- related, i.e. a potential impact (positive and negative) in one topic area is likely to have an impact on other topic area. Given its location in Northern Gwynedd and as a bridgehead settlement plus its role as an important Service Centre, there are particular concerns about the Bangor area if the assumptions prove incorrect.
- 7.2 GC's concerns are broadly based on potential/ probable gaps in information to inform Horizon's assumptions and a weak monitoring framework to identify and address circumstances that do not align with the original assumptions. Horizon seems to be of the view that local impacts can be managed. However, GC (and its partners) consider that minor variances from that case, arising from a range of factors, e.g. an increase in worker numbers, variation in origin of workers, delays in delivery of infrastructure, or inability to employ locally can have disproportionate negative impacts and will need require for contingencies. Failure or a delay in the supply of, for example, accommodation or park and ride facilities, could result in patterns of behaviour, which once established may be difficult to reverse. GC is concerned that Gwynedd is likely to experience increased demand and displacement if supply is delayed or does not materialise in the expected manner.
- 7.3 The adopted Anglesey and Gwynedd Joint Local Development Plan 2011 – 2026 is particularly relevant to this Statement of Local Impact, having had the benefit of formal Public Examination (2016 – 2017) and having been found sound following modifications stipulated by the Planning Inspectors. The Plan's vision and strategic objectives (Chapter 4), the Nationally Significant Infrastructure Projects and related development section (para 6.3.1 – 6.3.10) and the Wylfa Newydd and related development section (para 6.3.12 – 6.3.24) in chapter 6 of the Plan seek to ensure that local impacts are fully addressed. The latter section includes four Strategic Policies that deal specifically with Wylfa

Newydd and its related development. These sections and Policies include identifying the Council's vision and objective that proposals should, where possible, contribute positively to the implementation of the spatial strategy and meet the underlying strategic objectives of the Plan. They also identify an expectation of a commitment from Horizon to adopt initiatives to mitigate and compensate for impacts. The expectation for Horizon to address the infrastructure requirements arising from its development proposal is clearly set out in policy tests within Policy PS 9 through to Policy PS 12, which are supplemented by various generic Policies in the Plan (see Appendix 1). In order to meet the Policy expectations described in Section 6 of this Statement and address its concerns, GC considers that the DCO and its related documents should ensure that:

- monitoring is undertaken early and is ongoing throughout the construction period;
- mitigation should be undertaken proactively where appropriate;
- mitigation should follow impact and consider direct, indirect and induced impacts.

Avoiding negative impacts and facilitating positive impact

- 7.4 The Council considers that there are aspects of the proposed development that justify a precautionary approach requiring further discussion and agreement between the developer and relevant bodies. The Council wishes to have an input into discussions and arrangements in relation to mitigation measures to avoid adverse impacts, as well as discussions and arrangements to facilitate positive impacts for Gwynedd and the North Wales Region.
- 7.5 With regards to mitigation measures, the Council considers that these could be provided through amendments to the key DCO control documents such as the CoCP and through a section 106 agreement.
- 7.6 Gwynedd Council (GC) has only had sight of the S106 Heads of Terms (HoTs) which are set out within document 8.1 Planning Statement (paragraphs 7.4.8 to 7.4.86). Within these HoTs, Gwynedd Council is mentioned once, under the topic of Welsh Language. This is despite a substantial part of Gwynedd lying with the Key Study Area as defined by Horizon. Whilst Gwynedd Council recognises that the majority of impacts are likely to be experienced on Anglesey the scale of the project is such that it anticipates impacts and hence mitigations will also be required within its Council area. Gwynedd Council would therefore wish to see a mechanism within the S106 that allows for its involvement in the following areas, in additional to the Welsh Language:
- Accommodation – The HoTs provide little detail on what will be included within the S106, in contrast to some of the other topics. The section makes no reference to any of the organisations that would be party to the fund and makes no reference to the establishment of an agreed framework for monitoring.
 - Community Impact – The HoTs reference a management committee consisting of HNP, IACC, WG and the emergency services. GCC would also wish to be party.
 - Health and wellbeing – Reference is made to a sub-group and the implications made further on suggest this would include health bodies and emergency services. Gwynedd (and no doubt IACC) would wish to be represented on this group given our responsibilities under wellbeing and wider community health. The text also refers to housing market pressures which would be of concern to the Council.
 - Education and skills – Specific reference is made to IACC and to other organisations with regard to labour churn in the health sector. GC operates 13 residential care homes and has social care responsibilities. It would wish to be party to this.
 - Tourism – The HoTs do not mention any organisations and may therefore benefit from a reference to funding being available across the KSA.
 - Supply Chain Charter – Reference is made to IACC, Welsh Government, NWEAB and Menter Newydd. GC would wish to be included.

- Service Level Agreement and scale of contributions– Gwynedd would also wish to be able to call upon funding, particularly with regard to monitoring and for officer time spent in relation to the above.

7.7 In addition to the above areas the Council also has concerns regarding highways and transportation issues as referred to in part 6.1 of this statement and therefore there needs to be appropriate measures in place to mitigate any negative impacts.

7.8 In conclusion, the Heads of Terms to the S106 would benefit from an over-arching comment that the measures contained within the obligations would follow the impacts and in principle, be available throughout the KSA. As currently drafted, there is almost no reference to Gwynedd despite it forming a significant element of the study area. The Council will await sight of the draft S106 agreement at deadline 3.

Appendix A: Relevant Policies in the Anglesey and Gwynedd Joint Local Plan

Strategic Policy PS 1: Welsh Language and Culture

The Councils will promote and support the use of the Welsh language in the Plan area. This will be achieved by:

1. Requiring a Welsh Language Statement, which will protect, promote and enhance the Welsh language, where the proposed development falls within one of the following categories:
 - a. Retail, industrial or commercial development employing more than 50 employees and/or with an area of 1,000 sq. m. or more; or
 - b. Residential development which will individually or cumulatively provide more than the indicative housing provision set out for the settlement in Policies TAI 1 – TAI 6; or
 - c. Residential development of 5 or more housing units on allocated or windfall sites within development boundaries that doesn't address evidence of need and demand for housing recorded in a Housing Market Assessments and other relevant local sources of evidence.
2. Requiring a Welsh Language Impact Assessment, which will set out how the proposed development will protect, promote and enhance the Welsh Language, where the proposed development is on an unexpected windfall site for a large scale housing development or large scale employment development that would lead to a significant workforce flow;
3. Refusing proposals which would cause significant harm to the character and language balance of a community that cannot be avoided or suitably mitigated by appropriate planning mechanisms;
4. Requiring a bilingual Signage Scheme to deal with all operational signage in the public domain that are proposed in a planning application by public bodies and by commercial and business companies;
5. Expect that Welsh names are used for new developments, house and street names.

Strategic Policy PS 2: Infrastructure and Developer Contributions

The Councils will expect new development to ensure sufficient provision of essential infrastructure (either on-site or to service the site) is either already available or provided in a timely manner to make the proposal acceptable, by means of a planning condition or obligation. Subject to meeting the statutory tests, maintenance payments may be required pursuant to section 106 agreements in order to meet the initial costs of running services and facilities and to compensate communities for loss or damage caused by development. Where the essential, enabling and necessary infrastructure is required as a consequence of a scheme and cannot be provided on site, financial contributions will be requested, within limits allowed by legislation, to get essential investment off site. If the effect of the development is cumulative, the financial contributions may be accumulated, within legislative constraints, in order to alleviate the cumulative effect.

Policy ISA 1: Infrastructure Provision

Proposals will only be granted where adequate infrastructure capacity exists or where it is delivered in a timely manner. Where proposals generate a directly related need for new or improved infrastructure and this is not provided by a service or infrastructure company, this must be funded by the proposal. A financial contribution may be sought to secure improvements in infrastructure,

facilities, services and related works, where they are necessary to make proposals acceptable. Where appropriate, contributions may be sought for a range of purposes, including:

1. Affordable housing
 2. Sports and leisure facilities
 3. Education facilities
 4. Employment and training facilities
 5. Recreation and open space
 6. Transport infrastructure including public transport
 7. Healthcare facilities
 8. Nature conservation
 9. Recycling and waste facilities
 10. Renewable and low carbon infrastructure
 11. Cultural and community facilities
 12. Welsh language measures
 13. Broadband infrastructure
 14. Public Realm
 15. Flood risk management measures
 16. Service and utilities infrastructure, including water supply, drainage, sewers, gas and electricity
 17. Archaeological and historic assets
- Proposals for utility services to improve infrastructure provision will be granted subject to detailed planning considerations.

Policy ISA 2: Community Facilities

The Plan will help sustain and enhance community facilities by:

1. Granting the development of new community facilities, provided that:
 - i. they are located within or adjoining development boundaries or they are located outside development boundaries but within clusters where the proposal will provide an essential facility to support the local community;
 - ii. in the case of new buildings, that the local community's needs cannot be satisfied through the dual use of existing facilities or the conversion of existing buildings;
 - iii. where the proposal is for a facility being relocated, it can be demonstrated that the existing site is no longer suitable for that use;
 - iv. the proposal is of an appropriate scale and type compared to the size, character and function of the settlement;
 - v. the proposal is easily accessible by foot, cycle and public transport. The provision of new or enhanced multiuse community facilities, including the co-location of healthcare, school, library and leisure facilities in accessible locations will be encouraged.
2. Resisting the loss or change of use of an existing community facility unless:

- i. a suitable replacement facility can be provided by the developer either on or off site, and within easy and convenient access by means other than the car, or
- ii. it can be demonstrated that the facility is inappropriate or surplus to requirements, or
- iii. in the case of a commercially operated facility:
 - there is evidence that the current use has ceased to be financially viable, and
 - that it could not reasonably be expected to become financially viable and • no other suitable community use can be established, and
 - there is evidence of genuine attempts to market the facility, which have been unsuccessful.

Strategic Policy PS 4: Sustainable Transport, Development and Accessibility

Development will be located so as to minimise the need to travel. The Councils will support improvements that maximise accessibility for all modes of transport, but particularly by foot, cycle and public transport. This will be achieved by securing convenient access via footways, cycle infrastructure and public transport where appropriate, thereby encouraging the use of these modes of travel for local journeys and reducing the need to travel by private car. The Council will endeavour to improve accessibility and seek to change travel behaviour. This will be achieved by working with our partners to:

1. Maintain an appropriate public transport service, recognising alternative ways of maintaining travel opportunities;
2. Maintain and improve stations, infrastructure and services on the main Railway Lines including access to disabled people and other rail-related improvements;
3. Where possible safeguard, improve, enhance and promote and public rights of way (including footpaths, bridleways and byways) and cycleway networks to improve safety, accessibility (including disabled people) by these modes of travel and to increase health, leisure, well-being and tourism benefits for both local residents and visitors;
4. Support schemes that will improve park and ride / share facilities for areas of employment, new development and freight transfer facilities;
5. Allocating or safeguarding land where appropriate to facilitate the key strategic transport schemes. The Councils will also require appropriate transport infrastructure elements to be delivered as part of major infrastructure development schemes either in kind or through section 106 obligations.

Policy TRA 1: Transport Network Developments

1. Improvements to Existing Infrastructure

Improvements to the existing transport network will be granted provided they conform to the following criteria:

- i. The choice of route and/or site minimises the impact on the built and natural environment, landscapes and property; and
- ii. Permanent land-take is kept to the minimum that is consistent with good design and high quality landscaping; and
- iii. In the case of cycle ways, park and ride schemes, roads and roadside service areas, the scheme will help to improve road safety; and

- iv. In the case of new roads a full range of practicable solutions to the transport problem has been considered and road enhancement provides the optimum solution; and
- v. In the case of roadside service areas, the scheme must adjoin the strategic road network, focus primarily on serving the needs of motorists, not impede the movement of strategic traffic and in line with Strategic Policy PS 15 not undermine retail provision in the Sub- Regional Centre, Urban and Local Service Centres or Villages.

2. Transfer Between Transport Modes

In order to facilitate the transfer between transport modes and help to minimise travel demand and reduce car dependency, provided they conform to relevant policies in the Plan the following proposals will be granted:

- i. Improvements to existing rail and bus interchanges, including measures to facilitate access by active travel modes and disabled people with particular access needs;
- ii. Strategically located permanent park and ride facilities within or adjacent to Centres or in other locations close to the main highway network when it can be demonstrated that no alternative sites closer to the Centres are suitable, where customers are supported by frequent bus services between the facility and the destination;
- iii. Strategically located facilities within or adjacent to Centres for overnight lorry parking and freight transfer;
- iv. High quality driver and passenger facilities including but not limited to, seating, information, toilet facilities;
- v. Facilities for park and share in appropriate locations within or adjacent settlements on the strategic highway network;
- vi. Facilities within settlements for coach parking, taxis and passenger drop off;
- vii. Facilities for interchange with water-based transport.

3. Transport Assessments Proposals for large-scale development or developments in sensitive areas that substantially increase the number of journeys made by private vehicles will be refused unless they include measures as part of a Transport Assessment and/or a Travel Plan. Where the Transport Assessment reveals the need for a Transport Implementation Strategy this will need to be secured through a planning obligation.

4. Transport Schemes Improvements to the strategic transportation network in the Plan area shown on the Proposals Maps will be secured through safeguarding and provision of land. Schemes include:

- i. A487 Caernarfon to Bontnewydd
- ii. Llangefni Link-Road
- iii. A5025 Valley to Wylfa and other transport infrastructure improvements associated with the new nuclear development at Wylfa Newydd, including improvements from Amlwch to Wylfa Newydd where need for improvement on that section is demonstrated following a highway impact assessment of the Wylfa newydd Project on the A5025.

Policy TRA 4: Managing Transport Impacts

Where appropriate, proposals should be planned and designed in a manner that promotes the most sustainable modes of transport having regard to a hierarchy of users:

- 1. Pedestrians, including people with prams and/or young children;

2. Disabled people with mobility impairments and particular access needs;
3. Cyclists;
4. Powered two-wheelers;
5. Public transport;
6. Vehicular access and traffic management within the site and its vicinity;
7. Car parking and servicing;
8. Coach parking; and
9. Horse-riders.

Proposals that would cause unacceptable harm to the safe and efficient operation of the highway, public transport and other movement networks including pedestrian and cycle routes, public rights of way and bridle routes, will be refused. The degree of unacceptable harm will be determined by the local authority on a case by case basis.

Strategic Policy PS 5: Sustainable Development

Development will be supported where it is demonstrated that they are consistent with the principles of sustainable development. All proposals should:

1. Alleviate the causes of climate change and adapting to those impacts that are unavoidable in accordance with Strategic Policy PS 6;
2. Give priority to effective use of land and infrastructure, prioritizing wherever possible the reuse of previously developed land and buildings within the development boundaries of Sub Regional Centre, Urban and Local Service Centres, Villages or in the most appropriate places outside them in accordance with Strategic Policy PS 17, PS 13 and PS 14;
3. Promote greater self-containment of Centres and Villages by contributing to balanced communities that are supported by sufficient services; cultural, arts, sporting and entertainment activities; a varied range of employment opportunities; physical and social infrastructure; and a choice of modes of travel;
4. Protect, support and promote the use of the Welsh language in accordance with Strategic Policy PS 1;
5. Preserve and enhance the quality of the built and historic environment assets (including their setting), improving the understanding, appreciation of their social and economic contribution and sustainable use of them in accordance with Strategic Policy PS 20;
6. Protect and improve the quality of the natural environment, its landscapes and biodiversity assets, including understanding and appreciating them for the social and economic contribution they make in accordance with Strategic Policy PS 19;
7. Reduce the effect on local resources, avoiding pollution and incorporating sustainable building principles in order to contribute to energy conservation and efficiency; using renewable energy; reducing / recycling waste; using materials from sustainable sources; and protecting soil quality;
8. Reduce the amount of water used and wasted; reducing the effect on water resources and quality; managing flood risk and maximizing use of sustainable drainage schemes; and progressing the objectives of the Western Wales River Basin Water Management Plan. Proposals should also where appropriate:

9. Meet the needs of the local population throughout their lifetime in terms of their quality, types of tenure and affordability of housing units in accordance with Strategic Policy PS 16;
10. Promote a varied and responsive local economy that encourages investment and that will support Centres, Villages and rural areas in accordance with Strategic Policy PS 13;
11. Support the local economy and businesses by providing opportunities for lifelong learning and skills development in accordance with Strategic Policy PS 13;
12. Reduce the need to travel by private transport and encourage the opportunities for all users to travel when required as often as possible by means of alternative modes, placing particular emphasis on walking, cycling and using public transport in accordance with Strategic Policy PS 4;
13. Promote high standards of design that make a positive contribution to the local area, accessible places, that can respond to future requirements and that reduce crime, antisocial behaviour and the fear of crime in accordance with Policy PCYFF 3.

Strategic Policy PS 9: Wylfa Newydd and Related Development

In their role as determining authorities for related development for Wylfa Newydd the Councils will require compliance, where appropriate, with the criteria set out in this Policy and Policies PS 10 - 12, where applicable.

In responding to proposals forming part of a Development Consent Order application to the Secretary of State the Councils will take the same considerations into account in the preparation of a Local Impact Report.

1. Any relevant policies included in the Plan, and any relevant supplementary planning guidance should shape the approach to the development of the nuclear power station and proposals for related development;
2. In order to minimise impact and maximise re-use of existing facilities and materials, opportunities have been taken where feasible to integrate the requirements of the Wylfa Newydd Project with the proposed decommissioning of the existing power station;
3. Highways and transport proposals for the Wylfa Newydd Project form part of the integrated traffic and transport strategy that has regard to Strategic Policy PS 4 and any relevant detailed Policies in the Plan and minimises adverse transport impacts to an acceptable level, including those arising during the construction, operation and decommissioning stages, and any restoration stages. Proposals should where feasible make a positive contribution to transportation policy objectives in the locality, and should include multi-modal solutions and investment that encourages travel by public transport, walking and cycling and other sustainable forms of transport;
4. Early or preparatory works for the development of the nuclear power station shall demonstrate that they are necessary to ensure the timely delivery of the Wylfa Newydd Project or are designed to provide mitigation for the effects of the construction or operation of the Wylfa Newydd Project. Any early or preparatory works must be accompanied by a strategy to enable the sites to be restored to an acceptable standard should the Project not be consented or constructed and demonstrate how the costs of undertaking such restoration will be secured, including through bonding;
5. The accommodation requirements of construction workers should be met in a way that minimises impact on the local housing market, including the ability of those on low incomes to access the private rented sector, affordable housing and other housing services (taking account of the published Local Housing Market Assessment), and not result in unacceptable adverse economic (including the tourism sector), social, linguistic or environmental impacts.

Proposals should form part of a robust construction workers accommodation strategy that has regard to the Plan's Spatial Strategy and any relevant policies in the Plan, including Policy PS 10;

6. Where proposals are for a temporary period both the site selection and the proposal detail shall be informed by a consideration of legacy uses, so that investment in elements such as infrastructure, buildings, ecological and landscape works brings long term benefits. Where a legacy use is proposed, delivery plans for legacy uses will be required with planning applications to demonstrate how legacy use has informed the approach to the design and layout of the related development sites, as well to contribute to the framing of a S106 and/or other agreements and CIL payments (if applicable);
7. Proposals for campus style temporary workers accommodation, logistics centres and park and ride facilities will also be assessed against the criteria set out in Policies PS 10 - 12;
8. The scheme layout and design and the scale of open spaces, landscaping, planting (including hedging and tree belts), waterways and similar features proposed should avoid, minimize, mitigate or compensate for visual, landscape and ecological impacts on the local and wider area, as well as on cultural and historic aspects of the landscape, both in the short and longer term. Proposals will be expected to be commensurate with the scale of the development, and the extent of its impact;
9. 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. The promoter's procurement, employment, education, training and recruitment strategies and delivery plans will require to be submitted to the Council as part of any planning application so far as it is relevant to the application;
10. Community infrastructure facilities will be provided for construction workers, for example, park and ride or park and share facilities, shops, healthcare and sports and leisure facilities. Where feasible, provision of these community infrastructure facilities on sites other than the Wylfa Newydd Development Area should be sited and designed so that it can be made available for community use during the construction phase and ultimately, where appropriate, serve a community legacy use. Where there would be additional impacts or demands on existing community facilities the Council will seek either appropriate contributions for off-site facilities or upgrading existing facilities. Legacy use of any additional facilities provided should be considered where that is appropriate;
11. Proposals should include appropriate measures for promoting social cohesion and community safety;
12. All proposals shall be appropriately serviced by transport infrastructure including public transport and shall not have adverse impacts on local communities and tourism and this shall be demonstrated in a transport assessment. Where there is insufficient transport linkage or the road network does not have sufficient capacity to accommodate the level of traffic which will result from any development or an adverse impact is predicted, appropriate improvements to the transport network and the provision of sustainable transport options shall be provided to mitigate the impacts;
13. The burden and disturbance borne by the community in hosting a major national or regional nuclear related infrastructure project should be recognised; and appropriate packages of community benefits provided by the developer will be sought to offset and compensate the community for the burden and disturbance imposed by hosting the project;
14. Any proposal on the Wylfa Newydd site (outside a DCO) to treat, store or dispose of Very Low level, Low Level or Intermediate Level Radioactive Waste or to treat or to store spent fuel arising from the existing nuclear power station or any future nuclear development within

or outside the Plan area, in an existing or proposed facility on or off the nuclear site would need to i. demonstrate that the environmental, social and economic benefits outweigh any negative impacts.

15. If a future or legacy use for any temporary development is not feasible the Council shall require that temporary buildings are removed; and
 - i. that the serviced land is left in a suitable condition following the removal of the structures in accordance with a scheme of work submitted and approved by the Local Planning Authority; or
 - ii. all waste disposal facilities, roads, parking areas and drainage facilities are permanently removed from the site and the land is reverted to its original state in accordance with a scheme of work submitted to and approved by the Local Planning Authority.
16. It is possible that as the project develops, due to unforeseen consequences resulting from the construction and operation of the Wylfa Newydd Project, the Councils may require additional information from, or works to be carried out by the developer in order to off-set any additional impacts or burdens borne by the community affected. The developer should build in review mechanisms in order to monitor the full range of impacts, to review the adequacy of mitigation or compensation measures and to make adjustments as necessary.

Strategic Policy PS 10: Wylfa Newydd – Campus Style Temporary Accommodation for Construction Workers

In their role as determining authorities for campus style temporary accommodation for construction workers for Wylfa Newydd, the Councils will require compliance, where appropriate, with the criteria set out in Policy PS 9 and with this Policy. In responding to proposals forming part of a Development Consent Order application to the Secretary of State the Councils will take the same considerations into account in the preparation of a Local Impact Report.

1. the developer can firstly demonstrate that the proposal satisfies a demonstrable need for temporary accommodation for construction workers that cannot be met through either existing residential accommodation, or the re-use of existing buildings, or the provision of new permanent buildings capable of being adapted for permanent use following their use by construction workers; and
2. the proposal is located on the Wylfa Newydd Project site or a site located adjacent to or well related to the development boundary of Holyhead, Amlwch, Llangefni, Gaerwen or Valley and is close to the main highway network where adequate access can be provided without significantly harming landscape characteristics and features, and also takes account of policy preference for use of previously developed land; and
3. the proposal must include appropriate mechanisms to mitigate any adverse impacts of the proposed development on the Welsh language and culture or a contribution is made towards mitigating those impacts in accordance with Policy PS 1 and Policy ISA 1; and
4. Where there is insufficient capacity within existing off-site leisure, recreational, retail and healthcare facilities to meet the needs of occupiers of the site or such facilities are not available within an acceptable distance which facilitates pedestrian or cycle access to them, the proposal must include appropriate mechanisms to mitigate negative impacts which may include onsite provision of ancillary facilities for the use of the occupiers; and
5. Operators will be required to maintain occupancy information to facilitate the monitoring of the impacts of the development, including the number of construction workers accommodated, the duration of occupancy and keep a record of anonymised data of workers (having regard to the requirements of data protection legislation) and make this information immediately available, on request, to the Council.

Strategic Policy PS 12: Wylfa Newydd - Park and Ride and Park and Share Facilities.

In their role as determining authorities for park and ride and park and share facilities for Wylfa Newydd, the Councils will require compliance, where appropriate, with the criteria set out in Policy PS 9 and with this Policy. In responding to proposals forming part of a Development Consent application to the Secretary of State the Councils will take the same considerations into account in the preparation of a Local Impact Report.

1. In order to minimise the need for construction workers and workers that service the facility to travel by private car, the site is located: i. within or adjacent to development boundaries of Centres located along or close to the A5/ A55; or ii. in other locations along the A5/A55 where the site is part of a comprehensive approach to mitigating the transport effects of the Project, takes account of the Councils' preference to consider sites closer to Centres, has due regard to landscaping and environmental considerations, and where provision for travel to the site by sustainable means, including public transport and cycling, can be provided.
2. Proposals should make provision for new and enhancement of existing pedestrian and cycle paths and improvement to public transport services; 3. The siting of buildings and activities, means of access and egress and appropriate mechanisms are used to mitigate negative impacts of the proposed development on the amenity of local communities.

Strategic Policy PS 14: The Visitor Economy

Whilst ensuring compatibility with the local economy and communities and ensuring the protection of the natural, built and historic environment the Councils will support the development of a year-round local tourism industry by:

1. Focusing larger scale, active and sustainable tourism, cultural, the arts and leisure development in the sub-regional centre, urban service centres, and, where appropriate, local service centres;
2. Protecting and enhancing existing serviced accommodation and supporting the provision of new high quality serviced accommodation in the sub-regional, urban and local service centres and villages;
3. Managing and enhancing the provision of high quality un-serviced tourism accommodation in the form of self-catering cottages and apartments, camping, alternative luxury camping, static or touring caravan or chalet parks;
4. Supporting appropriately scaled new tourist provision and initiatives in sustainable locations in the countryside through the reuse of existing buildings, where appropriate, or as part of farm diversification, particularly where these would also benefit local communities and support the local economy and where they are in accordance with sustainable development objectives;
5. Preventing development that would have an unacceptable adverse impact on tourist facilities, including accommodation and areas of visitor interest or their setting, and maximise opportunities to restore previous landscape damage.

Policy TWR 2: Holiday Accommodation

Proposals for:

1. The development of new permanent serviced or self-serviced holiday accommodation, or
2. The conversion of existing buildings into such accommodation, or

3. Extending existing holiday accommodation establishments, will be permitted, provided they are of a high quality in terms of design, layout and appearance and that all the following criteria can be met:
 - i. In the case of new build accommodation, that the development is located within a development boundary, or makes use of a suitable previously developed site;
 - ii. That the proposed development is appropriate in scale considering the site, location and/or settlement in question;
 - iii. That the proposal will not result in a loss of permanent housing stock;
 - iv. That the development is not sited within a primarily residential area or does not significantly harm the residential character of an area;
 - v. That the development does not lead to an over-concentration of such accommodation within the area.

Policy TWR 3: Static Caravan and Chalet Sites and Permanent Alternative Camping Accommodation

1. Proposals for the development of new static caravan (i.e. single or twin caravan), holiday chalet sites or permanent alternative camping accommodation will be refused within the Anglesey Coast Area of Outstanding Natural Beauty, Llŷn Area of Outstanding Natural Beauty and the Special Landscape Areas. In other locations proposals for new static caravan or holiday chalet sites and permanent alternative camping accommodation will only be granted where:
 - i. It can be demonstrated that it doesn't lead to a significant intensification in the provision of static caravan or chalet or permanent alternative camping sites in the locality; and
 - ii. That the proposed development is of a high quality in terms of design, layout and appearance, and is sited in an unobtrusive location which is well screened by existing landscape features and/or where the units can be readily assimilated into the landscape in a way which does not significantly harm the visual quality of the landscape; and
 - iii. That the site is close to the main highway network and that adequate access can be provided without significantly harming landscape characteristics and features.
2. In exceptional circumstances, proposals involving the relocation of an existing static or chalet site already located in the Anglesey Coast Area of Outstanding Natural Beauty, Llŷn Area of Outstanding Natural Beauty and the Special Landscape Areas that forms part of the Coastal Change Management Area to another site will only be permitted providing that criteria 1. i – iii are met and the new site is located outside the Coastal Change Management Area.
3. Within the Anglesey Coast Area of Outstanding Natural Beauty, Llŷn Area of Outstanding Natural Beauty and the Special Landscape Areas proposals to improve existing static and chalet sites by:
 - i. minor extensions to the site area, and/or
 - ii. the relocation of units from prominent settings to less prominent locations, will be permitted providing all of the following criteria can be met:
 - iii. the improvements does not increase the number of static caravan or chalet units on the site unless, in exceptional circumstances, proposals involve the relocation of existing static and chalet parks that fall within the Coastal Change Management Area;

- iv. that the proposed development is part of a scheme to improve the range and quality of tourist accommodation and facilities on the site; v. in the case of a site located within the Coastal Change Management Area, that the proposed development is also part of a scheme to improve the safety of occupiers or occupiers of caravans or chalets;
- vi. that the proposed development offers significant and permanent improvements to the design, layout and appearance of the site and its setting in the surrounding landscape;
- vii. is appropriate when considered against other policies in the Plan 4. Outside the Anglesey Coast Area of Outstanding Natural Beauty, Llŷn Area of Outstanding Natural Beauty and the Special Landscape Areas proposals to improve existing static caravan and chalet sites by:
 - i. minor extensions to the site area, and/or
 - ii. the relocation of units from prominent settings to less prominent locations, and/or,
 - iii. a minor increase in the number of units on site, will be permitted providing all of the following criteria can be met:
 - iv. That the proposed development is part of a scheme to improve the range and quality of tourist accommodation and facilities on the site;
 - v. That the proposed development offers significant and permanent improvements to the design, layout and appearance of the site and its setting in the surrounding landscape;
 - vi. In the case of a site located within the Coastal Change Management Area, that the proposed development is part of a scheme to improve the safety of occupiers of occupiers of caravans or chalets;
 - vii. That any increase in the number of static holiday caravan or holiday chalet units is minor and is commensurate with the scale of any improvements to the site;
 - viii. Is appropriate when considered against other policies in the Plan.

The following Appendices are attached as separate documents:

Appendix 2: Report by Hardisty Jones Associates

Appendix 3: Data by STEAM on Tourism

Appendix 4: Executive Summary for Homelessness Strategy

Appendix 5: Report by ARC4 on the impact of Wylfa Newydd

