

**Representations to the Wylfa Newydd
Development Consent Order Application
(Application Reference: EN010007)**

December 2018

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Prepared By: Jon Suckley MTCP MRTPI on behalf of Land and Lakes Limited

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For and on behalf of GVA Grimley Limited

1. Qualification and Scope of Evidence

- 1.1 A Development Consent Order ("DCO") application for the Wylfa Newydd Nuclear Power station was submitted by Horizon Nuclear Power ("Horizon") to the Planning Inspectorate ("The Inspectorate") on 1 June 2018. The DCO application was accepted for examination on the 28 June 2018 and the examination hearings are scheduled to take place between 7-11 January 2019 and 4-8 March 2019.
- 1.2 This planning representation has been prepared by Jon Suckley MTCP MRTPI on behalf of Land and Lakes Limited ("Land and Lakes"). It has been prepared to advance Land and Lakes' case as part of the DCO Examination that Horizon's workforce accommodation strategy proposed in the DCO application is fundamentally flawed and departs from the Anglesey and Gwynedd Joint Local Development Plan 2011-2026 ("JLDP") adopted on 31 July 2017. Further, it demonstrates that the already consented Land and Lakes scheme for workforce accommodation is a preferable alternative scheme from a planning policy perspective and provides significant material benefits including sustainable legacy uses which already benefit from an extant planning permission.

My Background

- 1.3 I have practised for 15 years in the planning and development field and began my career in 2003 at the former Macclesfield Borough Council (now Cheshire East Council). In 2005, I joined HOW Planning ("HOW") as a Graduate planner and achieved my full membership to the Royal Town Planning Institute later that year. In 2013 I became a partner of HOW.
- 1.4 HOW was a specialist planning and Environmental practice founded in 2001. In May 2018, HOW was acquired by GVA, the largest independent commercial property agency in the UK. When the two companies combined, I was appointed a Senior Director.
- 1.5 I regularly advise a range of clients including developers, land owners, house builders, financial institutions, corporate bodies and local authorities on significant and complex planning matters in the residential, urban regeneration, mixed use, infrastructure, employment, care, heritage and leisure sectors.

Background to Land and Lakes and their workforce accommodation at Holyhead

- 1.6 Land and Lakes is a dynamic tourism and leisure company which has an emphasis on environmental awareness and the development of year-round resorts that promote, adventurous lifestyles. In 2009, Land and Lakes agreed terms with Anglesey Aluminium Metal Limited ("AAM") to acquire three physically separate but closely related sites on the edge of Holyhead, Anglesey. The sites are referred to as Penrhos Coastal Park, Land at Cae Glas and Land at Kingsland which all form part of AAM's wider estate.
- 1.7 AAM is jointly owned by Rio Tinto and Kaiser Aluminium and Chemical Corporation and began its aluminium smelting operation in Holyhead in 1971. The aluminium smelter was one of the largest employers in North Wales with circa 1500 staff members at its peak. Until recently, it produced up to 142,000 of aluminium every year and was the biggest single user of electricity (255 MW) in Wales.
- 1.8 The plant was powered from the national grid and received its electricity from Wylfa nuclear power station. AAM was used as a base load for Wylfa nuclear power station and saved the grid the cost of keeping the

power station on standby. The power contract expired, and the aluminium smelting operation was shut on 30 September 2009. AAM's land holding included the Penrhos estate which takes in the coastal park, land at Cae Glas and land at Kingsland. AAM allowed the public to use elements of the Penrhos estate as part of its community relations programme from 1971. When AAM's smelting operations ceased in 2009, the company was no longer in a position to fund the ongoing maintenance of the Penrhos Estate. At this time, AAM began a search for a new owner for the land to create a legacy for the local community who would allow public access to parts of the site to be formalised and secured into the future. Land and Lakes secured an option on the land and in return jointly invested with AAM a significant amount of money into the ongoing maintenance of the land to allow continued public access. Their maintenance programme costed circa £250,000 per year which AAM could no longer continue to fund when the aluminium smelting ceased. AAM's key objective was to create a legacy for the area and as the land was privately owned, AAM had to identify an appropriate steward that had a sustainable business plan otherwise the community benefits enjoyed would be lost.

1.9 The criteria adopted by AAM in its search to identify a suitable landowner who would create a legacy for the land comprised:

- i. The delivery of wide-ranging permanent employment opportunities for the area;
- ii. Proposals to create a high-quality tourism development which would secure a step change in Anglesey's tourism offer; and
- iii. To secure continued maintained, enhanced and sustainable public access across parts of the site.

1.10 Land and Lakes had its own site search criteria to identify commercially deliverable tourism opportunities on Anglesey Island. Its site search criteria was based upon:

- i. The site had to be of sufficient scale to enable a viable major development with an all year-round leisure offer to be created which includes a wide range of facilities and high-quality accommodation in a sustainable location;
- ii. To effectively compete with other tourism destinations in the UK, Land and Lakes required a site in a coastal location on Anglesey which provides safe accessibility to beaches. The requirement for a coastal location is fundamental and is Land and Lakes' unique selling point for the development. Without it, a sustainable and viable business model which can compete with other tourism destinations in the UK cannot be created;
- iii. The site had to be accessible by a range of transport modes by existing infrastructure to ensure a catchment of up to a 3-hour travel distance;
- iv. The site had to be situated in a sustainable location with accessibility to enable the local population to fill the local employment opportunities that will be created; and,
- v. The site had to be located within a 30-minute travel of Wylfa new build power station.

1.11 The Penrhos, Cae Glas and Kingsland sites met Land and Lakes' search criteria and they acquired the land in 2009 subject to obtaining planning permission for a tourist and leisure destination, retaining parts for continued public amenity and creating a lasting legacy for the local community and the Island as a whole.

1.12 In November 2012, HOW Planning submitted a planning application on behalf of Land and Lakes (LPA Ref: 46C427K/TR/EIA/ECON) for a leisure village and temporary construction worker accommodation with future and legacy tourism and residential uses at Holyhead. Planning permission was granted by Isle of Anglesey County Council ("IOACC") on 19 April 2016. The Decision Notice for the planning permission is provided at Appendix 1. The approved development comprises:

- i. A leisure village at Penrhos Coastal Park, Holyhead, comprising up to 500 new leisure units and associated leisure developments;
- ii. The erection of leisure village accommodation and facilities comprising up to 315 lodges at land at Cae Glas to be used initially as temporary construction workers accommodation and to be subsequently converted in an extension of the Penrhos Coastal Park; and
- iii. The construction of up to 320 new houses at Land at Kingsland, to be used initially as temporary construction workers accommodation and subsequently converted into a residential development.

My Role

1.13 I have been heavily involved with the Land and Lakes scheme and have acted on behalf of Land and Lakes since their instruction to HOW to prepare the planning application in 2010. My role spans a period of 8 years from 2010 until the present and during this time I have developed a detailed understanding of the wider context of the Island and its relationship to the Wylfa Newydd project. During this period, I have undertaken the following on behalf of Land and Lakes:

- i. Prepared and submitted their planning application which was accompanied by an Environmental Impact Assessment (EIA);
- ii. Led the extensive pre-application stakeholder and community consultation exercise;
- iii. Provided planning input into the negotiation of the applications Section 106 Legal Agreement;
- iv. Led the complex negotiations with IOACC and secured planning permission;
- v. Prepared and submitted representations throughout the preparation of the JLDPP including participation in the Local Plan Examination;
- vi. Prepared and submitted representations during the preparation of the Wylfa Newydd supplementary planning guidance adopted in 2018; and,
- vii. Provided planning input into Land and Lakes' representations to Horizon's DCO PAC consultations.

1.14 This representation represents my professional opinion, it is supported by a number of appendices to assist the Examining Authority's understanding of the planning case advanced by Land and Lakes for the

purposes of the Examination. I believe the facts stated in this evidence are true, accurate and have been prepared in accordance with the guidance of my professional institution.

2. Background to Land and Lakes Planning Permission

2.1 This section of my representation describes Land and Lakes' planning permission and the rigorous process that was followed to secure the consent.

The Site

2.2 The site comprises three separate parcels of land: Penrhos Coastal Park, Land at Kingsland and Land at Cae Glas all within a 1-kilometre radius of one another. The site is 207.5 hectares in area and is located in the eastern portion of Holy Island adjacent to the town of Holyhead. The parcels of land extend to:

- i. Penrhos Coastal Park – 80 Hectares;
- ii. Land at Cae Glas – 109 hectares; and,
- iii. Land at Kingsland – 18.5 hectares.

2.3 A plan identifying the location of the site edged in red is attached at Appendix 2.

Preparation of the Planning Application including Community Consultation

2.4 In 2010, HOW Planning was instructed by Land and Lakes to provide planning and environmental consultancy advice in connection with their planning application. Due to the scale and nature of the development, an Environmental Impact Assessment (EIA) was required to accompany the planning application.

2.5 As part of the preparation of the planning application, extensive consultation was undertaken with IOACC officers, statutory consultee organisations, key stakeholders and the local community. A summary of the consultation undertaken is set out below.

Pre-Application Discussions with IOACC and Statutory Consultee Organisations

2.6 A series of pre-application discussions and meetings were held with officers at IOACC, Gwynedd and Anglesey Councils' Joint Planning Policy Unit ("JPPU"), Countryside Council for Wales (now known as Natural Resource Wales ("NRW")), other key statutory consultee organisations and other interested parties in the preparation of the planning application including:

- i. An initial pre-application discussion with IOACC on 24 June 2011 to introduce Land and Lakes' draft development proposals;
- ii. A subsequent pre-application meeting on 12 September 2011 at IOACC offices in Llangefni with officers from IOACC, the JPPU, CCW, Environment Agency Wales and the applicant's development team;
- iii. A further meeting on 6 December 2011 with officers from IOACC, Land and Lakes and HOW to discuss the proposed changes to the scheme informed by the community consultation exercise and previous feedback provided by IOACC and statutory consultee organisations;

- iv. A further meeting held on 21 February 2012 with officers from IOACC, JPPU, Land and Lakes, HOW and Planit-IE (masterplanners and landscape architects) to obtain feedback from IOACC and JPPU on the revised draft proposals;
- v. A final pre-application meeting on 16 July 2012 with IOACC to discuss a range of topics focused on the requirements for the submission of the planning application.

2.7 Due to location of all three sites within the Anglesey Area of Outstanding Natural Beauty ("AONB"), Land and Lakes and the development team held regular meetings with Countryside Council for Wales ("CCW") primarily to focus on landscape and visual considerations. Pre-application meetings were held on 3 November 2011, 15 December 2011, 20 April 2012, 1 June 2012, and 4 July 2012.

Stakeholder and Community Consultation

2.8 Land and Lakes' draft proposals were presented at a public exhibition including a private viewing for members of Holyhead Town Council, Trearddur Bay Community Council and IOACC as well as existing tenants of the land on 20 October 2011. The main exhibition opened to the public on 21 October and 22 October 2011.

2.9 The event was widely advertised and provided the opportunity for members of the public and other stakeholders to view and comment on Land and Lakes' draft proposals.

2.10 Land and Lakes and members of the development team attended the public exhibition to provide advice and answer any questions that the local community had. Comments received during the stakeholder and community consultation exercise were taken into account and where practical and achievable, amendments to the scheme were made having regard to the relevant technical and planning policy considerations.

2.11 A detailed Statement of Community Involvement ("SCI") was prepared by HOW and submitted in support of the planning application, a copy of which is attached at Appendix 3. The SCI provided a detailed overview of the extent of the stakeholder and community consultation undertaken by Land and Lakes and summarised the main responses received by local residents, business and other stakeholders. The SCI responded to the feedback received during the stakeholder and community consultation process.

The Planning Application

2.12 HOW submitted an outline planning application with all matters reserved except for means of access (LPA Ref: 46C427K/TR/EIA/ECON) for Land and Lakes' proposals on 9 November 2012. The planning application was extensive and was accompanied by a comprehensive suite of supporting documents, the scope and extent of which had been prior agreed with officers at IOACC. The list of supporting documents is provided below:

- i. Planning application forms, notices and certificates, prepared by HOW, November 2012;
- ii. A suite of planning application drawings, prepared Planit-IE (masterplanners and landscape architects), Purcell (heritage consultants), and Curtins Consulting (highways), November 2012;
- iii. Supporting Planning Statement, prepared by HOW, November 2012;

- iv. Design and Access Statement, prepared by Planit-IE, November 2012;
- v. Economic and Tourism Need and Benefits Report, prepared by Regeneris Consulting, November 2012;
- vi. Statement of Community Involvement, prepared by HOW, November 2012;
- vii. Confidential Residential Viability Assessment, Kingsland, prepared by Grasscroft Developments Limited, November 2012;
- viii. Environmental Statement Non-Technical Summary (Volume 1) prepared by HOW, November 2012;
- ix. Environmental Statement Main Document (Volume 2) prepared by HOW, November 2012;
- x. Environmental Statement Appendices (Volume 3) prepared by HOW, November 2012.

2.13 The description of development for the outline planning application is set out on the Decision Notice at Appendix 1 and is summarised below:

- i. A high-quality leisure development at Penrhos Coastal Park with enhanced coastal and woodland public access;
- ii. A new build Wylfa construction workers accommodation complex in the short term at Cae Glas with central amenities and sports facilities which will be refurbished in the medium term to form an extension to the leisure development. A nature reserve with visitor centre and heritage centre are also proposed; and,
- iii. A residential development with 50% affordable provision set in attractive landscaping at Kingsland adjacent to the existing leisure centre and sports ground, on the edge of Holyhead town.

2.14 In the short term, a new complex was proposed at Cae Glas for nuclear workers accommodation in the form of lodges sub divided into 4-8 single self-contained en-suite bedrooms. It was proposed that all units would be single occupancy and in total there would be sufficient accommodation for up to 2000 nuclear construction workers. In the lead up to the submission of the planning application, discussions between Land and Lakes and Horizon had taken place and a letter supporting Land and Lakes' planning application dated 6 June 2012 was provided by Horizon which is attached at Appendix 4. The letter of support states:

"...whilst Horizon Nuclear Power cannot make any formal commitment of support ahead of any potential sale or the pre-application consultation process, where we will seek the views of the wider community on potential options for worker accommodation, the Land and Lakes scheme proposed at Cae Glas would seem to offer one option for an integrated transport (with park and ride and logistics potential) and accommodation package of which with accommodation element could subsequently be reused to provide a long term legacy for Anglesey's tourism industry.

From our initial discussions, I can confirm that the scheme would seem to meet the criteria that Horizon has initially set for minimum work at travel time to the site and the accommodation, along with the associated

leisure facilities, would appear to satisfy the modern standard expected for a construction work force pending more detailed consideration at an appropriate point in the development of our proposals..."

2.15 The original application proposed that an extension to the Penrhos Coastal Park Leisure development would replace the nuclear workers complex in the medium term. At the point in time there is no further requirement for the nuclear workers complex, it would be replaced in its entirety by the leisure development extension, creating a lasting legacy for both AAM and Horizon. The extended leisure offer at Cae Glas would comprise up to 315 refurbished lodges to create two, three- and four-bedroom holiday accommodation; a new 75-bedroom hotel with 100 car park spaces; and the creation of a new nature reserve.

Submission of Revised Proposals and Supplementary Information

2.16 In January 2013, IOACC's statutory consultation exercise on the planning application completed. Throughout the determination of the planning application, Land and Lakes continued its detailed dialogue with IOACC officers and statutory consultee organisations. In response to discussions with officers at IOACC and consultation responses submitted to the Council, Land and Lakes made some revisions to the application proposals.

2.17 The revised proposals and supplementary information were submitted to IOACC in May 2013. The supplementary submission included:

- i. Updated description of development, prepared by HOW, May 2013;
- ii. Addendum Supporting Planning Statement, prepared by HOW, May 2013;
- iii. Addendum Environmental Statement, prepared by HOW, May 2013;
- iv. Updated Design and Access Statement, prepared by Planit-ie May 2013;
- v. Additional Socio-economic Report, prepared Regeneris Consulting, May 2013; and,
- vi. Scheme Benefits Statement prepared by HOW, May 2013.

Addendum Environmental Statement

2.18 The Addendum Environmental Statement was prepared following a request from IOACC for further environmental information. It also reassessed the proposals in light of several design changes that were made such as reducing the area set aside for car parking at Penrhos Leisure Village, the formalisation of the Penrhos Coastal Path as a Public Right of Way and moving the access to Kingsland southwards to facilitate better visibility for drivers. Furthermore, since the submission of the planning application, Planning Policy Wales (PPW) was updated to include a 'presumption in favour of sustainable development', therefore the changes to the policy were also addressed. In summary, a number of key issues were addressed in the Addendum Environmental Statement including:

- i. Further information was provided to corroborate the findings of the socioeconomics assessment including additional evidence in relation to the displacement of jobs from existing tourism providers to the Leisure Village, which concludes that the offer from the proposed development is sufficiently different to result in very limited loss of jobs in other tourism ventures.

- ii. An evaluation of the impact of the temporary workers and new residents at Kingsland was undertaken which revealed that the additional demand for leisure and community facilities would represent a beneficial effect through the additional revenue that could be received by local businesses.
- iii. Further information was provided in relation to the landscape and visual impact assessment which concluded that only a limited number of sensitive viewpoints would be affected and that even these would only be exposed to a slightly worse visual impact.
- iv. Further information was provided in relation to the impacts upon Welsh language however, the conclusion remained unchanged in that a positive impact is anticipated in relation to providing jobs and homes that will enable the local Welsh-speaking community to stay together.
- v. Additional information provided/surveys undertaken in relation to biodiversity and ecology including a Lichen Survey, a Biodiversity Method Statement, an Arboricultural Impact Assessment and an Arboricultural Method Statement;
- vi. Further information was submitted in relation to the potential impacts of noise from Holyhead Leisure Centre on residents at Kingsland, noise from the ALPOCO plant to the north of Cae Glas and the noise generating activities at the Anglesey Aluminium Metals core site. This additional information supported the findings presented in the original Environmental Statement.

Scheme Changes

- 2.19 As part of the supplementary submission, the type of planning application was changed from an outline application to a hybrid planning application, seeking part full/part outline planning permission.
- 2.20 There were no changes proposed to the application as originally submitted at Land at Cae Glas. Whilst Land and Lakes' physical proposals at Cae Glas remained as originally submitted, changes to the wording of the description of development were made to provide more clarity over Land and Lakes intention that this development could only be used initially for temporary workers accommodation. Once the temporary use for construction workers accommodation has ceased, the units would be refurbished to create lodges forming an extension to the Penrhos Leisure Village. This would create a lasting legacy deriving from the nuclear construction project.
- 2.21 The changes proposed to Penrhos and Kingsland are summarised below:

Penrhos

- 2.22 There are a series of existing building located on the Penrhos parcel of land, the majority of which are listed. Land and Lakes proposed to retain these existing buildings and use them as leisure facility buildings as part of the proposed leisure village. Following discussions with officers at IOACC, the description of development was revised to promote the change of use of the existing buildings at Penrhos in full detail, creating a "hybrid" planning application. Land and Lakes sought full planning permission for the change of use for the buildings but not for any operational development, including changes to the external appearance to the building.

Kingsland

2.23 The supplementary submission revised Land and Lakes' approach to Kingsland to explicitly be promoted to allow the residential dwellings to be used initially as temporary construction workers accommodation. In the first instance, the residential dwellings would be temporarily occupied by construction workers. The design and layout of these properties would be to provide multiple occupancy accommodation to accommodate between 2-5 construction workers per property. The number of construction workers housed would depend on the size of the unit.

2.24 In this way, the scheme would have potential to accommodate up to 1500 construction workers at Kingsland. The units would also be capable of conversions to create conventional family housing once the temporary use of the development for construction workers accommodation had ceased.

2.25 Land and Lakes proposed that once the temporary use of the units at Kingsland for construction workers accommodation had ceased, 50% of the units to be converted into residential dwellings would be affordable in line with the Council's policy objectives.

2.26 During the above process, discussions with Land and Lakes and Horizon continued, and Horizon wrote a second letter in support of the revised proposals for temporary construction workers accommodation at Cae Glas and Kingsland, dated 30 May 2013, which is attached at Appendix 5. The letter stated:

" we are aware of IOACC's Position Statement on Wylfa Nuclear station new build: Accommodation facilities for construction workers study (issued in February 2011) [and their transport position statement for Wylfa new nuclear power station revision A (September 2011)] and preference to have in place a mix of accommodation options available for construction workers [including off site worker accommodation with associated park and ride and consideration to co-locating logistic centre and park and ride facilities.]"

I thank you for the regular updates over the last two years as you progress your proposals and planning application at Cae Glas and Kingsland. We appreciate how the scheme has evolved to provide the flexibility to offer a large scale integrated accommodation and transport solution for the Wylfa new build programme and one that would appear to meet the IOACC's preferred options as stated in their position statement. We also recognise the potential legacy use of this composite application with refurbishment into leisure lodges at Cae Glas and open market at Kingsland and appreciate the merits of this type of legacy use for the long-term benefit of the Isle of Anglesey and North Wales.

We will need to assess all the various options open to us following completion of the construction studies and we would of course, need to give any resultant preferred options more detailed consideration at an appropriate point in the development of our proposals. We cannot therefore offer any formal commitment to any potential site at this time. However, your planning application is timely and on behalf of Horizon I would like to offer our support to the planning application as your proposal offers a potential major site for the accommodation of construction workers and a transport centre of potentially strategic importance to the future development of our proposed nuclear new build at Wylfa, Anglesey..."

2.27 In summary, Land and Lakes revised submission proposed that both Land at Cae Glas and Kingsland would be initially used for temporary construction workers accommodation with the ability to house up to 3,500 construction workers. In the medium term, legacy uses at Cae Glas and Kingsland were proposed in the form

of an extension to the Penrhos Leisure Village and housing (of which 50% would be affordable housing respectively).

2.28 IOACC undertook a second round of statutory consultation on the revised proposals and supplementary submission which closed in June 2013.

Planning Committee

2.29 The planning application was considered at IOACC's planning committee on 2 October 2013. The recommendation set out in the Committee Report, attached at Appendix 6, was:

"that the application is referred to the Welsh Government for a period of 21 days in accordance with the Town and Country Planning (notification) (Wales) Direction 2012 with a recommendation that the local planning authority are minded to permit the planning application subject to:

- a) *The applicant entering into a Section 106 agreement, the draft heads of terms to which are set out below; and*
- b) *Planning conditions covering the matters set out below;*

That the Head of Planning Services be granted delegated authority to negotiate the terms of the Section 106 agreement and deal with the matters in A and B above by condition or section 106 as is considered appropriate by the Head of Planning Services."

2.30 In recommending the planning application for approval, officers had regard to the consultation responses provided by internal council departments and external statutory consultee organisations. A table providing a summary of the key consultation responses is provided at Appendix 7.

2.31 Overall, significant support was secured for the proposals from key consultees including:

- i. **Natural Resources Wales (NRW)** - Following detailed discussions throughout the application consultation process resulting in changes to alleviate concerns over the impact on the AONB, NRW confirmed that they had no objection to the proposal in principle and that the changes proposed were acceptable to mitigate the impacts.
- ii. **Economic Development Unit (EDU)** - The EDU were highly supportive of the scheme from the outset given its employment, economic and regeneration potential. It was strongly set out by EDU that a proposal of this scale on Anglesey is a unique opportunity to transform the socio-economic fortunes of the Island for generations and deliver a range of benefits. In their consultation response, the EDU concluded that it is confident that if the mitigation measures identified are addressed, including contributions to leisure, education, health, library provision and emergency services, then the mutual benefits from the scheme (from a socio economic and environmental perspective) will be considerable.
- iii. **Highways** - IOACC's highways department commissioned Mott MacDonald to assess the Transport Assessment submitted with the application and raised no objections subject to the planning obligations and conditions recommended.

iv. **Tourism Partnership North Wales (TPNW)** - Tourism Partnership North Wales were highly supportive of the proposals on the basis that they meet one of the key priorities in the Strategic Objectives in Tourism Strategy North Wales 2010-2015 which aims to ensure there is a sufficient supply and range of quality accommodation to meet changing market's needs, accommodate growth and support a thriving tourism economy. TPNW considered that the development would introduce a new product model to the Isle of Anglesey and to North Wales, in effect growing the market, rather than displacing existing business. It was also stated that without an increase in accommodation capacity to replace dated accommodation (which the scheme will provide), additional income will not be generated, nor will the objective to increase the dependence of the Isle of Anglesey on the visitor economy be achieved.

v. TPNW concluded that the project would be of national significance in terms of tourism development and promotion and will contribute significantly to the national objectives of Visit Wales' Tourism 2020, i.e. to grow tourism in Wales by 10%, between 2013 and 2020.

2.32 Despite achieving support from key consultees, Members resolved not to follow professional Officers advice and voted to refuse the application. At the 2 October 2013 Planning Committee, Members gave two reasons for refusal:

- i. The proposals would constitute over development in the countryside; and
- ii. The proposals would adversely impact the Area of Outstanding Natural Beauty (AONB).

2.33 In accordance with Paragraph 4.6.12 of the Council's constitution, the application had to be presented to Members at the 6 November 2013 Planning Committee so that they could consider their resolution. The Officers Report to the 6 November 2013 Planning Committee, attached at Appendix 8, addressed both reasons for refusal and set out the implications of the decision.

2.34 In the time between the 2 October 2013 Planning Committee and the 6 November 2013 Planning Committee, HOW directly responded to the reasons for refusal and there was a significant amount of local support generated for the proposals, primarily through social media. HOW sent three letters to IOACC on behalf of Land and Lakes, dated 22nd October 24th October and 30th October respectively.

2.35 The first letter dated 22nd October 2013 (Appendix 9). sought to directly address the reasons for refusal. In relation to the Committee's judgement that the scheme comprises over-development, the letter stated that none of the technical consultees had raised any objections. It also stated that a detailed exercise had been undertaken to identify the extent of the proposed new buildings, roads and pathways, which found that the total surface area across the three sites would be just 17% of the total application site area. In relation to the impact on the AONB, HOW's letter made reference to the relevant extract of the October 2013 Committee Report which concluded that it is appropriate to attach significant weight to the economic benefits of the scheme in relation to the impact on the AONB and that the relevant tests within PPW had been met.

2.36 The second letter dated 24th October 2013 (Appendix 10), summarised the support for the development, the changes proposed and reiterated the key community benefits that the scheme will deliver. In summary, the support for the development included but was not limited to:

- i. An e-petition in support of the proposals (788 signatures);

- ii. A Facebook page 'Land and Lakes Anglesey' with 1,000 likes;
- iii. 74 letters of support from local businesses and the local community; and,
- iv. A demonstration through the streets of Holyhead organised by Communities First in support of the Land and Lakes application was held on Friday 25 October 2013. This was predominantly to call for Members to recognise the dire need for jobs in Holyhead and how the development would provide much-needed employment opportunities.

2.37 The letter also contained a comprehensive Q&A sheet prepared by Land and Lakes to respond to questions raised by Members at the Planning Committee meeting on 6 October 2013.

2.38 The third letter dated 30 October 2013 (Appendix 11), set out a number of proposed revisions to the scheme at Kingsland in response to the reasons for refusal. This included a reduction in the developable area involving the omission of an area of land within Holyhead's settlement boundary, creating an increased buffer between the proposed built development and the open countryside to the west. This resulted in a reduction in the proposed number of houses at Kingsland from 360 to 320. The letter also confirmed that the changes have been assessed against a worst-case scenario in the ES and the overall findings of the report remain valid.

2.39 The letter then provided an update on the support for the development since the original letter dated 24th October 2013, including 797 signatures on the e-petition and 1,340 likes on the Facebook page.

2.40 The letters sent by HOW were considered within and appended to the November 2013 Committee Report.

2.41 The Planning Committee Report (November 2013) recommended:

"On the basis of the Original Report to Committee on 2 October and this Report, Members are requested to reconsider their resolution to refuse the application and are requested to grant planning permission for the development the subject of the application in accordance with the recommendation contained in Section 9 of the Original Report. Namely:

That the application is referred to the Welsh Government for a period of 21 days in accordance with Town and Country Planning (Notification) (Wales) Direction 2012 with a recommendation that the local planning authority are minded to permit the planning application subject to:

- a) *The applicant entering into a Section 106 agreement, the draft heads of terms of which are set out in the Original Report; and*
- b) *Planning conditions covering the matters set out in the Original Report;*

That the Head of Planning Services be granted delegated authority to negotiate the terms of the section 106 agreement and deal with the matters in A and B above by condition or section 106 as considered appropriate by the Head of Planning Services."

2.42 Members resolved to grant planning permission in accordance with the recommendation set out above.

Referral to the Welsh Government

2.43 Following the November 2013 Planning Committee, the planning application was referred to the Welsh Government. The Welsh Government, in their letter to IOACC dated 7 March 2014, attached at Appendix 12, concluded that the planning application would not be called in and could therefore be determined by IOACC.

Conditions and Section 106 Agreement

2.44 Following confirmation from the Welsh Government that IOACC could determine the planning application, the conditions and the Section 106 agreement were negotiated between Land and Lakes and IOACC. A summary of the Section 106 provisions relevant to Land and Lakes temporary construction workers accommodation is provided at Appendix 3 of Pinsent Masons' Written Submissions.

2.45 Following completion of the negotiations on the planning conditions and the Section 106 agreement, IOACC granted Land and Lakes part full part outline planning permission in April 2016.

3. The Development Plan

3.1 This section describes IOACC's Development Plan which will be a consideration in the Examining Authority's determination of the DCO application.

IOACC's Development Plan

3.2 The Development Plan for IOACC comprises the Anglesey and Gwynedd Joint Local Development Plan (JLDP) 2011-2026, adopted on 31 July 2017.

The Anglesey and Gwynedd JLDP

3.3 The Anglesey and Gwynedd JLDP (2011-2026) covers both the IOACC and Gwynedd Council Authority areas following their decision to formally merge a single planning unit in May 2011. The JLDP replaced the former planning policy framework for Anglesey which included the Gwynedd Structure Plan (1993) and the Anglesey Local Plan (1996).

The Examination of the JLDP

3.4 An important aspect of the JLDP as it emerged were the specific policies proposed which directly related to the Wylfa Newydd project and associated development.

3.1 On behalf of Land and Lakes, HOW prepared and submitted representations to the JPPU during the preparation of the JLDP in relation to the Matters Arising Changes in January 2017. Hearing sessions for the Matters Arising Changes were held in April 2017 and HOW participated in the Hearing session on 27 April 2017 to discuss the Wylfa Newydd policies in the JLDP.

3.2 The Inspector's Report was issued on 30 June 2017 and concluded that, subject to the changes set out in Appendix A and B of the Inspector's report, the Anglesey and Gwynedd JLDP 2011-2016 is found sound.

3.3 The Inspector's Report proposed a series of changes to the JLDP. The changes proposed by the Inspector which relate to Wylfa Newydd are described below.

3.4 The Inspector's Report states:

"7.37 The councils have presented a series of MACs to deal with Wylfa Newydd which included the introduction of three detailed policies Paragraph PS9A and PS9B and PS9 which are intended to compliment the more general Policy PS9. These policies set out specific criteria that will apply in relation to campus style temporary accommodation for construction workers, logistics centres and park and ride facilities. The councils have confirmed an intention to produce a Wylfa Newydd SPG in quarter three of 2017/2018 (NMC 343 refers) which will provide additional detail and will replace existing guidance.

7.38 The proposed suite of policies provides direction for the decision maker in relation to applications under the 1990 act and will inform decisions on DCO applications. They provide sufficient flexibility to enable decisions to be made in the light of the particular circumstances at that time. Taking together the changes that are proposed (NMC22, NMC28, NMC68, NMC70, MNC71, MNC125-MNC145, NMC188, NMC189, NMC397 and NMC 400) are necessary in order to ensure that the plan accurately reflects its different roles under the

national and local planning regimes and provides clarity on the local priorities that will influence decision making on the various aspects of the project, including means of minimising any harmful effects and capturing potential benefits."

3.5 The full extracts of the Inspector's required changes are provided at Appendix 13 and are summarised below:

- i. NMC 137 – The Inspector requested that a new paragraph is added following paragraph 7.3.17 to highlight the different accommodation options and the need to consider legacy options at the outset. The new paragraph, 7.3.17a states:

"Proposals for accommodation of construction workers should minimise the 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) and the tourism sector. Where appropriate, the Councils require the project to deliver legacy benefits to local communities during the plan period or beyond the construction period. A draft construction workers accommodation strategy has been developed and will be finalised having regard to the plans spatial strategy and any relevant policies in the plan, including a suite of policies that provides further guidance on the management of development related to the project"

- ii. NMC 138 - The Inspector requested that additional text is included to describe IOACC's preferred approach to the provision of construction workers accommodation. The proposed change sets out a criterion which will be used to assess whether a proposed site is well related to a development boundary:

"The following criteria will be used to assess whether a proposed site is well related to a development boundary:

- Physical distance/degree of separation with an increasing distance and separation less preferable; and
- The location of the site in relation to facilities, services and other sustainability assets (such as recreation provision, employment opportunities, etc..) of the centre/service villages; and
- Accessibility to the centre/service village (primarily by non-car transport mode) and ability to improve on it; and
- Visual impacts and ability to integrate the development into the landscape and townscape."

- iii. NMC 138 – The Inspector also proposed the introduction of a further paragraph, which states:

"Paragraph 7.3.17B refers to the various types of accommodation. Given the scale of the anticipated number of construction workers required during the construction phase, it is considered that modular development will be part of the supply of accommodation but will not be the first option except for provision for workers on the Wylfa Newydd site. Providing some modular accommodation in temporary buildings on the Wylfa Newydd site would be acceptable where it is supported by a provision of an appropriate level of community facilities and the transport impact

(including workers access and parking) can be demonstrated to be acceptable. Policy PS9 and Policy PS9A set out the requirements for such modular accommodation related to the Wylfa Newydd project."

iv. NMC 138 also proposes changes as set out below:

"Project promoters MUST should consider reusing demonstrate the reuse of existing buildings, and/or the provision of permanent buildings capable of being adapted for permanent use following use by construction workers, proportionate use of the private rented sector and consideration of existing consent, before proposing modular accommodation in temporary buildings"

v. NMC 141 - The Inspector requested a series of amendments to Policy PS9 which included an amendment to include cross reference to a new amended policy relating to construction workers accommodation and other related development. The following text was proposed at criteria 7:

"Proposals for campus style temporary workers accommodation, logistics centre and park and ride facilities will also be assessed against the criteria set out in policies PS9A-9C"

vi. NMC 143 – The Inspector requested that a new policy be included to provide the framework to address new campus style construction workers accommodation. This policy was referred to as Policy PS9A.

vii. NMC 189 – the Inspector proposed changes to paragraph 7.4.23 to make it clear that policy TA10 applies to temporary accommodation provided for construction workers required in connection with large scale construction projects other than the Wylfa Newydd project.

Summary

3.6 HOW, on behalf of Land and Lakes, participated in the preparation of the JLDP through the submission of representations, meetings with IOACC and the JPPU and participation in the Local Plan Examination at hearing sessions relating to the Matters Arising Changes for the Wylfa Newydd policies. It is clear from the amendments to the policies and the supporting text proposed by the Inspector, that the adopted policies in the JLDP relating to Wylfa Newydd construction worker accommodation reflect the IOACC's preferred strategy for a sequential approach to accommodation solutions which requires demonstration that the need for temporary construction workers accommodation cannot be met through either existing residential accommodation, or the reuse of existing buildings, or the provision of new permanent buildings capable of being adapted for permanent use following their use by construction workers. As the Inspector's paragraph 7.38 makes clear, these policies have been formulated in this way to ensure that any proposals for temporary workers accommodation associated with the Wylfa Newydd project minimise harmful effects and maximise benefits, particularly long-term legacy benefits for the local community.

Relevant Policies

3.7 The Inspector's requested changes to the JLDP were carried through into the final version which was adopted on 31 July 2017. The policies relevant to the provision and location of construction workers accommodation are Policies PS9 and PS10 in the adopted version. These policies are set out in full below:

Strategic Policy PS9: Wylfa Newydd and Related Development

3.8 Policy PS9 states:

"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 offset 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."

- 3.9 The key parts of Policy PS9 which are of relevance to the assessment of any proposals for temporary construction workers accommodation are (5), (6), (7), (10) (11) (12) and (13). Specifically, PS9 (5) seeks to minimise impacts on the local housing market and states that proposals should not result in unacceptable adverse economic (including the tourism sector), social, linguistic or environmental impacts.
- 3.10 PS9(6) requires that "site selection" be informed by a consideration of legacy uses so that the project can bring long term benefits.
- 3.11 PS9 (7) sets out that proposals for campus style temporary workers accommodation, logistics centres and park and ride facilities will be assessed against the criteria set out in Policies PS 10 – 12.
- 3.12 PS9 (10) relates to provision of community infrastructure facilities which should ultimately, where appropriate, serve a community legacy use.
- 3.13 PS 9 (11) relates to social cohesion and community safety, PS9 (12) to transport infrastructure and PS9 (13) to community benefits to offset and compensate for the burden and disturbance created by the Wylfa Newydd project.

Strategic Policy PS10: Wylfa Newydd – Campus style temporary accommodation for construction workers

- 3.14 Policy PS10 states:

"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."

3.15 One of the key criteria within PS10 against which proposals for campus style temporary construction workers accommodation must be assessed is PS10 (1). This requires the developer to demonstrate that the need for temporary construction workers accommodation 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.

3.16 PS10 (2) relates to the location of temporary construction workers accommodation which must be 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. PS10 (3) requires appropriate mechanisms to mitigate any adverse impacts of the proposed development on the Welsh language and culture. PS10 (4) relates to the provision of facilities for the use of occupiers and requires proposals to include appropriate mechanisms to mitigate negative impacts which may include onsite provision of ancillary facilities.

Other Material Considerations

3.17 In May 2018, IOACC published a Wylfa Newydd Supplementary Planning Guidance 2018 ("2018 SPG"). In doing so IOACC revised and updated the previous 2014 SPG in advance of the DCO process and to reflect several important changes including the adoption of the JLDP.

3.18 The relevant Guiding Principles contained within the 2018 SPG are summarised below:

3.19 **GP 5 - Tourism** states:

"The Wylfa Newydd project promoter and any other applicant should ensure that the construction and operation of the power station or any associated and related developments do not unacceptably adversely affect the value and importance of tourism to the Island in accordance with JLDP Policies PS9 and PS14..."

3.20 **GP9a - Maintaining and Creating Cohesive Communities** states that the County Council will expect all proposals to avoid large concentrations of construction worker accommodation unless significant socio-economic benefits can be delivered to the host community.

3.21 It also states:

"In partnership with relevant organisations, the project promoter or any other applicant should identify where opportunities exist to enhance community cohesion and tackle social inequalities. In particular, the County Council would encourage the project promoter or any other applicant to work alongside itself and Mon CF to identify how the Wylfa Newydd Project (alone and in combination with other investment projects on the Island), through housing, education, jobs and services and facilities provision, can facilitate regeneration in the Island's most deprived communities.

All proposals must include measures to promote integration with the local community including how effective communication with communities will be undertaken throughout the project."

3.22 **GP9b Maintaining and Creating Cohesive Communities - Campus Style Temporary Accommodation for Construction Workers located outwith the main Wylfa Newydd site** states:

"The Wylfa Newydd project promoter or any other applicant must ensure that proposals for campus style temporary accommodation for construction workers (which are not located on the main Wylfa Newydd Site) are located in accordance with the sequential approach set out in JLDP Policies PS9 and PS10 in order to mitigate effects on existing communities on the Island and promote sustainable, cohesive communities. Such campuses should not be situated so as to create isolated, unsustainable temporary communities which do not integrate with existing services, facilities and communities."

3.23 **GP10a - Permanent Housing** states:

"The development of housing for construction workers has the potential to deliver significant and lasting legacy benefits for the Island's communities and economy. The County Council will expect that, where appropriate, proposals include clear consideration of the long-term legacy impacts, and proposals for providing long term legacy benefits, at the earliest planning stages."

3.24 **GP10b - Campus Style Temporary Construction Worker Accommodation outwith the main Wylfa Newydd site** states:

"Proposals for campus style temporary construction worker accommodation must accord with the sequential approach to preferred development locations and other provisions in JLDP Policies PS9 and PS10...Proposals should be supported by a robust justification of need, demonstrating that the need cannot be met elsewhere in the existing housing market or through new buildings of permanent construction located in accordance with the JLDP spatial strategy and temporarily used to house construction workers."

3.25 GP10b goes on to state that:

"The project promoter or any other applicant must ensure that any temporary construction worker accommodation delivered at sites other than the main Wylfa Newydd site provides a legacy benefit such as serviced plots (from which temporary buildings have been removed) for future residential development. Where sites have proposals for reuse following campus style temporary construction worker accommodation use, the project proposals should, in so far as practical, provide infrastructure and servicing which is suitable for the intended subsequent use."

3.26 In addition to the Guiding Principles, the 2018 SPG recognises the Land and Lakes scheme as IOACC's preferred option at Paragraph 5.2.26 which states:

"In accordance with the JLDP requirement to use consented sites given that all of the impacts of such sites have been assessed and (with mitigation) deemed acceptable, it remains the County Council's view that the consented Land and Lakes development is a preferred opportunity to deliver construction worker accommodation that provides a lasting legacy benefit beyond the construction period of Wylfa Newydd (in the form of housing, major tourism development, employment and community facilities and services)."

4. Planning Policy Appraisal of Horizon's Construction Workers Accommodation Proposals

4.1 JLDP Strategic Policy PS9: Wylfa Newydd and Related Development and Strategic Policy PS10: Wylfa Newydd – Campus Style Temporary Accommodation are the two key policies relevant to the determination of Horizon's workers accommodation proposals.

4.2 The Planning Statement (Appendix C - Site Campus Planning Statement) (Ref: APP-406) submitted with the DCO assesses the Wylfa Newydd site campus against these policies. Land and Lakes disagrees with the applicant's assessment against these policies. In particular, the DCO assessment against these policies is deficient in the following material respects:

Strategic Policy PS9: Wylfa Newydd and Related Development

Policy PS9 (5) requires:

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;

4.1 The Wylfa Newydd proposal for a large on-site temporary campus does little to minimise the impact upon the local housing market or the tourism sector. Evidence collected by Land and Lakes on workers experience of large camps at large scale construction projects elsewhere including Hinkley Point and Shetland Islands (see L&L Written Submission Appendix 7) shows that workers prefer to live "off-site" than "on", particularly if the site is not close to a local town with extensive amenities. A general finding is that workers like to separate their work environment from the living accommodation in order to "decompress" and relax with an important element of that being the ability to leave the work site and easily wander into the local town to a pub, restaurant or cinema. At Hinkley Point, anecdotally the initial take-up of rooms at their on-site facility is understood to be tracking at around 20%, whilst alternative off-site provision remains available locally. On this basis, the accommodation of workers in isolated temporary apartment blocks is considered likely to drive workers towards alternative provision, putting pressure on both the availability of existing low-cost housing and existing tourism accommodation, potentially displacing existing tourists from Anglesey. This runs counter to a central objective of the Anglesey Destination Management Plan.

4.2 With regard to environmental effects, the Summary of Residual Effects presented in Horizon's Environmental Statement (ES) (Ref: APP-399) confirms that a large number of significant adverse effects are anticipated from the Wylfa Newydd project, many of which relate to the construction and operation of the Site Campus. In particular, the landscape and visual intrusion of the Site Campus on the Wales Coastal Path, seascape

and nearby settlements has been found to be of moderate and major adverse significance. Furthermore, the impacts of construction around the Tre'r Gof SSSI have been found to be of major adverse significance, a situation that cannot be helped by the siting of a worker campus immediately adjacent to it. If the TWA were to be sited elsewhere there would be much better opportunity to enhance the setting of the SSSI and avoid or mitigate the adverse environmental effects. We would also note (see following paragraphs for details) that the assessment of noise at the Site Campus has been found to be inadequate and that significant adverse effects upon the workers at the Site Campus are expected. Overall, these environmental effects are so significant that an alternative location for TWA should be found in order for the project to comply with Policy PS9.

- 4.3 Having regard to Horizon's ES noise assessment of the Site Campus, Land and Lakes has undertaken a professional review (See Appendix 9 of Pinsent Masons' Written Submissions) which finds that the methodology for the assessment of noise and vibration at the Site Campus is deficient in terms of the baseline data gathered, the assessment methodology used and the mitigation measures proposed.
- 4.4 In summary, the baseline noise conditions at the Site Campus location have been assumed and not subject to any survey. Residential premises over 1km from the noise source that is adjacent to the Site Campus had complained about noise from the existing Wylfa transformers. Despite this, the noise levels at the Site Campus, adjacent to the Wylfa transformers, has been assumed to be low. Even before construction related noise has been taken into account, the existing noise from the transformers could present a constraint to the use of this site for the Site Campus and further analysis is required.
- 4.5 The approach taken to the assessment of construction noise impacts at the Site Campus has been based on guidance recommended for anonymous noise sources such as road traffic, rather than the specific methodology for noise from construction activities recommended in TAN11. All other receptors besides the Site Campus were assessed using the appropriate method and no reason has been given for this inconsistent approach.
- 4.6 Reference to Noise Exposure Categories is inconsistent with the assessment of construction related noise but may have been used in an attempt to justify the location of the Site Campus in an unsuitable noise environment on the basis that no alternative sites exist, according to Horizon's Site Selection process. It is noted that the Site Selection process did not assess sites on the basis of the noise environment and therefore this is a moot point.
- 4.7 In terms of mitigation for noise at the Site Campus, no details of the design measures and their noise reducing properties are given but the impact has been assumed to reduce from Major Adverse to Negligible through their application. If the correct assessment methodology had been used, the amount of mitigation required would be even higher than that already accepted by Horizon and it is questionable whether internal noise levels in accordance with WHO guidance could be achieved through design alone as there could be a requirement to reduce internal noise levels by around 50db, which would be difficult and costly to achieve.
- 4.8 In relation to external noise at the Site Campus, no mitigation is recommended because the impacts were not assessed in the first instance. Given that the external noise levels will be far in excess of the recommended limits, this is a significant omission from the ES chapter. Mitigation requirements would be

substantial and, if large scale acoustic barriers are required, they should have been proposed and assessed as part of the application and the visual impacts considered as well as their acoustic properties.

4.9 In terms of the vibration assessment, the ES suggests that mitigation measures would be delivered to reduce an identified major adverse effect to negligible, whilst at the same time conceding that this may not be possible and that mitigation would be delivered to the greatest extent possible. This is not a firm commitment and it is therefore likely that vibration associated with works at Zone 11 on the Site Campus would represent a significant issue for shift workers.

4.10 In conclusion, the noise and vibration anticipated at the Site Campus indicates that the site is unsuitable as a location for TWA and that more analysis and detail on mitigation measures is required in order to prove otherwise. In the absence of such additional evidence, the application should not be approved with the Site Campus in its current form.

4.11 Policy PS9 also requires proposals to form part of a robust construction workers strategy that has regard to the Plan's Spatial Strategy and Policy PS10. The location of 4,000 workers on the WNDA in an isolated unsustainable location is directly contrary to the Spatial Strategy set out at paragraph 5.7 of the JLD: *'The Strategy will aim to disperse development proportionately around the Plan area whilst focusing on those locations that provide the best opportunities for achieving sustainable development.'* It is also in conflict with the sequential requirements of Policy PS10 (1) as set out in detail under consideration of that PS10 below.

4.12 In summary, the proposed Site Campus at Wylfa Newydd does not accord with the requirements of Policy PS9 (5) in relation to impact upon the local housing market and the tourism industry, the social and linguistic impacts, the potentially major adverse noise and vibration impacts and the requirement for development to be sustainably located and comply with the sequential test set out in Policy PS10(1).

Policy PS9 (6) requires:

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).

4.13 Horizon's site selection assessment is considered further below under the Policy PS10 (1) assessment which sets out the need to rule out the requirement to discount the provision of new permanent buildings capable of being adapted for permanent use following their use by construction workers prior to temporary accommodation being acceptable. The site selection process undertaken by Horizon fails to give any consideration to legacy uses. This is a significant omission. It therefore fails to comply with the clear requirement within PS9(6) to be "*informed by a consideration of legacy uses*".

4.14 Paragraphs 6.4.14 to 6.4.23 of Horizon's Site Selection Report Volume 4 (Ref: APP-439) contain the assessment of the Kingsland and Cae Glas sites and rule them out as suitable for the provision of TWA. However, the only mention of the Land and Lakes legacy uses is to incorrectly state that they are not 'complimentary' with the TWA use. No assessment is made of the socio-economic benefits that would be lost

from choosing the Site Campus ahead of the Cae Glas and Kingsland sites with their significant legacy uses. Horizon has therefore not properly considered legacy uses in the site selection process and the Site Campus proposal does not comply with PS9 (6).

Policy PS9 (10) requires:

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.

4.15 PS9(10) provides clear policy support and preference for ensuring that community facilities for the Wylfa workforce are located and designed in such a way as to be accessible to the local community both during and after the construction phase. The Site Campus is located in a remote part of the Island which is inaccessible to local residents. Moreover, the Campus will likely need to be secured with controlled access due to its proximity to the nuclear facility. It cannot be said to be accessible to local residents and is proposed for demolition following the construction phase. The Site Campus therefore meets neither policy requirement; it is not accessible and does not provide any legacy community use.

4.16 When compared to the alternatives at Kingsland and Cae Glas, it is considered that the isolated location of Site Campus will have negative impacts as the very limited eating, drinking and leisure facilities in the area means that not only will workers have a less attractive place to live but that the potential to capture off-site discretionary spend in Anglesey is significantly reduced. Furthermore, resources in essential public services (health, crime) will be drawn away from the more populated areas and areas which are most in need. In failing to provide a community legacy use from the Wylfa Newydd on-site campus, the proposals are considered contrary to Policy PS9 (10) when there is a clear viable alternative at Kingsland and Cae Glas which will provide a range of community and legacy benefits.

Policy PS9(11) requires:

Proposals should include appropriate measures for promoting social cohesion and community safety.

4.17 The site is in a very remote part of the island and there are no nearby facilities that are accessible by foot or public transport. Even the nearest settlement of Cemaes has very limited facilities. There is therefore limited opportunity for cohesion with the local community. Horizon states in the Site Campus Planning Statement (Appendix C) (Ref: APP-406) at paragraph 4.3.42 that: *"the strong likelihood is that there will be very limited interaction between the construction workforce and the local community during the construction phase."*

4.18 A large number of UK infrastructure projects such as HS2 high speed railway will be happening in parallel in the 2020s. Horizon will need to compete hard to attract and retain skilled construction workers and social cohesion is as important to workers as it is to host communities.

4.19 Recent survey work undertaken by Land and Lakes with Unite members, attached at Appendix 14, shows that whilst attrition rates are unlikely to be affected by a 15 min versus a 30 min commute time, they will be affected by ability of staff to integrate into communities and enjoy everyday facilities and by the quality of living accommodation.

Policy PS9 (13) requires:

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;

4.20 Horizon is proposing a 'Housing Fund' and a 'Community Impact Fund' to mitigate significant adverse impacts upon the housing market and demand on services. The Community Impact Fund aims to mitigate potential effects on education facilities and effects arising to local recreational resources and open spaces, and the Housing Fund would be used to incentivise provision of new housing, especially affordable housing, bring vacant properties back into use, encourage provision of more latent accommodation; fund measures to improve the function of the housing market and fund officer time to deal with any increase in homelessness. However, it is considered that these measures alone fail to constitute an appropriate 'package of community benefits' particularly when compared to the significant community and legacy benefits (see Section 6) that would be realised through provision of workers accommodation at the Kingsland and Cae Glas sites.

Strategic Policy PS10: Wylfa Newydd – Campus Style Temporary Accommodation

4.21 Policy PS10 (1) requires:

"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

4.22 Neither the Planning Statement (Ref: APP-406) nor the Site Selection Report Volume 4 – Temporary Workers Accommodation (Ref: APP-439) contain clear application or consideration of this policy. This is a key failing of the application against policy as it is incumbent upon the applicant, in line with PS10(1), to demonstrate that the need for TWA "cannot be met" through the use of new permanent buildings such as those proposed by Land and Lakes, before the policy permits any consideration of purely temporary structures. This is a very high test; however, it is the clear wording of PS10.

4.23 In assessing the site against Criteria 1, Horizon state that they have considered the ability for the provision of new permanent buildings which could be used for alternative uses following use by construction workers and ruled out Cae Glas as not technically feasible or financially viable, cross-referring to the Site Selection Report Volume 4 (Ref: APP-439). Paragraphs 6.4.14 to 6.4.23 of that report contain the assessment of the Kingsland and Cae Glas sites and attempt to provide justification of why they have been ruled out. However, it is clear upon analysis that no robust evidence is provided that the accommodation "cannot be provided" at Cae

Glas or Kingsland, but that they simply are not the preferred location for Horizon. However, that is not the policy test.

4.24 There are several incorrect statements contained throughout Horizon's assessment.

4.25 Firstly, at paragraph 6.4.15 it is stated that the JLDP "*give[s] equal local policy support to sites for TWA on the Wylfa Newydd Development Area to those within or adjacent to settlements*" and that this weighs against Cae Glas and Kingsland. This is an incorrect interpretation of the policy wording. Whilst PS10(2) does not distinguish between locations on the WNDA and those adjacent to settlements, that is not to say that the policy when applied as a whole has that result. Moreover, even if PS10 did provide equal support to TWA on the WNDA or TWA adjacent to settlements, as Cae Glas and Kingsland are adjacent to Holyhead, this would result in equal policy support being derived for both competing schemes. It is entirely incorrect to read any policy that supports Cae Glas and Kingsland and the Site Campus equally as somehow providing a reason to give different levels of support to the two proposals. However, this is precisely what Horizon appears to have concluded.

4.26 At paragraph 6.4.16, the report refers to the Red/Amber/Green (RAG) ratings of the sites. We have reviewed the criteria assessed and at Appendix 15 we provide our own assessment against the criteria for Kingsland, Cae Glas, and the main Wylfa Newydd Site (Option A). Whilst Land and Lakes' sites score negatively for several criteria, these are not directly referred to in the main body of the report, which states commercial viability is the key reason for ruling out Kingsland and Cae Glas.

4.27 Paragraph 6.4.19 sets out the details of why Kingsland is not considered commercially viable in a series of bullet points, which we have given numbers for ease of reference. Again, several incorrect and unevidenced assertions are made in this paragraph as follows:

- I. *'Transporting workers to Wylfa Newydd Development Area adds significant additional cost, which is less commercially viable'.*

4.28 Being 'less commercially' viable does not make the proposals unviable. Furthermore, Horizon do not provide a full breakdown of how these costs are calculated and we have reservations that they are overstated based on Land and Lakes own calculations (see paragraphs 4.32, 4.33 and 4.34 below). In the context of the overall cost of the project, Land and Lakes do not consider the claimed additional to costs to be significant. It is also necessary to weigh these financial costs against the overall sustainability of the project and the long-term socio-economic impacts and legacy benefits once the accommodation is no longer required for workers. In addition, Policy PS9 (13) requires the burden and disturbance borne by the community to be recognised and offset by appropriate packages of community benefits to compensate. This should be taken into consideration when assessing the claimed '*significant additional cost*' of transporting workers.

- II. *The resultant impact in terms of National Agreement for the Engineering Construction Industry (NAECI) allowances was further added to the lack of viability of the proposals. Together with the transportation of workers, this would increase the cost of the Wylfa Newydd Project from approximately £25m to £30m per 1,000 workers.*

4.29 Horizon do not provide the assumptions, calculation or methodology they use to arrive at these figures.

4.30 On behalf of Land and Lakes, Curtins have undertaken a high-level cost analysis (See Appendix 17) of the cost of transporting construction workers. Based on an assumption that each 1000 workers require 15 buses (45-seater) at a cost of £130k per bus (including vehicle lease across 5 years, maintenance, driver, welfare, fuel) it is concluded that the annual cost is approximately £2m per 1000 workers rather than £5m as stated by Horizon.

4.31 Horizon's figures take account of more than just the direct bus/coach transportation costs per 1,000 workers, as it builds in the operational costs (increase wages for each staff member as their shift is effectively 1hr longer to include coach journey time). However, this information is not provided for scrutiny and various factors need to be taken into account to arrive at the additional cost including: security sequence timing, on route or begin/termination, security costs, assumed shifts for the workers, nuclear industry work rate, per worker and what has been used to reflect actual labour mix.

III. *The proposed legacy use and Horizon use of the site are not complimentary, with the provision of oversized units that would not meet the local housing need after they are no longer required by workers.*

4.32 This is incorrect. The intention is for the proposed worker accommodation to be converted to housing for a mix and type of housing comprising 2, 3, 4 and 5 bedroom properties in the form of mews, semi-detached and detached housing, including an affordable housing provision of 50%, the details of which will be agreed at reserved matters stage. The proposal allows flexibility of residential units to be sub-divided and used as homes in multiple occupation to accommodate between 2-5 construction workers per property, the number dependent upon the size of the property. The houses would not initially be fitted with kitchens as food and beverage provision is made available at the canteen facilities provided at Cae Glas. There is potential to accommodate up to 1,500 workers this way, whilst ensuring long-term benefits through delivery of family housing. Moreover, IOACC granted planning permission for the scheme on the basis that the proposal would add 320 residential dwellings on a sustainable site at the edge of Holyhead, with 50% to be affordable, which was given significant weight in the Committee Report (Appendix 6).

IV. *The consented scheme does not include the necessary requirements for worker accommodation, including the necessary power requirements and transport infrastructure. For instance, the scheme does not include a bus terminus or other infrastructure requirements, which would reduce the level of bed spaces that could actually be delivered;*

V. *Following review, it is considered unlikely that the site can provide for the target number of 1,500 worker bed spaces within the site using the chosen form of housing (suitable for post operational use) and at the same time provide for the requisite operational amenities and other infrastructure. In order to achieve the upper target numbers the house forms require closer spacing and more units than shown on the consented schemes and would result in a very dense layout, which may not be acceptable in urban design or commercial terms.*

4.33 Both above statements (iv and v) are incorrect. 1,500 bedrooms have been consented at Kingsland and the cost of providing these and the supporting infrastructure has been modelled by Arcadis (See Appendix 5 of Pinsent Masons' Written Submissions) and demonstrated to be viable to provide up to 1500 worker beds on

site to an illustrative masterplan which has been consented and accepted by the IOACC in relation to the urban design principles and acceptable impacts of the proposals.

4.34 Whilst there will also be on-site provision of facilities to support workers, it is highly relevant to note that, unlike at Wylfa Newydd, both the Kingsland and Cae Glas sites are inherently sustainable locations being situated on the edge of Holyhead enabling workers access to the wide range of retail, leisure, recreation and other facilities available in the town. The site is also located in close proximity to the A55, the main trunk road on the island, Holyhead train station and the port of Holyhead enabling connectivity to the recreational offer in the wider area.

The reasons given for Cae Glas not being considered commercially viable in Paragraph 6.4.20 are likewise full of incorrect and unevidenced assertions, as follows:

VI. *The same principles apply as for Kingsland in terms transportation of workers, along with all other sites that are remote to the Wylfa Newydd Development Area;*

4.35 We assume the point being made here replicates the points made under the first bullet as it relates to Cae Glas (albeit it is not entirely clear) that claims transporting workers adds significant additional cost, which Horizon consider 'less commercially viable'. Our response as set out above under bullet (i.) therefore also applies here.

VII. *The proposed legacy and Horizon use of the site are not complimentary, with the provision of tourist lodges not meeting the needs of workers.*

4.36 This statement is wholly incorrect. The leisure village accommodation and facilities have been designed to be used initially as a temporary construction workers accommodation complex. Up to 315 lodges are proposed which will be initially sub divided for nuclear workers accommodation into 4-8 single self-contained en-suite bedrooms currently planned at a minimum 14.5m² each at Cae Glas and 15m² at Kingsland but with permission to enlarge these to Horizon's required 15.2m² (as stated on their RFP of 2015) and amenities facilities of up to 8430m² (2 storey at floor plate of 55m x 65m + 16 x 40m). All units will be single occupancy and in total there will be sufficient accommodation for up to 2,000 nuclear construction workers.

VIII. *The consented masterplan does not provide for the size and scale of amenities that would be required for effective operation as a campus for the proposed number of workers. The proposed hub building indicated on the master plan is a sufficient size to provide for some amenities, but it is neither large enough nor does it provide the requisite uses. In addition, insufficient areas allocated for delivery and other services that would be necessary; the result is that it is likely that the site cannot accommodate as many workers as suggested in the outline consent.*

4.37 This is incorrect. Land and Lakes sought specialist advice on scale and scope of amenity space provided and incorporated it in the planned scheme. The proposed scheme includes 2 hub buildings (not 1 as stated above) with a max parameter to allow for a total of 8430m² (2 storey at floor plate of 55m x 65m + 16 x 40m). On-site provision will include a central hub building providing reception and canteen ancillary to accommodation; recreational football pitches ; a combined heat and power centre; and a Park and Ride facility comprising up to 700 car parking spaces. The proposed on-site facilities taken together with Cae Glas' inherently more sustainable location on the edge of Holyhead mean that Cae Glas can easily

accommodate the number of workers proposed but with the added benefit all the legacy benefits and positive socio-economic impacts that will result from the development.

4.38 Again, the cost of providing the consented 2,000 bedrooms and the supporting infrastructure has been modelled by Arcadis (See Appendix 5 of Pinsent Masons' Written Submissions) and demonstrated to be viable to provide 2,000 worker beds on site to an illustrative masterplan which has been consented and accepted by the IOACC in relation to the urban design principles and acceptable impacts of the proposals.

IX. *There is no provision for a bus terminus and bus parking on the consented masterplan;*

4.39 This statement is wholly incorrect. The Cae Glas development area does provide for bus/coach provision. Vehicular access to the site would be via the infrastructure installed as part of the Parc Cybi employment development to the west. A car park with spaces for approximately 631 vehicles can be provided to the south of the main area of development. A car parking area comprising 700 parking spaces is also proposed to the west of the site together with a heritage centre developed in the medium term. The car parking provision will provide 'park and ride' in the short term for the Wylfa power station new build programme but subsequently provide a smaller proportion of car parking for a 'park and ride' scheme available for overspill parking for the Penrhos leisure scheme for the local community, as well as adequate car parking for visitors to the heritage centre.

X. *The proposed road layouts shown on the consented master plan are meandering tracks. These are inherently unsuitable for well trafficked roads with a high propensity of pedestrians;*

4.40 This statement is a misunderstanding of the Cae Glas proposals. Coach traffic will only likely use the initial (western elements) of the Cae Glas site where the coach terminus for worker collection and drop-off is identified. Notwithstanding this, the Land and Lakes development possesses an outline planning permission and the nature of the internal road infrastructure can be adapted to suit points of detail regarding its design (including road alignment) during the reserved matters process should such amendments be necessary.

XI. *Very significant amendments to the consented scheme would therefore be required which would be likely to require a fresh consent. This would require significant work and time to correct, which is complicated further by the fact that Horizon does not own the site.*

4.41 The Cae Glas proposals would not require 'very significant amendments' nor need a fresh outline consent. The scheme has outline consent which complies with planning policy aims and provides the necessary flexibility to adapt the proposed buildings and infrastructure during the reserved matters process whilst achieving a long-term legacy offer for Anglesey, a key aim of the JLDP.

4.42 At paragraph 6.4.21 Horizon consider that:

'the above are important considerations in accordance with NPS EN-1, including guidance relating to the consideration of commercial viability and realistic alternatives.'

4.43 In referring to NPS EN1, Horizon does not reference the relevant paragraphs. We note that NPS EN1 provides overarching guidance on the provision of new energy infrastructure and does not provide specific guidance in relation to the provision of temporary workers accommodation. NPS EN1 Part 4.4 states that the consideration of alternatives falls outside of the scope of the NPS but does provide some guidance, albeit it

is given for the new energy infrastructure and is not specific to provision of workers accommodation. The guidance sets a high bar for commercial viability stating that:

'alternative proposals which mean the necessary development could not proceed, for example because the alternative proposals are not commercially viable or alternative proposals for sites would not be physically suitable, can be excluded on the grounds that they are not important and relevant to the IPC's decision'

4.44 Whilst Horizon state that there will be additional financial costs of providing accommodation at Kingsland and Cae Glas, they do not claim that the development could not proceed because of this additional cost.

4.45 Paragraph 6.4.21 of the Site Selection Report (Ref: APP-439) goes on to position viability as the only reason for ruling out the sites:

'the fact that the sites rate red for commercial viability means that they are not considered to be realistic sites that could form part of a deliverable project.'

4.46 At paragraph 6.4.22 the assessment recognises that these highlighted 'concerns' are capable of being addressed through the detailed reserved matters and establishes transport costs as the key remaining concern for ruling out the sites in the following statement:

"The inherent viability constraints of transporting significant numbers of workers daily by bus to the Wylfa Newydd Development Area would remain even if the scheme could be amended to address the concerns above. In addition, locating workers as close as possible to the Power Station Site results in the removal of 260 buses each day from the local road network."

4.47 This recognition underlines the contrived nature of the reasons given (at paragraphs 6.4.19 and 6.4.20) for both sites not being considered commercially viable. In addition, Policy PS9 (13) requires the burden and disturbance borne by the community to be recognised and offset by appropriate packages of community benefits to compensate. This should be taken into consideration when assessing the claimed 'significant additional cost' of transporting workers.

4.48 Furthermore, whilst there would be a removal of 260 buses each day from the local road network, Curtin's Traffic and Transport Matters evidence (See Appendix 4 of Pinsent Masons' Written Submissions) finds that the site selection process and its conclusions (in relation to transport) are significantly flawed. They consider that the potential traffic impacts of the Wylfa Campus workers' accommodation for up to 4000 staff, particularly the traffic movements associated with workers' departure from the island to visit their permanent place of residence, have not been fully assessed. In addition, potential exists for unnecessary traffic impacts on routes which are less appropriate to experience increases in traffic in order for workers to gain access from the mainland in comparison to the predominant use of the A55 trunk road network to access the Land and Lakes development.

4.49 At Section 6 below, we set out the substantial benefits and legacy uses that will result from provision of accommodation at Kingsland and Cae Glas. Whilst there may be additional costs to Horizon during the construction of Wylfa Newydd from transporting workers, we have reservation as to how these have been calculated (see paragraphs 4.32-4.34 above). We have also identified deficiencies with Horizon's assessment

of additional noise and vibration impacts at the Wylfa Newydd Site Campus which it is considered would result in costly mitigation to be built into the design of the TWA buildings. Overall, in the context of the capital cost of the project, any additional cost associated with transporting workers are not considered to be so significant to outweigh either the lasting legacy benefits to the area that will accrue from Kingsland and Cae Glas or the negative socio-economic impacts (See Appendix 11 of Pinsent Masons' Written Submissions) that will result from the provision of TWA at Wylfa Newydd in a remote isolated location offering limited legacy benefits.

4.50 It is considered that there is significant conflict with Policy PS10 (1), specifically the requirement to demonstrate that the need for temporary workers accommodation cannot be met in the provision of new permanent buildings capable of being adapted for permanent use following their use by construction workers.

Policy PS10 (2) requires:

'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'

4.51 Horizon's proposals for a Site Campus have been presented, through their Welsh Language Impact Assessment (WLIA) (Ref: APP-432), as having an overall neutral effect at the construction stage. The conclusion of a neutral impact is based upon the consideration of population, quality of life, economic, infrastructure and social factors. Of these five categories, only economic factors were shown to see a positive impact, whilst all other categories were shown to experience negative effects. In response to this, Horizon has outlined a series of measures that they propose to secure through a Section 106 agreement, such as the appointment of a Welsh Language and Culture Co-ordinator, provision of language and culture awareness training to workers and the provision of community language services to help facilitate the integration of incomers. It is our view that, contrary to Policy PS10(2), the mitigation proposed is insufficient to offset the impacts of the entire Wylfa Newydd project on the Welsh Language. By way of comparison, the Section 106 agreement for the Land & Lakes project secured multiple commitments to protecting the Welsh language, including the implementation of a Welsh Language Scheme to encourage and promote the use of the Welsh Language, but also the payment of a contribution of up to £600,000 to be used towards the promotion of the Welsh language and the funding of a Welsh language tutor and a Welsh language officer.

4.52 Whilst it is accepted that both the Wylfa Newydd and the Cae Glas/Kingsland site campus proposals have an unavoidable impact on the Welsh language, a range of mitigation measures are proposed to mitigate these impacts during construction which could be equally applied to either proposal. However, Kingsland and Cae Glas will provide new affordable homes and long-term employment and supply chain opportunities in the local area that would be of benefit to Welsh speaking on Anglesey, resulting in a more positive legacy benefit for Welsh language and culture in the long term.

Summary

4.53 In summary, the proposed Site Campus at Wylfa Newydd does not accord with the requirements of Policy PS9 (5) in relation to impact upon the local housing market and the tourism industry, the social and linguistic

impacts, the potentially major adverse noise and vibration impacts and the requirement for development to be sustainably located and comply with the sequential test set out in Policy PS10(1).

4.54 The location of the TWA at Wylfa Newydd, also fails to comply with the clear requirement within PS9(6) to be *"informed by a consideration of legacy uses"*.

4.55 Having regard to Policy PS10, it is considered that there is significant conflict with Policy PS10(1), specifically the requirement to demonstrate that the need for temporary workers accommodation cannot be met in the provision of new permanent buildings capable of being adapted for permanent use following their use by construction workers. Furthermore, it is our view that, contrary to Policy PS10(2), the mitigation proposed is insufficient to offset the impacts of the entire Wylfa Newydd project on the Welsh language.

5. Planning Policy Appraisal of Land and Lakes' Construction Workers Accommodation Proposals

5.1 As the JLDP was adopted in July 2017 following the grant of consent for the Land and Lakes proposal by IOACC in April 2016, the scheme was not considered against the now adopted relevant policies. Therefore, in order to demonstrate that the proposals for TWA at Cae Glas and Kingsland accord with the JLDP, this section provides an assessment against the relevant requirements of PS9 and PS10.

Strategic Policy PS9: Wylfa Newydd and Related Development

5.2 The key parts of Policy PS9 which are of relevance to the assessment of any proposals for temporary construction workers accommodation are (5), (6), (7), (10) (11) (12) and (13).

Policy PS9 (5)

5.3 Specifically, PS9 (5) seeks to minimise impacts on the local housing market and states that proposals should not result in unacceptable adverse economic (including the tourism sector), social, linguistic or environmental impacts. It also requires proposals to have regard to the Plan's Spatial Strategy and Policy PS10.

5.4 The permission includes consent for a central hub building providing reception and canteen facilities, a park and ride facility to transport workers to the Wylfa Newydd Site, 700 car parking spaces, a new hotel and a lakeside hub comprising restaurant, café, retail facilities and a bar and a new grass football pitch and cricket pitch.

5.5 The Kingsland and Cae Glas proposals will provide good quality accommodation in a sustainable location which is considered will minimise the impact of the influx of construction workers upon both the existing local housing market and tourism accommodation. The attractive location and setting at Kingsland and Cae Glas will attract and retain workers reducing the pressure on accommodation elsewhere. In particular, it is considered that Kingsland and Cae Glas significantly outperform on this measure in comparison to the on-site proposals for accommodation at Wylfa Newydd whose remote isolated location away from key services, facilities and recreation is likely to lead to significant pressure on existing accommodation as workers are more likely to seek alternative provision from existing housing and tourist stock.

5.6 As set out in Section 6 of this report, the Land and Lakes proposals will provide wide reaching socio-economic benefits to the local area. The Wylfa Newydd Site Campus would not deliver long lasting positive impact to Anglesey, unlike the Land and Lakes scheme which will bring about a step change in the quality of the tourism product and the provision of housing to meet local needs, including 50% affordable provision as well as significant recreational facilities that will be provided for workers and the local community.

5.7 The Section 106 agreement, provided at Appendix 3 of Pinsent Masons' Written Submissions, ensures a range of measures are in place to mitigate impacts upon the Welsh language. Indeed, the provision of additional jobs that will result from the Cae Glas extension to the leisure village at Penrhos will help to reverse the trends

of outmigration of Welsh speaking young people and without it further generations of workers will leave the Island in search of alternative employment.

5.8 The effects of accommodating workers in this location on local facilities, socio-economics, transport, travel and the environment were all fully assessed within the ES and relevant mitigation has been secured through the use of conditions and the Section 106 agreement. IOACC granted consent based upon a full assessment of the likely effects of this proposal in combination with what was then known about the Wylfa Newydd Nuclear Power Station and determined that all effects were capable of being satisfactorily mitigated.

5.9 Finally, the location of workers accommodation at Kingsland and Cae Glas on the edge of the main settlement of Holyhead entirely accords with the JLDP Spatial Strategy (JLDP paragraph 5.7) for development to focus on locations that are sustainable and the sequential elements of Policy PS10 which are considered in detail under our assessment against that policy below.

5.10 In summary, the Kingsland and Cae Glas proposals fully accord with Policy PS9(5) as they will minimise the impact of temporary construction workers on the local housing market and tourism industry in relation to accommodation pressures. The proposal also brings about significant socio-economic benefits both in the short term and long term through the legacy uses. The environmental impact of the scheme has been fully assessed and the consent ensures that a range of mitigation measures are put in place including to protect the Welsh language. Finally, the location accords with the JLDP Spatial Strategy and Policy PS10.

5.11 By contrast, the TWA at Wylfa Newydd does not accord with the requirements of Policy PS9 (5) in relation to impact upon the local housing market and the tourism industry, the social and linguistic impacts, the potentially major adverse noise and vibration impacts and the requirement for development to be sustainably located and comply with the sequential test set out in Policy PS10(1).

Policy PS9 (6)

5.12 PS9(6) requires that "site selection" be informed by a consideration of legacy uses so that the project can bring long term benefits.

5.13 In accordance with this part of Policy PS9 (6), the proposals will provide considerable legacy uses in the form of the Cae Glas extension of 315 lodges to Penhos leisure village and the provision of up to 320 houses to meet local needs (including 50% affordable) at Kingsland. The magnitude of the benefits of this approach was recognised and highly supported by local authority officers, key statutory consultees and the community as set out above in Section 3. It was acknowledged by Officers that the proposals represent a 'step change' in the economy of Anglesey.

Policy PS9 (7)

5.14 PS9 (7) sets out that proposals for campus style temporary workers accommodation will be assessed against the criteria set out in Policy PS 10.

5.15 Assessment of the sites against PS10 is set out against this in detail further below which concludes that the proposals accord with this part of Policy PS9.

Policy PS9 (10)

5.16 PS9 (10) relates to provision of community infrastructure facilities which should ultimately, where appropriate, serve a community legacy use.

5.17 Unlike the temporary construction workers facilities proposed at the Site Campus, the community facilities which are proposed at Cae Glas and Kingsland will be permanent and made available to the wider community providing a substantial legacy benefit to the community of Holyhead in accordance with PS9 (10).

Policy PS9 (11)

5.18 PS 9 (11) relates to social cohesion and community safety.

5.19 The sites are directly adjacent to the settlement of Holyhead where a range of facilities can be accessed, thus promoting cohesion with the local community. Furthermore, the proposed development at Cae Glas includes a number of on-site facilities that can be utilised by local people, thus promoting community cohesion. The Section 106 agreement included a range of obligations to secure this including, securing ongoing public access to Penrhos, maintaining publicly accessible toilets, dedicating permissive coastal path as a Public Right of Way, a requirement to submit a Community Liaison Scheme, a requirement to submit a Welsh Language Scheme, a requirement to submit Nature Reserve and Visitor Centre plans, a requirement for a Local Labour Plan and the provision of the cricket pitches and a football pitch.

Policy PS9 (12)

5.20 PS9 (12) requires proposals to be appropriately serviced by transport infrastructure.

5.21 The content of the Transport Assessment was agreed through extensive discussion with highways officers at IOACC and the Welsh Government.

5.22 Through these discussions, it was demonstrated and agreed that the proposed legacy use of the Land and Lakes development had the most significant scope for traffic impact upon the surrounding highway network during the traditional peak hour periods compared with the initial TWA use of the Land and Lakes site. The legacy use was therefore the focus of the Transport Assessment.

5.23 The proposals were assessed and found acceptable by Officers in terms of highway capacity (see Appendix 6). The Transport Implementation Strategy and Green Travel Plan were agreed and secured through the planning conditions and the Section 106 obligations.

Policy PS9 (13)

5.24 PS9 (13) requires community benefits to offset and compensate for the burden and disturbance created by the Wylfa Newydd project.

5.25 In addition to the considerable legacy benefits, the Section 106 obligations are also relevant here which include binding commitments in relation to leisure provision, local employment and training and working with local businesses, funding for apprenticeships during construction and operation of the development,

securing Welsh language measures to ensure the promotion and protection of the language and collaboration with the existing tourism industry and local businesses to promote and protect those businesses from the impacts of the development to integrate the development appropriately.

5.26 Whilst Horizon propose a 'Housing Fund' and a 'Community Impact Fund' to mitigate significant adverse impacts upon the housing market and additional demand on services, it is considered that these measures alone fail to constitute an appropriate 'package of community benefits' particularly when compared to the significant community and legacy benefits (see Section 6) that would be realised through provision of workers accommodation at the Kingsland and Cae Glas sites.

Strategic Policy PS10: Wylfa Newydd – Campus Style Temporary Accommodation

PS10 (1)

5.27 One of the key criteria within PS10 against which proposals for campus style temporary construction workers accommodation must be assessed is PS10 (1). This requires the developer to demonstrate that the need for temporary construction workers accommodation 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.

5.28 The proposed legacy uses of the temporary workers accommodation proposed at Kingsland and Cae Glas for housing and to extend the leisure park respectively are both entirely in accordance with PS10(1) requirements.

Policy PS10(2)

5.29 PS10 (2) relates to the location of temporary construction workers accommodation which must be 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.

5.30 The location of Kingsland and Cae Glas adjacent to the main settlement of Holyhead fully accords with PS10 (2).

Policy PS10(3)

5.31 PS10 (3) requires appropriate mechanisms to mitigate any adverse impacts of the proposed development on the Welsh language and culture.

5.32 A Section 106 contribution was agreed with IOACC that includes a range of measures to ensure the promotion and protection of the Welsh language. The Committee report (Appendix 6) included an assessment of the impact on Welsh language which set out that Holyhead, compared to other areas of the Island which have a higher proportion of Welsh speakers, may be better able to absorb the increase in population resulting from the development. It also concluded that the houses and job provision will help to retain younger people and families in the area, thus potentially contributing to retaining the use of the Welsh language. The potential negative effects of the influx of non-Welsh speakers was considered acceptable with appropriate mechanisms to secure a range of mitigation measures including the use of bilingual signs,

use of and retention of Welsh place names, raising awareness of/and or contribution towards existing Welsh language courses and increasing awareness of language and culture.

Policy PS10(4)

5.33 PS10 (4) relates to the provision of facilities for the use of occupiers and requires proposals to include appropriate mechanisms to mitigate negative impacts which may include onsite provision of ancillary facilities.

5.34 The proposals include provision of onsite ancillary and recreational facilities to support the construction workers and the location provides easy access to the main settlement of Holyhead. Other impacts were assessed as capable by Officers (see Appendix 6) of mitigation through the range of contributions secured through the Section 106 obligations. These include contributions relating to education, health, impact on recreational and leisure facilities, library and emergency services.

Summary

5.35 In summary, the Kingsland and Cae Glas proposals fully accord with Policy PS9(5) as they will minimise the impact of temporary construction workers on the local housing market and tourism industry in relation to accommodation pressures. The proposal also brings about significant socio-economic benefits both in the short term and long term through the legacy uses. The environmental impact of the scheme has been fully assessed and the consent ensures that a range of mitigation measures are put in place including to protect the Welsh language. Furthermore, the location accords with the JLDP Spatial Strategy and Policy PS10.

5.36 The location of TWA at Kingsland and Cae Glas also fully accords with the PS9(6) requirement for "site selection" be informed by a consideration of legacy uses so that the project can bring long term benefits and PS9 (7) requirement to be assessed against the locational criteria set out in Policy PS10.

5.37 The proposals fully accord with the PS9 (10) requirement for community infrastructure facilities to serve a community legacy use where appropriate and include a range of measures to ensure that the proposals foster social cohesion in compliance with PS9 (11). The sites have been assessed and found to be appropriately serviced by transport infrastructure as required by PS9 (12). The proposals include a substantial level of community benefit secured by Section 106 agreement in accordance with PS9 (13). PS9 (13) requires community benefits to offset and compensate for the burden and disturbance created by the Wylfa Newydd project.

5.38 The Kingsland and Cae Glas proposals also fully accord with Policy PS10(1) and PS10(2) sequential and locational requirements. The proposals also include a wide range of measures to mitigate any adverse impacts on Welsh language and culture and in compliance with PS10(4), the provision of on-site facilities for workers and contributions to a range of services locally.

6. Scheme Benefits Appraisal

6.1 Through Land and Lakes' planning submission a series of significant scheme benefits covering sustainability, environmental, economic, social, and cultural and heritage factors were identified. The key benefits of the proposed development at Cae Glas and Kingsland, which were fully evidenced through Land and Lakes' consented scheme are set out below.

A Legacy for the Local Community

6.2 An integral benefit of the proposed development is that it will create a lasting positive legacy for the local community following the cessation of smelting at Anglesey Aluminium Metals Ltd. (AAM), and further down the line, following the completion of the Wylfa Newydd nuclear power station. This is primarily due to the unique nature of the scheme which will enable accommodation to be utilised for temporary construction workers accommodation and then be converted to tourism accommodation and market and affordable housing to meet the needs of both locals and tourists. Another key legacy benefit is the maintenance and enhancement of public access on the site, including enhancements to the coastal path and woodland trails.

6.3 The longer-term legacy of the Kingsland proposals includes the delivery of a modern, high-quality "aspirational" housing development set in attractive landscaping and open space extending to 5.6 hectares will be created in the medium / long term. A range of house types including 2, 3, 4 and 5 bedroom mews, semi-detached and detached properties will be built to meet an identified need. At the point in time that the temporary use for nuclear workers accommodation at Kingsland ceases, the transition to 'conventional' and affordable housing will make a positive contribution towards IOACC's housing supply targets, creating a lasting legacy for the nuclear development. The residential development at Kingsland will also deliver 50% affordable housing which exceeds policy requirements and addresses affordability issues that exist on the Island.

Nuclear Construction Workers Accommodation

6.4 The development at Cae Glas and Kingsland will provide a carefully managed / efficient accommodation and transport solution positively contributing to the identified need for construction worker accommodation for the Wylfa new build power station, in line with the Council's Wylfa Nuclear New Build: Construction Workers Accommodation Position Statement (March 2011) which sets out that the preferred option is for one third of workers to be accommodated in purpose-built accommodation (a minimum on-site to meet operational requirements but the majority off-site).

A Highly Accessible Site

6.5 The site is situated in a sustainable location on the edge of the built-up area of Holyhead. It is easily accessible by road, rail and sea and is extremely well connected locally, regionally and nationally. The three parcels of land will be linked together and to the town centre and railway station by a 'green' shuttle bus, further improving the accessibility of the development. There are shared footway/cycleways in place on both sides of Parc Cybi and on both sides of the A5153, providing connectivity between the Cae Glas site

and the wider area. There is a footway in place on the eastern side of the B4545 Kingsland Road and intermittent footway on the western side of Kingsland Road, which provides connections between the Kingsland site and the wider area.

Sustainability

6.1 Combined Heat and Power Plants are proposed at Penrhos and Cae Glas to ensure efficient energy supply. There is also an opportunity for the three development components to connect to the proposed Biomass energy plant at the AAM site. Land and Lakes also endeavour to design the residential scheme to meet Code for Sustainable Homes Level 4 and BREEAM Excellent standards. This will ensure that the buildings are well adapted to climate change, featuring energy efficient design, on-site low carbon energy generation (or district heating if possible) and appropriate ventilation.

The Creation of a Nature Reserve and Visitor Centre

6.2 The leisure development at Cae Glas will deliver significant ecological and biodiversity enhancements including the creation of a 40-hectare Nature Reserve at Cae Glas which will provide carefully managed public access and long-term management and provide educational facilities for all the community to enjoy and become actively involved. The Cae Glas Nature Reserve and Visitor Centre will be split into two phases including:

- Phase One – a minimum of 50 acres of land in the northern area of Cae Glas to include access to key viewing points together with a low impact highly sustainable building of minimum 150m² footprint of covered internal/external space;
- Phase Two - an extension to phase 1 to provide circa 100 acres of land to include access to key viewing areas together with an extension to the nature reserve visitor centre building to provide a low impact highly sustainable building of minimum 300m² footprint comprising minimum 150m² internal and 150m² of covered internal/external space.

6.3 These enhancements are contingent on the Penrhos scheme proceeding, which is required to allow legacy provision at Cae Glas.

Ecology and Biodiversity Enhancements

6.4 The proposals will secure significant ecological enhancements including significant investment in the long-term management of retained trees and woodland; new bird/bat nesting scheme; extensive planting of native woodland; creation of new ponds and extensive new areas of reptile habitats at Cae Glas. There will also be increased levels of public amenity and interaction with woodland particularly in the Cae Glas area.

Cae Glas Landfill

6.5 Appropriate means to investigate and remediate the current leachate into the Beddmanarch-Cymyran SSSI and Inland Sea will be secured.

Scheduled Ancient Monument

6.6 The proposed development at Cae Glas will be sensitively designed to enhance the setting of the Trefignath Burial Chamber which is a designated Scheduled Ancient Monument. A Heritage Centre is also proposed nearby to promote appreciation of local heritage across the Island.

New Sports and Leisure Facilities

6.7 New high-quality grass football and cricket pitches will be created at Cae Glas with a new club house and car parking area. Through the Section 106 agreement, Land and Lakes has agreed to pay financial contributions towards the cost of meeting additional demand for leisure and sports provision in the area as a result of the increase in population arising from the construction workers. It was also agreed to provide a sports and leisure centre with a minimum internal floor area of 690 m² and two outdoor sports pitches at Cae Glas for initial use by nuclear construction workers. The leisure facilities are to be provided prior to occupation of 10% of the total number of nuclear worker bedspaces to be constructed as part of the development and shall be made available to the nuclear construction workers free of charge throughout the Wylfa Newydd construction period. Land and Lakes has also agreed to provide financial contributions towards provision of swimming facilities in the area including an annual payment to continue for as long as the nuclear worker accommodation is occupied by the nuclear construction workers.

Economic Benefits

6.8 The Land and Lakes' scheme at Cae Glas and Kingsland will have a range of benefits to the local economy, including the creation of construction jobs and direct, on-site operational jobs, as well as indirect off-site operational jobs in Anglesey via the off-site expenditure of visitors and via corporate supply chain. Induced off-site jobs will also be created in the form of operational jobs via the wage expenditure in Anglesey businesses of direct / indirect workers and via off-site expenditure of Kingsland residents.

6.9 The leisure scheme will have significant longer term "catalytic" impacts on Anglesey and the region. The scheme will demonstrate the ability to successfully attract and trade on a higher value and all year round offer.

6.10 The project will provide a new tourist destination which will create a step change in Anglesey and North Wales existing tourism offer. The project has the potential to raise the profile of Anglesey and North Wales as a short break / holiday destination on a national and international basis. Furthermore, the proposed development will likely stimulate other operators to invest, thus strengthening Anglesey's ability to draw in more visitors.

6.11 Lands and Lakes has secured a commitment to facilitate local employment and training opportunities in relation to the scheme through a comprehensive local Employment, Training and Supply Chain Strategy, secured through the S106 agreement.

6.12 A further assessment of the economic benefits of the Cae Glas and Kingsland scheme in comparison to the Site Campus is provided by Regeneris (See Appendix 11 of Pinsent Masons' Written Submissions). This report indicates that the scale of the visiting workforce (approximately 3,500 workers) brings with it considerable economic opportunity including circa 250 on-site jobs to service the on-site facilities and maintain the campus.

Impacts on the Local Economy if the scheme is not delivered

6.13 Given the substantial economic benefits of the proposed development, there would conversely be negative impacts on the local economy should the development not be delivered.

6.14 Firstly, there will be no substantial improvements to the tourism offer. Tourism is one of the few potential growth sectors for Anglesey and opportunities need to be taken. The winter and autumn months currently show a clear decline in visitor numbers compared with the spring and particularly summer months. Analysis shows a very limited pipeline of other potential tourism and leisure investments and no realistic chance of shifting Anglesey's visitor profile. The scheme could also be a catalyst for other tourism investments. These catalytic impacts would clearly not materialise if the scheme did not proceed. In addition to the significant missed opportunity to redefine Anglesey's tourism offer, there could be harm to the local tourism market if the temporary workers accommodation was not to proceed. Without it or a suitable replacement, then the Anglesey market will be severely impacted as construction workers absorb a substantial share of the leisure beds and Bed & Breakfast accommodation. As the Council has recognised in its Position Statement this could risk displacing existing visitors and delay any wider investment plans of operators.

6.15 Secondly, whilst the energy sector will deliver some jobs growth, it should not be considered the panacea. Anglesey's economic structure is relatively narrow, and apart from tourism the only other substantial likely growth sector is that of energy. Substantial new jobs are predicted in the energy sector as a result of the proposed Wylfa new build power station, off shore wind and a number of other opportunities (collectively grouped under the Energy Island initiative). However, these jobs should not be viewed as capable of solving all of Anglesey's economic problems because they are uncertain; have high levels of "leakage", the benefits are mainly in the construction phase and the jobs are not suitable for all. In short, the energy sector alone is not capable of reversing the fundamental economic challenges which face Anglesey. Complementary investments, of a similar scale and ambition, are required in other sectors.

6.16 Without the development and the job and housing opportunities which it will support directly and indirectly, the general trend for working-age population decline on Anglesey is likely to continue. Evidence points to a sustained erosion in the working age population across Anglesey with significant implications for the types of community that can be sustained on the island. There are very few other places in the UK where the working age population is being lost at such an alarming rate. Quite rightly, various policies and strategies have as a central objective stemming this flow. Anglesey simply cannot afford to continue to lose jobs and working age residents at the rate of the last decade. The presence of appropriate and accessible job opportunities will be the primary factor in persuading working age residents to stay in Anglesey, as will the presence of appropriate housing options. The Land and Lakes scheme is one of a very small number of opportunities with the potential to help reverse the trends of out-migration, and without it further generations of workers will leave the island in search of alternative employment. The type and range of employment that the scheme will provide (i.e. housekeeping, grounds maintenance, general management, leisure management, catering, bar etc.) is very well aligned to the skill-sets available in the locality.

Summary

6.17 In summary, there are a number of compelling benefits of the Land and Lakes scheme which were fully evidenced through the planning application, supported by IOACC Officers and key consultees and secured through appropriate planning conditions and a comprehensive Section 106 agreement. These include the legacy benefits through the provision of housing, tourist accommodation and leisure and recreational facilities, ecological and biodiversity improvements, the creation of jobs and spending in the local economy. Conversely, a number of negative economic consequences are anticipated should the scheme not go ahead, including further out-migration of working age people from the Island and harm to the tourism market.

7. Summary and Conclusions

7.1 This representation has fully demonstrated Land and Lakes' case as part of the DCO Examination that Horizon's workforce accommodation strategy proposed in the DCO application is fundamentally flawed and departs from the Anglesey and Gwynedd Joint Local Development Plan 2011-2026 ("JLDP") adopted on 31 July 2017. Further, it demonstrates that the already consented Land and Lakes scheme for workforce accommodation at Kingsland and Cae Glas is a preferable alternative scheme from a planning policy perspective and provides significant material benefits including sustainable legacy uses.

7.2 Horizon's Planning Statement (Ref: APP-406) establishes that the relevant planning policy guidance for deciding DCO applications for nuclear NSIPs is provided in NPS EN-1 and NPS EN-6. Specifically, they refer to paragraph 4.1.5 of NPS EN-1 which states that other matters which the decision maker may consider both "important and relevant" to its decision making include development plan documents or other documents in the local development framework.

7.3 They then state that Paragraph 4.1.5 of NPS EN-1 explains that in the event of a conflict between these or any other documents and an NPS, the NPS prevails for the purposes of decision-making given the national significance of the infrastructure. However, Horizon do not try to state that there is any conflict with the local policy in the JLDP. Thus, the JLDP, as up-to-date local planning policy, is a "relevant and important" matter to be taken into account in decision-making under S105(2) of the 2008 Planning Act.

7.4 Indeed, the Planning Statement conclusion recognises that Paragraph 4.1.3 of NPS EN-1 [RD4] states that in considering any proposed NSIP, the decision maker should take into account:

- Its potential benefits, including in addition to its contribution to meeting the need for energy, its contribution to job creation and any long term or wider benefits; and,
- Its potential adverse impacts, including any long term and cumulative adverse impacts as well as any measures to avoid, reduce or compensate for any adverse impacts.

7.5 Paragraph 4.1.4 of NPS EN-1 provides additional policy on decision-making and states that the decision maker should take into account "environmental, social and economic benefits and adverse impacts, at national, regional and local levels".

7.6 This representation has demonstrated that Horizon's workforce accommodation strategy, which takes the form of a temporary Site Campus adjacent to the proposed power station for up to 4,000 workers, is fundamentally flawed. As set out in full in Section 4 of this statement, Horizon's Site Campus falls short of many of the provisions of Policies PS9 and PS10 of the JLDP which directly relate to the Wylfa Newydd project. Of note is Horizon's flawed site selection process and dismissal of the Land and Lakes sites based upon a number of factually incorrect statements and a failure to meet the requirement of PS10 (1) to demonstrate that their 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.

7.7 The Site Campus offers no lasting legacy benefit for the Island and will have a number of identified negative social, economic and environmental impacts including impacts on local employment opportunities, public services, transport infrastructure, social cohesion, tourism and the local economy. Locating workers in campus-style accommodation results in limited interaction with local communities and can have damaging effects on worker morale, thus creating difficulty retaining staff. In addition, serious concerns are raised regarding the traffic impact on rural roads of workers departing and returning to the Campus from their permanent places of residence. Furthermore, an assessment of Horizon's methodology for the assessment of noise effects experienced by users of the Site Campus is flawed and the proposals would likely result in residents of the Campus being exposed to unacceptable living conditions.

7.8 Conversely, it has been demonstrated that the Land and Lakes scheme for workforce accommodation at Cae Glas and Kingsland is a preferable alternative scheme from a planning policy perspective. The consented scheme was subject to a rigorous consultation process which found the development to be not only wholly acceptable in planning policy terms, but also capable of providing significant material benefits. These benefits, described in detail in Section 6 of this statement, include the sustainable legacy uses in the form of high-quality tourist accommodation and associated facilities and market and affordable housing. A detailed Section 106 agreement has been made containing substantial obligations to secure the delivery of numerous legacy benefits which will continue to be enjoyed by the Isle of Anglesey beyond the Wylfa Newydd construction period. Relevant mitigation measures were also secured to mitigate effects of accommodating workers in this location on local facilities, socio-economics, transport, travel, the environment and Welsh language and culture. The economic benefits of the proposals will be considerable, notably the provision of jobs, off-site expenditure, stimulation of further tourism investment in Anglesey and catalytic regeneration impacts for Holyhead. The development fully accords with the relevant policies within the JLDP and will provide accommodation in a highly sustainable location that will minimise the impact of the influx of construction workers upon both the existing local housing market and tourism accommodation.

7.9 Contrary to the claim in Horizon's Planning Statement conclusion, by proposing the Site Campus at Wylfa Newydd, Horizon has not taken all reasonable steps to limit the adverse effects of the Wylfa Newydd DCO Project as far as possible as a clear alternative exists which accords with the '*relevant and important*' JLDP. Horizon's own on-site proposal directly conflicts with the important local policy objectives to minimise adverse impacts and secure legacy benefits to off-set and compensate the burden of the NSIP upon the local community.

Appendix I

Decision Notice

Appendix II

Site Location Plan

Appendix III

Statement of Community Involvement

Appendix IV

Horizon Letter of Support, June 2012

Appendix V

Horizon Letter of Support, May 2013

Appendix VI

October 2013 Committee Report

Appendix VII

Summary of Consultation Responses

Appendix VIII

November 2013 Committee Report

Appendix IX

Letter to IOACC dated 22 Oct 2013

Appendix X

Letter to IOACC dated 24 Oct 2013

Appendix XI

Letter to IOACC dated 30 Oct 2013

Appendix XII

Letter from Welsh Government
dated 07 March 2014

Appendix XIII

Table of Inspector's Changes

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Unite Union Workers Questionnaire

Appendix XV

Bus Transfer Costs

Contact Details

Enquiries

Jon Suckley
0161 956 4061
jon.suckley@howplanning.com

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