



**LAND
& LAKES**
Developing Legacies

Horizon Nuclear Power Consultation
Sunrise House
Gloucester
GL3 4AE

22nd June 2017

Dear Sir/Madam

**WYLFA NEWYDD PROJECT ("PROJECT")
PRE-APPLICATION CONSULTATION - STAGE THREE ("PAC3")
CONSULTATION RESPONSE**

This representation has been prepared by Land and Lakes (Anglesey) Limited ("**Land and Lakes**") together with Planning Consultants HOW Planning LLP ("**HOW**") in response to the PAC3 produced by Horizon Nuclear Power ("**Horizon**") in relation to the Project.

Land and Lakes have a longstanding interest in this Project as the beneficiary of a planning permission¹ authorising the delivery of temporary accommodation for up to 3,500 nuclear construction workers at the Cae Glas and Kingsland Sites on Holyhead, together with legacy residential and holiday leisure village uses ("**TCPA Consent**").

As a result of its interest, representatives from Land and Lakes have been fully engaged throughout the consultation for this Project, including attending various stakeholder meetings and in responding to the stage 1 and 2 consultation ("**PAC1 and PAC2**")

We are seriously concerned that the proposal for the temporary worker accommodation set out in Horizon's PAC3 documentation represents a significant departure from that put forward in PAC2. Our concerns are set out in more detail in this representation and we would respectfully request that these are carefully considered by Horizon and that the proposals are revised back to the off-site solutions which received wide-spread support in the earlier consultations.

DETAILED REPRESENTATIONS

1. INTRODUCTORY COMMENTS

- 1.1 As stated above, PAC3 represents a significant departure from the proposal for the delivery of temporary worker accommodation put forward by Horizon in PAC2. Indeed, it is a complete step change in that it completely ignores the previous proposal for delivery of worker accommodation on Cae Glas and Kingsland by Land and Lakes pursuant to their TCPA Consent. It is highly relevant that the TCPA Consent was the subject of extensive consultation and considered positively by Horizon in PAC2 as well as being supported by the Isle of Anglesey County Council ("**IoACC**") and other key stakeholders.
- 1.2 The drastic change in Horizon's approach is made all the more surprising in light of representations made by them at the Energy Island Forum as recently as 29 March 2017, where they made it clear that the Project was still being promoted with off-site accommodation options delivered by Land and Lakes pursuant to the TCPA Consent. Land and Lakes is perplexed that such representations were made to key stakeholders and the public whilst Horizon was clearly preparing an entirely separate set of proposals for inclusion in the PAC3 documentation. The presentation made by Horizon showing Cae Glas and Kingsland as accommodation options at the Energy Island Forum on 29 March 2017 was therefore entirely misleading.
- 1.3 In addition to the above, page 5 of Horizon's Statement of Community Consultation ("**SOCC**"), setting out the proposals upon which Horizon's consultation strategy would be based, made clear reference to the delivery of

¹ Planning Application Consent reference 46C427K/TR/EIA/ECON

off-site worker accommodation. This remained in the SOCC until as recently as May 2017 when it was removed.

- 1.4 The PAC3 proposals are for unsustainable development which would give rise to severe socio-economic and environment effects which would be highly damaging to the Isle of Anglesey and its inhabitants. However, the fact that such proposals have been proposed at such a late stage makes it impossible for thorough and effective consultation on those impacts to be undertaken, given Horizon's stated aim to submit its DCO application later in 2017. Indeed, it should be noted that Horizon Representative, Richard Foxhall stated that Horizon intends to submit its DCO application as early as the end of August 2017 during a Public Tourism Meeting on 15 June 2017. A single round of consultation (if this is Horizon's intention) dealing with these entirely new worker accommodation proposals will not be sufficient to understand the extent of the implications and to enable the public and stakeholders to fully engage in the process and to influence any changes.
- 1.5 The PAC3 Consultation Overview Document ("**COD**") claims that Horizon remains committed to *"the Welsh Language and culture"* and to *"providing community benefits that help to deliver a positive socio-economic legacy to Anglesey [and] the wider North Wales region"*². Having reviewed the PAC3 documentation in detail it is highly questionable that such commitments can be fulfilled through the adoption of an accommodation strategy that fails to adequately plan for a truly sustainable legacy.
- 1.6 The PAC3 proposals are concerning, not only due to their late timing preventing adequate consultation, but also due to the following specific issues:
- 1.6.1 The fact that there is a lack of policy support for such proposals;
 - 1.6.2 The complete lack of empirical evidence in support of the figures and assumptions made throughout the PAC3 documentation;
 - 1.6.3 The potential for severely damaging socio-economic and environment effects, in particular relating to:
 - (a) Tourism;
 - (b) Transport and Road Safety;
 - (c) The economy; and
 - (d) Welsh language and culture.
- 1.7 We have set out further detail of these concerns below.

2. LACK OF POLICY SUPPORT

2.1 Existing Policy

- 2.1.1 A number of policy statements have been produced by IoACC in relation to construction workers' accommodation associated with the Project. These statements establish IoACC's objectives for a variety of accommodation solutions including purpose built permanent accommodation in accessible locations which will enable the delivery of future and legacy uses.
- 2.1.2 The Wylfa Nuclear New Build Construction Workers Accommodation Position Statement (March 2011) ("**Position Statement**") sets out IoACC's objectives for the provision of accommodation through an equal mix of purpose built accommodation, private rented accommodation (new and existing) and tourist accommodation (new and existing). Paragraph 4.13 of the Position Statement states that the preferred option will *"ensure that legacy is sustainable"* and *"promote local legacy benefits"*.

² Page 5

- 2.1.3 Furthermore, Policy GP10 of IoACC's Supplementary Planning Document *Nuclear New Build at Wylfa Supplementary Planning Document (July 2014)* ("**SPD**") requires the production of a Construction Worker Accommodation Strategy by Horizon which should (amongst others):
- (a) *"Deliver a legacy use by promoting permanent new accommodation that addresses local needs ... beyond the construction period";* and
 - (b) *"Ensure that construction worker accommodation is located so as to minimise the need to travel and promotes the provision and use of sustainable transport modes".*
- 2.1.4 It is clear from the above that the use of purpose built accommodation in a sustainable location and capable of delivering legacy benefits is embedded into IoACC's policy framework. The PAC3 proposals fail to fulfil this key aim and are therefore not compliant with IoACC policy and guidance.
- 2.1.5 It is also clear from the above that travel and transport sustainability forms a fundamental part of IoACC's policy aims for worker accommodation. A brief discussion of the impact on transport and travel times is set out at paragraphs 3.5.7 and 3.5.9, with more detailed discussion at paragraph 3.8 below. It is clear from such discussion that the PAC3 proposals also fail to meet this key aim.

2.2 Emerging Policy

- 2.2.1 Gwynedd Council and IoACC (the "**Councils**") are in the process of preparing a Joint Local Development Plan ("**JLDP**") for Anglesey and the Gwynedd Local Planning Authority Area. The JLDP has been submitted to Welsh Government for independent examination and the Planning Inspectorate ("**PINS**") received the submitted documents on 18 March 2016.
- 2.2.2 A number of hearing sessions took place between September and October 2016, the purpose of which was to assess the soundness of the JLDP. Following the sessions, a number of changes were made to the JLDP on which the Councils consulted in January 2017 – these changes were set out in a schedule and referred to as the Matters Arising Changes ("**MAC**"). Following this period of consultation, the Councils prepared a draft schedule of 'Potential Additional Changes' to the MAC
- 2.2.3 The Inspector reviewed both the MAC and the Potential Additional Changes to the MAC in further hearing sessions that were held on 26 and 27 April 2017. During the hearing session on 27 April 2017, the Inspector invited all participating parties (IoACC, Welsh Government, Horizon and HOW on behalf of Land and Lakes) to discuss further minor changes to the Potential Additional Changes to the MAC
- 2.2.4 Whilst the Inspector's Report is still to be published, the emerging JLDP, MAC and Potential Additional Changes to the MAC are clear in their policy direction that the Project, and particularly temporary worker accommodation, should minimise the impact on the tourism industry and have legacy benefits beyond the construction period
- 2.2.5 Horizon's PAC3 proposals are in clear conflict with the direction of the emerging policy, which has sought a balanced strategy which promotes legacy uses throughout each stage of its preparation.
- 2.2.6 Extracts from the MAC Potential Additional Changes Document (including the further minor changes discussed by all participating parties at the 27 April 2017 hearing session) which illustrate the policy direction of the Councils and demonstrate the emphasis on truly sustainable legacy uses are as follows (**emphasis added**):
- (a) 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**";*

(b) Paragraph 7.3.18 states:

"...Project promoters must demonstrate that they have fully considered the re-use of existing buildings and / or the provision of permanent buildings capable of being adapted for permanent use following use by construction workers and proportionate use of the private rented sector and consideration of existing consents before proposing modular accommodation in temporary buildings which will be removed at the end of the temporary use."

(c) Policy PS9 (Part 5) states:

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 the published Local Housing Market Assessment, and not result in unacceptable adverse economic (including the tourism sector), social, linguistic or environmental impacts.

3. SOCIO-ECONOMIC AND ENVIRONMENTAL IMPACTS

3.1 As part of PAC2, Horizon produced a Construction Worker Accommodation Strategy ("CWAS") in August 2016. The CWAS sets out a balanced approach to the provision of temporary worker accommodation and recognises the significant benefits of delivering purpose built accommodation at Holyhead.

3.2 The conclusion of the CWAS recognises purpose built accommodation as an integral part of the temporary construction worker strategy, with paragraphs 8.2 - 8.3 providing:

*"Horizon's approach to housing these workers aims to ensure the safe and efficient construction of the Project whilst also minimising any adverse impacts on existing communities and businesses and **generating legacy benefits**."*

*Horizon will meet some of the need through purpose-built accommodation both on the Wylfa Newydd Development Area and elsewhere across Anglesey. The on-site accommodation is particularly important for operational reasons, but all the purpose-built accommodation will be **important in attracting workers to the Project when they will have options elsewhere**. It will also **help manage worker behaviour and travel patterns and therefore reduce the impacts on existing communities across Anglesey**" (emphasis added)*

3.3 Paragraph 8.6 of the CWAS recognises the important role that the Holyhead sites would play in delivering a balanced accommodation strategy with a sustainable legacy, including;

"3,500 purpose-built bedspaces at Cae Glas and Kingsland near Holyhead that will be converted to tourist and permanent residential use (respectively) after construction".

3.4 Paragraph 8.7 goes on to state that:

*"This balanced strategy will enable the safe and efficient construction of the Wylfa Newydd Project, **prevent adverse impacts on local areas and deliver significant legacy** in the form of new tourist accommodation at Cae Glas and permanent housing at Madyn Farm and Kingsland".*

- 3.4.1 In light of the above it is surprising that in PAC3 Horizon has undertaken a radical departure from this balanced strategy without producing any robust evidence, policy basis or justification for doing so.
- 3.4.2 On the contrary, it is clear that Horizon's new approach set out in the PAC3 has the potential to give rise to severe socio-economic and environmental effects which we address in further detail below:

3.5 Impact on Tourism

- 3.5.1 The importance of tourism to the Isle of Anglesey's economy is made abundantly clear by the IoACC Destination Management Plan 2016-2020 ("**DMP**") which states

"the mission of the 2016-2020 Destination Management Plan is to promote and develop the Isle of Anglesey as a place to visit, live, work and invest".
- 3.5.2 The tourism industry is essential to the economy of Anglesey and, as such, it is essential that no part of the Project should adversely impact upon this vital industry. On the contrary, development associated with the Project should leave a legacy that will serve to improve the tourism offer in Anglesey in the future.
- 3.5.3 The previous proposals for delivery of worker accommodation pursuant to the TCPA Consent have been subject of careful consideration and consultation to ensure that they fulfil the aims of the DMP. By contrast, the PAC3 Proposals are bereft of any evidence based justification and are likely to have significant adverse impacts upon the tourism industry.
- 3.5.4 IoACC stressed the importance of the tourism industry in its concerns raised in it's official response to PAC2 as follows:

"The authority continues to highlight its concern that tourism as a key economic sector on the island has not been given enough weight or consideration. Tourism will be directly impacted through the possible diminishment of visitor numbers (due to building works) and indirectly affected by the use of tourist accommodation to house workers decreasing supply, displacement of staff and increased demand on facilities by a number of features of the projects and merits consideration as a key theme".
- 3.5.5 The above concerns voiced by IoACC during PAC2 can only have deepened as a result of PAC3 which has removed the potential for up to 3,500 workers to be accommodated at Cae Glas and Kingsland Sites pursuant to the TCPA Consent.
- 3.5.6 The PAC3 proposals for the spread of accommodation are based on a set of assumptions contained at page 22 of the COD. For ease of reference, these assumptions are set out below:
 - (a) *"approximately a quarter of the workforce (around 2,000 workers) will be local residents commuting daily from their existing homes*
 - (b) *approximately 3,000 construction workers living in accommodation that is on the open market, or in the private rental and tourist sectors*
 - (c) *up to 4,000 construction workers will live in the Site Campus"*
- 3.5.7 Taking each of these assumptions in turn, we set out our detailed concerns below
 - (a) **2,000 local residents commuting daily from their existing homes**

- (i) The figure of 2,000 residents is provided completely without evidence and we would question what this is based on. There is no indication that this significant proportion of the workforce is available with appropriate skills within the Daily Construction Commuting Zone ("**DCCZ**")
- (ii) In any event, it is understood that the time taken for workers to travel to the Dalar Hir Park and Ride ("**P & R**") facility could be up to 60 minutes each way³. Once at the P & R, Workers would then be transported to the Power Station site where they will complete daily shifts of 11 hours during an 11 day fortnight⁴. When coupled with the commute, this work pattern is wholly unsustainable and would not provide an attractive solution for home based temporary construction workers. We would question any construction company supporting a travel to work policy allowing a 90 minute travel time before and after an 11 hour working day. As such, it is likely that this group of workers will seek alternative accommodation, which would undoubtedly be from within the tourism (or private rented) sector closer to their workplace. This is precisely the type of activity that IoACC voiced concerns over during PAC2, as set out at paragraph 3.5.4 above.
- (iii) The relocation of workers to tourism (or private rented) accommodation will place increased pressure upon Anglesey's tourism industry and ultimately exacerbate the impact on the supply of tourist accommodation on the island. In turn this will also impact on visitor demand by restricting accommodation options and driving up prices. Ultimately, a lack of supply in tourist accommodation will reduce the amount of money spent by visitors. This in turn will have a knock-on effect on jobs and services in the local economy, with the displacement of staff working in the tourism industry.
- (iv) Page 124 of the PAC3 Main Consultation Document ("**MCD**") confirms that *"there will be 1,200 more car movements per day"* in place of 260 professionally driven buses (as proposed under PAC2). Such a dramatic increase in traffic numbers will undoubtedly have a significant adverse impact on traffic in the local area, not least from a road safety perspective, with the majority of drivers being tired after having worked long hours as discussed at subparagraph (ii) above.
- (b) **Approximately 3,000 construction workers living in accommodation that is on the open market, or in the private rental and tourist sectors**
 - (i) As above, the figure of 3,000 workers is provided completely without evidence and we would welcome clarification as to how this figure has been reached. Indeed, as discussed above, we consider it likely that a number of home based workers will look to relocate to open market, private rental and tourist accommodation in order to reduce their commuting time. As such, we consider that the figure of 3,000 workers is a very conservative estimate.
 - (ii) In any event, an influx of 3,000 (minimum) construction workers living in open market, private rental and tourist accommodation will undoubtedly have severe long term implications for Anglesey's tourism industry and private rented sector.
 - (iii) Anglesey's tourism sector does not have sufficient capacity to accommodate the real numbers of workers that will seek tourism accommodation as a result of Horizon's proposals. A tourism meeting was held in relation to the Project on 15 June 2017, during which it was noted that tourist operators at the meeting have no spare capacity during high season, with further work required by IoACC and Welsh Government to determine the actual capacity during high season.

³ based on an understanding that the P&R is circa 30 minutes from the Project Site and reference in the PAC2 CWAS to the DCCZ being broadly 90 minutes from the Wylfa Development area

⁴ See Page 23 of the PAC3 COD

- (iv) IoACC's Wylfa Nuclear Build Construction Workers Accommodation Position Statement (March 2011) states at paragraph 4.29:

*"Clearly the existing supply of tourism accommodation (hotels, B&Bs, cottages, second homes and caravans) across the Island holds the potential to provide part of the solution to meet the needs of the construction workers. However, it is equally recognised that **if too much of the existing supply of tourism accommodation is taken up by construction workers between 2013 and 2019 the local tourism market could be undermined.**"*
- (v) It is noted that page 41 of the COD states that Horizon will provide funding to both the housing and tourism sectors. Whilst Land and Lakes support the intentions of providing funding in support of tourism on the Island, it is clear that this is a tacit acceptance from Horizon that there is a need to mitigate harm to the tourism and housing sectors.
- (vi) When dealing with harm, the accepted approach to assessing development proposals is as follows:
 - (1) First and foremost harm should be **avoided**;
 - (2) If it cannot be avoided it should be **reduced**; and
 - (3) If a reduction in the level of harm is not possible, **mitigation** should be the final resort.
- (vii) Despite this accepted approach, the PAC3 proposals do not seek to avoid or reduce harm and instead move straight to mitigation proposals.
- (viii) The PAC2 proposals to provide accommodation pursuant to Land and Lakes' existing TCPA Consent would not only avoid harm on the tourism and private rented sectors but would further enhance housing and tourism in the area through its legacy offering.
- (ix) In any event, no details are provided of the proposed housing and tourism funds, making it impossible for any meaningful review of the same to be undertaken.
- (c) **Up to 4,000 construction workers will live in the Site Campus**
 - (i) It is unclear from the PAC3 documentation how many worker accommodation beds Horizon are committed to providing at the site campus. Passages contained in the PAC3 COD give contradictory information; with pages 5 and 22 suggesting that up to 4,000 beds will be provided across a phased programme. However, Page 24 of the document suggests a total number of just 2,500 beds would be delivered, again across a phased programme.
 - (ii) During the Public Tourism Meeting on 15 June 2017, Horizon confirmed that they would commit to building 1,000 bedspaces at the Project site, with any further phases being built on demand, if required. Horizon made it clear to the meeting of tourist operators that the provision of just 1,000 beds at the Project Site was their preferred option, and expressed a wish that as many tourist bed spaces could be made available as possible by individual operators. The contradictions within the PAC3 document and comments made during the public meeting suggest the scale and phasing of temporary accommodation on the Project site after the first 1,000 beds are of secondary importance to Horizon due to this accommodation being unattractive to a skilled workforce that is in demand.

- (iii) If only 1,000 beds are delivered on site, this would have a considerable impact on the tourism and private sector and could lead to upwards of 6,000 temporary construction workers requiring tourism or private rented bed spaces⁵. The impact of such numbers on local tourism could be devastating, not only in the short term during construction, but in the long term through the disruption of regular patterns of travel and the decline of Anglesey as an attractive tourist destination going forward.
- (iv) The extent to which Horizon can accommodate significant workers on-site is questioned for safety and security reasons given the nature of the Project. We would have expected the optimum position would be to avoid unnecessary workers on the campus with only those workers necessary for security purposes or a minimal critical workforce of up to 500, as previously proposed in PAC2 (9.77/ 9.78), being accommodated on site
- (v) The proposal to accommodate up to 4000 workers in this remote location is totally inappropriate. It will dominate the small villages in the near vicinity. Cemaes has a population of just 1,400, Treglele 1850 and Amlwch just 3,500 and an influx of 4,000 workers would overwhelm the village facilities enjoyed by local population and tourists.

3.5.8 The PAC2 proposal for the provision of temporary construction worker accommodation with legacy uses and leisure village pursuant to Land and Lakes' TCPA Consent would provide a sustainable solution in contrast to the revised PAC3 Proposals. The redevelopment of Holyhead would provide up to 315 new lodges on land at Cae Glas and 320 new houses on land at Kingsland for initial use as temporary accommodation for construction workers. The development would not only ease the pressure on the tourism accommodation sector, but it would also deliver major tourism growth and have a positive impact on Anglesey as a year round holiday destination by providing long term and sustainable tourism legacy benefits. Indeed, it is notable that Horizon themselves supported the Land and Lakes development in principle during the planning application process and continued in this support through its inclusion in the PAC2 proposals.

3.5.9 Concerns have since been raised by Horizon in relation to the commuting distances proposed under the PAC2 proposals. However, the commuting distance from Holyhead to the Project Site is equal to that which workers would have to travel to site from Horizon's proposed Park and Ride facility at Dalar Hir under the PAC3 proposals. The key difference being that under the PAC2 proposals, workers would be in close proximity to the Park and Ride facility at Cae Glas (which would then transport them to the Project Site) as opposed to the PAC3 proposals which would require them to travel up to 60 minutes by private motor vehicle to the Dalar Hir Park and Ride facility (as explained at 3.5.7(ii)). It is therefore clear that the PAC3 proposals are less sustainable than those proposed in PAC2.

3.5.10 Studies have shown that the PAC3 proposals for on-site worker accommodation are likely to be less attractive to future employees than the previous proposals for off-site accommodation under PAC2. Institutional blocks of 4 & 7 storey temporary accommodation will not attract and retain a quality workforce. This is supported by evidence from Unite the Union questionnaire of 25 shop stewards (see Appendix 1) who are more supportive of an attractive residential accommodation strategy close to a major conurbation as opposed to remotely located campus blocks. The PAC2 proposals provide a range of on site services integrated within a local community with a range of existing facilities. By contrast, the PAC3 proposals for on-site accommodation would be located in a remote part of Anglesey with limited facilities and a complete lack of integration for workers. It is inevitable that such accommodation would lead to increased daily movement of workers into the main towns of Holyhead and Amlwch which would have detrimental impacts on tourism, transport and health and safety, as outlined above.

3.5.11 In summary, Horizon's proposed accommodation strategy in its PAC3 Consultation will have a considerable adverse impact on the tourism industry in Anglesey. It will:

⁵ Potentially the numbers could be greater due to overinflated figures for workers travelling from home discussed in detail at paragraph 3.5.7(a)(ii)

- (a) Lead to a significant number of workers (possibly upwards of 6,000) requiring tourist or private rented accommodation during the construction phase, which will have significant immediate and long term impacts on the tourism industry;
- (b) Displace staff and place increased pressure on facilities;
- (c) Shift the risk of the Wylfa New Build Project onto the tourism industry, creating a very real risk of longer term damage; and
- (d) Fail to deliver long term tourism and legacy benefits to the island, which would be delivered with the development of sites at Holyhead pursuant to the TCPA Permission.

3.6 Economic Impacts

- 3.6.1 The PAC3 Proposals are likely to have serious implications for the Anglesey economy. An excess demand for worker accommodation in the tourist sector is likely to lead to a situation where local tourism operators choose to accommodate workers instead of holidaymakers. This will have severe impacts on the tourism industry, leading to falling visitor numbers and a decline in the quality of tourist accommodation, which will ultimately lead to the failure of associated businesses and loss of existing jobs in the industry. A similar chain of events took place in Morecambe during the construction of Heysham Power Plant in the 1980's where excessive contractor demand gave a temporary boost to the tourism industry. Unfortunately, this boost was short lived and, upon completion, the town became (and remains) a deserted and run-down resort, now hamstrung by social disadvantage. It is critical that Anglesey is protected from the same outcome with a balanced approach to the supply of accommodation to cater for the scale of demand.
- 3.6.2 The PAC3 proposals will also serve as a disincentive for future investment in the Anglesey economy generally and in particular in relation to tourism, which is heavily reliant on the picturesque nature of the Island. The beauty of the Island stands to be compromised by the PAC3 proposals for temporary blocks of 4 and 7 storey accommodation on Anglesey's northerly coastline, completely alien to its rural setting by significantly extending the industrialised mass silhouetted against the sea. The extent of the proposed campus construction also severely impacts upon the Tre'r Gof SSSI, reaching to within 65 metres of its boundary (PAC3 MCD 5.5.17) noting within Table 5.6 this will have a major adverse effect upon the SSSI leading to its eventual loss. North Wales Wildlife Trust are so concerned regarding this and other ecological and environmental impacts that they are campaigning for public awareness on their website and by site attendance on 22 June. This lack of concern for Anglesey's coastline in turn increases the risk to the tourism industry already posed by the likely influx of workers that will be taking up tourist accommodation.
- 3.6.3 The economic impact of this blow to the tourism industry will have long lasting effects that will far outlive the benefit of any temporary construction jobs created by the Project. As noted in IoACC's response to PAC2, Horizon *"must do more to guarantee local employment opportunities... Horizon need to make a commitment to ensuring long term careers to people in Anglesey and wider North Wales"*. This can only be achieved by ensuring that the Project and particularly the temporary worker accommodation has legacy benefits that last beyond the construction period, as per the PAC2 proposals to be delivered pursuant to the TCPA Consent.

3.7 Impact on the Welsh Language and Culture

- 3.7.1 Preserving the Welsh language is a key focus of IoACC and is critical in maintaining the unique cultural identity of the island. Local jobs are crucial in retaining the population, reducing out migration and preserving cultural integrity. The Anglesey Welsh Language Assessment (2017) stated that in the 30 years to 2011, the under 15 age group living on the island fell by 28% and the 16-39 age group fell by 19%. In that same 30 year period the number of Welsh speakers on Anglesey has declined from 62% to 57%. It is clear that these trends are interlinked and a focus on retaining young people on the island is critical.

3.7.2 Outward migration of young people is one of the most damaging factors contributing to the deterioration of the Welsh language and culture. This is set out in the Welsh Language Strategy 2016-2021 published by the Anglesey Welsh Language Strategic Forum, which states *"if the decline were to continue, it could threaten the existence of the Welsh language"*.

3.7.3 A number of statements are contained in Horizon's PAC3 documentation regarding their commitment to the Welsh language and culture. For example, at paragraph 9.2.1 of the PAC3 MCD it states that *"Horizon values Welsh language skills"* and at paragraph 9.2.7:

"Since the Stage Two Pre-Application Consultation Horizon has continued to identify measures to mitigate the adverse effects, and enhance the beneficial effects, of the Project on the Welsh language and culture".

3.7.4 Despite alleged commitment to Welsh language and culture, Horizon's PAC3 proposals have potentially severe consequences on the ability of young people and families to remain on the Island due to the likely fall in sustainable tourism related jobs and the availability of affordable homes. This in turn will impact upon Welsh language and culture.

3.7.5 The adverse impacts of the PAC3 proposals are, to some extent, recognised in the PAC3 documentation. Table 9.1 of the MCD states that *"the number of non-home-based workers and their dependents still has the potential to dilute existing Welsh culture and tradition"* and also that *"The use of the Site Campus... is likely to reduce the proportion of Welsh speakers"*. In addition section 9.2 states:

"in-migration of non Welsh-speaking construction workers into local communities will have an adverse effect on the Welsh language and culture"; and

"increased demand for housing during construction could increase rents payable to private landlords and increase house prices. This could have adverse effects on local people, especially the young and low-income groups. Given that a high proportion of the local population are Welsh speakers, this could adversely affect the Welsh language if local Welsh speakers are forced to move away because they can no longer afford to live in the area."

The consultation documents do not, however, make any attempt to quantify these impacts.

3.7.6 The adverse impacts of Horizon's PAC3 proposals on the tourism sector, the economy and private rented sector (as set out in these representations) will be fundamental in influencing the number of young people that choose to move away from the island. For example, the impacts of Horizon's proposals will lead to a decline in the numbers of locally available jobs in the tourism industry and the numbers of homes available in the private rented sector. This will significantly reduce the ability of young people and families to stay on the island. In turn the impact of this upon the Welsh language and culture are likely to be devastating. As noted in IoACC's response to PAC2, Horizon *"must do more to... sustain the Welsh language"*.

3.7.7 The proposed mitigation put forward by Horizon in the PAC3 MCD is completely inadequate to prevent the continued decline of the Welsh language and mitigate the adverse effects of the project on Welsh culture. In any event, as noted at paragraph 3.5.7 b (xi) above, mitigation should be the final port of call when dealing with harm and should only be called upon when avoidance and reduction are not possible.

3.7.8 Table 9.1 in the PAC3 MCD states:

"The use of the Site Campus would lead to a significant increase in the local population near to communities of Cemaes and Tregelle and is likely to reduce the proportion of Welsh speakers. However, the magnitude of the effect will largely depend on the level of community interaction between the workers and the host communities. The Site Campus contains significant on-site amenities to encourage workers to remain on-site"

3.7.9 Page 24 of the PAC3 COD sets out the *"significant on-site amenities"*, which actually comprise only:

- (a) one amenity building;
- (b) areas of open space; and
- (c) a health service.

The offer of such limited amenities at this remote location will not encourage workers to remain on site and therefore an excessive number of workers will spill out into the local villages that are unable to support such an influx.

3.7.10 Instead of seeking to *avoid* or *reduce* the negative impact upon the Welsh language and culture, Horizon's PAC3 proposals instead relies on the actions of construction workers and the residents of Anglesey to do so. As well as relying upon workers and host communities to interact to prevent the numbers of Welsh speakers from declining, their proposals also indicate that the responsibility for social cohesion is with the workers themselves. Table 5.7 of the PAC3 MCD states that

"Employees residing on the Site Campus will be required to conduct themselves in accordance with the Site Campus Management Plan".

3.7.11 This suggests that Horizon's strategy for maintaining social cohesion would simply be to provide sanctions to those that do not comply with their Site Campus Management Plan. This approach is reinforced within Horizon's proposals set out on page 8 of the PAC3 COD, which states that Horizon will appoint a Welsh Language and Culture Coordinator to develop a "behavioural based" programme.

3.7.12 By comparison, the PAC2 proposals for Cae Glas & Kingsland would limit concerns about the supply of tourism accommodation and increase the number of sustainable jobs in the tourism sector through the creation of jobs to service the worker accommodation which would in turn provide career paths into hospitality for the Cae Glas & Penrhos holiday Village. This would attract tourists, all of which would help to maintain a sustainable tourism economy, thereby discouraging out migration from Anglesey and consequently help to preserve the Welsh language and culture.

3.7.13 Prior to securing the TCPA Consent, Land & Lakes entered into a legally binding Section 106 Agreement with IoACC which contained a number of obligations, including the promotion of Welsh language and culture amongst all workers and visitors to the development.

3.7.14 The Section 106 Agreement also includes a commitment to Welsh language courses, tutors, Officers, Welsh building and street names and visitor information in Welsh and English. A number of these benefits will not be capable of being carried forward under the PAC3 proposals.

3.7.15 IoACC has expressed clear support for the PAC2 proposals and delivery of worker accommodation pursuant to the TCPA Consent. Paragraph A.9.24 of the PAC3 MCD clearly states that IoACC *"supported this location [Kingsland and Cae Glas] for temporary workers accommodation"* and that *"Several other stakeholders expressed support for this site due to anticipated economic and legacy benefits, and the utilisation of existing infrastructure"*. It is clear that Horizon's latest proposals do not provide sufficient weight to the views provided by IoACC and other key stakeholders during the PAC2 process. The latest proposals are absent of any beneficial longer term legacy and represent a major failure to exploit a more balanced approach that would retain temporary workers accommodation at Kingsland and Cae Glas and reap the benefits to the Welsh language and culture that this would provide.

3.8 Traffic Impact and Road Safety

- 3.8.1 For reasons already touched upon previously, it is clear that the PAC3 proposals would have a significant adverse impact on traffic and sustainable patterns of travel.
- 3.8.2 Pages 123-125 of the PAC3 MCD set out the main changes to Horizon's proposed transport strategy since PAC2. Page 124 of the PAC MCD provides that:
- "There will be 1,200 more car movements per day (600 cars arriving and leaving the site), but there will be 260 less buses movements" and on page 3, "We are increasing the number of car parking spaces at the Wylfa Newydd Development Area from 1,000 to 1,900 parking spaces".*
- 3.8.3 The PAC3 documents provide no evidence to support these numbers or to allow a full assessment of the potential traffic issues on the site. Nevertheless, it is clear that the proposals will lead to a significant increase in the number of private vehicles on local and rural roads, which in turn will lead to increased traffic and road safety concerns in the surrounding area. It is clear that the PAC3 strategy is not underpinned by robust evidence and is inherently unsustainable in comparison to the PAC2 strategy which relies on professionally driven coach journeys and public transport.
- 3.8.4 As stated previously, the distance that workers would need to travel from accommodation sites at Holyhead is the same distance that workers would need to travel from the P & R, which has poorer links to public transport and serves a disparate workforce reliant on private vehicles. We also note that the PAC3 MCD confirms Horizon's preference for a logistics centre at Holyhead on the basis of traffic impacts as well as planning policy support. We support this assertion and suggest that Horizon should take a similarly pragmatic approach to the consideration of accommodation sites that have strong planning policy support and existing planning permissions. We also note that the PAC3 proposals do not consider the impact on traffic that will occur from up to 4,000 workers living on the Site Campus without access to recreational facilities within reasonable walking distance. This will inevitably lead to higher numbers of daily car movements for worker recreation, plus extended travel to and from the Site at the beginning and end of each fortnightly shift with adverse impacts upon road traffic, which have not been appropriately assessed or set out in the PAC3 MCD.

3.9 Impact on the Private Rented Sector ("PRS")

- 3.9.1 Table 5.2 of the PAC3 MCD sets out a predicted demand for 900 bedspaces in the PRS, based on the assumption that Horizon will deliver up to 4000 beds at the Site Campus. The MCD also states that Horizon have estimated that Anglesey has a capacity of 1,285 beds in this sector. We have already queried the accuracy of Horizon's figures in terms of the number of beds that will be delivered at the Project Site. Putting those concerns aside, we are also concerned with Horizon's estimation that Anglesey has a capacity of 1,285 private rented beds. IoACC's response to Horizon's PAC2 clearly states at paragraph 10.4 that *"Evidence commissioned by the IACC suggests that only 260 private rented properties become available in Anglesey each year (churn)"* and at paragraph 10.6 that *"Given that lack of capacity in PRS and the number of people on the waiting list for Council property (350) any decrease in the availability of houses to rent or increase in rental prices as a result, would cause a significant adverse impact to Anglesey's PRS which is unacceptable"*. This suggests there is a serious lack of capacity in this section of the market and it is therefore wholly inappropriate to assume that 1,285 beds can be made available in this sector.
- 3.9.2 Horizon's PAC3 proposals would place an inordinate amount of pressure on the PRS, requiring over three times Anglesey's residual capacity. The impact of this on Anglesey's economy and community will be far reaching and detrimental. As highlighted in IoACC's PAC2 response (paragraph 10.5 Appendix A) where they voiced concerns that the proposals would:
- "result in increased rent prices (due to increased demand and less supply available on the market) and landlords being incentivised to end existing tenancies rather than renewing them in*

order to obtain higher rental income from construction workers. This will result in local people not being able to afford to rent a house and this could significantly increase the risk of homelessness on the Island, displacement of local people who have to move to find affordable accommodation and the subsequent impacts on community cohesion, Welsh language and culture and availability of labour".

- 3.9.3 Whilst Horizon's PAC3 proposals estimate that 200 fewer workers will need to be accommodated in the PRS than the PAC2 Proposals, it is clear that the concerns raised by IoACC have still not been adequately addressed.
- 3.9.4 The cost of re-housing 1 displaced family from private rented accommodation in Anglesey costs Welsh Government £23,000⁶, a figure which does not take into account any social cost with that relocation. The lack of availability in the PRS will have a significant detrimental impact on future rental prices. The proposals put forward under PAC3 would result in increased rent prices and the danger that landlords could terminate existing tenancies in order to obtain higher rental income from construction workers. This would have a significant impact on youth migration, the displacement of local families, the Welsh language and the tourist industry. It could also increase the risk of homelessness on the island and have a major adverse impact on community cohesion and availability of labour (as supported by IoACC's response to PAC2 at paragraph 10.5, Appendix A).

4. CONCLUSION

It is clear from the detailed concerns set out above that the radical change in strategy from PAC2 to PAC3 has resulted in an unbalanced strategy that is likely to have a myriad of negative impacts on Anglesey including:

- 4.1 Having a significant detrimental impact on the tourism industry, both in the short and the long term due to the lack of any legacy benefits;
- 4.2 Have an adverse economic impact on the Island, with the loss of long term sustainable full time jobs at Holyhead - replaced by temporary jobs that provide no long term legacy following the construction of the Project;
- 4.3 Exacerbate out-migration, particularly of young people, which in turn could have a devastating effect on the Welsh language and the cultural identity of the Island;
- 4.4 Lead to a significant increase in traffic and the use of private motor vehicles by workers following long shifts each day, promoting unsustainable patterns of travel, leading to a range of localised traffic issues, increasing safety risk of own Horizon's workforce, public safety and disruption;
- 4.5 Place significant pressure on the private rented sector, which in turn could damage patterns of migration, local job and the tourism industry.

In putting forward the PAC3 proposals, Horizon have failed to give sufficient consideration to the representations to extensive prior consultation and discussion with IoACC and other Key Stakeholder and is therefore jeopardising the entire consultation process. The PAC2 proposals received significant support from IoACC, largely due to the numerous benefits arising from the legacy uses of the worker accommodation to be provided at Cae Glas and Kingsland and the positive impact this would have, particularly on economic regeneration, Tourism, Welsh language and culture. Horizon has given very little consideration to the Land and Lakes sites since commercial negotiations ceased in May 2016. Meetings have been arranged with Horizon since this date but there has been no attempt by Horizon to progress any negotiations. Despite repeated requests by Land and Lakes to discuss potential alternative proposals for use of those sites, Horizon has simply responded with spurious and unfounded reasons for their lack of suitability. All meetings have been minuted as a matter of course to record as such.

The use of Land and Lakes sites would cost Horizon no more financially than the PAC3 proposals but would require commitment. The PAC3 proposal requires little commitment but would have significant detrimental impacts as highlighted above and will deliver no legacy to the island.

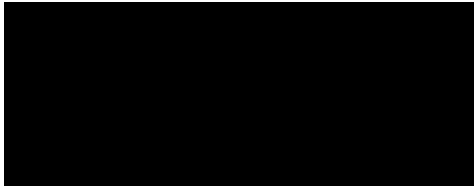
⁶ Source: Welsh Government

We do not consider the potential negative impacts of the PAC3 proposal to be intrinsic to the Wylfa Project or irreversible as the Project moves forward and would be open to working with Horizon to ensure that a more inclusive, integrated and sustainable strategy is realised.

In light of the above we would hope that Horizon will re-engage with us to consider how a return to the PAC2 proposals could be made to work for all parties.

We would be grateful if you could confirm safe receipt of these representations and should you require further information or wish to discuss then please don't hesitate to contact me.

Yours sincerely



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Cc

Dr Gwynne Jones – Isle of Anglesey County Council
John Howells – Welsh Government
Gwen Roberts – Welsh Government
Mathew Clarke – BEIS
Jon Suckley - HOW Planning
Mike Pocock – Pinsent Masons

APPENDIX 1

UNITE THE UNION QUESTIONNAIRE

On 7th March 2017, Land and Lakes presented to 25 Unite the Union Shop stewards who represent a cross section of the construction workforce across the UK.

The purpose of the presentation was to gauge reaction to the Land and Lakes permanent worker accommodation proposal at Cae Glas & Kingsland (30 minutes travel distance by coach from Wylfa site) as opposed to temporary worker accommodation blocks at Rhosgoch (15 minutes travel distance to Wylfa) or on the Wylfa site itself.

The summary of results from the Questionnaire are attached