

**From:** [PMO](#)  
**To:** [Wylfa Newydd](#)  
**Cc:** [Dylan Williams](#); [Liz A. Davies](#)  
**Subject:** IACC Deadline 4 Submissions: OFFICIAL  
**Date:** 17 January 2019 13:59:30  
**Attachments:** [image003.png](#)  
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[image005.png](#)  
[D4 covering letter Final.pdf](#)

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Good afternoon,

Please see attached the IACC Submission in respect of the above.

Welsh language translation will follow as soon as available.

Regards,

Swyddfa Rhaglen Ynys Ynni /  
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Mae'r neges e-bost hon a'r ffeiliau a drosglwyddyd ynghlwm gyda hi yn gyfrinachol ac efallai bod breintiau cyfreithiol ynghlwm wrthynt. Yr unig berson sydd 'r hawl i'w darllen, eu copio a'u defnyddio yw'r person y bwriadwyd eu gyrru nhw ato. Petaeth wedi derbyn y neges e-bost hon mewn camgymeriad yna, os gwelwch yn dda, rhowch wybod i'r Rheolwr Systemau yn syth gan ddefnyddio'r manylion isod, a pheidiwch datgelu na chropio'r cynnwys i neb arall.

Mae cynnwys y neges e-bost hon yn cynrychioli sylwadau'r gyrrwr yn unig ac nid o angenrheidrwydd yn cynrychioli sylwadau Cyngor Sir Ynys Mon. Mae Cyngor Sir Ynys Mon yn cadw a diogelu ei hawliau i fonitro yr holl negeseuon e-bost trwy ei rwydweithiau mewnol ac allanol.

Croeso i chi ddelio gyda'r Cyngor yn Gymraeg neu'n Saesneg. Cewch yr un safon o wasanaeth yn y ddwy iaith.

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Ms Kay Sully,  
The Planning Inspectorate,  
National Infrastructure Planning,  
Temple Quay House,  
2, The Square,  
Bristol,  
BS1 6NP

Dear Kay,

**EN010007 Wylda Newydd DCO: Deadline 4 Submissions.**

Please see attached our Submissions in respect of the above. These are set out as Appendices to this letter as follows:-

**APPENDIX A.** Written submission of Oral Cases.

1. ISH 1 on Socio-Economic Matters. 7th January, 2019. Submission includes
  - Annex 1.1 IACC/WG/GCC note on quantum of available housing stock.
  - Annex 1.2 Information in respect of conditions on the Land & Lakes permission.
  - Annex 1.3 Definition of a Welsh Speaker.
  - Annex 1.4 Non home based workforce: calculation of child dependents of migrant workers.
  - Annex 1.5 Anglesey Visitor Surveys 2017 and 2018 reports.
  - Annex 1.6 STEAM data breakdown.
2. ISH 2 on Socio-Economic Matters. 8<sup>th</sup> January, 2019.
3. ISH 2 on the DCO. 9<sup>th</sup> January, 2019. Submission includes
  - Annex 3.1 Alternative wording and reasoning for the definition of 'Maintain'.
4. ISH1 on Biodiversity. 10<sup>th</sup> January, 2019.
5. ISH2 on Biodiversity. 11<sup>th</sup> January, 2019.

The following represent ExA 'Action Points', as noted by the IACC during the Hearings, and are dealt with in:-

**APPENDIX B:** A post-hearing note agreed with Cyngor Gwynedd in respect of early learnt behaviors (the creation of behavioral patterns in respect of the use of accommodation by workers).

**APPENDIX C:** A post hearing note setting out the IACC's views on how the proposed housing fund will be used to increase capacity in the housing stock and the timescales involved.

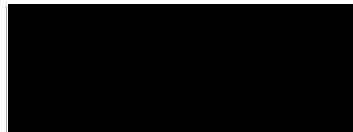
**APPENDIX D:** A post hearing on the IACC's views on the list of Reasonably Foreseeable Future

Projects generating cumulative effects.

Please note, the IACC will not be submitting comments in respect of Change Requests relating to the information submitted by the Applicant at Deadline 1 (13 November 2018) in relation to REP1-014; REP1-016; and REP1-017 given that these have not, as yet, been formally submitted to the examination.

Finally, the IACC wishes to advise the Examining Authority that it will wish to speak at Compulsory Acquisition Hearings.

Yours sincerely,



**Dylan J. Williams**

**Pennaeth Gwasanaeth  
Rheoleiddio a Datblygu Economaidd**

**Head of Service  
Regulation and Economic Development**

# **APPENDIX A**

## Written submission of Oral Cases

## **Issue Specific Hearing 1: Socio Economics**

### **7<sup>th</sup> January, 2019.**

Appearing for IACC – Martin Kingston QC, relevant topic specialists are noted against the appropriate agenda items.

#### **Agenda item 3: Accommodation**

Topic specialists: Michael Jones, Cambridge Centre for Housing and Planning Research

Rhys Jones, Major Consents Impact Manager, IACC

IACC have had no substantive discussion with HNP since the deadline 2 and 3 submissions.

IACC have a major concern with the timing of delivery of the TWA campus. It is noted that a new phasing plan is due to be submitted by Horizon at Deadline 4, IACC therefore notes that any submissions made at this time are subject to revision once the further version of the phasing plan has been considered.

The essence of IACC's issue is that before any of the TWA becomes available there will be a substantial number of non-home based workers looking for accommodation in the private sector.

These could number in the thousands and IACC do not accept that the Island should bear the risk on effects of them using local housing provision prior to Y4 Q4. Other than the cost to HNP, no reason has been advanced why the TWA could not be provided earlier and avoid creating a problem. HNP assert that the provision of TWA cannot be made while the SP&C works are under way but do not provide any convincing reasons why.

With the call in of the SP&C planning application there may be changes in timing of the development in any event, and these effects should be explained. In particular, the effect of not being able to start the SP&C works ahead of the DCO on delivery and phasing has not been explained. IACC notes the Panel's request that more detail is provided by HNP on these reasons.

Workforce build up is the issue. 2,400 bedspaces are required by Y4 Q4, which is 80% of all available bedspaces at the time any TWA provision is due to be available (and not allowing for any delay) this will create intolerable pressure on the Island. The question is also whether it is reasonable for the incoming workforce to absorb so much local accommodation for so long thereby preventing use of that accommodation by local residents and those wishing to relocate. IACC have contributed to the Panel request that IACC/WG/GCC prepare a note on quantum of available housing stock which is submitted as Annex 1.1.

IACC is looking for certainty that the TWA will be used as intended. Pricing of the accommodation provided is an important issue, as workers will live locally if they can save money in doing so and if the standard of the TWA is not adequate. Pricing and quality thresholds are needed. IACC also questions why a mechanism cannot be imposed that requires a minimum level of occupation. Some employment situations contractually require occupation in prescribed accommodation locations.

IACC also seeks more information on whether the TWA can be retained longer.

Information requested by the Examining Authority in respect of conditions related to the Land and Lakes planning permission is included at Annex 1.2.

#### **Topic 4 Welsh Language and Culture**

Topic Specialists: Annwen Morgan Assistant Chief Executive of Isle of Anglesey County Council

Dr Kathryn Jones, Iaith Cyf.

Owain Wyn, Iaith Cyf.

IACC noted that they wish to set down a marker that what HNP have proposed as mitigation for impacts on the Welsh language and Culture is entirely insufficient. It is further noted the Council consider that there has been some confusion when talking about Welsh Language provision and the need for assistance in primary schools, however, there has been no discussion about the impact on secondary schools.

The framework the Council uses for the identification of Welsh skills provide a known and tested methodology for assessing Welsh language skills. In response to the panels' request for how a Welsh speaker should be defined, the Council has liaised with the Welsh Government and has produced a paper setting out the shared understanding of the definition of a Welsh speaker is attached as Annex 1.3. In general the Council would define a Welsh speaker as someone who can communicate and be understood in Welsh. The communication should be a simple message not a one word answer. IACC believes the targets necessary to be achieved are Level 2/3 oral and Level 3 written to ensure that communication is made at these standards. The IACC notes that defining a speaker can therefore be quite complex as there are various levels of ability and different jobs may require different levels of ability and is therefore important to recognise patterns of use as well an individual ability.

To ensure the viability of a language, language transfer needs to take place in the home or through education services. The Council collects data every January which records the percentage of children with varying abilities of Welsh.

IACC continue to assert that a target is needed for the employment of Welsh speakers in order to be able to carry out meaningful monitoring. These targets should also be increasing over time. Where there is a failure to meet targets, measures to increase the number of Welsh speakers should then be triggered. These measures should be set out in the section 106 agreement in as far as possible however, it is recognised that the flexibility will be required. This must however be an enforceable obligation with a monitoring regime and contingency measures where targets are not been achieved.

IACC notes that the question was raised in the hearing as to the percentage of Welsh speakers in the wards in North Anglesey. As advised the percentage varies between 50-70% however, that can be further broken down as follows:

Llanbadrig (52.4%)

Mechell (61.1%)

Amlwch Rural (54.3%)

Amlwch Port (64.5%)

Llaneilian (58.9%)

Llanfaethlu (64.4%)

Llanerchymedd (69.9%)

IACC continue to submit that it is necessary to understand the likely distribution of home based workers in order to fully assess the impact on the Welsh Language.

## **Education Strategy**

Topic Specialists      Annwen Morgan Assistant Chief Executive, Isle of Anglesey County Council

Peter Trevitt, Peter Trevitt Consulting.

IACC submits an education strategy is absolutely necessary for the project. To date there have been a lot of warm words on the provision of education however, there has been no detail on what will be delivered, how and what resource is required to do so. Without a strategy, this level of detail cannot be established.

The number of dependants, IACC note that Horizon's figure of 220 children is at peak only. IACC submits that that figure should be 521 at peak and the methodology used to calculate that figure is set out at Annex 1.4. IACC however notes that this figure is a snapshot at peak. The total of number of children who will come through the system over the entire construction period is calculated as 1158 and this is the figure which should be planned for. This is 1158 individual children who will each require support services.

The influx of construction workers and their dependents is not a normal change in demographics which the education services provided by IACC are used to dealing with. This is an influx caused specifically by a particular project bringing significantly greater burden than natural growth. A Section 106 contribution to support the burden so created is therefore critical. It is noted that in response to LIR, HNP have referenced a contingency fund of £1million and a skills and education contribution of £3million. It is not clear how these figures have been calculated and what they are intended to cover. In particular contingency funds are by their very nature intended to address issues which were not expected but arise. The issues raised are entirely expected and should be planned for and resourced appropriately and separately from contingency funds.

English as a second language.

IACC currently provide some support for English as a second language however, that program of support is not sufficient and has no capacity to accommodate an influx of users. In 2018, 49 pupils in secondary schools had a first language which was not English or Welsh. Further children in coming without English or Welsh as a first language will put significant further pressure on the system. The majority of children who have English as an additional language also have Welsh as an additional language and therefore require considerable support. English is added as a subject at KS2 (age 7). It is reasonable and credible to assume that the number of children entering secondary education without any Welsh, and with English as an additional language will increase due to the project and the level of support required will therefore will also increase.

It is noted that the HNP submission REP3-004 at paragraph 9.10.25 questions the Council's figures on the ratio of teachers to pupils in immersion services. The Council notes that HNP's evidence on this is entirely wrong. The evidence set out in chapter 9 of the LIR (REP2-132 page 20 para 2.7.4) sets out the figures which show the number of children educated across 2 teachers and 2 classes and comes out at a ratio of between 1:7 and 1:8.

IACC recognises the need to provide better support for additional languages and the need for the intense support of children without English or Welsh as a first language. The challenges for children who can't attend education without a language which uses for example the Roman alphabet will be considerably more difficult than those who require immersion support for Welsh only. A strategy to properly support this is therefore vital.

### **Agenda Item 5 – Health and Wellbeing**

IACC note that their primary concern under this topic is displacement of staff, in particular of staff in social care. There is also a Welsh language dimension to this displacement.

### **Agenda Item 6 – Recreation and Tourism**

Topic specialists: Professor Annette Pritchard, Swansea University

Professor Nigel Morgan, Swansea University.

IACC have a fundamental concern with the monitor and mitigate approach on tourism. Tourism is a very fast moving industry. Surveys are very retrospective and will not protect the brand. Where the brand of Anglesey as a tourist destination is damaged, it would be incredibly difficult to retroactively repair that damage. Anglesey is a destination in and of itself. Anglesey visitors visit the island not a specific place on it. Crossing the bridge to Anglesey is part of what gives it its identity as a destination.

IACC note that the figures presented by Horizon concerning the likelihood of tourists returning to Anglesey considers the "presence" of a nuclear power station not the "construction" of nuclear power station full point. IACC consider that the construction impact will be considerable and will be the relevant situation for the next 10 years. The 2018 visitor survey identified that 16% of both self-catering and hotel accommodation users would be less likely to visit. IACC agreed to submit that survey and this is attached to this note as Annex 1.5.

IACC welcomed the update from Horizon regarding the delivery of the permanent visitor centre. A separate note is made in the Day 4 post-hearing note about the agreed statement on the specification for the Visitor Centre

IACC continues to have serious concerns about the overriding issue of the significant use to be made of private sector accommodation in the early stage of the project.

The IACC continue to be concerned about the vulnerability of the tourism sector and the ability of tourism businesses to retain staff who could be attracted to employment at Wylfa creating a substantial risk of displacement. There are 5,630 FTE jobs within the [Anglesey] tourism sector. Seasonal workers within the tourism industry are 95% resident in Anglesey and Gwynedd. The STEAM data breakdown is attached an Annex 1.6.

IACC have serious concerns regarding the potential for damage to the brand of Anglesey tourism and accommodation. Families are a very important segment of the tourism offer and are unlikely to want to share with workers. Sharing accommodation with workers, such as within caravan parks, will damage the Anglesey brand.

There is concern regarding the night time economy and the influx of a mostly male population. The family visitor market are less likely to want to visit anywhere where the night time economy is geared towards the needs of workers and these sectors will create demand for different forms of provision. While temporary construction workers would add expenditure to the local market it would be very different and would not replace that which would come from holidaying families.

Anglesey remains a strong holiday destination, with staying on and exploring the Island a clearly identifiable purpose of a holiday, even if day trips are made off the Island.

The peak period is June, July, August and September. However April, May and October are also significant. The dates on which Easter falls also have a significant impact, if this falls in April then tourism in this month can also be significant.

The tourism offer on Anglesey includes a lot of self-catering and second homes. People do visit throughout the year and particularly at weekends. This underpins expenditure in other areas. For example 25% of retail expenditure on Anglesey comes from tourism.

IACC note and accept there may be a boost to the local economy through the construction and build for the 10 year construction period. However, where the development of the project damages the underlying tourism economy then there will be a significant long lasting inter-generational damage to the economy of Anglesey. Damage to the brand of Anglesey as a tourism destination could take decades to recover from. Therefore allowing such damage to be caused on the basis that incoming workers will contribute to the economy is not a sustainable approach. The Anglesey brand has been built on small independent businesses and has enjoyed a decade-long unbroken period of growth. The loss of £27 million in visitor spend will not be replaced by £10 million in worker spend.

IACC do not recognise and do not accept the picture of the sparse use of the coastal path at Wylfa which has been presented by Horizon.

#### **Agenda Item 7 – Law and Order**

IACC note that they have received no detailed response to the LIR on this issue and particularly on the safeguarding point. IACC continue to maintain the position that the safeguarding needs are essentially a function of population. The incoming workforce is equivalent to a male working age population of a town with 20,000-25,000 people in it and it is therefore unrealistic to consider there will be no safeguarding issues. The predominately male workforce incoming will, as a matter of demographics, create a safeguarding need. This is not intended to cast aspersions on any construction worker or treat them as a group. However the numbers concerned will create some need.

There are a number of preventative measures which can be taken to prevent harm arising. The preventative measures which Horizon can take these will not be 100% successful. The cost of responding to the safeguarding need is very high and there is a significant cost to IACC for a potentially small number of children or vulnerable adults requiring safeguarding. This is of course small compared to the harm suffered by individuals who need such support.

#### **Other**

IACC note that a lot of the Horizon strategies of 'plan monitor and manage' would allow issues to arise before they are addressed. IACC does not consider it acceptable that the Island's community and the Council carry the risk of this development. The risk should fall on Horizon as the project promotor and the cause of the change requiring the resource. It is not acceptable that harm is allowed to arise and damage the Island before Horizon start to implement contingency or remedial measures.

## **ANNEX 1.1**

### **Housing & Temporary Worker Accommodation Headline Joint Position Statement for Deadline 4.**

- 1.1 At the request of the Examining Authority, this Post Hearing Note has been produced to jointly outline the Isle of Anglesey County Council (IACC), Gwynedd Council (GC) and the Welsh Government (WG) positions (herein after referred to as “ the parties” where a common position exists) on housing and temporary workers accommodation (including tourism accommodation) and to identify common ground given the similarity in positions and conclusions. The Examining Authority requested that this note be submitted at Deadline 4 (17<sup>th</sup> January 2019).
- 1.2 The Local Authorities (IACC, Gwynedd and Conwy), Housing Associations and the Welsh Government have been collaborating on housing and worker accommodation for Wylfa Newydd for a number of years. This includes the commissioning of studies (e.g. Arc 4, Amec Foster Wheeler Study, Policy and Practice and North Anglesey Study) as well as attending the Wylfa Newydd Strategic Housing Partnership to share respective positions and concerns.
- 1.3 All parties agree that it is essential that local residents, and those wishing to move to the key study area as long term residents, should continue to be able to remain within their existing property or be able to find homes to buy or rent throughout the prolonged ten year period of construction of Wylfa Newydd.
- 1.4 All parties also agree the need to protect the economically vital tourist industry during this period, enabling both first time and repeat visitors to find suitable accommodation at a price they can afford at the times when they want to visit.
- 1.5 All parties agree to the principle of proximity. The Proximity Principle is, simply, an acknowledgement of and response to the fact that those communities closest to the development should see the greatest concentration of mitigation, compensation and benefits delivered to and around them in order to reflect the level of impact experienced. The principle provides that a sequential approach is to be adopted with consideration given first to the impacts on host communities, followed by neighbouring communities and on other communities affected by any displacement .
- 1.6 While it is technically the case that every bedspace in the private sector that is occupied by a construction worker means that there is one less available in the housing or tourism markets, all parties recognise that given the protracted construction period there is a degree of uncertainty as to the flexibility and fluctuation that may occur over time in these markets, and therefore there is very limited capacity to accommodate construction workers without undue detriment. In this regard there has been a difference of approach in methodology used to assess the extent of any slack in the tourist and private rented sector. However all parties

are agreed that at a best case it is unlikely to exceed 10% of turnover and could well be even more limited.

- 1.7 Horizon, however, have attempted to argue that there is 'spare capacity' or 'headroom' in the private sector which could absorb 3,000 workers without any significant impact upon either the housing or tourism markets.
- 1.8 The parties agree that Horizon's approach is flawed because:
  1. Horizon's strategy is based upon first absorbing vacancies from the private rental and tourism sector, and only then constructing TWA: over 80% of the identified 3,000 bedspaces in the KSA would be absorbed from the private sector by Y4Q4, when the first 1,000 bedspaces in TWA come onstream.
  2. Horizon have focussed on meeting peak demand, and have failed to consider the impact on the housing and tourism markets of the very rapid build up of workforce numbers, requiring 1,600 bed spaces in the twelve months of Y4, with 1,200 of these in the six months of Y4Q3 and Y4Q4, and 700 of these within the single quarter of Y4Q4. All parties are agreed that a more rational approach to TWA phasing is possible, (see Annex 1 below) which would reduce pressure on the private sector and allow a more evenly balanced programme for additional supply to be achieved.
  3. Horizon are relying entirely upon market forces to meet the demands for delivering any additional private sector accommodation. While the Joint Local Development Plan (covering Gwynedd and Anglesey) has allocated sufficient housing sites to meet jobs led growth, there is little likelihood that private house builders will be able to respond in the time between DCO implementation and when the demand will increase during Y4. Therefore, in order to ensure such delivery there is need for pro-active interventions to commission new stock from house builders and developers by a single purchaser in order to deliver the numbers required.
  4. Horizon have not provided any data on the length of time that different sections of the workforce will be present on site, making it impossible to estimate the tenure split between potential purchasers and renters, and have underestimated the likely numbers of partners and dependents, with associated implications for family housing, education, health and other sectors.
  5. Horizon propose to 'mitigate' the effects of excess demand only after the event, proposing a small Housing Fund which will, *inter alia*, '*support rent deposits for people at risk of homelessness*' and '*fund officer time relating to homelessness*': all parties are agreed that that the aim should be to prevent people from losing their homes, not to 'mitigate' these losses.

- 1.9 North Wales, and Anglesey in particular, is a peripheral economy, but one with a strong sense of community and identity. The potential loss of a home, or the inability to find a suitable and affordable home, will disrupt local community cohesion, and will disperse local people out of the area. Such a negative impact on local communities, and consequence to the Welsh language and culture, is a prospect which all parties consider to be unacceptable, and appropriate mitigation measures must be secured in advance.
- 1.10 More detailed comment on the approach taken by all parties in assessing the accommodation implications of Wylfa Newydd, and how these differ from that of Horizon, is set out in the following sections.

**All parties are agreed:**

- 1.11 That the provision of 4,000 bedspaces in TWA is acceptable and is fundamental in controlling the potential impacts of non-home based workers, provided that a timely phasing of TWA is secured together with a binding agreement on quality and occupancy of the TWA.
- 1.12 That providing 3,000 bedspaces from the housing and tourism markets is acceptable, provided that an appropriate sized housing fund is provided from an early stage in order to secure a timely increase in housing supply (through a potential range of interventions) is secured in order to match (and accommodate) the increase in demand from WN workers. In particular that provision is made for additional housing stock to be delivered within Anglesey to match the pattern of demand.
- 1.13 That the gravity modelling by Horizon provides a useful indicator of the potential distribution of demand, and that a broad division of the likely impacts on accommodation between Anglesey, Gwynedd and Conwy All parties are agreed that mitigation should follow the impacts.
- 1.14 That if the above mitigation measures are not secured then additional impacts will be felt in Anglesey, Gwynedd, and Conwy.

**Key areas of agreement with Horizon**

- 1.15 The parties, (together with Horizon) are agreed:
- 1.16 That a target of 20 empty properties per annum, returned to use over the five years to Y7Q4, is achievable (although WG would prefer a more aspirational target).
- 1.17 That creating a total of 400 bedspaces in latent accommodation by Y7Q4 is achievable provided there is positive action to incentivise this level of provision.

## **Key areas of disagreement with Horizon**

1.18 All parties are agreed:

### **Temporary Worker Accommodation (TWA)**

- 1.19 That the phasing of TWA currently proposed by Horizon is unacceptable, and in particular will result in a demand for 1,600 bedspaces from the private sector in the space of the twelve months of Y4.
- 1.20 That an alternative phasing of TWA (set out in Annex 1) is both practicable and desirable, and will both create a more balanced quarterly demand for private sector accommodation and reduce the amount of additional supply required while spreading this out over a longer period to the peak demand in Y7Q4.
- 1.21 That they are not currently convinced that Horizon's proposals for TWA will provide 'accommodation of choice' that will be acceptable to the workforce in preference to finding accommodation in the private sector.
- 1.22 That binding commitments are required from Horizon defining the phasing and quantum of TWA to be delivered, tied to the total number of workers permitted on the project, and that there should be a commitment through the DCO (S106) to monitor occupancy (lettings) to ensure that occupancy does not fall below 85% for any phase at any time for a monitoring frequency period to be determined. Such a commitment should also provide for the release of additional contingency fund payments should occupancy remain below 85% for an identified period. Horizon will be expected to use whatever necessary marketing, contractual, and pricing measures that are appropriate to ensure that an average occupancy of 85% in TWA is achieved.
- 1.23 That clarity is urgently required to substantiate the verbal statement made by Horizon at the first Issue Specific Hearing to the effect that TWA provision on site would have to be reduced for ONR safety reasons once reactor 1 becomes operational. This was the first time that this issue has been raised. Parties are therefore concerned about the contribution that the TWA can make for accommodating the workforce during the later stages of the construction process after peak, and whether there could be additional and as of yet unidentified impacts on other accommodation sectors post peak construction, that may require later mitigation.

### **On owner occupation**

- 1.24 That Horizon's methodology for calculating 'headroom' in the owner occupied sector is flawed, and would result in over a quarter of all net vacancies in the sector being bought by construction workers over the five years up to Y7Q4. This

proportion is unacceptable, and would lead to local residents, and those wishing to move to the area as long term residents, being unable to find homes to buy.

- 1.25 That although the JLDP has allocated sufficient land to meet jobs led growth to 2026, it is unlikely that developers and house builders will have the capacity or confidence to provide the rapid build up of units required by Y4Q4.
- 1.26 IACC has provided in the Local Impact Report (REP2-068) an estimate of the additional supply of housing that would be required across the KSA i.e. 520 properties. This could be from new build and/or bringing empty properties back into use. The other parties to this note have not provided written evidence to the examination on this point but support the general point that IACC is making.
- 1.27 As identified in 1.7(3) above it is likely that additional market support and/or land assembly will be required to produce early and proportionate action by the development industry to secure the delivery of additional new build units.

### **On the Private Rented sector (PRS)**

- 1.28 That Horizon's methodology for calculating 'headroom' in the private rented sector is flawed, and would result in nearly a quarter of all net vacancies in the sector being rented by construction workers over the five years up to Y7Q4.
- 1.29 That the spending power of construction workers, combined with their preference to live as close as possible to site, will lead to rent increases in North and West Anglesey. To the extent that insufficient supply becomes available in these areas, demand will spill over across Anglesey and into Gwynedd, followed in turn by rent increases. This process will lead to the displacement of significant numbers of existing tenants and potentially first time buyers if properties transfer from home ownership to private rent. The parties agree that if this occurs there will be wider impacts on social cohesion and welsh language within communities.

### **On Tourist accommodation**

- 1.30 That Horizon's methodology for calculating 'headroom' in the tourism sector is flawed, and could result in virtually 90% of all commercial vacancies in the sector being rented by construction workers over the five years up to Y7Q4. This is clearly unacceptable.
- 1.31 That Horizon's estimates rely almost wholly upon the unknown behaviour of the private owners of their own holiday caravans, and their willingness to forgo their holidays in order to rent their caravan out to construction workers.

## Annex 1

**Figure 1 - Horizon's current Phasing Strategy**

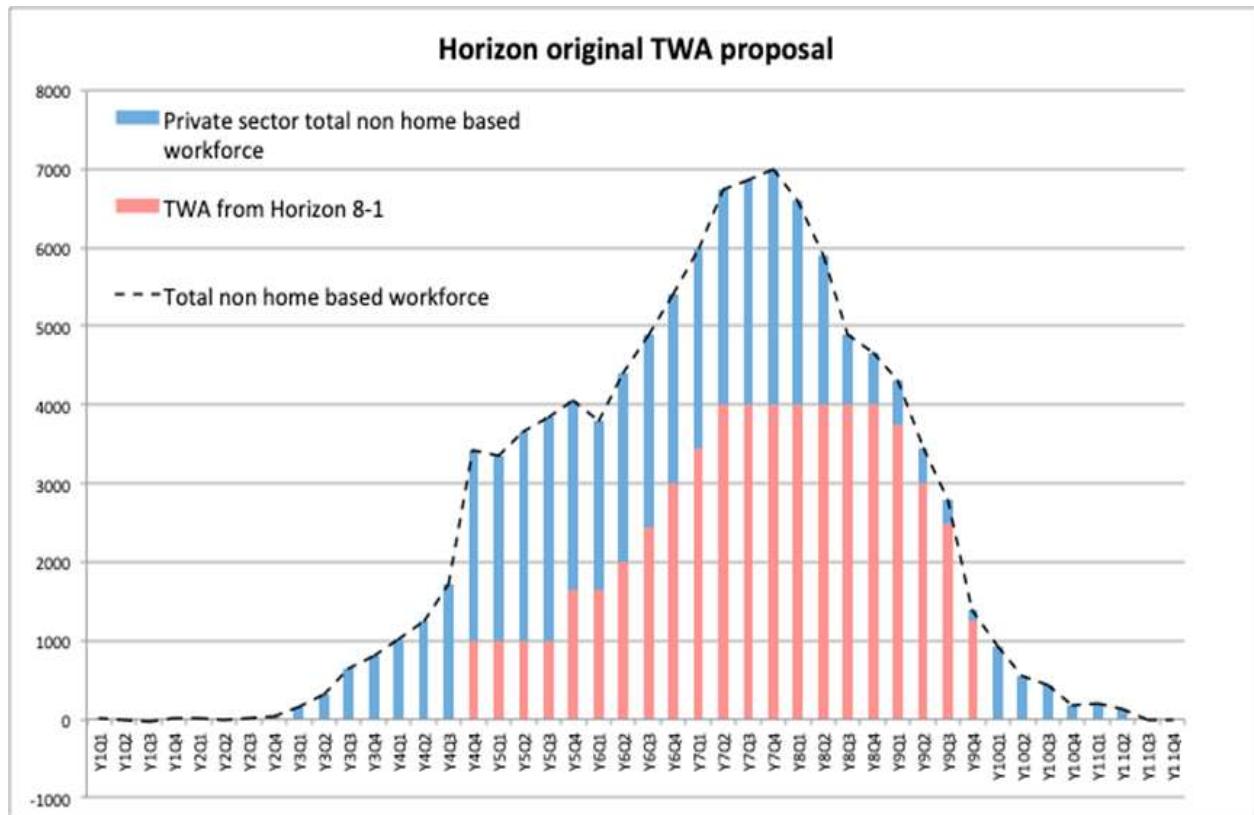


Figure 1 above shows Horizon's current proposal for TWA. What this demonstrates is the reliance on the private sector from Y3 Q1 to the opening of the first phase of the site campus (1,000 bedspaces) in Y4 Q4. This is unacceptable. All parties would prefer to see a steadier build-up of private sector accommodation through bringing forward the delivery of the TWA. This is shown in the Figures below.

**Figure 2 – IACC / WG and GC Preferred Timing to TWA (Showing Private Sector Build Up)**

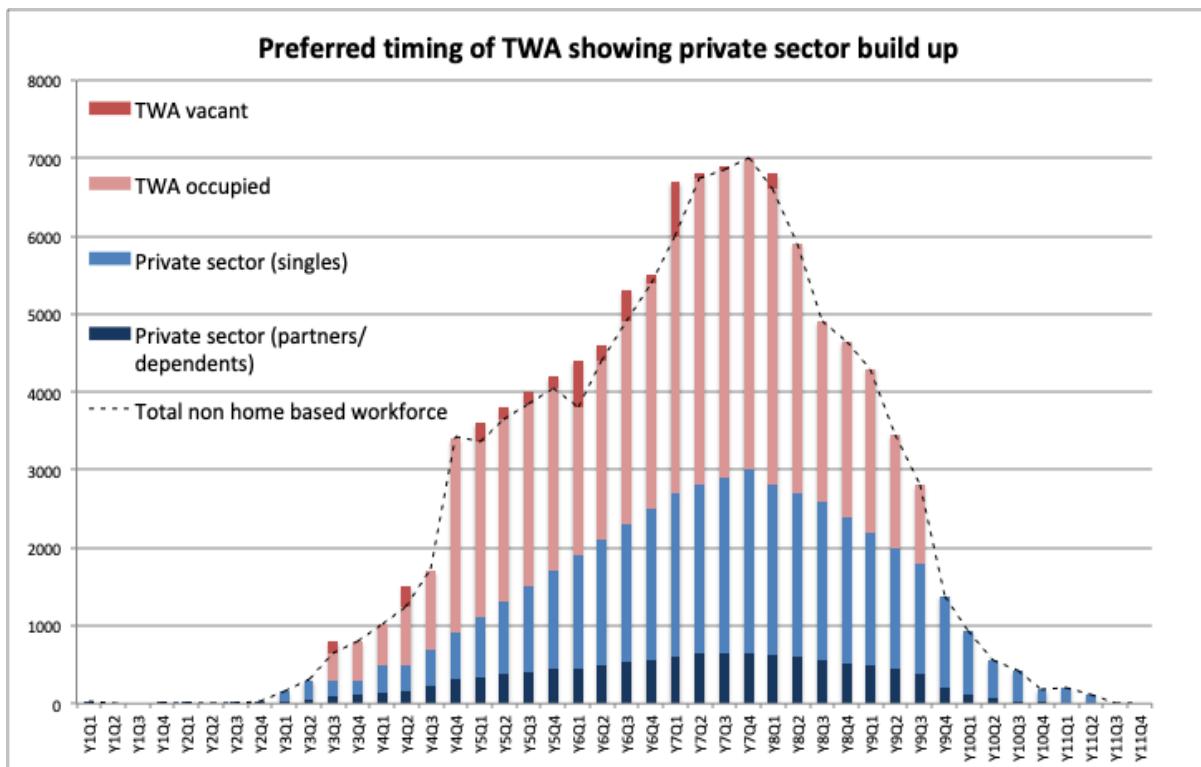
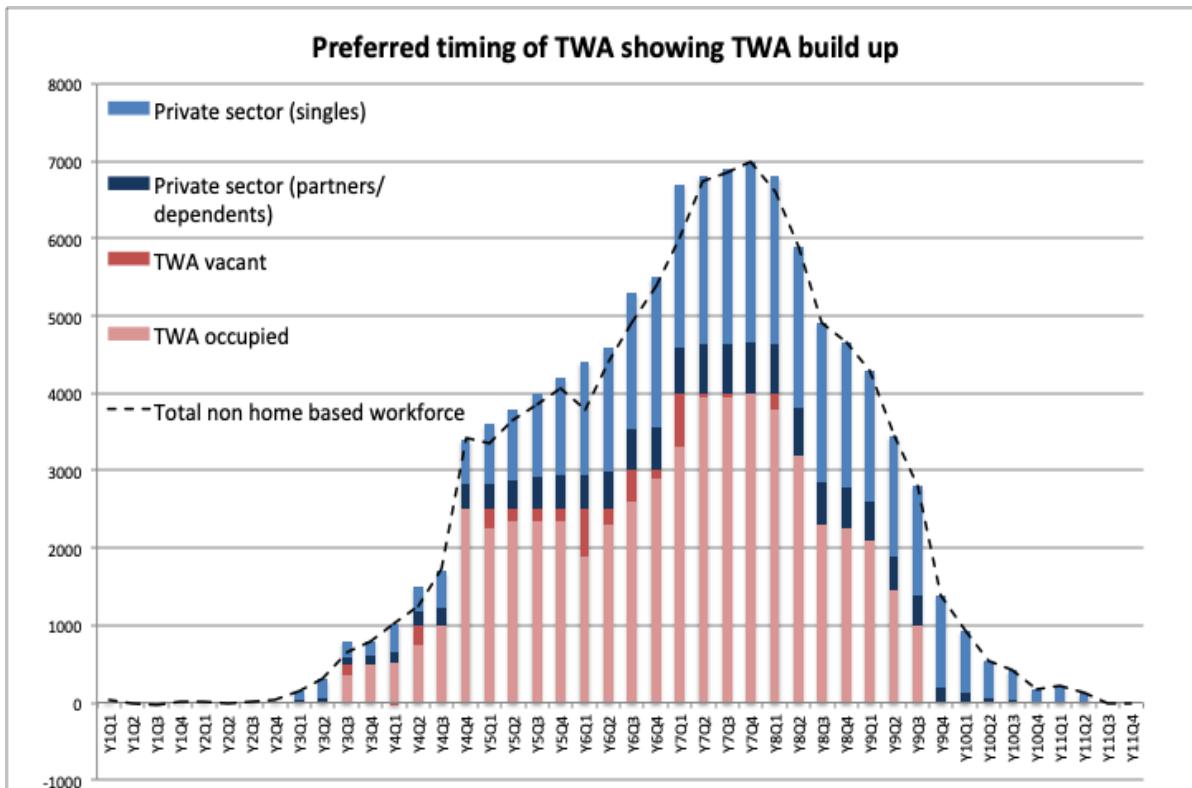


Figure 3 - IACC / WG and GC Preferred Timing to TWA (TWA Build Up)



The alternative build-up of TWA illustrated in Figure 2 and Figure 3 above would allow a steady increase in the use of private sector accommodation, to its peak of 4,000 bedspaces in Y7Q4, without creating an excessive demand in any one quarter. The suggested alternative would also allow a more measured release of private sector accommodation as the workforce numbers decline after Y7Q4 to Y11Q3. **The IACC WG and GC agree this is a sensible Phasing Strategy that should be adopted by Horizon.**

## Annex 1.2

### Information in respect of conditions on the Land & Lakes planning permission.

IACC has been asked to clarify the intention in applying conditions to the permission granted for Land and Lake which restricted initial use of the Cae Glas and Kingsland sites to occupation by nuclear construction workers. That is set out below. Please note that this decision was made under the previous development plan comprising the Gwynedd Structure Plan (1992) and the Ynys Mon Local Plan (1996) as well as the Stopped UDP, which have now been superseded by the JLDP (2017). The Land and Lakes proposal was determined to represent a departure from the development plan as regards the Cae Glas and Kingsland sites.

The initial holiday development would be site on the Penrhos site. Nuclear worker accommodation was applied for as the initial use at Cae Glas and Kingsland, with the accommodation at Kingsland being serviced by Cae Glas. An important consideration was that the proposals were presented as a package, all of which are stated to be necessary to make the development viable and allow it to proceed. The applicant provided that the worker accommodation aspects of the proposal were integral, without them the Cae Glas and Kingsland sites would not be developed.

The leisure/tourism development at Penrhos is stated in the application to require a coastal location. The tourism use of Cae Glas would be an extension of the tourism development at Penrhos. An extension to this facility at Cae Glas depends upon Penrhos for its facilities and coastal access.

In summary the planning case made for the nuclear worker development was as follows:

1. The national need to deliver a nationally significant infrastructure project and to provide accommodation for labour so as not to jeopardise the local housing market and tourism accommodation.
2. Economic Development, the need for additional employment to be located in Holyhead and steering development to the most appropriate location in order to try to reverse the adverse impacts of recent major job losses in accord with the economic benefits as expressed in the application.
3. Sustainability, the sustainability credentials of Holyhead being the largest and most sustainable settlement on Anglesey.

All three application sites are located within the AONB and the then applicable development plan provided that consideration of applications for major developments should therefore include an assessment of:

1. the need for the development, in terms of national considerations, and the impact of permitting it or refusing it upon the local economy;
2. the cost of and scope for providing the development outside the designated area or meeting the need for it in some other way;
3. any detrimental effect on the environment and the landscape, and the extent to which that could be moderated.

The national need for nuclear power and the desirability of providing accommodation for the construction workers required to deliver that in a planned and managed way with an agreed legacy use weighed in favour of the development. It was demonstrated to the satisfaction of the LPA at the time that there were no alternate sites available outside the AONB which could have accommodated the proposals collectively given the inter-dependencies of the sites and the economic case made.

The main driver for the nuclear accommodation part of the proposals was the national need for nuclear power which carries a need for worker accommodation. The Council's then current position statement set out that the Council considered that an overly intensive use by construction workers of local bed and breakfast and other forms of temporary accommodation would conflict with the important role this type of accommodation plays in facilitating the tourist sector in the local economy. The Council considered at that time that 33% of the anticipated need for construction workers' accommodation should be satisfied via purpose built construction workers' accommodation.

The Council considered the policies set out in EN1 and EN6. The need case was considered in detail and the need for construction workers accommodation was found to be demonstrated. The proposal was also found to represent a positive economic impact through the creation of jobs in the Holyhead area and the need for economic development in this area weighed in favour of grant.

As the applicant made the economic case that Cae Glas and Kingsland sites would not come forward without a first use as nuclear worker accommodation, the need for which would not arise until consent is granted for a new nuclear power station. A restriction in the 106 agreement restricting any development of Cae Glas and Kingsland was therefore considered justified. Planning permission would not have been granted for Cae Glas and Kingsland elements of the proposal in the planning application without such restrictions.

## **Annex 1.3**

### **Definition of a Welsh speaker**

The Isle of Anglesey County Council, Gwynedd Council and Welsh Government are agreed that the definition of a Welsh speaker is an individual with spoken skills in Welsh at Level 3 or higher as defined by the Association of Language Testers in Europe (ALTE) Framework (see below) and 'Canolradd' (Intermediate) level as defined by the National Centre for Learning Welsh. Although Level 3 individuals may not understand the entire discussion in Welsh (especially if the matters are technical in nature), they are able to understand and contribute to the conversation without changing the language of the discussion from Welsh to English, both in work and community contexts.

Speaking Levels (based upon ALTE framework and adopted by IACC and Gwynedd Council workplace Welsh Language Skills Strategies) are :-

- 0      No skills
- 1      Able to conduct a general conversation [greetings, names, saying, place names]
- 2      Able to answer simple enquiries involving work
- 3      Able to converse with someone else, with some hesitancy, regarding routine work issues
- 4      Able to speak the language in the majority of situations using some English words
- 5      Fluent – able to conduct a conversation and answer questions, for an extended period of time where necessary

## Annex 1.4

### Non home based workforce: calculation of child dependents of migrant workers.

IACC has largely followed the same methodology as Horizon which is set out below. The calculations are shown in Table 1. Notes refer to column headings:

- A The assumed percentages of workers bringing partners to Wylfa Newydd is as set out by Horizon in APP-067 (see Appendix). The same categorisations have also been used for this purpose. It has been assumed that 4% of site services staff will bring partners however no data is available and this may be higher. Note that these apply to all 7,000 non-home based workers. It is understood that those without dependents may choose to live in the onsite accommodation (when available) or in the community, while those with dependents must live in the community.
- B, C, D Peak workforce figures are taken from Horizon APP-096 (see Appendix), aligning with the categories used in A. From these the numbers of home based and non-home based workers in each category have been calculated.
- E Combining columns A and D provides an estimate of the number of non-home based workers bringing partners at peak at 795.
- F Using figures provided by Horizon, the proportion of workers living on Anglesey to those living elsewhere can be calculated (see Appendix APP 435) at 85%. This is used to estimate the number of non-home based workers bringing partners at peak at 676.
- G Using Horizon's data (see Appendix APP-088) the proportion of workers with partners bringing dependents is 220/285 or 77%. This is used to estimate the number of non-home based workers bringing dependents at peak at 521.

Please note the figures are estimates and a range of factors could lead to actual numbers being higher or lower. These include factors affecting the uptake of work by Anglesey residents which could reduce the number if they exceed Horizon's estimates. The IACC notes that if the ONS data on family size at 1.85 children per mother is used instead of the figures for workers with dependents which has been used as a proxy for the dependents, then the estimate of the number of non-home based workers bringing children at peak would be 963. The IACC accepts the proxy use only if all of these dependents are considered to be children and the figure is not reduced for other types of dependent. This methodology in this annex has followed Horizon's, however the ONS data demonstrates why IACC considers that proposals need to be robust as the worst case scenario could be considerably higher.

Table 1

<b>Non home based workforce: numbers of workers with partners and with dependents</b>								
	A % of workers with partners	B Peak workforce	C Home based workforce (local labour)	D Non home based workers	E Non home based with partners	F Of whom, living on Anglesey (85%)	G Of whom, with dependents (77%)	
	Horizon 6.2.2 (2.4.32)	Horizon Table 2-8	Horizon Table 2-8	Horizon Table 2-8	D*A	E*0.85	F*0.77	
Supervisory and managerial	25%	1998	237	1761	440	374	288	
Site services etc staff	4%	902	689	213	9	7	6	
Civil engineering and M&E operatives	4%	5649	883	4766	191	162	125	
Operational staff	60%	451	191	260	156	133	102	
<b>Total</b>		<b>9000</b>	<b>2000</b>	<b>7000</b>	<b>795</b>	<b>676</b>	<b>521</b>	

## Links to Horizon's submissions

Horizon's estimates of the likely household composition of the non home based workforce:

ES Volume C Chapter 1: (APP-088)

*1.5.48 The assessment presented below is informed by the non-home-based population and the additional population which could reasonably be expected to arrive with workers. The breakdown of the additional population during main construction is shown in table C1-14. This is calculated based on benchmarking information that 25% of non-home-based professional workers, 4% of operatives (for example civils; and mechanical and electrical workers) and 60% of operational workers (arriving during construction) would bring families into the area. The average family composition data of these types of workers were used to determine the average number (based on English and Welsh data) of partners and dependants. A more detailed description of these assumptions and the approach is provided in chapter B2 (Application Reference Number: 6.2.2). These figures represent the worst case and are used throughout the public services assessment.*

**Table C1-14 Breakdown of non-home-based workers and dependants during peak construction**

Additional population	Number of people
Non-home-based workers	7,000
Estimated partners	285
Estimated dependants	220
Total	7,505

Horizon's methodology:

6.2.2 Environmental Statement Vol B [APP 067]  
Section 2.4.32 Pages 49-50

The process used for assessing the effects on public services followed these steps:

- I. The anticipated change in population was determined. Additional population includes the Wylfa Newydd Project workforce, partners and dependants that move to the area.
- II. The relevant proportion of the change (e.g. only children of school age are relevant to discussion of school places) was compared to the baseline capacities.
- III. The effect on the capacity of the services was assessed.

In order to determine the anticipated change in population, a series of steps were followed:

- I. The number of non-home-based workers was taken from the Local labour section of the appendix C1-2 (Application Reference Number: 6.3.9) and their distribution was taken from the Accommodation section of the same appendix.
- II. Based on the type of occupations identified within appendix C1-2 (Application Reference Number: 6.3.9), demographic profiles for the non- home-based workers were created. These used the most relevant occupation categories based on the Standard Occupational Classification 2010 (SOC2010) [RD17]. This step recognises that different kinds of occupations have different age and gender profiles.  
Demographic profiles were created for both construction and operational workers,

with non-home-based workers having a demographic profile based on workers from England and Wales.

III. Using these SOC2010 categories, census data were used to determine the average age and gender profiles. These were matched with additional census data to determine average family composition. The family composition data were further analysed using census information in order to determine the average number of dependants of different age categories.

IV. For the construction workforce, having established a demographic profile for workers of different types, the following assumptions were then used:

- 25% of non-home-based professional workers, 4% of operatives (e.g. mechanics, engineers, scaffolders) and 60% of operational workers would bring families into the area during construction; and during operation, 60% of workers would bring families and seek family-style accommodation.

V. In order to determine the magnitude of the effect, the spare capacity (or 'headroom') for the services was compared and contrasted with the expected increases in the level of demand for both the construction and operational periods. An assumption was made that dependants could be any age, as the construction and operational periods last for a long time so a single dependant may create demand for facilities at different stages of education.

VI. It was therefore determined that a worst-case approach would be to assess the maximum number of dependants against all relevant public services, regardless of age category. This accounts for the unlikely scenario that all dependants would be the same age and provide the maximum pressure to each public service as they age.

Horizon's figures in the third column shows the geographic distribution of non-HB migrant workforce workers with families between Anglesey and the rest of the DCCZ. The calculation of the proportion living on Anglesey is  $(1024+633+451)/3000 = 85\%$ . See Table 1 column F

8.2.3 Community Impact Report [APP 435]  
Page 6

*The EIA forecasts the likely distribution of workers across the island and mainland, based on information about the workforce, housing market, and travel distances. This has been used to indicate the potential local distribution of project-wide effects relating to the workforce.*

**Summary of workforce distribution results**

Area	Home-based workforce	Non-home-based migrant workforce	Site Campus
Anglesey North	521	1,024	4,000
Anglesey South	279	633	-
Anglesey West	456	892	-
Menai Mainland	265	451	-
Wider area	479	-	-
<b>Workforce totals</b>	<b>2,000</b>	<b>3,000</b>	<b>4,000</b>

Number and proportion of workers of different types

6.3.9 Environmental Statement [APP 096]  
Table 2-8 Page 23

2.4.41 Table 2-8 shows the effect of holding the number of home-based “site services, security and clerical” workers constant across each of the three overall local labour scenarios based on 25%, 20% and 15% home-based workers at peak construction respectively. Based on the available pool of labour for site services, security and clerical, the raised local content scenario seems to offer an entirely feasible strategy for Horizon.

**Table 2-8 Effect of different local labour scenarios**

Overall local labour (Col A)	Overall peak demand (Col B)	25% local labour content	20% local labour content	15% local labour content	22% local labour content (latest estimate)
Site services, security and clerical staff	902	812	812	812	689
Supervisory/managerial	1,998	140	83	26	237
Civil engineering	3,069	717	426	134	675
Mechanical and electrical operatives	2,580	362	214	68	208
Operatives	451	226	226	226	191
<b>Total</b>	<b>9,000</b>	<b>2,250</b>	<b>1,800</b>	<b>1,350</b>	<b>2,000</b>

Figures for overall peak demand (Col B) are used in IACC analysis, Table 1 column B

**Annex 1.5**

**2017 & 2018 Visitor Survey Reports**  
(see overleaf)



## REPORT

### Isle of Anglesey County Council Visitor Survey

November 2017



Strategic Research and Insight Ltd  
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Park Place  
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[www.strategic-research.co.uk](http://www.strategic-research.co.uk)

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5. Implications.....	20

## 1. 90 Second Summary

### **Wylfa Newydd**

The presence of the proposed new nuclear power plant is not in itself likely to impact on visitor numbers to Anglesey. The vast majority (96%) of current visitors say it 'makes no difference' to their likelihood of returning.

The very small proportion saying it is likely to affect their decision to return are mostly opposed to nuclear power in general.

### **Power line**

The presence of additional pylons on Anglesey will not deter the vast majority (89%) of visitors from returning.

However, this result varies by visitor type in terms of the accommodation they stay in. 13% of those staying in serviced accommodation or self catering cottages / apartments say the additional pylons will make them less likely to visit.

### **Increased traffic**

Increased traffic is also not likely to greatly affect the likelihood of visiting Anglesey again – the vast majority (86%) of visitors say it 'makes no difference'.

However, about one in six (16%) of those staying in serviced accommodation or self catering cottages / apartments say the increased traffic will make them less likely to visit.

### **Impact is more likely to be on visitor experience rather than likelihood of visiting**

Although the figures throughout the survey show that the vast majority of existing visitors will still return, open comments show that the experience for some could be adversely affected.

Overall, about a third (33%) of respondents have made comments which are in some way negative about the visitor experience or the projects themselves. 11% have offered neutral or positive comments, and the remainder (56%) have given no opinion.

### **Traffic and pylon eyesore are the main impacts on experience**

The beautiful and peaceful natural environment is the main motivation for visiting Anglesey, so heavy traffic and pylons do not fit well with this.

Some visitors question why the new pylon could not run entirely underground, given the impact it will have on the landscape.

### **Difference in opinion on nuclear power**

The power plant itself is not likely to impact on visitor experience, although some question the choice of nuclear power over renewable sources. Others see the power plant as a necessity in that it has to be built somewhere.

### **Job creation**

The main positive factor perceived about these developments is the job creation in the area.

## 2. How and Why has this Research been Conducted?

**Proposed new nuclear power plant** A new nuclear power plant – Wylfa Newydd - is being proposed on the Isle of Anglesey. It will be built close to the existing Magnox nuclear power plant at Wylfa, which is being decommissioned. The construction programme is approximately 10 years.

**National Grid** National Grid are proposing to construct a power line from the proposed new nuclear power plant to an existing substation at Pentir on the mainland. The new power line will be close to existing pylons and will comprise mainly overground power lines, apart from underground sections where it crosses the Menai Strait.

**Impact on traffic** The above two projects will impact on traffic on and around Anglesey. Vehicular and maritime traffic will increase in volume.

**What will be the impact on visitors?** Isle of Anglesey County Council has commissioned this independent research to understand the impact of the proposed developments on:

- The visitor experience on Anglesey
- Whether the developments are likely to impact decisions to visit Anglesey in future

**Face-to-face interviews** We have conducted 446 face-to-face interviews with visitors to Anglesey from 26 October to 11 November 2017. The Welsh and English school half terms occurred during the fieldwork period.  
All interviews have been conducted with non-residents of Anglesey, and respondents have had the opportunity to participate in English or Welsh.

**Sampling locations** We have focussed the fieldwork at locations of high visitor footfall:

Location	No. of interviews
Anglesey Sea Zoo	70
Beaumaris Town Centre	117
Benllech	16
Holland Arms Garden Centre, Pentre Berw	58
Holyhead Town Centre	16
Oriel Ynys Mon, Llangefni	81
Plas Newydd, Llanfairpwll	47
Traeth Cymyran Beach (Rhosneigr)	41
<b>Total</b>	<b>446</b>

### 3. Visitor Profile

- 3.1 The following key visitor profiling information reflects the research sample of autumn visitors. This may or may not reflect Anglesey's overall visitor profile throughout the whole year.
- 3.2 We will be conducting a second wave of this research during spring / Easter 2018.

#### Day / staying / passing through

**Q3 “Are you staying overnight in Anglesey, taking a day trip or just passing through?”**

Overnight trip	51%
Day trip	45%
Just passing through to/from Holyhead (ferry)	4%

- 3.3 The overnight / day visitor split is roughly 50/50, with some (4%) visitors just passing through on their way to or from the port at Holyhead.
- 3.4 Visitors from England tend to stay overnight (72%), whereas visitors from Wales tend not to (81% are day visitors).
- 3.5 The balance between overnight and day visitors in this autumn sample differs from other times of year. For example, a visitor survey we conducted in Anglesey between March and September 2013 comprised 75% overnight visitors.

#### Origin of visitors

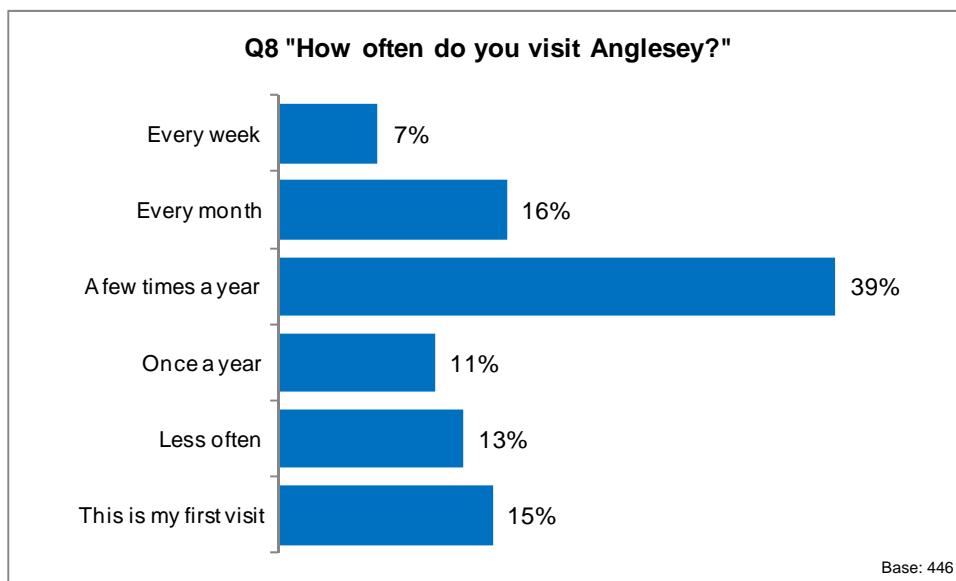
North West England	30%
Rest of England	28%
North Wales	32%
Rest of Wales	4%
Outside England and Wales	6%

- 3.6 The origin of visitors with British Isles post codes is also shown on the following scatter map:



3.7 As probably expected, Anglesey's autumn visitors are heavily clustered in the North Wales / NW England region that is within about 2 hours' drive. Nearly all (95%) autumn visitors travel to Anglesey by car.

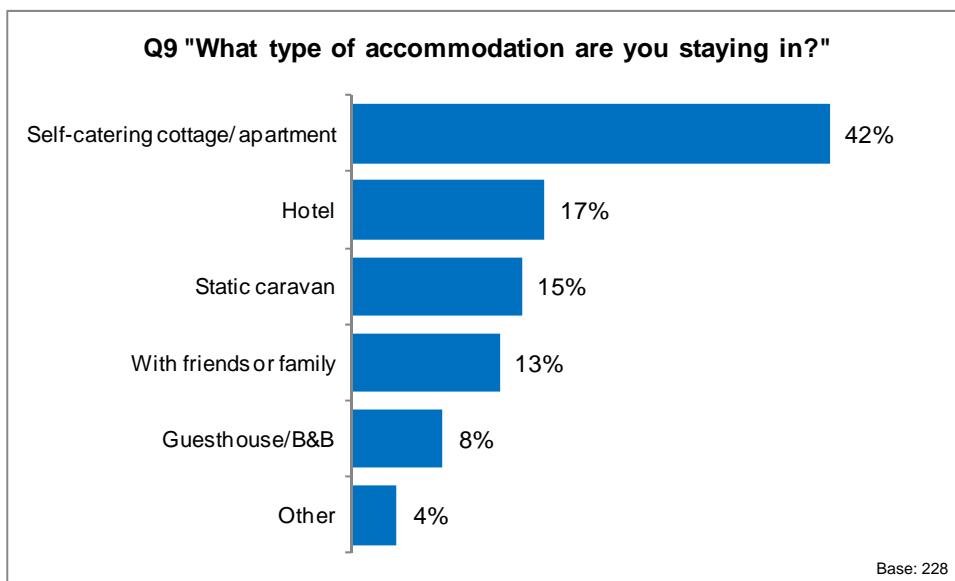
## Frequency of visiting



### Wide range of visitor frequencies

- 3.8 Visitors vary greatly from first timers (15%) to those who visit every week or month (23%).
- 3.9 Most (83%) visitors from Wales visit at least a few times a year. English visitors visit less often overall, but nevertheless, about half (53%) visit at least a few times a year.
- 3.10 Visitors from outside England and Wales are likely to be first-time visitors (73% are).
- 3.11 Frequency of visiting is a key cross-break for later questions as it clearly differentiates results on awareness of proposed developments.

## Accommodation

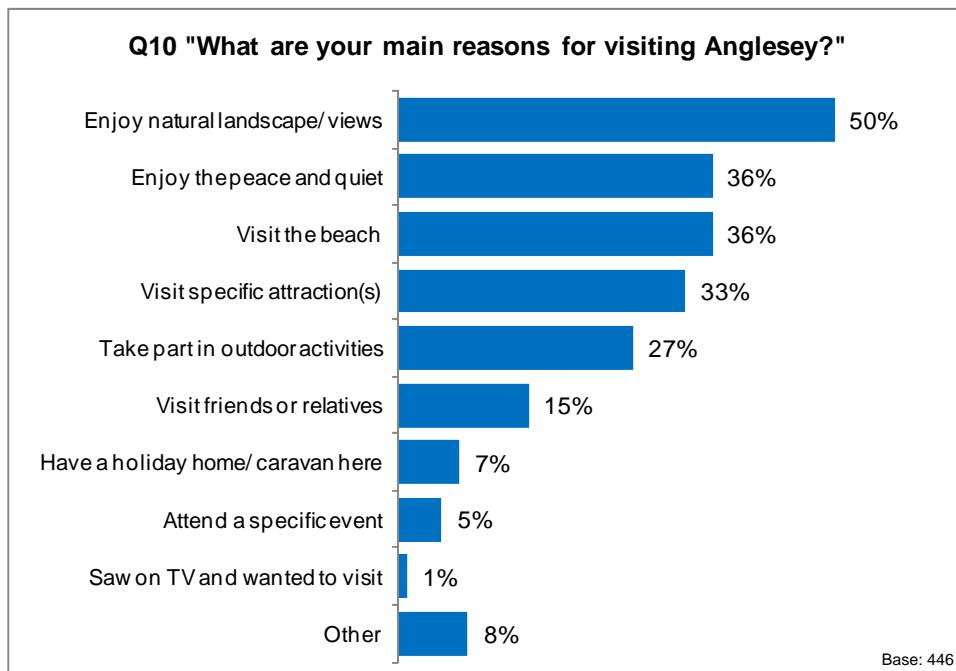


*Q9 has just been asked to overnight visitors*

### High prevalence of self-catering stays on Anglesey

- 3.12 About two in five (42%) autumn overnight visitors stay in self-catering accommodation. To some extent this reflects the profile of accommodation provision on Anglesey.
- 3.13 However, Anglesey also has a significant number of caravan parks but many of these had closed before the fieldwork period, meaning that the proportion of visitors staying in static caravans (15%) may well be higher at other times of year.
- 3.14 Results differ by type of party. The majority (59%) of families with children choose to do self-catering at this time of year, whereas the most common (45%) choice of accommodation for adult-only groups of relatives / friends is to stay with friends or family.

## Reasons for visiting



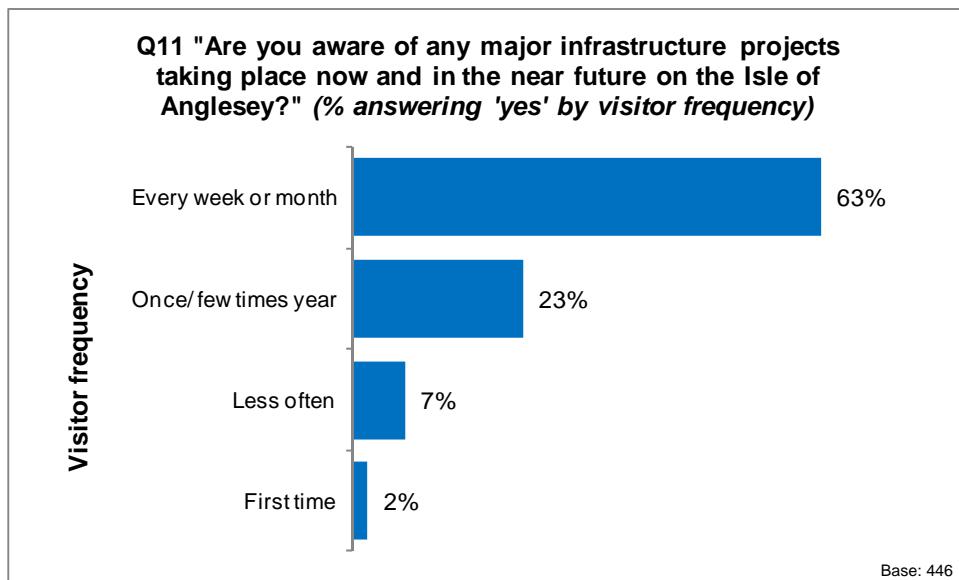
*Q10 has been asked to all except those who travelled by ferry*

### Draw of the natural environment

- 3.15 As expected, Anglesey's major draw remains its natural environment – the views, the peace and quiet, and the beaches. This is consistent with other visitor surveys on Anglesey.
- 3.16 This key reason for visiting makes research into the impact of a nuclear power plant build, pylons and increased heavy-duty traffic all the more important. What will the impact of the development be on the visitor experience? We discuss this in the next Section.

## 4. Impact of Proposed Developments

### Awareness of current and pending projects



#### Awareness varies greatly with frequency of visits

- 4.1 Overall, about a quarter (27%) of visitors are aware unprompted of the current and planned major infrastructure projects. However, to understand this result fully, it should be viewed by visitor frequency, as the above chart shows.
- 4.2 Awareness is also higher among the following visitor types:
  - Day visitors (34%) (linked to frequency of visits)
  - Lone visitors (36%) (linked to frequency of visits)
  - Couples (34%)
  - Welsh visitors (47%) (linked to frequency of visits)
  - Over 55s (34%)

---

**Unprompted awareness is mostly of the nuclear power plant**

The majority (75%) of visitors saying they are aware of major infrastructure projects mention the nuclear power plant or Wylfa Newydd by name.

*"There's going to be a new nuclear power station"*  
Male, Manchester

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**Pylons hardly mentioned**

Only seven respondents have mentioned pylons or power lines.

*"Pylons being erected"*  
Female, London

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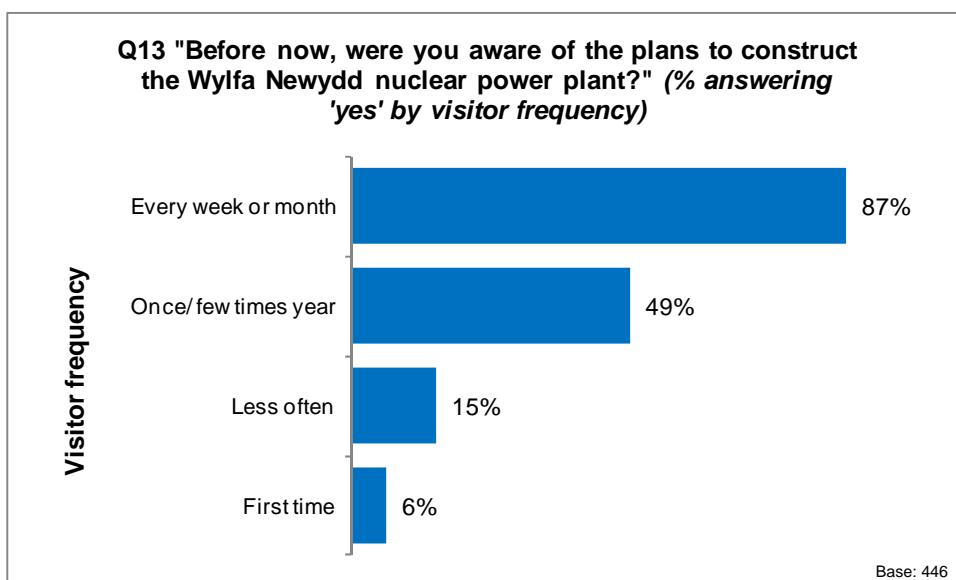
**Some mention a new bridge** Seven respondents say they are aware of a new bridge proposal across the Menai Strait.

*"A third bridge"*  
Female, North Wales

**Solar power** A solar power farm has also been mentioned by seven respondents.

*"Proposed solar panel site"*  
Female, Birmingham

## Prompted awareness of the new nuclear power plant



*Before asking Q13, interviewers read out a short description of the proposed new nuclear power plant*

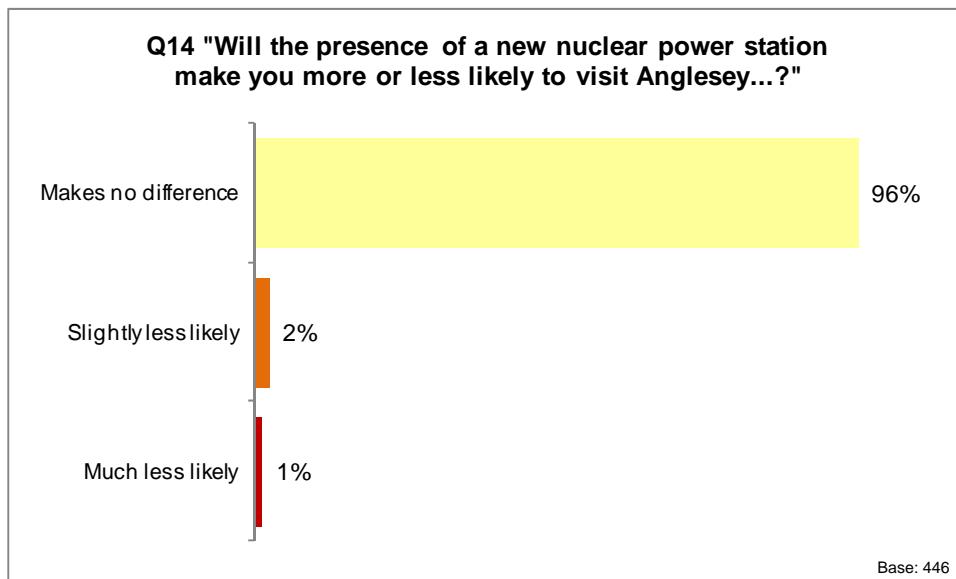
### Very significant variation by visitor frequency

4.3 Overall, about half (47%) of visitors have answered that they were aware of the plans before hearing the description from the interviewer. This might appear to conflict with the results to Q11, but prompted awareness in surveys is normally much higher than unprompted awareness. Results vary hugely by visitor frequency, as shown on the above chart.

4.4 As with Q11, awareness is also higher among:

- Day visitors (58%) (linked to frequency of visits)
- Lone visitors (54%) (linked to frequency of visits)
- Couples (51%)
- Welsh visitors (78%) (linked to frequency of visits)
- Over 55s (55%)

## Impact on future visits



### Negligible impact on future visits

4.5 The presence of a new nuclear power plant is unlikely to make a material difference to future repeat visits to Anglesey from existing visitors. This finding is consistent across all visitor types.

#### Some are against nuclear energy

The main reason why some visitors say they are less likely to visit Anglesey as a result of the new nuclear power station is because they are generally against nuclear power. Some qualify this further.

*"There are potential dangers"*  
Female, North Wales

*"I do not believe in nuclear energy"*  
Male, Birmingham

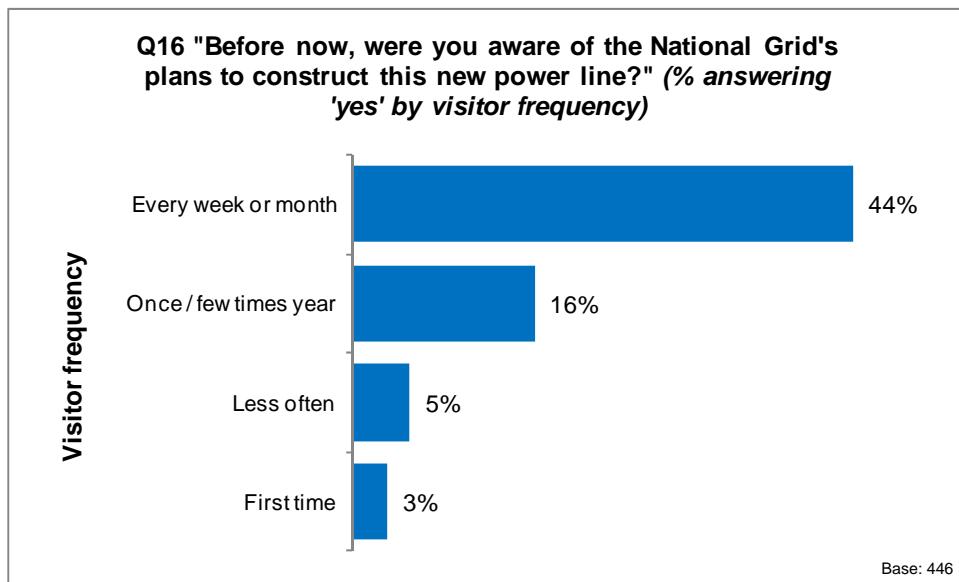
*"There are dangers with nuclear power plants and issues with waste disposal"*  
Female, Yorkshire

#### Eyesore

A few respondents are put off by the eyesore they believe the power plant will be on the landscape.

*"I live near a nuclear power station in Cumbria and it doesn't look good"*  
Female, Cumbria

## Prompted awareness of National Grid plans



*Before asking Q16, interviewers read out a short description of the proposed power line construction*

### Lower awareness of the power line than the nuclear build

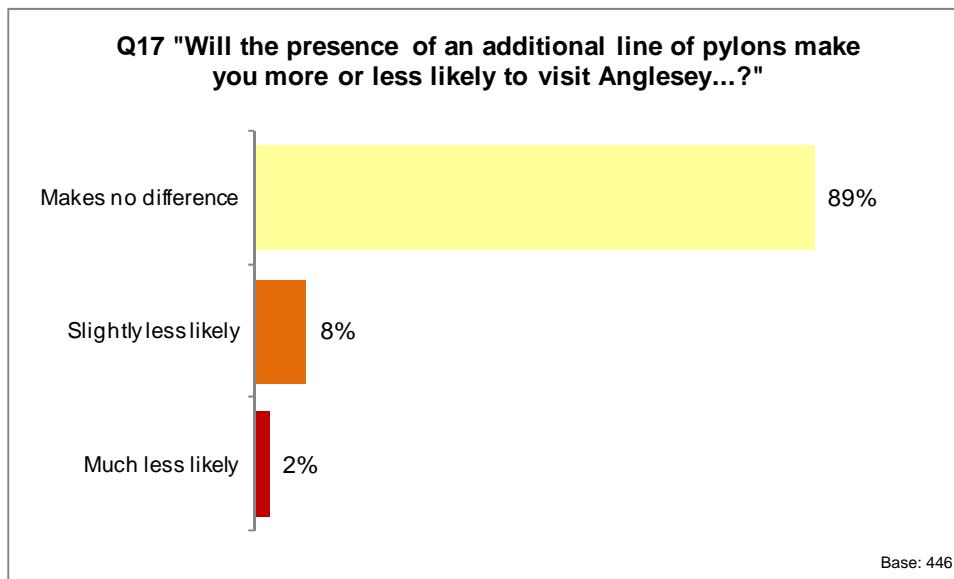
4.6 About one in five (19%) visitors have answered that they were aware of National Grid's plans to construct a new power line before hearing the description from the interviewer. Awareness is much lower than that of the nuclear power plant build (47%).

4.7 As before, awareness varies greatly by frequency of visiting Anglesey, as shown on the above chart.

4.8 Also as before, awareness is higher among:

- Day visitors (24%) (linked to frequency of visits)
- Lone visitors (26%) (linked to frequency of visits)
- Couples (23%)
- Welsh visitors (34%) (linked to frequency of visits)
- Over 55s (23%)

## Impact on future visits



### Low impact on likelihood of visiting, but some impact on enjoyment

- 4.9 The presence of additional pylons on Anglesey will not deter the vast majority (89%) of visitors from returning.
- 4.10 There is an impact on some visitors though. Most differences by visitor type are not significant, but lone visitors seem to be more put off – one in five (21%) say they are less likely to visit.
- 4.11 Type of visitor in terms of chosen accommodation also makes a difference. 13% of those staying in serviced accommodation or self catering cottages / apartments say the additional pylons will make them less likely to visit.

---

**Spoiling the landscape** As enjoying the beautiful natural environment is a key reason to visit Anglesey, some visitors have not reacted well to the prospect of a line of pylons.

*"An impairment on the beauty of the Island"*  
Female, North Wales

*"It will spoil the natural beauty of the island, which is unspoilt"*  
Female, Yorkshire

*"It's in an area of outstanding beauty"*  
Male, Cheshire

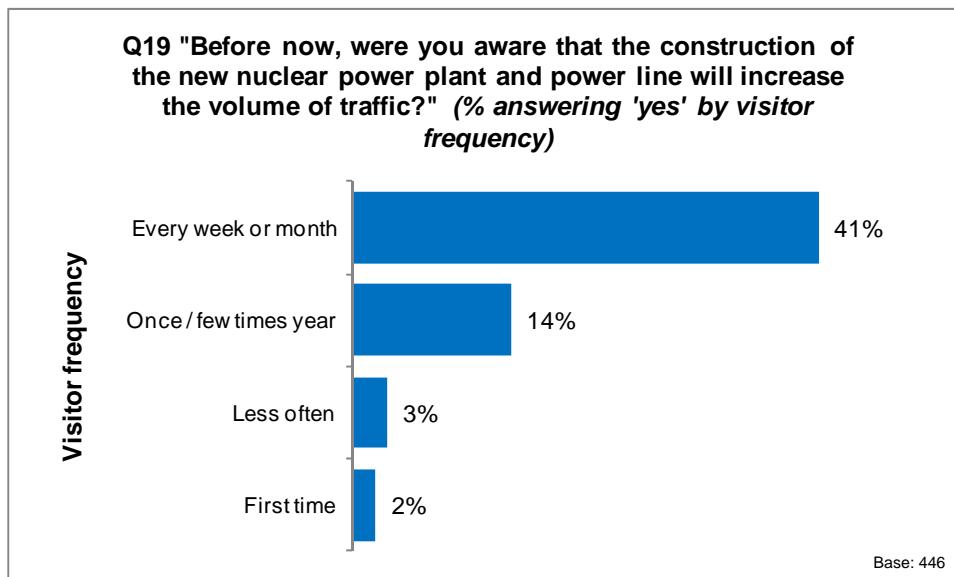
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**And therefore the visitor experience** Some visitors qualify that spoiling the landscape therefore spoils their experience of Anglesey.

*"It will take from my walking enjoyment"*  
Male, Greece

*"I don't want anything here to spoil Anglesey"*  
Male, Wrexham

## Prompted awareness of traffic increase

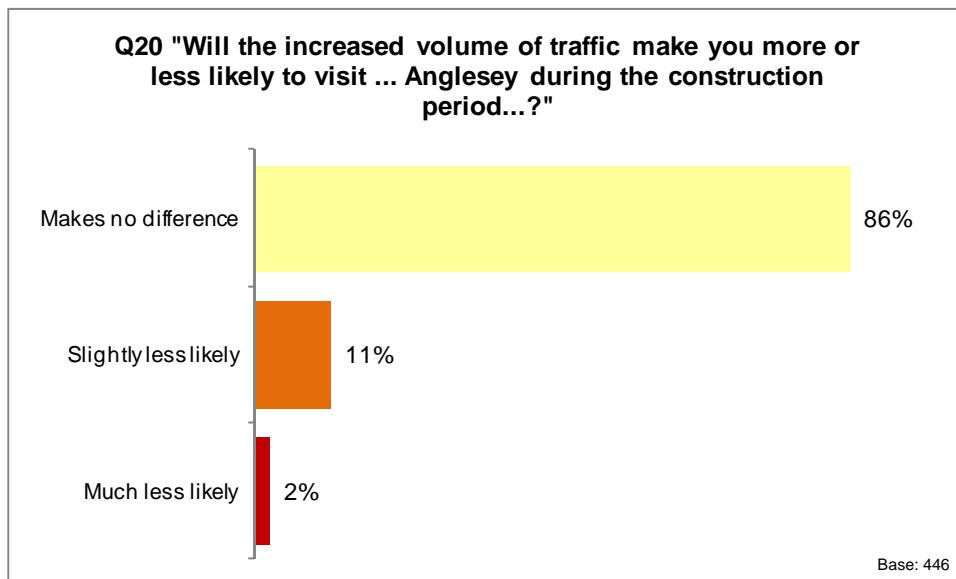


*Before asking Q19, interviewers stated that during the construction of the two projects, the volume of both vehicular and maritime traffic will increase*

### Low awareness of traffic increase except among the most frequent visitors

- 4.12 About one in six (17%) visitors have answered that they were aware of the increase in traffic during construction before being informed by the interviewer.
- 4.13 About two in five (41%) of those who visit Anglesey every week or month are aware of this, but most other visitors are unaware.
- 4.14 As before, awareness is also higher along:
  - Day visitors (24%) (linked to frequency of visits)
  - Lone visitors (23%) (linked to frequency of visits)
  - Couples (20%)
  - Welsh visitors (31%) (linked to frequency of visits)

## Impact on future visits



### Slight impact on likelihood of future visits

4.15 In spite of nearly all (95%) visitors travelling to Anglesey by car, most (86%) say they will not be deterred from returning by the increase in traffic.

4.16 The traffic may affect some future visits though. Differences by visitor types are mostly not significant, except by type of accommodation stayed in. Those coming to stay overnight with friends and relatives are the least likely to be deterred (97% say the increase in traffic will not affect their decision to visit).

4.17 On the other hand, about one in six (16%) of those staying in serviced accommodation or self catering cottages / apartments say the increased traffic will make them less likely to visit.

### Getting to Anglesey

Some visitors will be put off by the time taken to get to Anglesey. Bridge congestion is a concern. A few say that they might get round increased traffic by avoiding peak times and seasons.

*"If the A55 is busy it would stop us visiting"*  
Female, Rhyl

*"Avoid peak times maybe"*  
Female, North Wales

*"The bridges are already a bottle neck"*  
Female, North Wales

### 'Are we nearly there yet?'

For some visiting parties which have small children or elderly relatives in the car, heavy traffic is a significant deterrent.

*"Three children in a car in heavy traffic is off-putting"*  
Female, Aberystwyth

*"Toddler in heavy traffic"*

Female, North Wales

*“Don't want to be sat in heavy traffic having elderly passengers”*  
Female, North Wales

---

**Spoiling the experience**

Others say that the more congested traffic getting around Anglesey will spoil their experience.

*“It will affect my enjoyment”*  
Male, Liverpool

*“It will take from the enjoyment”*  
Female, USA

---

**Anglesey's roads can't cope with this** Some believe that Anglesey's roads are not made for high volumes of heavy goods traffic.

*“The roads are too small for lorries of that size”*  
Male, Derbyshire

---

## Final thoughts

4.18 On being asked to comment openly about the possible impact of the construction projects on future visits to Anglesey, it seems clear that although the figures throughout the survey have shown that the vast majority of existing visitors will still return, the experience for some could be adversely affected.

4.19 Overall, about a third (33%) of respondents have made comments which are in some way negative about the visitor experience or the projects themselves. 11% have offered neutral or positive comments, and the remainder (56%) have given no opinion. We discuss the main themes below.

---

**Couldn't the power lines go underground?**

Some visitors are confused as to why so much of the power line will be above ground instead of under it.

*“Power lines should be underground”*  
Male, North Wales

*“Power lines should be buried”*  
Male, Reading

*“Put the cables underground. We love Anglesey.”*  
Male, South Wales

Although the pylons won't deter most visitors from returning, the eyesore on the otherwise beautiful landscape is unwelcome and may affect the experience of some visitors.

*“It looks really ugly”*  
Female, Wolverhampton

*“I don't like the idea visually of pylons but it won't stop me coming”*  
Female, Rhyl

---

*"This will affect enjoyment. The power lines should go underground."*

Male, North Wales

*"Power lines are ugly and this is a lovely place"*

Male, Cardiff

Some even suggest camouflaging the power lines:

*"Obscure the power lines by colouring them green"*

Female, North Wales

*"If the pylons could be camouflaged it would be better"*

Male, Warrington

---

**Couldn't the power come from renewables?**

Some visitors don't understand why nuclear is the choice of energy source rather than renewables.

*"I don't agree with nuclear. Use wind power or sea currents."*

Female, Newport

*"Not happy with nuclear. Why not wave energy or solar?"*

Male, North Wales

*"Could resource power in other ways – hydro, wind, solar"*

Male, Yorkshire

---

**Job creation is a major positive**

Positive comments made usually relate to job creation. Some Welsh visitors say they are keen to see local people benefiting from the employment opportunities.

*"Jobs are essential for the island"*

Male, Wrexham

*"Good news for jobs; bad news for damage to the environment"*

Male, Wrexham

*"I would travel at quiet times. I'm a realist. This will create jobs."*

Male, Stockport

*"Make sure the work goes to Welsh workers"*

Female, Rhyl

---

**Power has to come from somewhere**

Some say that although no-one wants a power plant in their home or holiday environment, the plant has to be built somewhere.

*"Not ideal, but you can't be too 'nimby' [not in my backyard]. Hope it doesn't impact on tourism."*

Female, London

*"The power companies say that people want more power, so build more power plants"*

Male, North Wales

*"We need our power, so that's that"*

Female, North Wales

---

**Won't stop us coming**

The general feeling among many visitors who have negatives to say is that although the developments might impact on their experience, it is not enough to stop them coming.

*"It would take a lot to stop us coming"*  
Male, North Wales

*"Pylons are not the prettiest thing to see but it wouldn't put me off coming"*  
Male, Yorkshire

---

## 5. Implications

### Visitor experience needs to be protected

At a first glance, the quantitative findings from this survey appear to show that the impact of the developments is likely to be limited because most existing visitors say they will still come.

However, the more likely impact is on the experience. The peaceful and attractive outdoor environment is the main draw of Anglesey, so heavier traffic and a new power line put the visitor experience at risk.

As visitors have not yet seen the impacts of the developments for real, we do not know to what extent their experience will be affected. If the impact is significant, we do not know whether this could affect the duration and frequency of further visits and their likelihood of recommending Anglesey to others.

### Avoiding heavy traffic

Heavier traffic is the most likely impact on experience – both in getting to Anglesey and travelling around it.

A number of measures could be explored to limit the impact on visitors, including:

- Encouraging car sharing among construction workers
- Raising awareness of when construction traffic is likely to have the greatest impact on the roads
- If feasible, limiting the volume of heavy construction traffic on the roads during the peak tourism season

### Communicating reasons for certain decisions

Nuclear power will always have its opponents but some visitors question why renewable sources are not being used instead of building a new power plant. The project might find greater acceptance if more visitors understood why this decision has been taken.

Similarly, questions are being asked about why the new power line will not run entirely underground. Again, the project might find greater acceptance among visitors if they understood why a significant overground stretch is necessary.

### Spring research

Another wave of this research is planned for spring / Easter 2018. It would be useful to explore the perceived impact on visitor experience further as it is this, rather than the likelihood of returning at all, which is at risk.



## REPORT

Isle of Anglesey County Council

Visitor Survey

Spring 2018



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## 1. 90 Second Summary

### Most results are very similar to the autumn survey

Most of the results – especially awareness of the different projects and likelihood of future visits – are very similar to the autumn survey.

Where awareness results differ, this is mostly explained by the spring visitor sample containing more visitors from England and fewer from North Wales when compared to the autumn sample.

### More acceptance of the projects however

The balance of negative vs neutral or positive comments is different from in the autumn. Only 9% of respondents have made final comments which are in some way negative about the visitor experience or the projects. 14% have offered neutral or positive comments, and the remainder (77%) have given no opinion.

By comparison, in the autumn survey the negative comments outnumbered the neutral or positive comments by 3:1.

### Power is necessary, and it creates jobs

In being more accepting of the projects compared to the autumn survey respondents, some spring visitors recognise the need for power, even though no-one wants to see the infrastructure.

Others also cite job creation and the benefits to the local economy as key positives.

### Wylfa Newydd

The presence of the proposed new nuclear power plant is not in itself likely to impact on visitor numbers to Anglesey. The vast majority (95%) of spring visitors say it 'makes no difference' to their likelihood of returning.

### Power line

The presence of additional pylons on Anglesey will not deter the vast majority (92%) of visitors from returning.

However, the most common negative theme in the final open comments is that the power line should run underground in order not to spoil the landscape and therefore the most significant motivation for visiting Anglesey.

### Increased traffic

Increased traffic is also not likely to greatly affect the likelihood of visiting Anglesey again – the vast majority (86%) of visitors say it 'makes no difference'.

However, about one in six (16%) of those staying in hotels or self catering cottages / apartments say the increased traffic will make them less likely to visit.

### Please be sensitive

Spring visitors mostly recognise that these projects need to take place, but some ask that they are managed in the most sensitive way possible in order not to spoil their experience of Anglesey.

## 2. How and Why has this Research been Conducted?

**Proposed new nuclear power plant** A new nuclear power plant – Wylfa Newydd - is being proposed on the Isle of Anglesey. It will be built close to the existing Magnox nuclear power plant at Wylfa, which is being decommissioned. The construction programme is approximately 10 years.

**National Grid** National Grid are proposing to construct a power line from the proposed new nuclear power plant to an existing substation at Pentir on the mainland. The new power line will be close to existing pylons and will comprise mainly overground power lines, apart from underground sections where it crosses the Menai Strait.

**Impact on traffic** The above two projects will impact on traffic on and around Anglesey. Vehicular and maritime traffic will increase in volume.

**What will be the impact on visitors?** Isle of Anglesey County Council first commissioned this independent research in autumn 2017 to understand the impact of the proposed developments on:

- The visitor experience on Anglesey
- Whether the developments are likely to impact decisions to visit Anglesey in future

This spring 2018 survey is the 'second wave' of research – the aim being to capture the views of springtime visitors.

**Face-to-face interviews** We have conducted 411 face-to-face interviews with visitors to Anglesey from 30 March to 19 April 2018. All interviews have been conducted with non-residents of Anglesey, and respondents could participate in English or Welsh.

Sampling locations	Location	No. of interviews
	Anglesey Sea Zoo	36
	Beaumaris Town Centre	100
	Benllech	25
	Holland Arms Garden Centre, Pentre Berw	33
	Holyhead Town Centre / Millennium Bridge	14
	Oriel Ynys Mon, Llangefni	71
	Plas Newydd, Llanfairpwll	77
	South Stack Cliffs RSPB reserve	30
	Traeth Cymyran Beach (Rhosneigr)	25
	<b>Total</b>	<b>411</b>

### 3. Visitor Profile

3.1 The following key visitor profiling information reflects the research sample of spring visitors. This may or may not reflect Anglesey's overall visitor profile throughout the whole year.

#### Day / staying / passing through

**Q3 "Are you staying overnight in Anglesey, taking a day trip or just passing through?"**

Overnight trip	61%
Day trip	36%
Just passing through to/from Holyhead (ferry)	3%

Base: 411

3.2 The proportion of overnight visitors (61%) is higher than in the autumn (51%). However the balance between overnight and day visitors still differs from longer-window profiles where the summer is included. For example, a visitor survey we conducted in Anglesey between March and September 2013 in conjunction with Visit Wales comprised 75% overnight visitors.

3.3 Visitors from England tend to stay overnight (75%), whereas visitors from Wales tend not to (78% are day visitors).

#### Origin of visitors

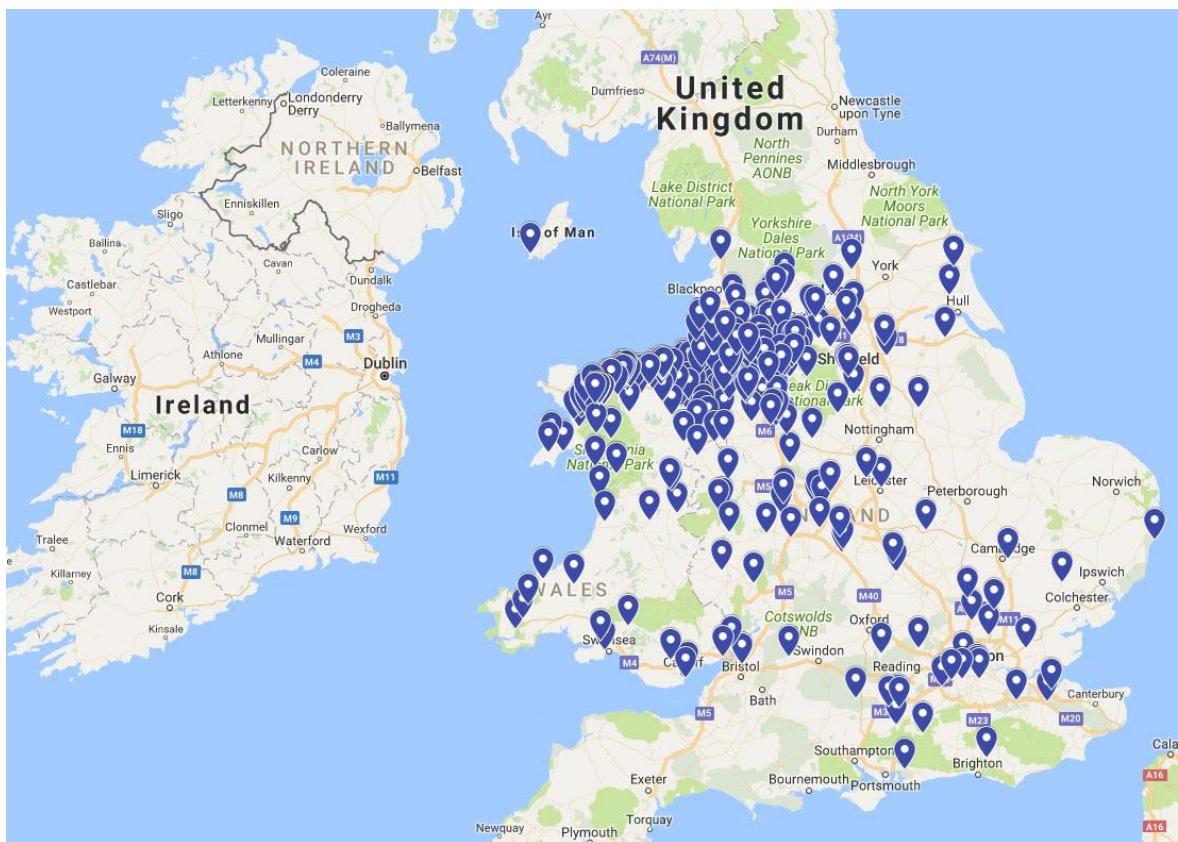
North West England	38%
Rest of England	34%
North Wales	20%
Rest of Wales	1%
Outside England and Wales	7%

Base: 411

3.4 A higher proportion (72%) of spring visitors come from England compared to in the autumn (when 58% come from England). The Visit Wales survey conducted in Anglesey in 2013 between March and September found 66% of visitors to come from England.

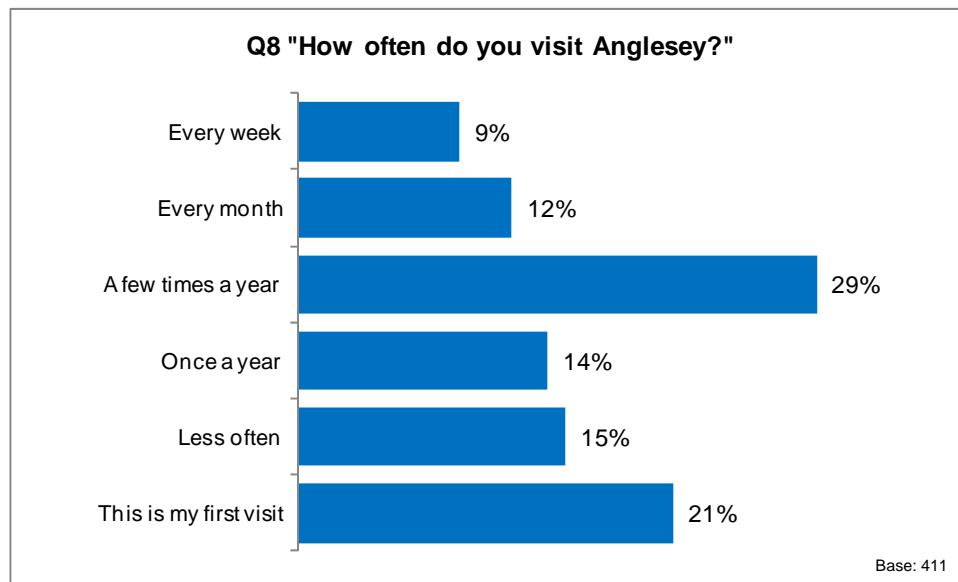
3.5 North Wales makes up one fifth (20%) of spring visitors, but about a third (32%) of autumn visitors. The above-mentioned Visit Wales survey found 24% of visitors to come from North Wales.

3.6 The origin of visitors with British Isles post codes is also shown on the following scatter map:



3.7 Although the spring visitor profile is spread out further than in autumn, visitors are still heavily clustered in the North Wales / NW England region that is within about 2 hours' drive. Nearly all (92%) spring visitors travel to Anglesey by car.

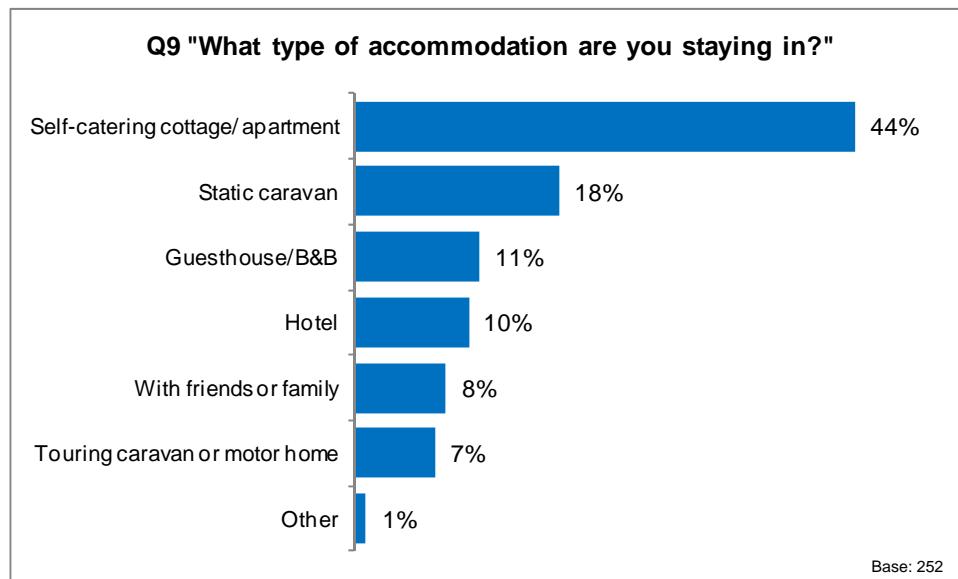
## Frequency of visiting



### More first-time visitors in spring than in autumn

- 3.8 About one in five (21%) visitors to Anglesey this spring have visited for the first time. This compares to a lower proportion (15%) in autumn 2017. The Visit Wales survey conducted in Anglesey in 2013 between March and September found 13% of visitors to be new.
- 3.9 Most (82%) spring visitors from Wales visit at least a few times a year. English visitors visit less often overall, but nevertheless, close to half (44%) visit at least a few times a year.
- 3.10 Visitors from outside England and Wales are likely to be first-time visitors (63% are).
- 3.11 Frequency of visiting is a key cross-break for later questions as it clearly differentiates results on awareness of proposed developments.

## Accommodation



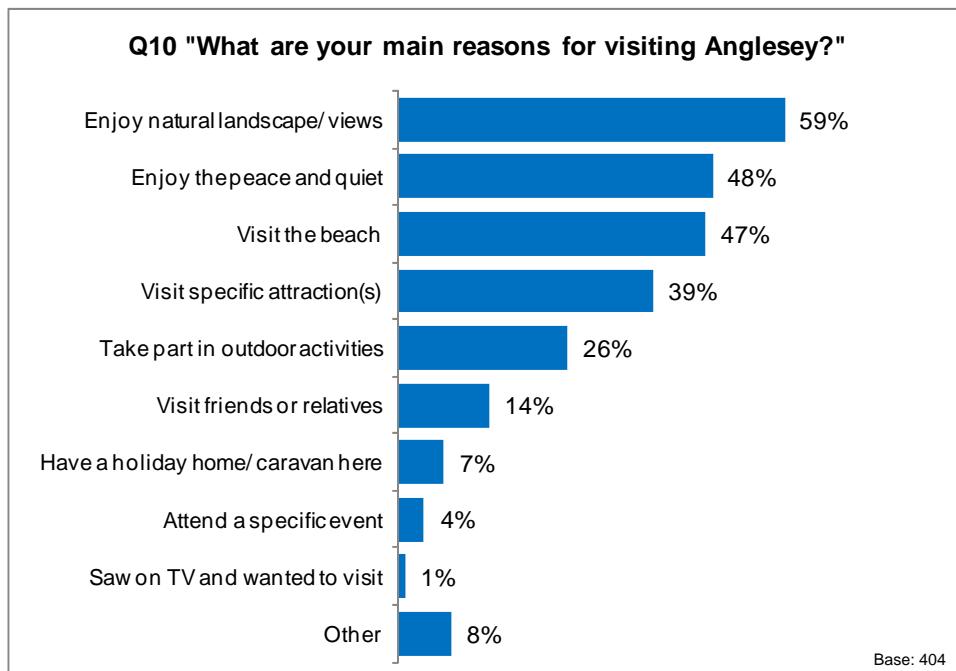
*Q9 has just been asked to overnight visitors*

### Caravan parks are open in the spring

3.12 In the autumn survey, many caravan parks had closed before the fieldwork period, resulting in low proportions of visitors in the sample staying in caravans, especially touring. This spring survey probably gives a better reflection of accommodation used during the busier tourism periods.

3.13 Results differ by type of party. More than half (55%) of families with children choose self-catering, whereas the most common (24%) choice of accommodation for lone visitors is to stay with friends or family.

## Reasons for visiting



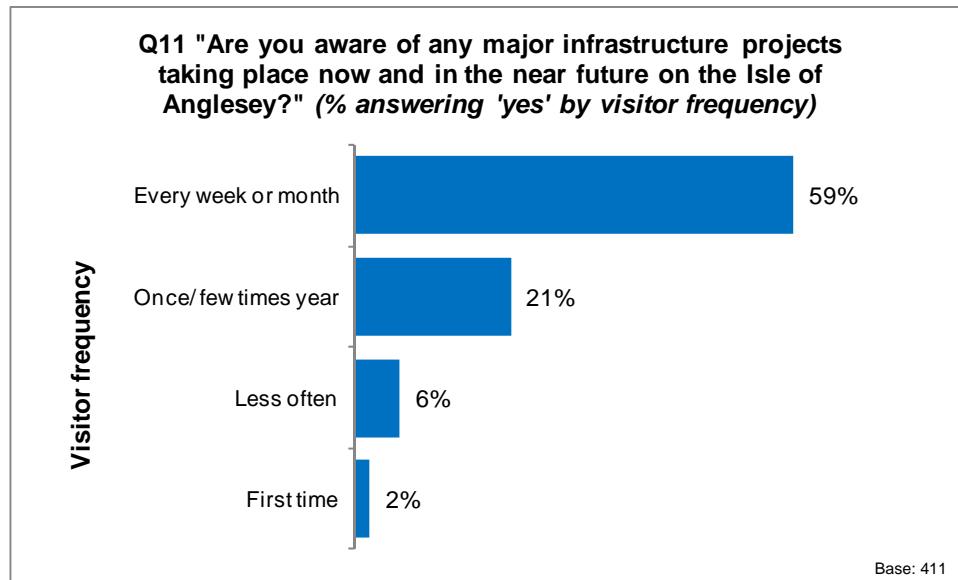
*Q10 has been asked to all except those who travelled by ferry*

### Draw of the natural environment

- 3.14 The order of reasons for visiting Anglesey in the spring is the same as in the autumn. The natural environment remains the main draw – the views, the peace and quiet, and the beaches. This is consistent with other visitor surveys on Anglesey.
- 3.15 This key reason for visiting makes research into the impact of a nuclear power plant build, pylons and increased heavy-duty traffic all the more important. What will the impact of the development be on the visitor experience? We discuss this in the next Section.

## 4. Impact of Proposed Developments

### Awareness of current and pending projects



#### Similar results to the autumn

4.1 Overall, about a quarter (23%) of visitors are aware unprompted of the current and planned major infrastructure projects. This is similar to the autumn result (27%). To understand this result fully, it should be viewed by visitor frequency, as the above chart shows.

4.2 Awareness is also higher among the following visitor types:

- Welsh visitors (60%) (linked to frequency of visits)
- Lone visitors (43%) (linked to frequency of visits)
- Day visitors (34%) (linked to frequency of visits)
- Over 55s (28%)

---

**Unprompted awareness is mostly of the nuclear power plant**

The majority (80%) of visitors saying they are aware of major infrastructure projects mention the nuclear power plant or Wylfa Newydd by name.

*"Wylfa Newydd. I've heard on the news that they are decommissioning one and opening another."*  
Male, Manchester

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**Some mention a new bridge**

Eight respondents say they are aware of a new bridge proposal across the Menai Strait. This is very similar to the autumn result.

*"A third bridge"*  
Male, Stockport

**Pylons hardly mentioned again**

Only three respondents have mentioned pylons or power lines. It was also the case in the autumn that awareness of this is very low.

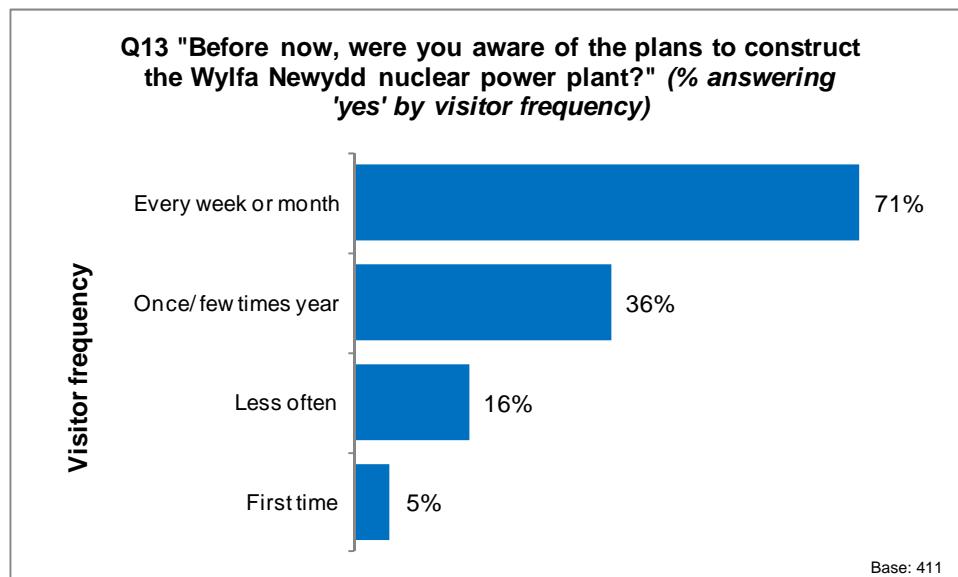
*"I work for Electricity North West so I'm aware of the station and pylons"*

Male, Warrington

**Menai Science Park**

Three respondents have mentioned a science park, presumably referring to the Menai Science Park (just opened).

## Prompted awareness of the new nuclear power plant



*Before asking Q13, interviewers read out a short description of the proposed new nuclear power plant*

### Very significant variation by visitor frequency

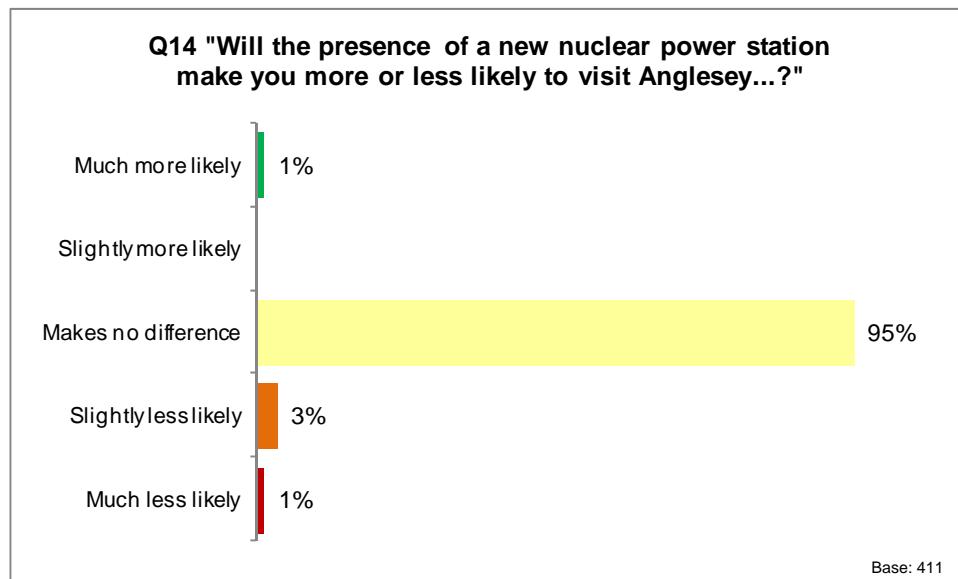
4.3 Overall, about a third (34%) of visitors have answered that they were aware of the plans before hearing the description from the interviewer. This is much lower than the autumn result (47%), but this may be due to a much lower proportion of spring visitors coming from North Wales compared to in autumn.

4.4 The results to Q13 might appear to conflict with the results to Q11, but prompted awareness in surveys is normally much higher than unprompted awareness. Results vary hugely by visitor frequency, as shown on the above chart.

4.5 As with Q11, awareness is also higher among:

- Welsh visitors (77%) (linked to frequency of visits)
- Day visitors (47%) (linked to frequency of visits)
- Lone visitors (46%) (linked to frequency of visits)
- Over 55s (40%)

## Impact on future visits



### Impact on future visits is still negligible

4.6 The presence of a new nuclear power plant is unlikely to make a material difference to future repeat visits to Anglesey from spring visitors. This finding is consistent across all visitor types and very similar to the autumn result.

**Dislike of nuclear power** A small number of visitors are against nuclear power. Some qualify this by giving reasons of health fears or being pro-green energy.

*"By the time it is built it will be out of date. What about green energy?"*  
Female, Birmingham

*"There is no need [for nuclear power]. There are other options that are greener."*  
Female, Warrington

**Spoiling the landscape** As the beautiful natural environment is the most common motivation for visiting Anglesey, some visitors are put off visiting by the eyesore.

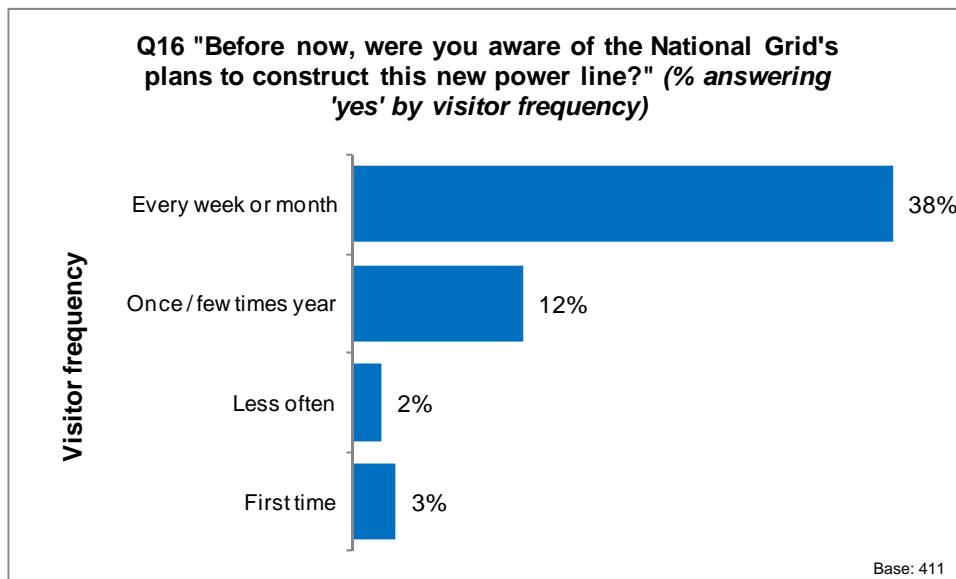
*"I'm much less likely to visit because it spoils the landscape"*  
Female, Southampton

**Much more likely to visit?** A few respondents say they are 'much more likely' to visit. This answer may seem a little odd, but they qualify their responses.

*"I will be coming more often for work"*  
Male, North Wales

*"I'm a transport planner. This is good for jobs."*  
Male, North Wales

## Prompted awareness of National Grid plans



*Before asking Q16, interviewers read out a short description of the proposed power line construction*

### Awareness of the power line remains low

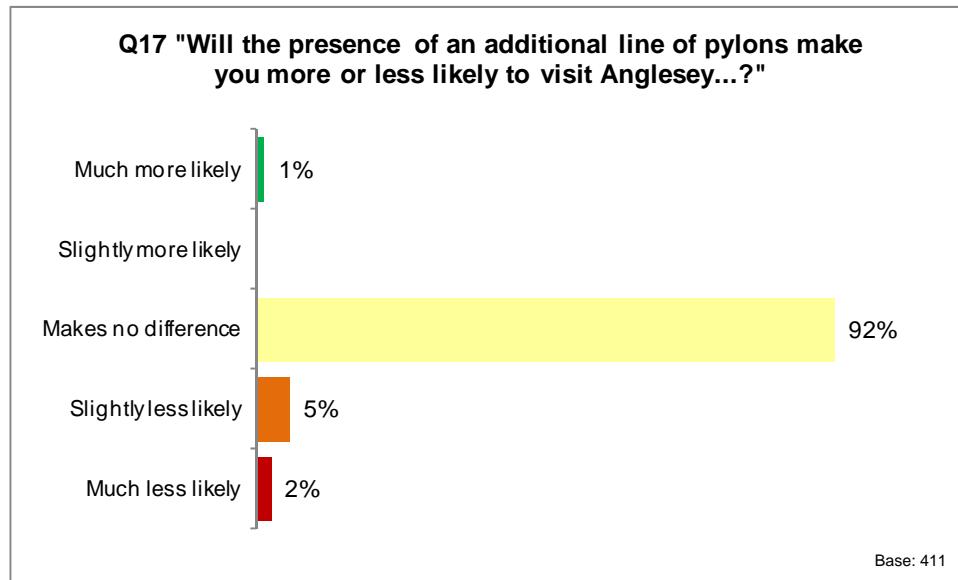
4.7 About one in seven (14%) visitors have answered that they were aware of National Grid's plans to construct a new power line before hearing the description from the interviewer. This is lower than in the autumn (19%), but this is explained by the lower proportion of spring visitors coming from North Wales than in the autumn.

4.8 As before, awareness varies greatly by frequency of visiting Anglesey, shown on the above chart.

4.9 Also as before, awareness is higher among:

- Welsh visitors (44%) (linked to frequency of visits)
- Lone visitors (24%) (linked to frequency of visits)
- Day visitors (23%) (linked to frequency of visits)

## Impact on future visits



### Low impact on likelihood of visiting, but some impact on enjoyment

- 4.10 The presence of additional pylons on Anglesey will not deter the vast majority (92%) of visitors from returning. This is similar to the autumn result.
- 4.11 There is some variation by visitor type, most notably overnight visitors, whereby 10% say they are less likely to visit (compared to 1% of day visitors).
- 4.12 Older visitors are also more likely to be affected – 10% of over 55s say they are less likely to visit.

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#### Please don't spoil the landscape

Some visitors are really not happy about part of Anglesey's beautiful landscape being spoilt by pylons. It's a key reason why they visit.

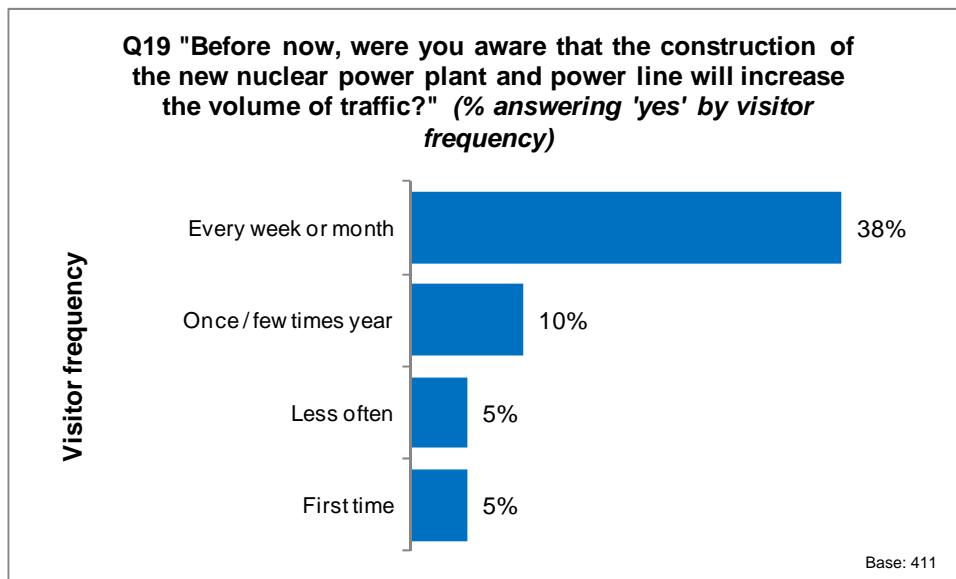
*"Anglesey is a beautiful place and the pylons would spoil it"*  
Male, Lancashire

*"Ugly"*  
Male, North Wales

*"Sorry, it would ruin the views"*  
Liverpool

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## Prompted awareness of traffic increase

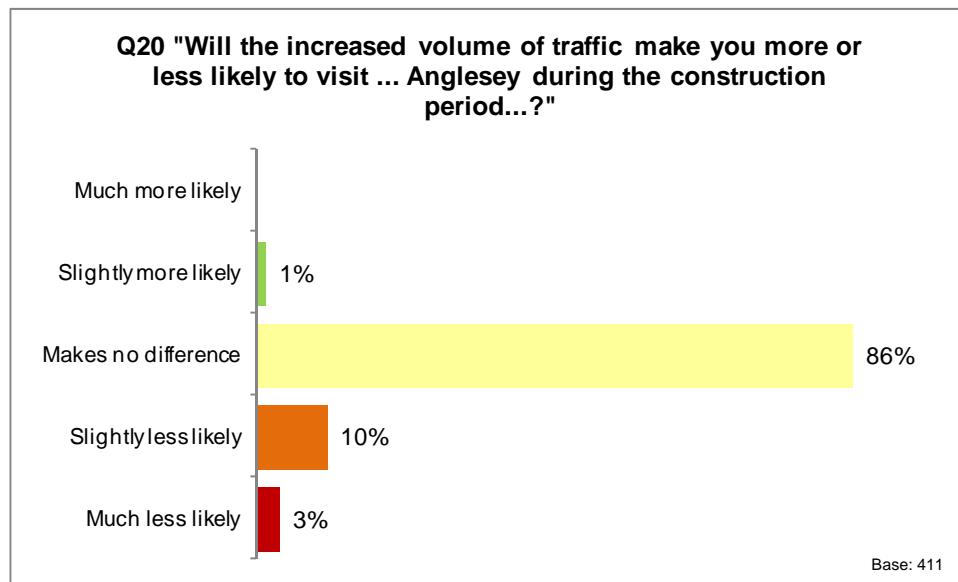


*Before asking Q19, interviewers stated that during the construction of the two projects, the volume of both vehicular and maritime traffic will increase*

### Continued low awareness of traffic increase except among the most frequent visitors

- 4.13 About one in seven (14%) visitors have answered that they were aware of the increase in traffic during construction before being informed by the interviewer. This is similar to the autumn result (17%).
- 4.14 About two in five (38%) of those who visit Anglesey every week or month are aware of this, but most other visitors are unaware.
- 4.15 As before, awareness is also higher along:
  - Welsh visitors (34%) (linked to frequency of visits)
  - Lone visitors (22%) (linked to frequency of visits)
  - Day visitors (21%) (linked to frequency of visits)

## Impact on future visits



### Slight impact on likelihood of future visits

4.16 In spite of nearly all (92%) visitors travelling to Anglesey by car, most (86%) say they will not be deterred from returning by the increase in traffic. This is the same as the autumn result.

4.17 The traffic may affect some future visits though. About one in six (16%) of those staying in hotels or self catering cottages / apartments say the increased traffic will make them less likely to visit.

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#### Getting to Anglesey – some will be put off

Some visitors are less likely to visit because congestion will put them off trying to get there. Some cite congestion already at peak times, such as getting across the bridge.

*"It will not be as attractive if the route here is gridlocked"*  
Male, North East England

*"Don't want to be stuck in traffic when coming for a holiday"*  
Female, Liverpool

*"There are queues on the bridge already"*  
Female, North Wales

---

#### Journeys can be part of the experience

For some, the peaceful scenic journey coming across the Menai Strait into Anglesey and around Anglesey is part of the holiday experience. The prospect of increased traffic does not sit well with them.

*"The beauty of Anglesey partly is due to the quiet roads"*  
Male, Manchester

---

## Final thoughts

4.18 As was the case in the autumn survey, open comments show that the construction projects could adversely affect future visits to Anglesey for some. This is in spite of the figures throughout the survey clearly showing that the vast majority of existing visitors will still return.

4.19 However, the balance of negative vs neutral or positive comments is different from in the autumn. Only 9% of respondents have made final comments which are in some way negative about the visitor experience or the projects. 14% have offered neutral or positive comments, and the remainder (77%) have given no opinion.

4.20 By comparison, in the autumn survey the negative comments outnumbered the neutral or positive comments by 3:1.

4.21 We discuss the main themes below.

---

**Job opportunities** Positive comments usually relate to job creation and the local economy. They see that this benefit outweighs any negatives.

*“It brings employment, which is good”*  
Male, Lithuania

*“Good for the economy”*  
Male, USA

*“Good for employment and wealth on the island. It will stimulate the economy.”*  
Male, North Wales

*“It’s not ideal and I wouldn’t want it to destroy the island but I can see that it will create jobs here”*  
Female, Manchester

---

**If we want power, we need this** Some see the necessity of the construction projects. No-one wants the eyesore, but we need power.

*“You can’t get away from this – we need power”*  
Male, Chester

*“Energy is needed to supplement natural renewable forms for the foreseeable future”*  
Male, Dorset

*“Everyone wants power but not the infrastructure”*  
Male, Oxford

---

**Couldn’t the power lines run underground?** The most common negative theme concerns the pylons and why the cables can’t be run underground instead to preserve the beauty of the landscape.

*“I would like to see more of it underground. It will be more difficult to get to bird watching sites.”*  
Female, London

---

*"If pylons could be underground it would not spoil the beauty of the island"*

Male, Merseyside

---

**Please be careful how this is done**

Some visitors accept that these projects have to happen but request that they are managed in the most sensitive possible way.

*"Must be done sympathetically. Try to maintain the island's beauty. Nuclear is needed for the future."*

Male, Preston

*"I heard the roads were to be improved so lorries could take a specific route"*

Male, Manchester

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## 5. Implications

<b>Protecting the visitor experience</b>	<p>As was the case in the autumn survey, the quantitative findings appear to show that the impact of the developments is likely to be limited because most existing visitors say they will still come.</p> <p>However, the visitor experience is at risk. The beautiful outdoor environment remains the main draw of Anglesey, so heavier traffic and a new power line sound ominous to some visitors.</p> <p>While visitors mostly say they are just as likely to return to Anglesey, we do not yet know the effect on the duration and frequency of further visits and the likelihood of recommending Anglesey to others.</p>
<b>Promoting the benefits</b>	<p>Projects that impact on the environment can lead to a lot of 'treading on eggshells', but many visitors see this as a positive, without needing to be prompted.</p> <p>More focus on the benefits to the local economy, job creation and provision of power could help to offset some of the concerns.</p>
<b>Avoiding heavy traffic</b>	<p>Heavier traffic remains the most likely impact on experience – both in getting to Anglesey and travelling around it.</p> <p>While the overall increase in volume of traffic on the roads during the construction phase might not be avoidable, help could be provided for drivers to 'avoid each other'. This could include raising awareness of times of day, days of the week and months of the year when traffic is likely to be heavier.</p> <p>Some visitors will happily adapt their travel plans to avoid congestion if they can, and likewise if anything can be done to reduce construction traffic during key holiday periods then this could help protect the visitor experience too.</p>
<b>Communicating reasons for pylons</b>	<p>Pylons instead of underground cables are the most common theme of negative comment given at the end of the survey. It could help to win visitors' acceptance of the development if they understand why this decision is taken.</p>
<b>Monitoring impact in the future</b>	<p>These two surveys conducted in autumn 2017 and spring 2018 have indicated the expected impact of the projects. Given the very sensitive nature of construction impacting on the natural environment, it would be wise to survey visitors again when the developments are in full flow.</p>

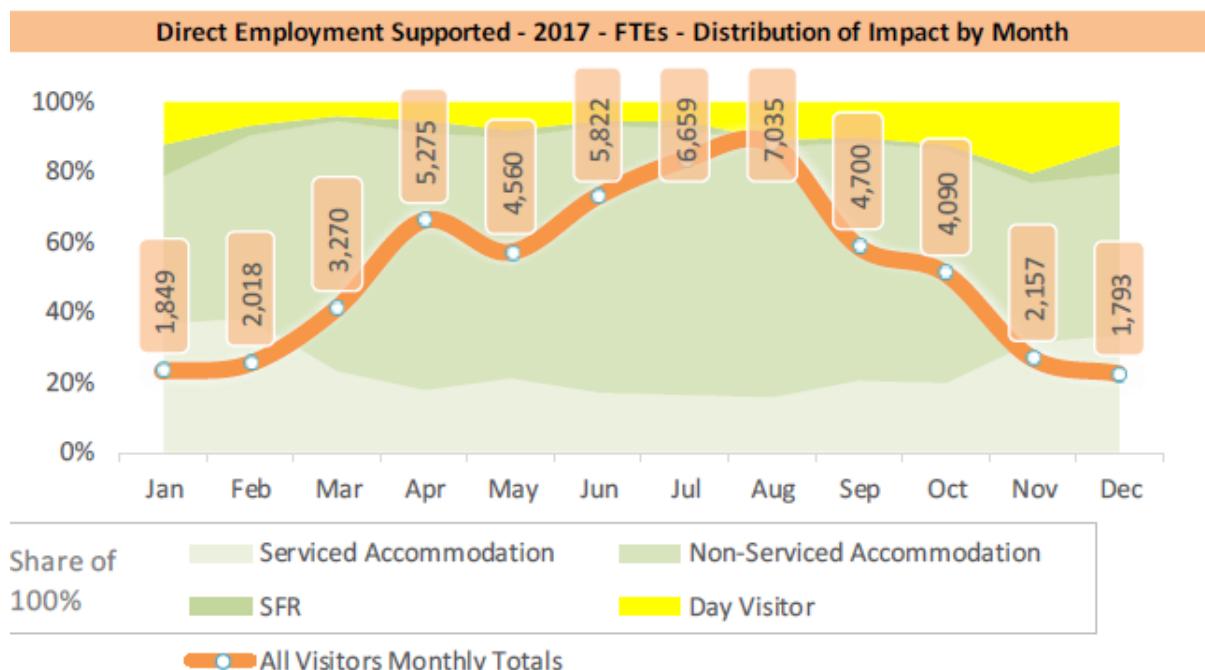
## Annex 1.6

### STEAM Data Breakdown.

At the Issue Specific Hearing (ISH) on the 7<sup>th</sup> January 2019, the Examining Authority requested that the IACC produce a Post Hearing Note on the STEAM breakdown of tourism jobs on Anglesey. This Post Hearing Note is therefore based on the STEAM Report 2017 which was submitted as an Annex to the tourism Chapter of the Local Impact Report (REP2 – 109).

According to STEAM data, there are an average of 4,102 Full Time Equivalent (FTE) jobs on Anglesey. (*Note the IACC used a figure of 5,600 in the LIR based on UK standard figures of 1FTE per £54,000 of tourism spend<sup>1</sup>*). As can be seen in Figure 1 below, the number of FTE peak in August at 7,035, falling to 1,793 in December.

**Figure 1**



Page 38 of the STEAM Report (REP2 – 109) provides a detailed breakdown per month of the number of FTE working in the tourism sector. The STEAM Report also provides a trend analysis that compares the number of FTE per month from 2006 to 2017. What this demonstrates is the significant increase in the number of FTE in the 'shoulder months' with the number of FTE increasing by almost 30% when comparing April 2006 to April 2017, for example. The trend analysis shows that the number of FTE's has increased considerably in these 'shoulder months' (particularly March, April and October) which indicates that the tourism season on Anglesey is much longer than the peak season of July and August.

Economic Impact (£M) per month (see REP2 – 109 p.54) also demonstrates the significant increase in economic value of tourism during these shoulder months. STEAM data shows a 53% increase in economic impact from April 2006 to April 2017.

<sup>1</sup> Oxford Economics, 2013, *Tourism Jobs and Growth*, Visit Britain. ([Link](#))

This correlates with the Tourism Bedstock Survey 2018 (REP2 – 111), which shows a steady increase in occupancy from April to peak in August, before declining in September with least occupancy from December through to February. Between 27% and 34% of the providers are closed between November and February. The Tourism Bedstock Survey 2018 also asked accommodation providers about the number of employees (permanent and seasonal) involved in running the business. The table below shows total employment overall for the 262 participants who provided information for this question (out of sample of 268).

**Table 1**

	<b>Serviced, rooms and hostels</b>	<b>Caravan and camping</b>	<b>Self catering and alternative</b>	<b>All providers</b>
<b>Total permanent staff (Full time equivalents)</b>	610.5	307	320	1109.5
<b>% Permanent staff</b>	55%	28%	29%	
<b>Average number of permanent staff</b>	7.7	3.2	2.6	4.2
<b>Total seasonal staff (Full time equivalents)</b>	297.5	102	111	444.5
<b>% Seasonal staff</b>	67%	23%	25%	
<b>Average number of seasonal staff</b>	3.7	1.1	0.9	1.7
<b>Base</b>	81	96	128	262

What the table above shows is that there are 1,554 FTE employed by these accommodation providers. This amounts to 1,109 employed permanently and 445 on a seasonal basis.

#### ***Breakdown of Tourism Jobs by Sector***

Figure 2 below provides a breakdown of the tourism jobs by sector. What this shows is that the majority of the jobs are in the accommodation sector (26%), followed by food and drink (21.2%) and shopping (20.7%). Whilst the number of FTE in the accommodation sector has remained consistent since 2006, the number of workers in the food and drink sector has increased significantly (by 25%).

With the opening of many new restaurants, the increased popularity of food festivals together with the surge in local food producers, the food and drink sector on Anglesey has become one of the most important and lucrative tourist sectors on the Island. This was recently demonstrated in the Times newspaper 930<sup>th</sup> December 2018) where North West Wales was described as the ‘foodie destination for 2019’<sup>2</sup>.

<sup>2</sup> <https://www.thetimes.co.uk/article/northwest-wales-the-foodie-destination-for-2019-trvkjz9fh>

**Figure 2**

SECTORAL DISTRIBUTION OF EMPLOYMENT - FTES													
SECTOR / YEAR		2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
Accommodation	FTES	1,042	1,046	1,046	1,041	1,034	1,039	1,045	1,063	1,062	1,075	1,086	1,063
Food & Drink	FTES	700	685	742	740	778	773	712	737	788	874	880	868
Recreation	FTES	316	304	354	347	374	381	329	344	262	283	307	332
Shopping	FTES	839	822	881	886	936	924	860	892	742	824	811	851
Transport	FTES	149	145	162	160	170	171	153	160	128	146	147	155
Direct Employment	FTES	3,045	3,003	3,186	3,172	3,292	3,288	3,099	3,196	2,981	3,201	3,231	3,269
Indirect Employment	FTES	802	789	850	849	895	883	813	847	722	789	801	833
TOTAL	FTES	3,848	3,791	4,036	4,022	4,187	4,171	3,912	4,043	3,704	3,990	4,032	4,102

### Commuting Patterns

Details on commuting patterns within Anglesey and Gwynedd is contained within REP2 – 103 (p.36 – 37). Data from the Census shows that over **95 percent** of workplace employment in Anglesey was filled by those who reside within Anglesey and neighbouring Gwynedd. The majority (89 percent) of residents working outside of Anglesey do so in Gwynedd. Similarly, 92 percent of Gwynedd's workforce reside in either Anglesey or Gwynedd. Based on the 2011 commuting patterns, it is reasonable to assume that much of the labour demanded through expansion, replacement and new investments in Anglesey and Gwynedd will be sourced mainly from the two local economies.

Place of work:	Place of residence:					
	Isle of Anglesey	Gwynedd	Conwy	Denbighshire	Flintshire	Elsewhere
Isle of Anglesey	87%	8%	2%	0%	0%	2%
Gwynedd	11%	81%	4%	1%	0%	3%
Conwy	2%	3%	84%	7%	2%	2%
Denbighshire	0%	1%	13%	72%	7%	7%
Flintshire	0%	0%	1%	5%	67%	26%

Source: Census 2011.

What this data indicates is that 95% of people working in the tourism sector live in the Key Socio Economic Area (KSA). This is an important sector for the Island and any displacement of workers in this sector would have a significant impact on the tourism economy.

## **Issue Specific Hearing 2: Socio Economics**

### **8th January, 2019**

Appearing for IACC – Martin Kingston QC, relevant topic specialists are noted against the appropriate agenda items

#### **Agenda item 3(a) Jobs, Skills and Supply Chain –**

Topic specialists: Dylan Williams Head of Service – Regulation and Economic Development, IACC  
Neil McCullough, Oxford Economics  
Peter Trevitt, Peter Trevitt Consulting

On the progress on the WNESS ToR and JSIP, IACC confirmed that they have commented on a draft ToR for the WNESS and the action plan. It is important that these details (WNESS, JSIP and SCAP) are agreed to ensure the potential benefits of the scheme are delivered.

IACC support for the project is based on producing local, high value jobs. There is capacity to improve the supply of skilled local people, but the Council considers that more detail is needed on the training that is actually required by HNP. Displacement is a risk that runs alongside new employment opportunity and requires to be managed by appropriate training.

IACC notes the Panel's comment that the right point to start is with the present local population and the skills present within it and then to consider the broad skills that population needs.

The Jobs and Skills Implementation Plan does not presently meet IACC's expectations and in any event is contradicted by HNP's response to the IACC's LIR. This HNP response states there is no need for any specific training whereas IACC believes it should be possible to identify particularly training that would be valuable, especially so in respect of the under-16s, which is presently an under-considered group. The WNESS and JSIP also need to come together to provide for longer training objectives than the initial 3 year period.

One of the reasons IACC say that the JSIP is not agreed is because it refers to an education strategy that is extremely important but has not been provided. Some, inadequate, measures have been suggested for pre and post 16 education, but with no information on duration. Most Wylfa workers will come from Island schools, but there is little information on how HNP will support those schools.

In terms of displacement, IACC generally agrees that labour market churn is good, but WN is offering temporary change and after construction things will go back. In the interim, if local businesses have difficulty filling roles, IACC wants to see the ability across all sectors to bring local people in to support gaps left by people moving to work at WN.

In response to the Panel question over the present level of under-used resource in the local labour market, there is a figure of c4,000 economically inactive people in Anglesey and Gwynedd that have expressed interest in taking on work. IACC cannot assess the full risk of people leaving jobs for WN, not least because it is too early in the project for people to start moving job in significant numbers. IACC's objective is to push the adverse effects of displacement as far forward into the future as possible.

IACC therefore is pushing for as much detail on these employment and training strategies is to ensure that enforceable schemes of mitigation are secured in the s106.

The proximity principle is particularly important in this regard for North Anglesey, where there is a high proportion of low paid and minimum wage jobs, with a high proportion of Welsh Language spoken, increasing the vulnerability to adverse effects from displacement without an adequate training response.

IACC notes the Panel comment that the SCAP is not the sole responsibility of HNP and that all interested parties have a responsibility to contribute to how these plans will be supported and anchored in the s106. The IACC wishes to stress however that the SCAP is a process that will

operated by, and therefore is primarily applied by, HNP. IACC as LPA and enforcing authority for the s106 need adequate detail and clarity on such plans in order to effectively enforce compliance with them.

#### **Agenda Item 4 traffic and transport**

Topic specialists: Huw Percy, Head of Service – Highways and Transport, Isle of Anglesey County Council

Gethin Gilford, Senior Engineer, Isle of Anglesey County Council

IACC concurs with the update given by the Applicant that there have been two meetings on traffic and transport issue since deadline 3 and that it is fair to say the parties have not closed out any further issues at those meetings.

IACC agree that the scope of the strategic traffic model was agreed. IACC have requested raw traffic flow data for the A5025 from the Applicant. This is because IACC consider that require the raw data on the average daily figures and the composition of the figures. IACC have a query around the HGV growth factors used for the future baseline IACC also have a concern regarding whether HNP have included the Magnox decommissioning HGV traffic has been included in those figures given that the first stage of decommissioning wasis programmed to commence in 2015 and be completed by 2025. Therefore, the IACC would not expect any HGV traffic related to the Magnox decommissioning routed on the A5025 post-2025.

IACC was asked to update on the online A5025 highway improvements permission. The online A5025 improvement works were granted planning permission in July 2018. A CPO hearing was held in September 2018 and a decision on the CPO is expected early in 2019.

IACC confirmed that they are happy with the design principles for the A5025 offline improvement works.

The acceptability of the transport proposals for the scheme is dependent on MOLF and offline highway works being delivered timeously. IACC considers that the early years strategy for the project is incredibly important. IACC has some serious concerns regarding the effects on communities of the proposed HGVs. The increase proposed by Horizon varies between 62% and 90% over the baseline (noting that IACC does not yet currently agreed the baseline). IACC requests that a maximum of a 40% increase over baseline is set as a cap unless and until the offline improvements are fully open. This would act to reduce the adverse impacts on the communities.

In order to agree the baseline IACC needs to agree the traffic counts and to agree the definition of what is being classed as an HGV. The percentage increase growth in traffic per year needs to be agreed and how the cumulative baseline is to be determined has to be agreed. IACC note that they met with HNP and asked for the data earlier in January 2019. If it cannot be agreed it would be a matter to be resolved by the ExA.

IACC confirmed and do confirm that the A5025 has the physical capacity to take the traffic suggested by HNP and IACC's concerns relates to the effects on the communities' quality of life. If the IACC cap of 40% increase over baseline is accepted then on the HNP baseline of 235 traffic movements that would be 100 additional of HGV movements (2way).

IACC have noted concerns with the design of the new junction at Dalar Hir. IACC have proposed 2 different alternative designs. IACC welcomes HNP's commitment to look at these designs and the indication given that they were hoping to take one of these forward. IACC would be pleased to continue to engage on the redesign of this junction.

IACC note Horizon's submission that bringing forward the provision of the TWA onsite would require an increase in HGV movements to allow the materials necessary to build the TWA to be delivered to site. IACC consider that this is part of the balancing which should be considered in the overall early years strategy: IACC request that this strategy is secured by requirement and not under the a COCP.

IACC was asked comment on the lack of proposals for improvement works on the stretch of A5025 between the developments side and Amlwch. IACC notes that they reluctantly agree that there is no requirement to undertake upgrade works to this area, although it is desirable and the IACC are aware of considerable local support and pressure for improvements on this stretch of road. The site preparation and clearance proposals included a commitment to community resilience funding which would have provided an opportunity to fund improvements to this stretch of road. It is now unclear whether that will happen.

In terms of safety after the A5025 improvements IACC will be reviewing all speed limits under its statutory powers.

In response to discussion on the Britannia and Menai bridges and the capacity of the Menai Bridge to take HGV traffic re-directed from the Britannia Bridge, IACC notes that both of these bridges are trunk roads. When there are closures of the Britannia Bridge there are stacking procedures and facilities in place to stack HGVs and prevent unnecessary congestion on the Menai Bridge.

IACC request that measures to monitor and manage facilities for, and use by, non-motorised users and in particular importance of preventing rat running on unsuitable local roads which are also used by non-motorised users, are progressed.

### **Wales Coastal Path**

IACC note that they have set out a detailed response on the issue of diversion of the Wales Coastal Path in the LIR. IACC strongly disagree with the assertion by Horizon that this stretch of path is sparsely used; the nearest IACC counter at Llanbadrig has recorded an average use of between 14,000 and 15,000 for the years 2015-17 users per year.

IACC considers this path to be a very important facility of economic value to the area. This coastal path attracts people to the area. The IACC does not consider that the attraction of walking along the side of a main A class road will be anything like as strong as that of coastal walking path. IACC is looking for some significant measures to offset the adverse impact of the diversion of this path.

IACC notes that the diversion of this path and the particulars of the route have not been discussed for some years between IACC and HNP. IACC have asked questions at each stage and each consultation as to why the diversion route has been chosen and whether any security concerns of having the path closer to the site could not be mitigated. IACC would welcome further information from Horizon on this.

Following the hearing, a meeting is to be scheduled between HNP and IACC. At this meeting the IACC wants to discuss with HNP the details of the significant measures that are required to offset the adverse impact of this path at the construction stage as well as the need for HNP to reconsider the realignment of the path at the operational stage.

## **Issue Specific Hearing 2 on the DCO**

### **9<sup>th</sup> January, 2019.**

Appearing for IACC – Martin Kingston QC, relevant topic specialists are noted against the appropriate agenda items.

#### **Article 2 : Definitions**

##### **Definition of commence**

IACC continue to have objections to the definition of commence and in particular the potential confusion caused by the exclusion of site preparation and clearance works where those site preparation and clearance are not themselves defined and the potential for confusion between those and works within the scope of Work 12.

The IACC objects to the inclusion within the definition of commence which removes from that definition the erection of temporary buildings. The IACC objects to this on the Greenfield's site not the main site as on the Greenfield sites there are issues of flooding and drainage where the erection of temporary buildings is not appropriate without discharge of the noisy requirements. Just because these works are small or minor to Horizon or indeed small and minor and the context of the larger works which will follow does not mean that they can be allowed to progress uncontrolled. They do have potential consequences and do need to be controlled.

##### **Definition of maintain**

The position previously set out by IACC remains. IACC is concerned about the breadth of this definition and whether all of the maintenance works included in this very wide definition have been properly taken in to account when assessing the environmental impact. The addition of the tailpiece about materially new or different environmental effects does not address this concern. Replacement works outside of the main construction period would not necessarily have any more materially new or different works in the original construction however the impact on residents could be some way down the line, there would be very little control of those works and the disruption and community impact issues would not necessarily have been anticipated.

IACC have agreed to provide alternative wording and reasoning for this definition and that is attached as Annex 3.1.

##### **Definition of discharging authority.**

IACC wish to clarify that they are entirely in agreement that the LPA has no lawful jurisdiction below mean low water and they are not seeking any extension of their vires. The appropriate discharging authority below mean low water would be the Secretary of State or NRW. IACC does not consider that it has the resourcing or skills to proper undertake discharging responsibilities in that area.

As currently defined IACC's discharging responsibilities begin above mean high water springs. This is not the normal local planning authority area of responsibility which extends to mean low water and therefore covers the intertidal area. In the case of this project there are works situated in the intertidal zone which will have visual and landscape impacts on an important and sensitive area of the coast. It is not considered that NRW's normal responsibilities extend to consider all matters of visual and landscape impact on the coast. The IACC objects to the removal of its normal area of responsibility between mean low water and mean high water springs.

As requested by the panel during the hearing IACC are liaising with NRW and Welsh Government on this point. Provided that these discussions can be successfully concluded, IACC would intend to discuss with HNP to establish if an agreed amendment to the definition of discharging authority can be included in the revision of the dDCO to be submitted at Deadline 5.

## Article 10 Defence to statutory nuisance

IACC maintain that they do not consider it appropriate that the defence to statutory nuisance created under section 158 extends to matters covered by the COCP given the lack of detail and specificity within the COCP's. The IACC's position is that section 158 assumes that there are proper controls in places of the works. IACC and Welsh Government were requested by the panel to consider what would be required in the COCP's to render this article suitable. The IACC maintain that they do not consider it appropriate that the defence to statutory nuisance created under section 158 extends to matters covered by the COCP given the lack of detail and specificity within the COCP's. The IACC's position is that section 158 assumes that there are proper controls in places of the works. IACC and Welsh Government were requested by the panel to consider what would be required in the COCP's to render this article suitable. The IACC and Welsh Government are liaising on this issue and will submit detailed response at Deadline 5.

## Article 74

IACC do not consider it appropriate that the permitted development rights granted to electricity generators are available to Horizon outside of the main site. The associated development sites are not being used for the purposes of electricity generation: they are being used in order to construct a generating site and therefore do not require the ongoing PD rights which would accrue to the main site.

The permitted development rights for electricity undertakers in Wales are set out in Part 17 Class G of the GDPO 1995. That class includes the very wide "(f) any other development carried out in, on, over or under the operational land of the undertaking". If all of the associated development sites are classed as operational land, then that permitted development right would apply. This is entirely disproportionate as these sites are not being used for the generation or transmission of electricity, and removes the proper control of development that the local planning authority should be able to exercise over these sites.

It is clear that the majority of the permitted development rights accruing to this class are designed to allow the proper carrying out of electricity undertakings, not the operation of park and ride, logistic centres and highway construction. This is clear from the other section of Par 17 Class G which concern the installation or replacement of electrical apparatus, plant and machinery. The application of the electricity undertakers permitted development rights to the associated development sites would be outwith the purpose for which these rights are normally granted.

## Article 79 and Schedule 19

IACC continue to submit that the periods for determination set out in Schedule 19 are too short.

IACC object to the deemed approval process set out in Schedule 19 paragraph 1 sub-paragraph 3. IACC were pleased to note during the hearing Horizon undertook to remove the deemed approval provision and therefore look forward to reviewing the amended DCO in this regard.

IACC continue to object to the fees set out for the work in discharging requirements as being far too low. IACC understand that these fees are as apply to the discharge of TCPA conditions however the complexity of work involved in this project is considerably more than that involved in the majority of TCPA applications. IACC notes that while Horizon have submitted and did submit at the hearing that the considerable resources are being made available to the Council through the s106, all of these resources are fully committed to functions other than the discharge of requirements.

IACC understands Horizons position that the fees and timescales suggested reflect the PINS guidance, however this is general guidance for all DCO's and account must be taken of the level of work and complexity of issues for this particular DCO. The guidance is not a blanket process which should apply to every DCO, if that were parliament's intention it would no doubt be set out in either the act or regulations.

Associated development item p)

IACC continue to be concerned as to the breadth of this item and the lack of case made for its necessity. IACC would suggest that this item is deleted. It is however accepted that there may be a compromised position between full deletion and any current very wide drafting. The breadth of this provision adds to a more general concern regarding creep of implemental changes and minor works on the project which are not currently anticipated.

IACC objects in particular to the inclusion of the word 'expedient' as introducing considerable doubt as to the meaning of this provision. What would be expedient is not defined, would it be anything which reduces cost, makes development easier for the developer to carry out or quicker and who would take the judgment as to what was expedient. IACC welcomed Horizon's submission that this would item not apply to temporary works post the decommissioning of them.

IACC reiterated its concerns regarding the issue of works being undertaken without awareness or monitoring or with any communication with the public. IACC considers that if the panel does decide that item p) should be included, it should be limited to the main site.

### **COCPs**

IACC maintains its concerns that the COCPs are considerably lacking in the necessary details to make them fit for purpose. IACC does not consider that the COCPs should be approved and certified under the DCO in their current form. If substantial progress cannot be made on inserting the detail required, then a further approval process of these documents will be necessary. The COCPs as they currently stand can only be considered to be general outlines which the fully detailed COCPs would have to comply with.

IACC recognises that this would be a large task for HNP in responding to all of the comments on COCPs during the examination and along with the other workstreams in progress. IACC doubt that this could be satisfactorily completed by the close of exam and that the drafting of the fallback position where a further approval is required should therefore be undertaken at this time to ensure that it is in place if the COCPs cannot be agreed.

### **Requirements**

IACC notes that it does not consider the amendment made to the wording of requirements which require the submission of items for approval by IACC pre-commencement rather than approval is suitable. Horizon's submission that because the works thereby approved have to be carried out in accordance with that approved document that approval is implied is not accepted. IACC does not agree as there is nothing that would prohibit works starting when the document is submitted but not approved. IACC welcomes Horizon's undertaking in the hearing to amend this wording back to the previous version.

### **Article 5**

IACC noted that it was still not content with the operation of article 5. In large part the Council's issues are centred on the definition of commence. The definition of commence in the dDCO excludes site preparation and clearance. Horizon had previously indicated that it would remove Work 12 SPC works from the scope of that exclusion. However, as no definition of site preparation and clearance is given, and it is not stated that undertaking Work 12 will constitute commencement, then for the purposes of identifying what requirements apply and whether any work is authorised the IACC is not clear what works of site clearance and preparation on the main site would constitute development. This is unacceptable as it would make the carrying out of the role of the enforcement authority very difficult in practice and creates considerable uncertainty for all parties. IACC looks forward to seeing the revisions to the definition of commence in the DCO and will respond thereto.

The IACC still considers that the works set out under work 12 are not in alignment with the SPC as set out in the TCPA. IACC notes that due to the calling-in of the TCPA by the Welsh Government it may be that this concern is overtaken by events.

### **Protective Provisions**

IACC notes that discussion of protective provisions for the protection of the Council as Highway Authority is ongoing with Horizon and may be able to address many of the concerns with the Highways provisions of the DCO which were set out in the written representation.

### **Section 106**

IACC noted that the submissions made in its previous submission REP1-018 still stand.

The LIR has identified a number of necessary mitigation works and steps. The IACC has been very careful to provide evidence for each of the mitigations which it is seeking and that evidence base is referenced in detail in the LIR. The IACC recognises that some elements are very difficult to cost, for example the community fund is designed to address impacts which are not easily quantifiable in cost terms, and planning judgement has been required to reach the position set out on that.

The IACC continues to object to the governance arrangements set out for the contingency funds under the section106 (see REP3-042). As an example, under schedule 3 tourism, a sub group is to be set up in accordance with the terms of reference set out in schedule 16 (however, there are no terms of reference currently incorporated within schedule 16). That sub-group will determine if monitoring shows an impact which requires to be address and suggest mitigation for it. That proposal is then considered by the WNMPOP which will decide whether to approve the release of funds and thereby the delivery of any mitigation.

The IACC continues to object to the use of the WNMPOP for the approval of the distribution of funds from the contingency funds. The process set out in schedule 16 whereby funds would be released by the WNMPOP includes a number of mays, ifs buts and other caveats, is unnecessarily complicated and introduces considerable doubt as to when and if such funds would ever be made available. The approach suggested removes from the LPA the ability given to it by statute to make the judgements regarding the monies to be paid under the section 106. It puts the payment of funds into the hands of a number of sub-groups and the WNMPOP group. The IACC fully understands the desire of other groups to receive funds set out in the 106 and to have some control of those funds, however, the 2008 Planning Act did not modify section 106 in order to make any other party a required party to such deed. The IACC notes, of course, that any party can enter a contract, however, a section 106 is a deed which is expressed in statute to be between the developer and the LPA. That such an agreement is between a developer and an LPA does not mean that IACC cannot agree that it will dispose of funds to other bodies. The channelling of funds through the LPA does however mean that the party with the ability to enforce the agreement as a deed as set out in section 106 has the necessary knowledge and control to know whether or not compliance with the section 106 is being achieved by the developer, and take enforcement actions should it not be.

The IACC submits that the complications in the process with the distribution of contingency funding mean that it is destined for a disaster. The IACC will not sign the section 106 with this process for the distribution of contingency funds still in the drafting.

The IACC considers that it would be unwise to set up a complex and novel way with mitigation as is set out in this 106. The proposals made greatly increase the risk of legal challenge and therefore they delay to the project would arise should such legal challenge be taken.

The Council wants to and is happy to be accountable for all funds which are given to it and would covenant with anybody who would be the recipient of such funds as to how their use would be controlled and monitored and reported upon.

The IACC notes that the section 106 would require a number of other documents to be finalised before the 106 could be signed. This includes the supply chain action plan and jobs and skills strategy. IACC considers that these documents are some way from being in a fit state to be considered final.

## **Annex 3.1**

### **Article 2 – definition of Maintain**

The IACC suggests the following alternative drafting for the definition of maintain:

“maintain” includes inspect, repair, adjust, alter, improve, landscape, preserve, remove, reconstruct, refurbish, or replace any part of the authorised development, provided such works do not give rise to any materially new or materially different environmental effects to those identified in the Environmental Statement, or vary the authorised development as described in Schedule 1 (Authorised development), and any derivative of “maintain” must be construed accordingly and subject to the following:

For Work Nos [1 and 4] maintain shall also include the relaying, extending or enlarging of any part of those Works; and

Where Works are of a temporary nature and decommissioning or restoration of such Works has begun, no works shall be carried out as maintenance which are not required for the purposes of carrying out decommissioning or restoration.

# **Issue Specific Hearing 1 Biodiversity**

## **10<sup>th</sup> January, 2019.**

Appearing for the IACC:

Patrick Robinson, Burges Salmon LLP

Angharad Crump [DCO Lead Officer Wylfa Newydd], Isle of Anglesey County Council

Mike Frost, [Ecologist], Wood on behalf of Isle of Anglesey County Council

**Agenda Items 3a – 3d, Habitats Regulation Assessment.** IACC is deferring to NRW on this issue.

In response to the Panel's concerns over lack of detail in control documents and the possibility of overlap between Requirements and CoCPs, IACC stated that it would reflect upon the appropriate drafting of both Requirements and CoCPs in light of the mandatory wording of Requirements attaching particular importance to their content.

IACC welcomed HNPs confirmation that a permanent Visitor Centre will now be progressed as a TCPA and is to include a Viewing Platform. In response to the Panel's questions over what in-combination material could be submitted to cover the provision of a Visitor Centre IACC reiterated the great importance it sets by this proposal and the means by which its provision can be secured.

The IACC welcomes the agreement for further discussion between HNP and IACC to progress agreeing the broad specification of this centre and for HNP to provide a note at Deadline 4 confirming how the delivery of the Centre is to be committed to.

**Agenda Items 4a – 4b Marine Works and Marine Environment.** IACC is deferring to NRW on this issue.

### **Agenda Item 5 terrestrial ecology and birds**

**Baseline surveys, hydroecological assessment, drainage and dewatering and air quality impacts on Tre'r Gof SSSI.** IACC is deferring to NRW on these issues. IACC have nothing to add to the submissions made by NRW on this point. IACC continue to consider that a requirement requiring approval of the detailed construction drainage design is required.

The IACC confirmed that it has in its Site Campus LIR Chapter (Chapter 18), paragraph 1.4.13 confirmed that it believes that in order to minimise impact on the Tre Gof SSI and the Wylfa Head site, that the TWA should be further concentrated to West/South of the Amenity Building. Given the backdrop of the existing Wylfa Magnox power station and Dame Sylvia Crowe's mound, the proposal would have far less impact (landscape, visual, ecological) by condensing the development within a smaller area / footprint, but with potentially larger (i.e. taller) accommodation blocks. Further detail is also provided in its Written Representation (Section 14). The Council confirmed that no formal engagement has been undertaken between HNP and IACC to discuss this further.

**Hydrological baseline information for Cors Gwawr and Cae Canol-dydd compensation sites; and Baseline and air quality information for Cae Gwyn SSSI.** IACC is deferring to NRW on these issues. IACC note and concur with the NRW position on the compensation sites.

**Air quality at Trwyn Pencarreg Wildlife Site.** IACC has reviewed the revised data provided in the applicant's Air Quality Mitigation Quantification Report [REP3-052], and is satisfied with the conclusions, subject to the implementation of the proposed mitigation measures being appropriately secured.

**Great Crested Newt - A5025 offline highways works.** IACC is now content with the baseline data presented on great crested newts. The outstanding concern relates to the restoration plan, the provision of ponds and the potential for newts to recolonise the area. IACC agrees with NRW's

submission that avoidance measures for Great Crested Newts should be set out in the sub-CoCP for the A5025 works.

IACC continue to have serious concerns concerning a level of detail set out in the CoCPs and sub CoCPs and support NRW's position that these cannot be certified in their current form. Should they not be completed with full details during the examination, then a further approval should be required.

## **Issue Specific Hearing 2. Biodiversity. 11<sup>th</sup> January, 2019**

Appearing for the IACC: Patrick Robinson, Burges Salmon LLP

Angharad Crump DCO Lead Officer, Isle of Anglesey County Council

Mike Frost, Ecologist, Wood

This section covers the carried over items from the day 4 agenda.

### **Day 4 agenda item 5 v: baseline information**

#### **Reptiles and section 7 habitats**

The IACC is currently awaiting provision of the individual survey reports for each survey year, which Horizon has indicated will be provided at Deadline 4; this is required to understand the survey limitations in each survey year, to ensure that the baseline is suitably robust. IACC accept that the mitigation proposed employs standard and established approaches, although these are being applied to a site that is substantially larger than most sites where these methods are successful, which we think introduces uncertainties regarding the persistence of reptiles, particularly adders, in the local area – and the extent to which populations will be fragmented by the development. Adders are patchily distributed across the island, and re-colonisation at the site relies on local persistence – so whilst we are not convinced that substantial additional mitigation is required we do believe that there needs to be a substantive long-term population monitoring scheme for the duration of the construction and the LHMS period to allow these uncertainties to be tested, and appropriate interventions to be identified if required. On section 7 habitats the balance between the loss of these habitats and how and where and what replacement habitats will be created including how the commitments to create with are secured, requires the provision of further detail.

The IACC is also waiting for further detail on the types and areas of Section 7 habitats affected by the scheme (permanently and temporarily), and the areas proposed for reinstatement or restoration as part of the LHMS; this is to ensure that the LHMS commitments reflect the habitat loss, and are measurable.

IACC notes Horizon's commitment at the hearing to provide further reptile survey data and further section 7 habitat details at forthcoming deadlines. IACC will review these details on their submission.

IACC notes further request from the panel that IACC and HNP progress a joint note on monitoring and what is required in terms of scope and requirements. IACC is progressing this.

IACC is generally comfortable with mitigation proposed with A5025 works but would like more information on the main site proposals for both the construction and operational periods. HNP confirmed that the LHMS deals with this but confirmed that discussions will be further progressed with the IACC.

#### **Red Squirrel**

IACC has concerns regarding the assessment of effects on red squirrels. We have some reservations regarding the 'alone' assessment given that the DSC woodland will be effectively isolated for the construction period, but are particularly concerned that the assessment does not adequately explore the likely cumulative effects with the National Grid North Wales Connection DCO proposal (NGET).

The DSC woodland (10.5 ha) is a key component of the mitigation proposals for red squirrel (and bats). IACC wants to better understand what would be the effect if the population of Red Squirrels are lost for the duration of the construction phase. The IACC requires an assessment of alone

effects as well as a Cumulative Assessment which includes consideration of the National Grid North Wales Connection DCO proposal.

IACC consider that the key issue on red squirrel relates to the cumulative assessment with the National Grid proposal. The National Grid overhead line proposals will run directly through the centre of the woodland [see APP-027 of the North Wales Connection application (4.11 Trees and Hedgerows Potentially Affected Plans – Section A – Wylfa to Rhosgoch Sheet 1 of 5 DCO\_A/TR/PS/01); the National Grid plans indicate that 1.3 ha (actually, 1.37 ha.) of woodland will be 'removed' and 1.1 ha will be 'affected / managed' (likely to at least be tree height reduction and tree species controls) to accommodate the scheme. A further 0.7 ha of woodland is marked as being 'potentially affected'. Therefore, at least 2.47 ha. (23.5%) of the DSC woodland will be directly affected by the NGET scheme, with ancillary effects possible (e.g. wind-throw due to tree removal)<sup>1</sup>.

IACC would contend that the cumulative effects of isolation (due to the Main Site works), fragmentation and habitat loss (from the NGET scheme), disturbance (due to the Main Site works, the Magnox decommissioning, and the NGET scheme, which will take place concurrently or consecutively), and increased mortality risk (from all three projects) are not adequately assessed, and that the persistence of red squirrel throughout construction is very uncertain given these cumulative pressures. There are very few blocks of woodland in north-west Anglesey and so the DSC woodland is likely to be particularly important to the local population.

### **Bats**

Following the submission of information at Deadline 3 the IACC is more comfortable regarding the potential impact of the A5025 offline on bats but considers the mitigation requires to be more fully set out.

With regards to the main site, the IACC remains concerned that the current extent and quantity of the mitigation for bats does not reflect the impact.

IACC does not consider that the provision of alternatives roost sites is sufficient. The proposals do not offset the long-term loss of roosting opportunities site-wide, and the provision of bat boxes in the short and long-term should reflect this. 16 known building roosts, plus several additional buildings and at least 57 trees with features that could be used by roosting bats will be offset by 3 bat barns, a wildlife tower, and 40 bat boxes. IACC's position is that the concentration of roost provision around a small number of bat barns will provide some benefits to bat populations locally, principally if breeding productivity increases - but the significance of losing all features that might be used for opportunistic roosting over several hundred hectares for 30+ years (assuming time for trees to reach some level of maturity) should not be underestimated. HNP has agreed to engage in further discussions with the IACC to try and resolve the disagreement relating to bats.

### **Breeding birds**

IACC queries related to the use of a valuation tool (Fuller's) to assess the value of breeding bird assemblage which is then disregarded. That tool indicated that the site was of regional importance at least, but this is dismissed in the ES where it is stated that tool is not appropriate for the site. No further explanation or justification is provided for reaching the conclusion that the breeding bird assemblage is of low value, which perhaps gives the impression of moving the goalposts. However, IACC notes that it is generally content with the baseline on breeding birds and agrees that it reflects the current situation.

### **Chough**

The main concern of the IACC for chough relates to visitor pressure. IACC confirmed that the Wylfa Head is a sensitive location. IACC notes that the revised baseline information produced by Horizon (REP3-046) goes somewhat to answering the queries raised by the Council regarding the use of specific fields by chough, however the Council will be looking for the updated versions of

<sup>1</sup> Post-hearing note: IACC understands that National Grid will have post-development control over the woodland in its easement, not Horizon, which will also constrain delivery of Horizon's commitments (e.g. to replant wind-thrown trees

the Workforce Management Strategy including Code of Conduct to confirm how sensitive areas will be managed and how visitor pressure including visitor pressure from the TWA will be secured through the mitigation strategies, which should include appropriate wardening / Ecological Clerk of Works (ECoW) supervision at key periods during construction.

The responsibilities and resourcing of the ECOW role, in respect of managing visitor pressure arising from within and because of the site should be made explicit in the CoCPs and if inadequate, will need to be made the subject of further approval process.

The IACC noted that the LHMS does not specifically address visitor pressure, and IACC would be keen to engage on the progression of mitigation proposals to address that point, including wardening.

The Council is concerned that the role of the Ecological Clerk of Works (ECoW) is wide and the role needs to be adequately resourced.

The Council expects the CoCPs to include more comprehensive details regarding the role of the Ecological Clerk of Works and the activities that it is to undertake or for the scope of this role to be subject of prior approval.

### **Barn owls**

IACC notes that the request for HNP to provide further information on barn owls including how inspections for and cessation of construction activity where roosts are found will be secured. IACC would be keen to review this information at the appropriate deadline.

### **Other Matters**

IACC is content that other issues (e.g. badgers) have been adequately addressed, subject to appropriate measures being detailed within the CoCPs.

### **Day 5 agenda items.**

IACC do not have any comments they wish to make on coastal change.

The IACC notes that it is content to follow the approach of NRW with regards to the effects on the Cemlyn lagoon shingle ridge.

**Cemaes Bay bathing water.** The IACC notes that the NRW is the regulatory authority for water discharges however, the IACC continues to stress the great importance to the community of Cemaes of the bathing water qualities at Cemaes Bay. That bathing water is currently compliant but only just, which makes it vulnerable and the IACC strongly wish to see controls to ensure that discharges from the site will not result in deterioration of that water quality. IACC therefore look forward to seeing the further information which Horizon have undertaken to submit at deadline 5.

### **Climate change and flooding.**

**4. Climate change.** The IACC is content to concur with NRW on the climate change points.

4) b) ii) Dalar Hir – The IACC supported the concerns raised by NRW including that a Blockage Scenario Assessment is required. In particular the IACC notes that the FCA Addendum (REP2-372) confirms flooding on one parking space. The IACC agrees that this matter can be appropriately dealt with through detailed design and amending the topographical survey. IACC also did request further information on flooding on the spine road at Nant Dalar and therefore welcomes Horizon's response that that spine road will remain free from flooding in the current modelling.

4) b) iii) Off-line highway improvements

Section 1- The IACC would welcome the formal submission of the Technical Note (Hydraulic modelling of tidal defence breach at Valley) which HNP has presented to NRW which presents the flooding predictions associated with defence failure under extreme tidal conditions, The IACC confirmed that it has received a copy of this note directly from NRW. .

Section 3 - IACC concurs with the conclusion of NRW that the proposal to allow flooding on private land from the A5025 section3 (Llanfachraeth) is contrary to policy TAN15. The IACC reserves its position on this matter until the further information due to be submitted by Horizon can be considered including confirmation of the progression of discussions between HNP and the landowner regarding the legal agreement.

3) b) ii) The IACC supported the concerns raised by NRW regarding flood risk on the main site and in particular the lack of details of the mitigation to offset the changes in the catchment. NRW confirmed that the detail of this mitigation should be available during the examination process to confirm that the mitigation is possible and can take place within the order limits. The IACC looks forward to seeing a further update from HNP on the progression of this detail during the examination. The position of the IACC is that the requirement which should be imposed on the detailed drainage design of the main site should specify that there should be no increase in flood risk on any property including the third party property currently at risk.

In respect of revised Control Documents to be submitted by HNP at D5 (and the revised Phasing Strategy and Design and Access Statement to be submitted at D4) IACC welcomes the agreement by HNP that these will be submitted with track change versions, or similar means of highlighting changes.

**Transboundary issues** – IACC had no comments to make in the hearing on transboundary issues, however it is noted that HNP are to make further submissions on dispersion modelling and analysis of accidental releases of radiation which will be reviewed when received.

## **APPENDIX B**

Post-hearing note agreed with Cyngor Gwynedd in respect of early learnt behaviors and the creation of behavioral patterns in respect of the use of accommodation by workers

## **Post Hearing Note – Early Learnt Behaviours**

### **Introduction**

At the Issue Specific Hearing (ISH) on the 7<sup>th</sup> January 2019, the Examining Authority asked the Isle of Anglesey County Council (IACC) and Gwynedd Council (GC) to jointly prepare a Post Hearing Note on the early learnt behaviours from Hinkley Point C in relation to workers accommodation. This includes the creation of any patterns and why this is a real issue for the Wylfa Newydd project.

The IACC have included detail on this in its Housing Chapter of the LIR (REP2 – 068 section 5.20 and 5.21). Gwynedd Council have also included details on the lessons learnt from Hinkley in their Written Representation (with particular focus on risk of homelessness) (REP2 – 303). The IACC also include a section on the risk of homelessness and evidence from Hinkley in section 5.10 of its LIR (REP2 – 068).

As detailed in section 2.11 of the IACC's LIR (REP2 – 068) the IACC have been collaborating closely for a number of years with the Somerset Authorities, learning from their experiences of dealing with Hinkley Point C and the Hinkley Point Connection Project. One particular focus has been on developing a detailed and in-depth understanding of housing and worker accommodation issues. The experiences shared by the IACC in its LIR, therefore, is a verified account of the housing impacts currently witnessed in Somerset by key senior personnel from Somerset who have subsequently supported the IACC's work.

### **Evidence from Hinkley Point C**

The latest (complete) data available is the position at December 2017, eighteen months into the construction programme and 30 months after earth moving works commenced. At December 2017, 51% of the peak workforce was on site (2,870 from 5,600 workers), a point which is predicted to be reached at Wylfa Newydd in Y4Q4.

The table below shows the original prediction by EDF of the tenure split of the non-home based workforce at peak, and the actual tenure split with half the workforce on site.

## Monitoring data from Hinkley (December 2017)

	EDF DCO Application		EDF 18 Months - Dec 2017			Current Percentage of Peak total
	Home Based Workers	Non-Home Based Workers	45%	1291		
Total Workforce	5600		55%	1579		
				2870		
<b>Type of Accommodation Taken Up by non-home based Workers</b>						
House / Flat Let	20%	750	31%	51%	489	805
House / Flat Let with HPC Workers			20%		316	
House / Flat Share	11%	400		20%		316
Caravan / Campsite	16%	600	13%	27%	205	79%
Hotel			6%		95	
Bed & Breakfast			6%		95	
Holiday Let			2%		32	
Owner Occupied			2%		32	8%
Campus Accommodation	39%	1450			0	0%
<b>Totals</b>	<b>3700</b>		<b>100%</b>	<b>100%</b>	<b>1580</b>	

The table shows that with half the workforce on site, the take up of properties in the PRS had already exceeded the predicted peak (107%) and that latent and tourist accommodation was already at three quarters of the predicted peak (at 79% and 72% respectively) at only 51% of peak. Owner occupation, however, was far below the predicted peak, with only 8% of the workforce having bought a property.

The IACC have been keeping this table up to date with monitoring data obtain from Hinkley Point C Socio- economic Advisory Group (SEAG)<sup>1</sup> which was analysed and verified by Mr. Andrew Goodchild. Unfortunately, there were gaps in the July 2018 monitoring data, which meant the IACC could not compare with the December 2017 figures. However, information on house / flat to share (i.e. latent accommodation) was available and it shows that 534 Hinkley workers are living in latent accommodation. This far exceeds EDF's predicted figure of 400 (see table below):

<sup>1</sup> See Annex 8V - Accommodation Reports from Hinkley Point C Socio-Economic Advisory Group (REP2 – 136).

## Monitoring data from Hinkley July 2018

	EDF 24 Months Actual - Jul 2018			Current Percentage of Peak total
Home Based Workers	49%	1583		
Non-Home Based Workers	51%	1647		
Total Workforce		3230		
<b>Type of Accommodation Taken Up by non-home based Workers</b>				
House / Flat Let	39%	645	??	Detail not available in Monitoring Report (Annex 8V)
House / Flat Let with other		??		
House / Flat Share (Room Rental)	32%	534		134%
Caravan / Campsite	13%	216	395	66%
Hotel	8%	132		
Holiday Let	2%	47		
Purchased Accommodation	2%	34		7%
Campus Accommodation		0		0%
Other (i.e. above data does not add up)				
<b>Totals</b>			<b>1647</b>	

The IACC note that the on-site temporary workers accommodation campus (510 bedspaces) opened in June 2018 which is not reflected in the above data. The IACC wait to see the next monitoring report before commenting on how this may (or may not) affect the accommodation in the other sectors. Data shows, for example, in that first week of opening there were only **six bookings** at the on-site campus.

Early learnt behaviours therefore show that once workers are in their private accommodation (albeit PRS, owner occupied, latent or tourism) they are unlikely to move from this accommodation to the on-site campus. This may be for a number of reasons (e.g. they have signed a 6-month lease) or they are happy where they are.

What this data does not show is the churn, and any 'new worker' may choose to live in the on-site campus. However, we will have to wait until the latest monitoring data is available to confirm this.

### Proximity to Site

Analysis of the location of the living accommodation of the 783 non-home based construction workers on site at June 2017 showed that 90% were living within 15 kilometres of site.

The latest monitoring data<sup>2</sup> shows that of the 1,529 non-home based workers currently living in the area, 1,247 commute come from Sedgemoor, 145 from Taunton Dean and 137 from West Somerset. This shows that 82% of the non-home based workers living in the area (i.e. within 60 minutes) live within broadly a 15km radius to site<sup>3</sup>.

Section 8.4.2 of Horizon's response to the IACC's LIR (REP3 – 004) challenges the IACC's assumption in relation to use of accommodation on the Menai Mainland and misunderstanding of the data (i.e. the concentration of impacts within 15km radius). Horizon state that the concentration of workers within 15km seen at HPC is a function of the distance to Bridgwater and is unlikely to be replicated on Anglesey. However, Horizon's own Workforce Accommodation Strategy shows a spatial distribution of the workforce as follows:

**Table 8.2 Sub-Regional Summary of Accommodation Demand and Supply**

Area	Available bed spaces	Demand from non-home-based workforce
Anglesey North	1,105	1,024
Anglesey South	2,485	633
Anglesey West	2,135	892
Menai Mainland	3,990	451
<b>Workforce totals</b>	<b>9,715</b>	<b>3,000</b>

This shows that 1,024 will live in Anglesey North and 892 are assumed to live in Anglesey West. This is a total of 1,916 (or 64%) of the 3,000 non-home based workers wanting to live in existing accommodation in these two spatial areas alone (given their proximity to site). What is also shows is that only 451 workers will live on the Menai Mainland (and this includes PRS, owner occupation as well as tourism accommodation). The 15km radius covers all of North Anglesey and most of Anglesey West (including Holyhead) therefore this is a function of the distance to two of Anglesey's main Urban Centres, the same as Bridgewater is to HPC.

### **Other Emerging Pattern**

- i. The work commissioned by Gwynedd Council (REP2 – 303 Appendix 2) included detail from interviews undertaken with Sedgemoor and West Somerset colleagues. They notes the pressure on different sectors of the housing market. In particular it notes that the “housing market has become flooded with HMO’s” and “worker are using accommodation allowance to club together to access private rented accommodation”.

<sup>2</sup> Socio-Economic Advisory Group Accommodation Dashboard July 2018 (row 4.1 to 4.3) ([Link](#))

<sup>3</sup> Note the remaining 118 workers (i.e. making the total to 1,647 non-home based construction workers or 51% of the 3,230 workers onsite) live and commute from outside the area.

- ii. This is a particular concern for the IACC and GC as the average rental prices on the Island (e.g. North Anglesey 2 bed property £450 per month) is easily achievable for workers who receive £39.37 allowance per night (see section 5.8 of IACC's LIR for further detail on "Affordability") (REP2 – 068).
- iii. The number of worker who purchased a property is also significantly lower than anticipated by EDF (7%). This is one of the reasons why the IACC have been more flexible in the allocation of accommodation (i.e. not splitting out PRS and Owner Occupied) as people could buy houses to let out to Wylfa Newydd workers, for example.
- iv. Latent accommodation is significantly higher than EDF expected in Hinkley (134% of total at only 50% of peak). This is something that the IACC and GC will seek to avoid as there are important issues such as safeguarding, protecting more vulnerable tenants etc. that needs to be considered.
- v. The work undertaken by GC (as mentioned in (i) above) also found that "*the workers' accommodation has recently come on stream and EDF have made the commitment to ensure that this accommodation is filled to mitigate pressures on the housing market. However, as most workers are contractors most of the workers have already sourced accommodation locally before coming to the area through websites such as Rightmove or Spareroom.co.uk and not through the accommodation finding service provided by EDF*". This highlights the importance of the Wylfa Newydd Accommodation Management Service (WAMS) and the weakness of this, as workers cannot be mandated to use it.
- vi. There also seems to be an emerging pattern in Somerset of workers focusing on accommodation around the park & ride sites. This requires further monitoring, but it could be an issue for the villages nearest the proposed park and ride at Dalar Hir.

## **APPENDIX C**

### Post-hearing note setting out the IACC's views on how the proposed housing fund will be used to increase capacity in the housing stock and the timescales involved

## **Horizon's Housing Fund**

### **Introduction**

At the Issue Specific Hearing (ISH) on the 7<sup>th</sup> January 2019, the Examining Authority requested that the Isle of Anglesey County Council (IACC) prepare a Post Hearing Note by Deadline 4 (17<sup>th</sup> January 2019) on the Housing Fund. The Examining Authority requested that the IACC outline their reflections of how the proposed Housing Fund will be used to increase capacity of accommodation stock, how the Housing Fund should be used and the timescales involved.

### **Horizon's Proposed Housing Fund**

Details on Horizon's proposed Housing Fund is contained within section 9.3 of their Workforce Accommodation Strategy (APP – 412). In summary, it proposes that the Housing Fund can:

- incentivise provision of new housing, including affordable housing, both to meet increased demand and provide a legacy;
- augment existing empty homes programmes and bring vacant properties back into use, both to meet increased demand and provide a legacy;
- encourage provision of more latent accommodation (e.g. spare rooms);
- fund measures to improve the functioning of the housing market (e.g. help people downsize, support rent deposits for people at risk of homelessness etc.);
- fund council officer time to deal with any increase in workload, e.g. to deal with homelessness; and
- support local authority enforcement of planning and licensing, especially for caravan sites.

### **IACC's Position**

The IACC's position on the proposed Housing Fund (including what this fund should deliver and by when) is included in section 6.0 and 7.0 of the Housing Chapter of the LIR (REP2 – 068). In summary, this consists of:

#### **New Build Housing**

- i. The IACC welcome Horizon's very broad commitment to incentivise provision of new housing, including affordable housing, both to meet increased demand and provide a legacy. However, no detail has been provided on how many units, where, by when, for who etc. It is not possible therefore, for the IACC to determine whether the proposed Housing Fund is sufficient to deliver the additional units required to meet the significant increase in demand.

- ii. Based on its own evidence base, the IACC have on the other hand provided a definitive figure of the number of new units required. The provision of **520 new build units** is required to create sufficient supply during the build-up of numbers in the incoming Wylfa Newydd workforce. This is required between Y3Q1 and Y4Q4 (and particularly during the six months of Y4Q3 and Y4Q4) to prevent significant displacement. Table 20 and 21 in the IACC's LIR (REP2 -068) outlines the number of units required per quarter before Y4 Q4. The below table shows this increase required per quarter from Y3 Q1 to Y4 Q4.

Newbuild numbers rounded to nearest 10 units								
Quarterly increase required in OO&PRS in excess of 32 per quarter (newbuild)	50	10	55	30	20	50	115	190
<b>Cumulative increase required from new build</b>	<b>50</b>	<b>60</b>	<b>115</b>	<b>145</b>	<b>165</b>	<b>215</b>	<b>330</b>	<b>520</b>

Although the numbers of completions in the first six quarters are relatively steady, the suggested programme would require careful planning in order to deliver 300 completions in the six months before the first 1,000 TWA bedspaces become available. However, the IACC have proposed an **alternative Phasing Strategy** for the Temporary Workers Accommodation which will mean that less units will be required (450) at a much steadier and deliverable timescale of Y7 Q2 (**See Annex 1**).

- iii. The programme might be commissioned through a variety of routes, such as: built directly by the IACC, commissioned from RSLs, through Joint Venture arrangements with landowners and developers, or contracted directly with house building firms or developers.
- iv. The new build units should be weighted geographically towards the north of the island. This is in order to meet the existing shortfall in supply as recognised by Horizon and to account for the shorter travel times demanded by workers (as witnessed at Hinkley).
- v. When properties are released as the Wylfa Newydd workforce declines, IACC will need to determine the proportions of the legacy stock that are to be sold or rented on the open market, sold for Low Cost Home Ownership, or rented either at 'affordable' rents or social rents (i.e. to reflect the need at the time).

### **Private Rented Sector (PRS)**

- i. Again, the IACC welcome the very broad commitment by Horizon to fund measures to improve the functioning of the housing market (e.g. help people downsize, support rent deposits for people at risk of homelessness etc.). However, this is again far too vague for this stage of the project given that Horizon propose to absorb virtually all the private sector capacity in the first 4 years of the project.
- ii. Costed measures need to be agreed now as part of the s.106 agreement to ensure that these can be implemented immediately post DCO. Given the long lead in time for house building, a reactive approach is wholly unacceptable.
- iii. As can be seen in Table 19 of the IACC's LIR (REP2 – 068), the IACC have not differentiated between owner occupied and PRS in terms of supply of additional units. Given the fluidity and uncertainty in the housing market, the IACC view is that the supply of 520 new units are required to meet the demand from both the

owner occupied and the PRS (i.e. to meet the housing needs generally with demand from Wylfa Newydd workers, other people wanting to move to the Island and local residents).

- iv. Horizon's Workforce Accommodation Strategy proposes to have 600 workers in owner occupied and 900 in the PRS. However, the IACC's has further broken this down to account for single workers with partners / dependants (590) and 2 workers sharing (904). The remaining 180 workers are proposed to be in self-catering accommodation to release the pressure on tourism accommodation (B&B and Hotels).
- v. The IACC have therefore not broken down the 520 additional units to "XX" number of owner occupied and "XX" number of PRS at this time. This must be determined against a number of factors including the housing need for that village or town, the affordable housing requirement, spatial demand from Wylfa Newydd workers etc. The IACC did secure resources through the Site Preparation & Clearance S.106 to identify sites etc. but significant uncertainty remains around this (including timescale for delivery) due to Welsh Government call-in.
- vi. Notwithstanding the above, the IACC propose that the Housing Fund /additional units should:
  - a. be let at the average private sector rent in North Anglesey, in order to put downward pressure on rents generally at the time of peak demand.
  - b. Any budgeted (and agreed) shortfall between rental income (net of management and maintenance costs) and financing costs should be met by Horizon.
  - c. The properties should be let to the Wylfa Newydd workforce via the WAMS as its first priority, before other private sector properties are offered (i.e. to prevent people from being displaced from their own homes).
  - d. In order to minimise the costs of rent collection, an amount equivalent to the agreed rent should be paid direct by Horizon each month, and the rent itself recovered by Horizon from the individual workers' accommodation allowances.
- vi. In addition, following discussions with the Welsh Government and Gwynedd Council, the IACC believe that the housing fund should include landlord incentives to include landlord training, advice as well as minor grants to bring existing PRS up to standard for letting on the open market.

## **Latent Accommodation**

- i. The IACC acknowledge Horizon's commitment to "encourage provision of more latent accommodation". However, again there is no detail on how Horizon propose to do this. What measures are Horizon going to implement to 'encourage' people to let out a spare room?
- i. The IACC accept that 400 latent units is an acceptable figure for latent accommodation provided that accommodation providers meet the criteria to house workers in accordance with the WAMS.
- ii. To achieve this, Horizon will need to incentivise accommodation providers to make this an acceptable proposition for people to let a room. A financial

contribution is therefore required by Horizon to establish a 'Latent Accommodation Fund', which would form part of the wider 'Housing Fund'.

- iii. This Latent Fund would be available for local residents wanting to accommodate Wylfa Newydd Construction Workers to make minor improvements and alterations to their properties.
- i. This fund would be available to residents as a one off grant of, for example, of up to £2,000 for every property to make alterations and improvements to bathrooms or installation of en-suite, installation of smoke and heat detectors, minor improvements, new doors with locks etc.
- i. The resulting bedroom must be let through the WAMS, for a maximum period of ten years, and be available for 52 weeks in the year. If the property is advertised by the WAMS for six months and remains unlet, the room may be let on the open market. To account for this potential 'loss' of accommodation on the WAMS (e.g. 10% - 20%), the IACC would expect the Latent Fund to be used to bring forward 450 - 500 bedspaces / properties.

### **Empty Homes**

- i. As part of the proposed Housing Fund, Horizon intend to augment existing empty homes programmes to enable vacant properties to be brought back into use, both to meet increased demand and provide a legacy. This is the only part of the Housing Fund where there is currently common ground between the IACC and Horizon.
- ii. The IACC and Horizon agree that 20 properties per annum for 5 years (leading up to peak) should be delivered on Anglesey through the Housing Fund. However, the scope of the fund is yet to be agreed. Empty properties could either be let to Wylfa Newydd workers (e.g. for 5 years during construction), or the grant could be available for local people who may have been displaced or cannot afford to rent or buy property due to the increase in prices (or a combination of both).
- iii. The IACC propose that up to £25,000 per property is an acceptable figure based on existing grant rates.
- iv. Following discussions with the Welsh Government and Gwynedd Council, the IACC's position on Empty Homes has changed since the submission of the LIR. The IACC's position in the LIR was that these properties were required in addition to the 520 new units. This is because when an empty home is brought back into active use; other properties become vacant thus not resulting in any nett additional new units. However, the IACC accept that Horizon intend to augment the existing empty homes programme, therefore these would be in addition to the units the IACC would already be bringing back. This 'additionality' will however need to be demonstrated through monitoring and measures implemented if it does not result in nett additional units.

### **Tourism Accommodation**

- i. Although tourism accommodation does not form part of the Housing Fund, the proposed Fund proposes to support local authority enforcement of planning and licensing, especially for caravan sites. As stressed by the IACC at the Preliminary Hearing and re-iterated at the Issue Specific Hearings, the IACC

has fundamental concerns regarding Horizon's approach to 'monitor and manage' impacts as and when they occur. The implication that resources will be required for enforcement, particularly for caravan sites, raises significant concern for the IACC that Horizon's approach is fundamentally flawed and this will have an unacceptable and lasting impact on the tourism sector.

- ii. The IACC have proposed an alternative approach in the LIR (REP2 – 068 section 4.1.1 p. 6 - 9) whereby Horizon submit a list of 'approved caravan sites' that workers can use and this can be managed through the WAMS. This will ensure that impacts on tourism are managed and will also ensure the workforce are managed and have the necessary facilities and services to meet their needs without impacting adversely on existing communities. Under current proposals, Horizon have no idea of where the workers will live and what impacts they will have. They will only find this out through monitoring when the impacts have already occurred.

## Approach to Monitoring and Mitigation

- i. As outlined above, Horizon's approach to 'monitor and manage' impacts is unacceptable. This is not only unacceptable for tourism accommodation, **but for all accommodation sectors**. Horizon in their Workforce Accommodation Strategy (APP – 412 section 2.1.3) *recognises there is uncertainty about a range of issues, including the level of existing capacity and the precise location of supply and demand for accommodation. Its approach is therefore to plan for the scenario that has been assessed in the Environmental Statement. This makes use of both existing accommodation and provides a large amount of purpose built temporary workers' accommodation and alongside these, puts in place measures to monitor and manage the use of existing accommodation and provide a flexible fund to avoid and mitigate significant impacts that do arise*". This approach is again mentioned in section 6.7.6 where Horizon propose that "a Housing Fund that can help to achieve these kinds of increase in supply. **This forms part of a "monitor and manage" approach**".
- ii. As stated by the IACC in its LIR (REP2 – 068 section 1.1.2 and 5.1.8) the aim of IACC is to seek a viable solution to housing the incoming construction workforce that enables the local housing market, and the local tourism economy, to continue to function normally throughout the construction period, with as little disruption as is practicable. This means ensuring that local people can stay in their own homes (i.e. PRS); tourists can continue to visit Anglesey and local people can afford to buy and rent properties in their own communities. This requires pro-active mitigation measures to ensure that there is a commensurate increase in supply of housing to meet the demand. **The current Workforce Accommodation Strategy proposed by Horizon would place an unacceptable stress on both the housing market and the tourism economy**.
- iii. As states in section 6.1 of the IACC's LIR (REP2 – 068 p.60) The IACC would be in a position to agree Horizon's breakdown of accommodation by sector provided that a suitable package of mitigation measures is delivered to mitigate against the adverse impacts. However, given the lack of detail on the mitigation measures (and how these measures would be secured/delivered via the Housing Fund) and the lack of clarity on when the temporary workers

accommodation will be available (in the form of a detailed Phasing Plan), **the IACC objects to Horizon's Workforce Accommodation Strategy.**

### **IACC Officer Costs**

- i. The IACC disagree that Officer time should be funded through the Housing Fund. This should be funded through a Service Level Contribution in the s.106 agreement and the Housing Fund should be used to mitigate the impacts.
- ii. The IACC view is that in order to implement the delivery of the new housing units, the management of the empty homes programme, the latent fund and monitoring, this requires considerable resource which Horizon have vastly underestimated. The IACC believe that a minimum of three Housing Officers are required to implement this Housing Fund effectively (excluding enforcement).

### **Timescale**

- i. The IACC have clearly stated that pro-active mitigation measures are required to meet the significant increase in private accommodation demand by Y4 Q4.
- ii. By Y4 Q4 there will be 2,400 non-home based construction workers living in private accommodation. This will increase to 2,855 by Y5 Q3 before fluctuating until peak of 3,000 two years later in Y7 Q4. In their response to the Examining Authorities First Set of Written Questions, Horizon state that only 1,620 workers will require accommodation (i.e. 50% of the 3,000) before TWA is available (Y4 Q3). This is clearly misleading as the following quarter (i.e. Y4 Q4) when the first phase of TWA is available, there will be 2,400 workers living in existing accommodation.
- iii. The IACC have suggested an alternative phasing strategy to the TWA which will significantly reduce the pressure on private sector accommodation (particularly in the early years of the project) (**See Annex 1**). This will also allow a much steadier build-up of new accommodation stock without creating excessive demand in any one quarter. The IACC would strongly suggest that Horizon adopt this revised phasing strategy for the TWA as it has such an impact on the use of private accommodation.
- iv. If Horizon adopt the IACC's alternative phasing strategy, this will have a significant impact on timescale, as the 'peak' demand for private accommodation will occur at Y7 Q4 instead of Y4 Q4. It will also result in less units being required (450 instead of 520) and these can be delivered at a much more realistic and achievable timescale.
- v. As stated in the ISH, Horizon have not provided any justification for not being able to bring forward the delivery on the on-site campus.

### **Conclusion**

1. The IACC welcome the principle of a Housing Fund. However, the lack of detail in terms of its scope, value and timescale means that the IACC objects to Horizon's Workforce Accommodation Strategy.
2. The IACC have stated that it would be in a position to agree Horizon's Workforce Accommodation Strategy if the Housing Fund provided sufficient mitigation to meet the significant increase in housing demand.

3. The scale of the proposed Housing Fund (£10M) is insufficient to deliver the 520 new units necessary to accommodate the increase in housing demand.
4. The IACC have proposed an alternative phasing strategy for TWA (Annex 1). This will have a significant impact on the demand for private sector accommodation in the early years of the project (and on the delivery of new units). The IACC would encourage Horizon to adopt this revised phasing strategy.
5. The IACC require pro-active mitigation to ensure that housing market continues to function normally.
6. Horizon's 'monitor and manage' approach is wholly unacceptable. Waiting until monitoring data show local residents are displaced, homelessness has increased, visitor numbers have declined and local people cannot afford housing in their own communities before implementing mitigation is clearly unacceptable.

## **Annex 1 – Alternative TWA Phasing Strategy**

This paper provides an alternative phasing strategy to Horizon's proposed strategy as is outlined in Figure 1 below.

**Figure 1 - Horizon's current Phasing Strategy**

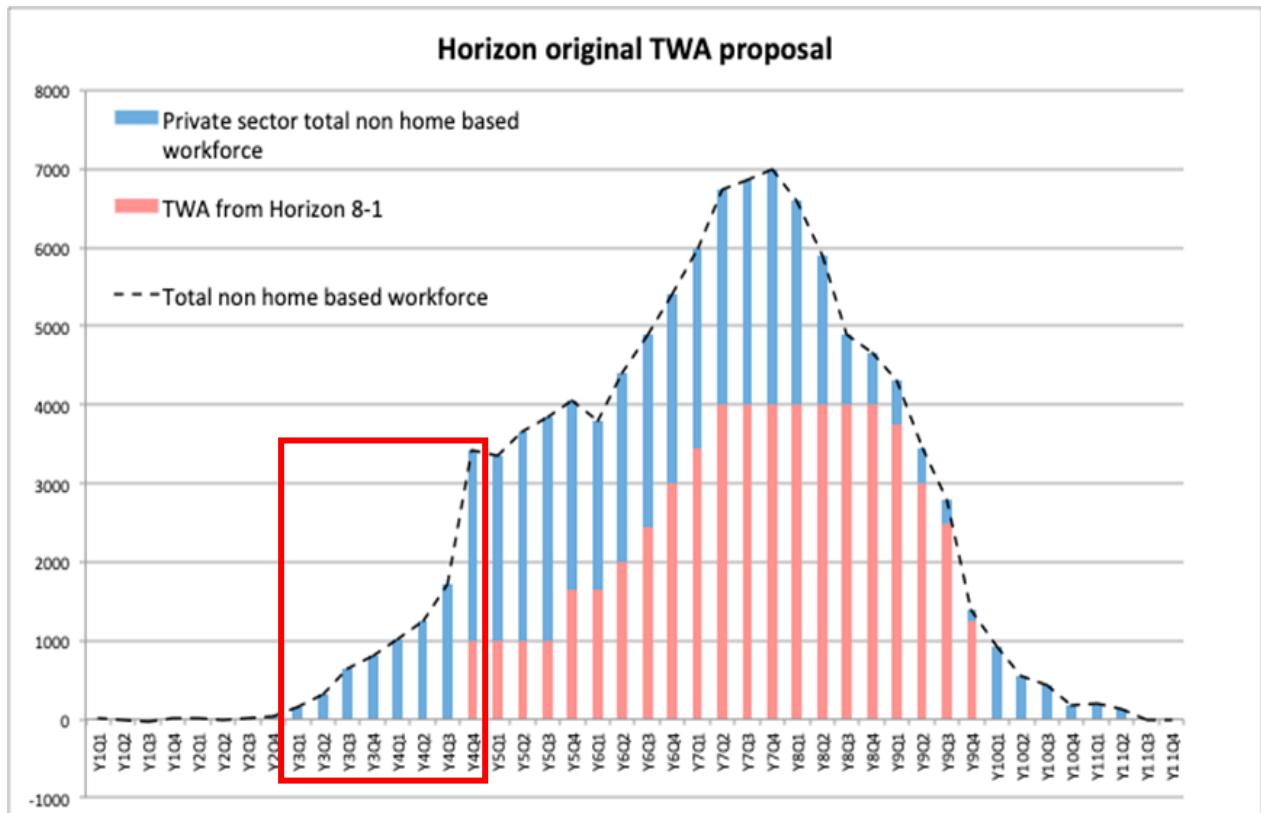


Figure 1 above shows Horizon's current proposal for TWA. What this demonstrates (red box) is the reliance on the private sector from Y3 Q1 to the opening of the first phase of the site campus (1,000 bedspaces) in Y4 Q4. This is unacceptable. All parties would prefer to see a steadier build-up of private sector accommodation through bringing forward the delivery of the TWA. This is shown in Figures 2 and 3 below.

**Figure 2 – IACC / WG and GC Preferred Timing to TWA (Showing Private Sector Build Up)**

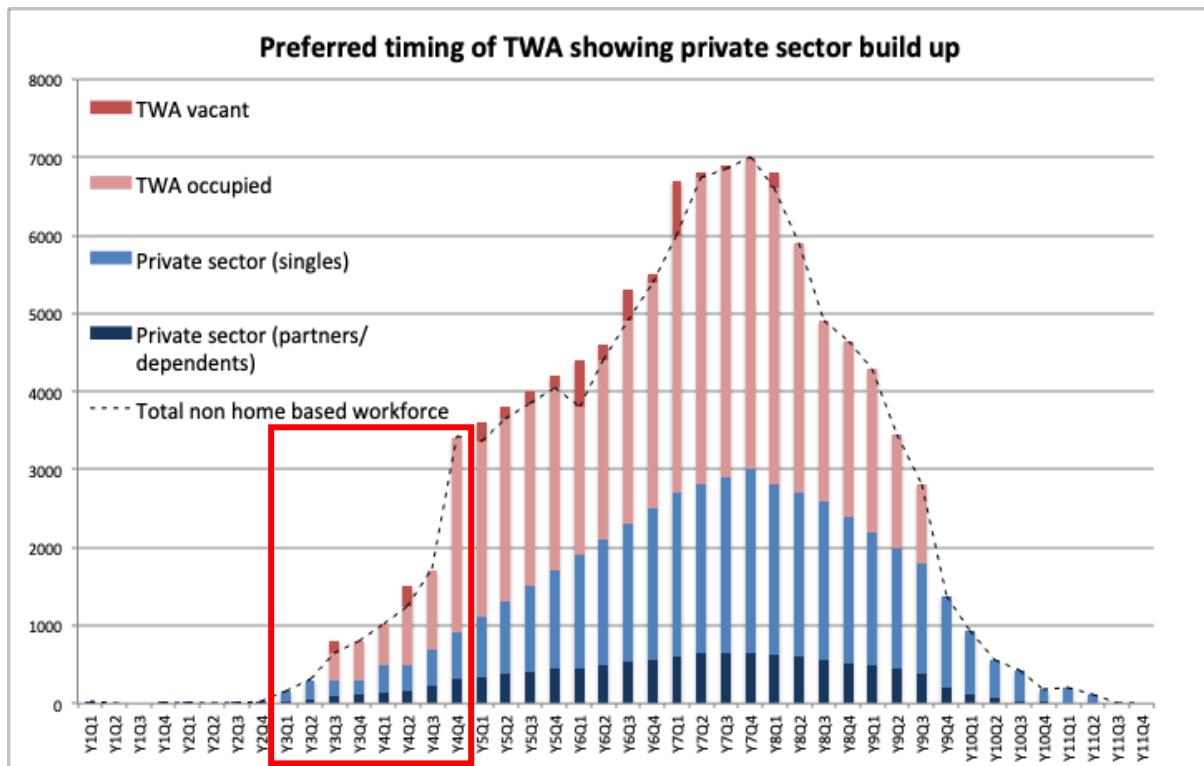
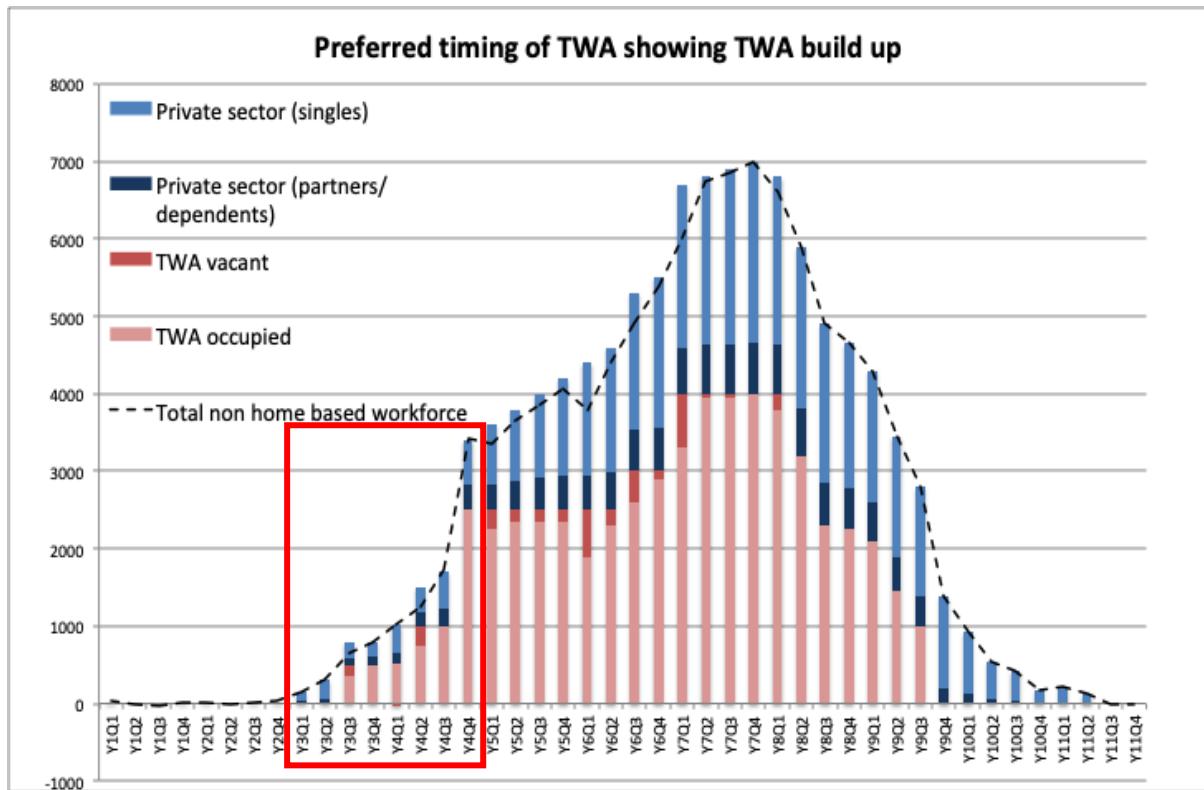


Figure 3 - IACC / WG and GC Preferred Timing to TWA (TWA Build Up)



The alternative build-up of TWA illustrated in Figure 2 and Figure 3 above would allow a steady increase in the use of private sector accommodation, to its peak of 3,000 bedspaces in Y7Q4, without creating an excessive demand in any one quarter. The suggested alternative would also allow a more measured release of private sector accommodation as the workforce numbers decline after Y7Q4 to Y11Q3. **The IACC WG and GC agree this is a sensible Phasing Strategy that should be adopted by Horizon.**

The overall numbers and tenure of non-home based workers in the private sector are set out in the Table 1 below.

**Table 1**

<b>Tenure of bedspaces compared</b>				
	IACC	% of stock required	Horizon	% of stock required
OO & PRS (self contained, single worker with partner/dependents)	590	20%		
OO & PRS (2 workers sharing)	904	30%	600 (OO) 900 (PRS)	20% OO & 30% PRS
Self catering (2 workers sharing)	180	6%		
Caravans (2 workers sharing)	650	22%	650	22%
Latent (single worker per room)	406	14%	400	13%
B&B & Hotels (single worker per room)	270	9%	450	15%
<b>Total</b>	<b>3000</b>	<b>100%</b>	<b>3000</b>	<b>100%</b>

The table shows an assumed use of self-catering accommodation (either from holiday cottages normally let commercially, or from holiday home owners choosing to let their property on a one-off basis). This assumption may reduce pressure on other tourist accommodation such as B&B and hotels.

Table 2 below shows the resulting build up by quarter, from Y3Q1 to Y4Q4, when TWA would become available (i.e. Horizon's current proposal of 1,000 bedspaces by Y4 Q4). This results in the need for 522 additional units to meet the increased demand.

**Table 2**

<b>Numbers of non home based worker and units of accommodation required, by tenure</b>								
	Y3Q1	Y3Q2	Y3Q3	Y3Q4	Y4Q1	Y4Q2	Y4Q3	Y4Q4
<b>Number of non home based workers</b>								
Total non home based workers onsite	150	310	650	800	1015	1245	1725	3420
Number in TWA	0	0	0	0	0	0	0	1,000
Total workers in private sector accommodation	150	310	650	800	1015	1245	1725	2420
Quarterly increase in workers in private sector	120	160	340	150	215	230	480	695
<b>Units of accommodation required in each quarter</b>								
OO & PRS (self contained, single worker with partner/dependents)	31	60	123	150	190	234	325	448
OO & PRS (2 workers sharing)	50	62	85	121	133	170	228	330
Self catering (2 workers sharing)	0	1	20	17	30	34	51	68
Caravans (2 workers sharing)	0	22	70	76	108	130	184	249
Latent (single worker per room)	22	42	87	107	135	167	231	313
B&B & Hotels (single worker per room)	15	28	58	71	90	111	154	209
Total units required in private sector	118	215	443	542	687	846	1173	1617
Quarterly increase in units required	118	98	228	99	145	160	326	445
Quarterly increase required in OO&PRS in excess of 32 per quarter	49	9	54	32	20	49	117	193
<b>Cumulative increase required from additional stock</b>	<b>49</b>	<b>58</b>	<b>112</b>	<b>143</b>	<b>163</b>	<b>212</b>	<b>329</b>	<b>522</b>
<b>Newbuild numbers rounded to nearest 10 units</b>								
Quarterly increase required in OO&PRS in excess of 32 per quarter	50	10	55	30	20	50	115	190
<b>Cumulative increase required from additional stock</b>	<b>50</b>	<b>60</b>	<b>115</b>	<b>145</b>	<b>165</b>	<b>215</b>	<b>330</b>	<b>520</b>

### Alternative proposal for TWA phasing

Table 3 below shows the result of phasing TWA earlier, from Y3Q3, in 500 bedspace increments.

This would allow a more evenly spread absorption of accommodation from the private sector, and a more gradual build up in the numbers of additional stock required to reach **450 units** by Y7Q4 at peak construction. This steadier delivery of new build units would be much more achievable / realistic than having to dramatically increase housing supply by 522 units by Y4 Q4 to meet the sharp increase in demand.

**Table 3**

Numbers of non home based worker and units of accommodation required, by tenure										
Number of non home based workers										
20	20	21	111	20	23	16	23	30	120	150
40	20	42	22	111	222	40	45	32	160	160
10	-30	11	-31	0	222	40	45	32	160	310
-20	-30	-20	-31	0	222	40	45	32	150	300
40	40	39	39	148	371	67	75	54	215	515
10	-30	8	-31	0	371	67	75	54	-270	245
50	40	47	39	148	519	93	105	76	480	725
90	40	86	39	148	667	120	135	97	195	920
125	40	125	39	148	816	147	165	119	-60	860
165	40	164	39	148	964	173	195	141	290	1150
200	40	203	39	148	1112	200	225	162	205	1355
240	40	242	39	148	1261	227	255	184	200	1555
280	40	281	39	148	1409	253	285	206	-255	1300
320	40	320	39	148	1557	280	315	227	600	1900
360	40	359	39	148	1706	307	345	249	0	2500
400	40	398	39	148	1854	333	375	271	500	3000
435	40	437	39	148	2002	360	405	292	-400	4000
440	5	441	4	74	2076	373	420	303	750	4000
445	5	445	4	74	2151	387	435	314	100	2850
450	5	449	4	74	2225	400	450	325	150	4000
									150	7000
Units of accommodation required in each quarter										
OO & PRS (self contained, single worker with partner/dependents)										
PRS (2 sharing)										
Caravans (2 sharing)										
Tourism										
Latent										
Total										
Quarterly increase in units required										
Quarterly increase required in OO&PRS in excess of 31 per quarter										
<b>Cumulative increase required from additional stock</b>										
Newbuild numbers rounded to nearest 10 units										
Quarterly increase required in OO&PRS in excess of 32 per quarter										
<b>Cumulative increase required from additional stock</b>										

## **APPENDIX D**

### Post hearing note on the IACC's views on the list of Reasonably Foreseeable Future Projects generating cumulative effects.

## Post hearing note on the IACC's views on the list of Reasonably Foreseeable Future Projects generating cumulative effects.

As part of the Cumulative Effects Assessment, HNP have consulted the IACC on the list of Reasonable Foreseeable Future Projects (RFFPs) which could contribute to cumulative effects in order to form a short list.

Attached is a copy of this correspondence.

Project Ref No. AN17 refers to the following project;

*The IACC plans to take control of up to 500 homes in the next 30 years. This is likely to involve the Construction of 300 council houses.*

HNP has continuously scoped out this project and confirmed;

Although funding has been secured, no detailed proposals or Environmental information have yet been identified to deliver the housing plans; therefore it is scoped out.

The IACC has confirmed that this project needs to be scoped in. IACC has secured funding to bring forward this house building programme (400 units) over the next 4 years.

Although the Council recognises that no Environmental Information is available, it is considered that HNP could assess the potential impacts of such a scheme, including the Transport effects.

## Angharad Crump

---

**From:** Sarah Price <[sarah.price@dw.dllp.com](mailto:sarah.price@dw.dllp.com)>  
**Sent:** Dydd Mawrth, 6 Chwefror 2018 15:57  
**To:** Rhian Pritchard; Dylan Williams  
**Cc:** Angharad Crump; Liz A. Davies; Roger Parkinson; Kieran Somers; James.Hooker@wales.gsi.gov.uk; iwan.williams@cyfoethnaturiolcymru.gov.uk; Neil.Burke@Horizonnuclearpower.com; ifer.gwyn@horizonnuclearpower.com; Delyth Owen  
**Subject:** RE: Update to list of Reasonably Foreseeable Future Projects (RFFPs) for inclusion in updated Cumulative Environmental Effects Assessment

Dylan,

Thank you very much for your response and it is helpful that we are generally in agreement. With regard to the additional projects that you raise, as you know, we are working hard to finalise DCO documents and unfortunately we are not able at this stage to review these for potential inclusion in the DCO cumulative assessment, principally because of the knock-on effects to other documents which rely on the outcome of the cumulative assessment. However, we will give them due consideration and can continue to discuss with you through the Statement of Common Ground discussions.

I hope this is satisfactory at this stage and I would be happy to discuss further.

Diolch,

Sarah

**Sarah Price**  
BA (Hons) DipTP MRTPI  
Partner



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**From:** Rhian Pritchard [mailto:[RhianPritchard@ynysmon.gov.uk](mailto:RhianPritchard@ynysmon.gov.uk)]  
**Sent:** 31 January 2018 09:25  
**To:** Sarah Price <[sarah.price@dw.dllp.com](mailto:sarah.price@dw.dllp.com)>  
**Cc:** Angharad Crump <[AngharadCrump@ynysmon.gov.uk](mailto:AngharadCrump@ynysmon.gov.uk)>; Liz A. Davies <[LizDavies@ynysmon.gov.uk](mailto:LizDavies@ynysmon.gov.uk)>; Roger Parkinson <[Roger.Parkinson@Horizonnuclearpower.com](mailto:Roger.Parkinson@Horizonnuclearpower.com)>; Kieran Somers <[Kieran.Somers@Horizonnuclearpower.com](mailto:Kieran.Somers@Horizonnuclearpower.com)>; James.Hooker@wales.gsi.gov.uk; [iwan.williams@cyfoethnaturiolcymru.gov.uk](mailto:iwan.williams@cyfoethnaturiolcymru.gov.uk); [Neil.Burke@Horizonnuclearpower.com](mailto:Neil.Burke@Horizonnuclearpower.com); [ifer.gwyn@horizonnuclearpower.com](mailto:ifer.gwyn@horizonnuclearpower.com); Delyth Owen <[Delyth.Owen2@Horizonnuclearpower.com](mailto:Delyth.Owen2@Horizonnuclearpower.com)>

Good Morning Sarah,

Thank you for your email below. We have reviewed the response that you have prepared in relation to the contents of our email dated 15<sup>th</sup> December 2017, and have the following comments to make in relation to the list of Reasonably Foreseeable Future Projects (RFFPs) for inclusion in an updated Cumulative Environmental Effects Assessment for the Wylfa Newydd DCO.

We acknowledge that the Holyhead Port Expansion (AN30) has been scoped into the the list of Reasonably Foreseeable Future Projects (RFFP) for the cumulative effects assessment.

In relation to the comments made in your email regarding sites that remain to be scoped out and no further changes required to the RFFP list, the IACC has the following comments;

- **AN04 Land and Lakes:**  
Agree with your comments that only the Penrhos element of the Land and Lakes development is within the scope of the cumulative assessment.
- **AN13 and AN14 Holyhead and Llanfaethlu Primary Schools:**  
Agree with your comments that these remain in the cumulative effects assessment because the effects of these projects are not currently included as part of the baseline conditions of the environmental impact assessment.
- **AN12 West Anglesey Demonstration Zone, AN17 IACC housing and CN02 Improvements to Junctions 15 and 16 of the A55:**

**AN12 West Anglesey Demonstration Zone** - As confirmed in our response dated 15<sup>th</sup> December 2017, the IACC is aware that the West Anglesey Demonstration Zone (Morlais Tidal Energy Project which is managed by Menter Mon) is now progressing and has received EU and Welsh Government funds to support the further preparatory and consent work for the zone. We recommend that you contact the relevant officers at Menter Mon to gain further information regarding this project for you to include this reasonably foreseeable project in the cumulative effects assessment.

**AN17** - The IACC has announced plans to take control of up to 500 homes in the next 30 years. This is likely to involve the construction of 300 council houses. As previously confirmed funding has been secured to bring forward this house-building programme over the next 4 years. We recognise the limited environmental information that is currently available regarding this plan.

**CN02 - Improvements to Junctions 15 and 16 of the A55** – The Welsh Government's website confirms that a single option strategy has been agreed and that an Early Contractor Involvement (ECI) Contractor has been appointed to progress and develop the delivery of this single option through to the construction phase of the project. (<https://beta.gov.wales/a55-junctions-15-and-16>) The IACC consider that this reasonably foreseeable project should be scoped in and included in the cumulative effects assessment.

The Planning Inspectorate's Advice Note 17: Cumulative effects assessment relevant to nationally significant infrastructure projects provides details of the 'other development' for inclusion in the Cumulative Effects Assessment (Table 3). Tier 3 'other developments' include developments identified in other plans and programmes (as appropriate) which set the framework for future development consents/approvals, where such development is reasonably likely to come forward.

- AN20 Removal (and in some cases replacement) of utility services  
As you confirm that there is potential for the proposed work to overlap in terms of construction activities it is considered that these proposed works should be scoped in and included in your Cumulative Effects Assessment.
- AN22 Third bridge across the Menai Straits:  
This project is currently progressing through public consultation (15th December 2017 to 9<sup>th</sup> March 2018). As you confirm, this proposal is recognised as having the potential for cumulative effects. Although we note that the current consultation includes a total of 4 options, we consider that the consultation documentation does provide environmental information that you would be able to include in your cumulative effects assessment and that the assessment could be further updated as and when further information is available and a preferred option confirmed.

We also refer you to the Note of PINS Advice dated 19<sup>th</sup> January 2017 which followed a meeting called by the Secretary of State for Wales to discuss the relationship between a potential third bridge crossing of the Menai Strait and the proposed North Wales Connection project which is in turn related to the Wylfa Newydd Nuclear Power Station. The Advice confirms that in terms of the approach to the environmental assessment and cumulative assessment, the attendees were referred to PINS Advice Note 17 which proposes the tiered approach to cumulative effects assessment.

- AN23 Llanbadrig Solar Farm  
We confirm that the permitted scheme is referred to as 'Rhyd y Groes Solar Farm' on the planning decision notice.

In relation to the projects that the IACC advised in its email dated 15<sup>th</sup> December 2017 that should be included in the RFFP and your subsequent comments, the IACC has the following comments to make;

- Stena Ports Ltd and IACC - Holyhead Outer Harbour Breakwater Restoration/Improvements Scheme  
- The IACC recommends that enquiries are made with the Port Authority to gain confirmation as to the environmental information that is available.
- Joint Local development Plan Allocations - Referring again to The Planning Inspectorate's Advice Note 17, sites identified in the Joint Local Development Plan are recognised as Tier 3 'other developments'. The IACC therefore considers that the RFFP should include the LDP allocations and included in the Cumulative Effects Assessment.

With regards to all of the Projects that the IACC has advised that should be included in the RFFP, we request that the relevant section of the DCO submission provides confirmation of the reasoning for discounting these projects.

Kind Regards.

**Rhian Pritchard**  
*ar ran Dylan Williams – Pennaeth Rheoleiddio a Datblygu Economaidd /*  
*on behalf of Dylan Williams – Head of Regulation and Economic Development*

**Rhian Pritchard**  
Cydlynnydd Swyddfa / Office Co-ordinator  
Rheoleiddio a Datblygu Economaidd / Regulation and Economic Development  
Cygner Sir Ynys Môn / Isle of Anglesey County Council

Canolfan Fusnes Môn / Anglesey Business Centre  
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 Ysgrifennu a chatafyn Gymreig neu Saesneg  
Please write to me in Welsh or English

**From:** Sarah Price [mailto:[sarah.price@dwdlp.com](mailto:sarah.price@dwdlp.com)]  
**Sent:** 10 January 2018 15:57  
**To:** Rhian Pritchard <[RhianPritchard@ynysmon.gov.uk](mailto:RhianPritchard@ynysmon.gov.uk)>  
**Cc:** [James.Hooker@wales.gsi.gov.uk](mailto:James.Hooker@wales.gsi.gov.uk); [iwan.williams@cyfoethnaturiolcymru.gov.uk](mailto:iwan.williams@cyfoethnaturiolcymru.gov.uk); [Neil.Burke@Horizonnuclearpower.com](mailto:Neil.Burke@Horizonnuclearpower.com); [ifer.gwyn@horizonnuclearpower.com](mailto:ifer.gwyn@horizonnuclearpower.com); [Delyth.Owen2@Horizonnuclearpower.com](mailto:Delyth.Owen2@Horizonnuclearpower.com)  
**Subject:** RE: Update to list of Reasonably Foreseeable Future Projects (RFFPs) for inclusion in updated Cumulative Environmental Effects Assessment

Rhian,

Thank you for your response to our request for further information relating to the list of Reasonably Foreseeable Future Projects (RFFP) for the cumulative effects assessment. The information provided has been considered by the author of the cumulative effects assessment. One additional project has been scoped into the RFFP shortlist, as set out below.

- AN30 Holyhead Port Expansion:  
As requested, the Stena Line Ports Ltd proposal to develop Holyhead Port has been given the identifier AN30 and scoped into the cumulative effects assessment.

We have considered all of your comments, but found that no further changes were required to the RFFP list, according to our criteria, as explained below.

- AN04 Land and Lakes:  
We agree that only the Penrhos element of the Land and Lakes development is within the scope of the cumulative effects assessment, and have updated the RFFP shortlist to clarify that the assessment only considers the Penrhos development.
- AN13 and AN14 Holyhead and Llanfaethlu Primary Schools:  
We are aware that construction of the primary schools at Holyhead (AN13) and Llanfaethlu (AN14) is now complete, and so there will be no temporal overlap of construction effects. However, these remain in the cumulative effects assessment because the effects of these projects are not currently included as part of the baseline conditions of the environmental impact assessment.
- AN12 West Anglesey Demonstration Zone, AN17 IACC housing and CN02 Improvements to Junctions 15 and 16 of the A55:  
Although you advised that these projects have progressed, there is no environmental information available on which to base the cumulative effects assessment. Therefore, these projects remain scoped out of the assessment.
- AN20 Removal (and in some cases replacement) of utility services  
Further to your query about the timings of the removal and/or replacement of services in the Wylfa Newydd Development Area, it is anticipated that there may be some overlap of construction activities.
- AN22 Third bridge across the Menai Straits:

This project is progressing through public consultation and therefore whilst recognised as having the potential for cumulative effects, the lack of a preferred option or environmental information on effects means that it has not been included in the assessment at this stage.

- **AN23 Llanbadrig Solar Farm**

We have chosen not to rename AN23 to Rhyd-y-Groes as the project is clearly identifiable by its current name, which is shown on our figures, and this also avoids potential confusion with the Rhyd-y-Groes windfarm.

We have also considered the list of potential additional projects provided by the IACC. The only project to be added to the RFFP list was the proposed expansion of Holyhead Port, as noted above. The reasons for discounting the other suggested projects is set out below.

- There is no published environmental information available relating to the Holyhead Outer Harbour Breakwater Restoration/Improvement Scheme.
- The proposed hotel at Parc Cybi (application reference 19C842E/1/TR/ECON) forms part of the Parc Cybi Stage 2 development and is therefore already considered in the cumulative effects assessment within AN06.
- The proposed development at Llanfawr Newydd site at Turnpike Nant, Llangrifiolus (application reference 36C175T/VAR) is a variation to a 2005 application for non-EIA development. No spatial link has been identified and so the project has not been included in the RFFP list.
- A search of the IACC planning website has been undertaken for projects in relation to the Anglesey Schools Modernisation Programme. The projects identified, including Ysgol Santes Dwynwyn, are non-EIA projects, with no spatial links to the Wylfa Newydd Project and have not, therefore, been included in the RFFP list.
- Similarly, a search was undertaken of the Joint Local Development Plan allocations to identify any allocations which may have potential cumulative effects with the Wylfa Newydd Project. Housing allocations exist at Cemaes and Valley, but with no firm project proposals these have been scoped out of the cumulative effects assessment.
- As advised by the IACC and Gwynedd Council, planning permission has been granted for 138 residential units and extra care facility at allocation T19 in the Joint Local Development Plan. At this stage, we have identified no spatial link with the Wylfa Newydd Project, and so this project is scoped out of the cumulative effects assessment.

I hope that the above is helpful and would be happy to discuss.

Diolch,

Sarah

**Sarah Price**  
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Partner



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**From:** Rhian Pritchard [mailto:[RhianPritchard@ynysmon.gov.uk](mailto:RhianPritchard@ynysmon.gov.uk)]  
**Sent:** 15 December 2017 13:47  
**To:** Sarah Price <[sarah.price@dwdllp.com](mailto:sarah.price@dwdllp.com)>  
**Cc:** [James.Hooker@wales.gsi.gov.uk](mailto:James.Hooker@wales.gsi.gov.uk); [iwan.williams@cyfoethnaturiolcymru.gov.uk](mailto:iwan.williams@cyfoethnaturiolcymru.gov.uk); [Neil.Burke@Horizonnuclearpower.com](mailto:Neil.Burke@Horizonnuclearpower.com); [ifer.gwyn@horizonnuclearpower.com](mailto:ifer.gwyn@horizonnuclearpower.com);

[Delyth.Owen2@Horizonnuclearpower.com](mailto:Delyth.Owen2@Horizonnuclearpower.com)

**Subject:** RE: Update to list of Reasonably Foreseeable Future Projects (RFFPs) for inclusion in updated Cumulative Environmental Effects Assessment

Good Afternoon Sarah,

Thank you for sharing the list of Reasonably Foreseeable Future Projects (RFFPs) for inclusion in the updated Cumulative Environmental Effects Assessment with the Authority. We agree that it is worthwhile to review the list again, in particular since the DCO submission date has changed.

We have reviewed the list and have added an additional column to your table 'IACC comment' (please see attached). Whilst we are in agreement with the majority of the projects scoped in/scoped out, we do consider that some of the projects need to be scoped back into the assessment as further environmental information is available or will be available in due course, including in particular the Third Bridge Crossing across the Menai Strait which is Welsh Government Project which is now progressing in terms of public consultation.

There are some additional Reasonably Foreseeable Future Projects which the IACC considers need to be included, further details of which are provided below;

1. Stena Ports Ltd – Proposal includes the extension of Salt Island, Holyhead to create a multi-use berth/quay and standage - Consenting Process underway
2. Stena Ports Ltd and IACC – Holyhead Outer Harbour Breakwater Restoration/Improvements Scheme – Studies currently underway
3. Application Reference 34C533A – Tyn Coed, Llangefni – Planning permission granted for 138 residential units and extra care facility. Allocation reference T19 in the Joint LDP.
4. Application Reference 19C842E/1/TR/ECON – Planning permission granted for a new 80 bed hotel at Parc Cybi, Holyhead
5. Application reference 36C175T/VAR - Outline permission for a roadside service area containing a hotel, petrol filling station, restaurants with drive through facilities together with associated access roads parking and landscaping on the Llanfawr Newydd site at Turnpike Nant, Llangristiolus.
6. Ref no AN13 and AN14 of your list refers to projects to build two new primary schools which have now been constructed and do not require consideration. However, as part of your assessment consideration is required to the following project which form part of Anglesey's School Modernisation Programme;
  - a. Ysgol Santes Dwynwen – Planning Permission has been granted for a new school for 180 pupils in Newborough. Construction work commenced in September 2017.
7. As a result of the construction of new primary schools as part of the school modernisation programmes, a number of primary school buildings are expected to be redeveloped for other uses, including housing.
8. IACC has previously confirmed that the list of Reasonably Foreseeable Projects shall include the Tier 3 projects which include Development Plan allocations. It is therefore considered that the list of Foreseeable Projects shall include the site allocations for Anglesey in the adopted Anglesey and Gwynedd Joint Local Development Plan, which includes land safeguarded for both employment and housing. Details of the allocations can be obtained from the Authority's website ;  
<http://www.anglesey.gov.uk/planning-and-waste/planning-policy/joint-local-development-plan-anglesey-and-gwynedd/>

Please do not hesitate to contact us if you wish to discuss our comments further.

Kind Regards.

**Rhian Pritchard**

**ar ran Dylan Williams – Pennaeth Rheoleiddio a Datblygu Economaidd /  
on behalf of Dylan Williams – Head of Regulation and Economic Development**

**Rhian Pritchard**

Cydlynnydd Swyddfa / *Office Co-ordinator*

Rheoleiddio a Datblygu Economaidd / *Regulation and Economic Development*

Cyngor Sir Ynys Môn / *Isle of Anglesey County Council*

Canolfan Fusnes Môn / *Anglesey Business Centre*

Parc Busnes Bryn Cefni / *Bryn Cefni Business Park*

Llangefni

Ynys Môn / *Anglesey*

LL77 7XA

 01248 752508

 Yspdfennwch ataf yn Gymraeg neu Saesneg  
Please write to me in Welsh or English

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**From:** Sarah Price

**Sent:** 28 November 2017 15:21

**To:** Dylan Williams ([DylanWilliams@ynysmon.gov.uk](mailto:DylanWilliams@ynysmon.gov.uk)); [James.Hooker@wales.gsi.gov.uk](mailto:James.Hooker@wales.gsi.gov.uk); [iwan.williams@cyfoethnaturiolcymru.gov.uk](mailto:iwan.williams@cyfoethnaturiolcymru.gov.uk)

**Cc:** Neil Burke ([Neil.Burke@Horizonnuclearpower.com](mailto:Neil.Burke@Horizonnuclearpower.com)); [ifer.gwyn@horizonnuclearpower.com](mailto:ifer.gwyn@horizonnuclearpower.com); [Delyth.Owen2@Horizonnuclearpower.com](mailto:Delyth.Owen2@Horizonnuclearpower.com)

**Subject:** Update to list of Reasonably Foreseeable Future Projects (RFFPs) for inclusion in updated Cumulative Environmental Effects Assessment

Dear Dylan, James and Iwan,

We have consulted with you previously on the list of Reasonably Foreseeable Future Projects (RFFPs) for the cumulative effects assessment for the Wylfa Newydd Project.

The cumulative environmental effects assessment for the Wylfa Newydd Project involves the assessment of the effects of the Wylfa Newydd Project together with other RFFPs. The criteria used to identify RFFPs are set out in the 2016 Scoping Report and 2017 Scoping Report Addendum, available on the Planning Inspectorate's website

(<https://infrastructure.planninginspectorate.gov.uk/projects/wales/wylfa-newydd-nuclear-power-station/?ipcsection=docs>).

Since the long list and short list of RFFPs were agreed in April 2017, the expected application submission date for the Development Consent Order for the Wylfa Newydd Project has changed. It was our intention that the list of RFFPs should be finalised four months prior to the submission date, and therefore we are now consulting on the list again.

The long list that was agreed in April is attached to this email. Those listed as 'scoped in' form the short list. If you are aware of any more projects that should now be considered for inclusion in the cumulative effects assessment, please reply to this email by 15<sup>th</sup> December 2017 with as much information as you have about the additional projects.

Please note that, as previously, we will also assess the effects of the A5025 On-line Highway Improvements and the Visitor Centre within the inter-project cumulative effects assessment, as neither of those developments form part of the Wylfa Newydd Project for the purposes of the DCO application or the Marine Licence application.

Please do not hesitate to call if you have any queries. Otherwise, we look forward to hearing from you.

Diolch,

Sarah

**Sarah Price**  
Partner



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Mae cynnwys y neges e-bost hon yn cynrychioli sylwadau'r gyrrwr yn unig ac nid o angen rheidrwydd yn cynrychioli sylwadau Cyngor Sir Ynys Mon. Mae Cyngor Sir Ynys Mon yn cadw a diogelu ei hawliau i fonitro yr holl negeseuon e-bost trwy ei rwydweithiau mewnol ac allanol.

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Ref. No.	Developer	Project title & description	Tier	Spatial link	Temporal link	Scoped in or out	Justification for scoping project in or out	IACC Comment
AN01	Magnox Limited	Decommissioning of the Existing Power Station (Wyfia) including care and maintenance of the existing facilities followed by decommissioning and final site clearance. Decommissioning activities are understood to last until 2025.	1	Yes	Yes	In	Inter-project cumulative effects are possible as a result of the Wyfia Newydd Project's construction activities and Magnox's proposed decommissioning activities.	Agreed.
AN02	Orthios Group	<p>Anglesey Eco Park</p> <p>Including:</p> <ul style="list-style-type: none"> <li>a 299 megawatt electric (MWe) biomass power station within the existing consented scheme;</li> <li>prawn-growing facility (aquaculture);</li> <li>large soil-less indoor vegetable growing facility (hydroponics);</li> <li>home compostable food packaging facility;</li> <li>the compostable food packaging Centre of Excellence;</li> <li>research and development; and</li> <li>a deep water jetty for bulk import.</li> </ul>	1	Yes	Yes	In	Inter-project cumulative effects are possible as a result of the Wyfia Newydd Project's construction and operation and Lateral Power's proposed construction and operation.	Agreed.
AN03	Eco Pellets Limited	Llangefni Wood Biomass Plant Construction and operation of a wood pellet burning power plant, expected to generate 30MW of electricity.	3	Potential	No	Out	Although there is a potential spatial link between the proposed Llangefni Wood Biomass Plant and the Wyfia Newydd Project, there is no temporal link as the Llangefni Wood Biomass Plant has failed in its planning application attempts.	Agreed.
AN04	Land and Lakes	Penthos Leisure Village A leisure village at Penthos Coastal Park; a leisure village at Cae Glas; and a residential	1	Yes	Potential	In	Penthos Coastal Park is scoped in. Inter-project cumulative effects are possible as a result of the Wyfia Newydd Project's construction	Agreed – however, Cae Glas and Kingsland could be scoped out if Horizons are not progressing with this TWA option?

Ref. No.	Developer	Project title & description	Tier	Spatial link	Temporal link	Scoped in or out	Justification for scoping project in or out	IACC Comment
		development of up to 320 new houses at Kingsland.					and operation and Land and Lakes' proposed construction and operation.	
AN05	Conygar Stena Line Ltd	Holyhead Waterfront Redevelopment A comprehensive mixed use development on 1.2km of Holyhead waterfront at Newry Beach and Porth y Felin.	1	Yes	Potential	In	Inter-project cumulative effects are possible as a result of the Wyfia Newydd Project's construction and operation and Conygar Stena Line's proposed construction and operation.	Agreed.
AN06	Conygar	Parc Cybi Stage 2 Mixed-use employment developments, primarily distribution and warehousing space on the southern edge of Holyhead alongside the A55.  Part of the Stage 2 development will be used as the Horizon Logistics Centre, with funding from Horizon. The Horizon Logistics Centre part of Parc Cybi Stage 2 is assessed as part of the Wyfia Newydd Project and so is excluded from the Cumulative Effects Assessment.	1	Yes	Potential	In	Inter-project cumulative effects are possible as a result of the Wyfia Newydd Project's construction and operation and Conygar's proposed construction and operation.	Agreed.
AN07	National Grid	North Wales Connection Project, Wyfia to Pentir A new connection for new energy generation in north Wales. Potential new generation includes the proposed Wyfia Newydd Project as well as a number of renewable energy projects.	2	Yes	Yes	In	Inter-project cumulative effects are possible as a result of the Wyfia Newydd Project's construction and operation and National Grid's proposed construction and operation.	Agreed.
AN08	TPG Wind Limited (a joint venture between E.ON and Eurus Energy UK Ltd)	Rhyd-y-Groes Repower The current wind Rhyd-y-Groes Wind Farm, located near the northern shores of Anglesey in Wales, has 24 turbines with a maximum total power output of 6.6MW. Proposals are to replace the current turbines with up to 11 modern turbines, which could produce up to 9.9MW of renewable energy.	1	Yes	Potential	In	Inter-project cumulative effects are possible as a result of the Wyfia Newydd Project's construction and operation and proposed construction and operation of the Rhyd-y-Groes Repower project. Horizon will continue to monitor the Rhyd-y-Groes Repower project to identify the likely start date.	Agreed.
AN09	M-SParc	Menai Science Park	1	Yes	Yes	In	Inter-project cumulative effects are possible as a result of the Wyfia Newydd Project's construction	Agreed.

Ref. No.	Developer	Project title & description	Tier	Spatial link	Temporal link	Scoped in or out	Justification for scoping project in or out	IACC Comment
		A new science park located on the outskirts of Gaeafwen. Being developed as a location for industry-facing research projects, small-medium enterprises and corporates, to drive growth in knowledge-based science in northwest Wales.					and operation and M-SParc's proposed construction and operation.	
AN10	Amiwlch LNG (previous Cantaxx)	Amiwlch LNG  Tankers would import liquid gas to a mooring 3km from the Amiwlch coast. The gas would then be transferred by an undersea pipeline from the mooring platform to the site near the town of Amiwlch, where it would be converted back to natural gas and sent into the UK gas network.	1	Yes	Potential	In	Inter-project cumulative effects are possible as a result of the Wyfa Newydd Project's construction and operation and Amiwlch LNG's proposed construction and operation.  Horizon will continue to monitor the Amiwlch LNG project to identify the likelihood of it progressing.	Agent.
AN11	Minesto	Holyhead Deep 10MW (and phased development to 80MW)  Tidal kite installation off the coast of Holyhead, plus on-land elements and grid connection.  Minesto plans to start the installation of a 10MW marine energy array in 2017. Future proposals would increase this to 80MW.	1	Yes	Potential	In	Inter-project cumulative effects are possible as a result of the Wyfa Newydd Project's construction and operation and Holyhead Deep's proposed construction and operation.	Agent.
AN12	Menter Môn/Morlais	West Anglesey Demonstration Zone  Menter Môn has been awarded a long-term lease to manage an area of seabed off the west coast in order to develop the marine energy sector. Currently looking for developers/technology companies.	2	Yes	No	Out	No demonstration project has yet been identified in the West Anglesey Demonstration Zone; therefore it is scoped out at this time.	WACZ (West Anglesey Demonstration Zone) has been awarded to Menter Môn. Môn currently underway for a number of trials in relation to the project, which indicates that it is not progressing with the current.
AN13	Isle of Anglesey County Council (IACC)	Holyhead Primary School  New primary school planned to replace Ysgol y Parchedig Thomas Ellis, Ysgol y Parc and Ysgol Llaingoch schools. To be built on the former Ysgol Cybi site in Holyhead, involving refurbishment of the existing building and the addition of a linked extension.	1	Yes	Potential	In	Inter-project cumulative effects are possible as a result of the Wyfa Newydd Project's construction and operation and Holyhead Primary School's proposed construction and operation.	WACZ (West Anglesey Demonstration Zone) has been awarded to Menter Môn. Môn currently underway for a number of trials in relation to the project, which indicates that it is not progressing with the current.

Ref. No.	Developer	Project title & description	Tier	Spatial link	Temporal link	Scoped in or out	Justification for scoping project in or out	IACC Comment
AN14	IACC	Llanfaethu Primary School The new primary school to replace Ysgol Cylch y Garn, Ysgol Ffwrdd Win and Ysgol Llanfachraeth.	1	Yes	Potential	In	Inter-project cumulative effects are possible as a result of the Wyfia Newydd Project's construction and operation and Llanfaethu Primary School's construction and operation.	IACC: concern that development is incomplete and should be included
AN15	IACC	Llangefni Link Road Scheme A new 2.5km link road around the eastern side of Llangefni to enable traffic to more freely access the industrial estate in Coleg Menai and reduce expected traffic in Llangefni town centre.	1	Yes	Yes	In	Inter-project cumulative effects are possible as a result of the Wyfia Newydd Project's construction and operation and the Llangefni Link Road's proposed construction and operation.	Agreed
AN16	DU Construction	A new operational centre on Penthos Industrial Estate, Holyhead.	1	Potential	No	Out	It is anticipated that the DU Construction operational centre would be complete prior to Horizon construction activities commencing. In addition, the scheme is a relatively small development that is not closely linked spatially with the Wyfia Newydd Project.	Agreed
AN17	IACC	The IACC has announced plans to take control of up to 500 homes in the next 30 years. This is likely to involve the construction of 300 council houses.	3	Yes	No	Out	No project has yet been identified to deliver the housing plans; therefore it is scoped out.	IACC: anticipate that this project (which, if not scrapped, is likely to receive funding to bring forward the first residential planning programme (4000 homes) within the first 4 years).
AN18	Energy Consultants Wales	Erection of one 100kW wind turbine with a maximum hub height of up to 38m, rotor diameter of up to 24m and a maximum upright vertical tip height of up to 48m together with the construction of an access track on land near Tyn Raitl, Bodorgan.	1	No	Potential	Out	No spatial link and a small-scale project; therefore it is scoped out.	Agreed
AN19	McCarthy & Stone	McCarthy & Stone proposes to demolish Plas Glannrafon Hotel in Anglesey, and build 36 self-contained apartments.	1	No	No	Out	No spatial link as any environmental effects would not be significant and would be very local to the Plas Glannrafon site in Benllech, which is more than 15km south east of the Wyfia Newydd Development Area. The project is likely to be completed in advance of the Wyfia Newydd Project; therefore it is scoped out.	Agreed. This development is currently under construction.

Ref. No.	Developer	Project title & description	Tier	Spatial link	Temporal link	Scoped in or out	Justification for scoping project in or out	IACC Comment
AN20	Utilities companies (various)	Removal (and in some instances replacement) of services currently in place on the Wyfia Newydd Development Area. Plans are in place to remove or replace existing services, e.g. electrical cables, which are currently installed on the Wyfia Newydd Development Area. This work is expected to be carried out by the relevant utilities companies under permitted development rights and funded by Horizon.	1	Yes	Yes	In	Inter-project cumulative effects are possible as a result of the Wyfia Newydd Project's construction and operation and the removal of existing services from the Wyfia Newydd Development Area.	Consideration required with regards to the timescale of this project. Will this project be complete before DCC submission?
AN21	Atlantis	Tidal array of up to nine tidal generators at The Skerries off the northwest coast of Anglesey.	N/A – project cancelled	Yes	No	Out	The project has been cancelled.	Agreed.
AN22	Welsh Government	Third bridge across the Menai Straits.	3	Potential	Potential	Out	Until environmental and traffic information relating to a preferred option becomes available, it will not be possible to include this proposed project in the Cumulative Effects Assessment. Further discussions will be held with the Welsh Government as the project develops.	IACC suggests that this project needs to be included in the environmental brief as a formal environmental and traffic plan is sought in 2018 within Welsh Government with the remaining site specific information.
AN23	Countrywide Renewables	Llanbadrig Solar Farm Development of 220 acres (89ha) of agricultural land at Llanbadrig for the installation of a solar farm with the potential to generate up to 50MW.	1	Yes	Potential	In	Inter-project cumulative effects are possible as a result of the construction and operation of this solar farm and the construction and operation of the Wyfia Newydd Project.	Agreed. IACC suggests that this project is renamed Rhwdf y Groes Solar Farm. Turn to a continuation page with this development.
AN24	Grwp Llandrillo Menai	Hybrid application applying for full planning permission for the creation of a new engineering centre, car parking, children's play area and associated works and applying for outline planning permission with some matters reserved for a residential development of 157 dwellings, a hotel and food and beverage facility along with associated car parking and works on land at Coleg Menai, Ffordd y Coleg, Llangefni.	1	Potential	Potential	In	Inter-project cumulative effects are possible as a result of the Wyfia Newydd Project's construction and operation and the proposed construction and operation of the new facilities at Coleg Menai.	Agreed.
AN25	Dwr Cymru Welsh Water	Wyfia Newydd Potable Water Supply. Provision of a potable water supply for the construction and operation of the Wyfia Newydd Power Station.	3	Yes	Yes	In	The construction of the new pipeline may overlap with the start of construction works for the Wyfia Newydd Power Station.	Agreed.

Ref. No.	Developer	Project title & description	Tier	Spatial link	Temporal link	Scoped in or out	Justification for scoping project in or out	IACC Comment
		<p>Newydd Power Station, involving abstraction, treatment and supply.</p> <p>Abstraction of water is proposed to be from the existing Carreglefn Reservoir.</p> <p>Treatment is expected to be at the existing Alaw Treatment Works.</p> <p>The transport of water to the Wyfia Newydd Development Area would be predominantly through a new, dedicated pipeline route (either single or dual pipes), linked to the existing Dŵr Cymru Welsh Water distribution network.</p>					The operation of the water supply will continue through the construction and operation of the Wyfia Newydd Power Station.	
AN26	Dŵr Cymru Welsh Water	Wastewater treatment upgrade to serve the Wyfia Newydd Power Station Main Site. Whilst the volume of treated water would increase, it is expected that existing quality standards would continue to be met.	3	Yes	Yes	Out	It is not currently possible to assess the potential for cumulative effects as no information is available.	Agreed
AN27	IACC	Business units at Penhos:	1	Potential	Potential	Out	This is a small-scale project with no potential for significant environmental effects.	Agreed
AN28	IACC	Business units in Llangefni:	1	No	Potential	Out	The project is not spatially linked to the Wyfia Newydd Project as any environmental effects would be local to the site in Llangefni, in the southern part of Anglesey. This is a small-scale project with no potential for significant environmental effects.	Agreed
AN29	Anwyl Homes	Residential development at South Stack Road, Holyhead	1	No	Potential	Out	The development is more than 3km from the proposed Logistics Centre at Parc Cybi, and separated from it by the urban area of Holyhead.	IACC considers that this project requires further consideration, in particular with regards to development timescales – this could potentially

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GW01	Snowdonia Pumped Hydro Limited	Construction of 123 detached and semi-detached homes on an 11 acre site.					This distance, together with the lack of significant effects, mean that this project is scoped out.	have cumulative impacts (on local labour supply, cost and availability of materials etc.).
GW02	Welsh Government	Glyn Rhonwy Pumped Storage Construction and operation of a 600MW/h pumped storage scheme, with a generating capacity of 99.3MW, at the Glyn Rhonwy and Chwarel Fawr quarries, near Llanberis, Gwynedd.	1	Potential	Yes	In	Inter-project cumulative effects are possible as a result of the Wyfia Newydd Project's construction and operation and Glyn Rhonwy's proposed construction and operation.	Agreed
GW03	Gwynedd Council	A487 Caernarfon to Bontnewydd Bypass A new 9.8km highway commencing at the Goat roundabout (A499/A487 junction) and terminating at the Plas Menai roundabout. The new route would have 22 separate structures including seven bridges.	1	Potential	Yes	In	Inter-project cumulative effects are possible as a result of the Wyfia Newydd Project's construction and operation and the A487 Bypass's proposed construction and operation.	Agreed
GW04	National Grid	Ysgol Hafod Lon Newydd School, Penrhyndeudraeth, Gwynedd A new school for pupils with special educational needs from the Meirionnydd and Dwyfor areas of the county. The school opened in Autumn 2016.	1	No	No	Out	The construction of the Ysgol Hafod Lon Newydd School was completed in advance of the Wyfia Newydd Project. There are no anticipated spatial links as the school site is approximately 50km from the Wyfia Newydd Development Area.	Agreed
GW05	YnNi Lyn and Nova Innovation	North Wales Connection Project, West Gwynedd New underground cables at the Glaslyn Estuary.	2	No	Yes	Out	Glaslyn Estuary is approximately 60km south of the Wyfia Newydd Development Area. There is no spatial link with the Wyfia Newydd Project so no potential for cumulative effects.	Agreed
GW06	Welsh Government	Tidal energy project off Bardsey Island 3MW array of tidal energy turbines under the water in Bardsey Sound.	3	No	Potential	Out	Bardsey Sound is approximately 70km from the Wyfia Newydd Development Area. The small scale of the project, the lack of a spatial link with the Wyfia Newydd Project and the lack of firm proposals mean that this project is scoped out.	Agreed
		A55 Abergwyngregyn to Tair'r Meibion Improvement	3	Potential	Potential	Out	No environmental information is yet available.	Project currently under construction until Summer 2019.

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Gw07	Jones Bros	Caermafon Brickworks Quarry	2	No	No	Out	No temporal or spatial link with the effects of the Wyfia Newydd Project	Agreed.
CN01	Conwy County Borough Council	Demolition of Colwyn Bay's Victoria Pier.	3	Potential	Potential	Out	The application to demolish the pier has been rejected. No environmental information about this project is available online.	Agreed.
CN02	Welsh Government	A55 – Junction 15 and Junction 16 improvement	3	Potential	Potential	Out	The project is still at the options stage.	
DN01	Memoria Ltd	Crematorium facility on land near Glascoed Road in St Asaph, Denbighshire.	1	No	No	Out	The crematorium opened in advance of the Wyfia Newydd Project. The site is approximately 70km from the Wyfia Newydd Development Area. As there are no spatial or temporal links with the Wyfia Newydd Project, the Memoria Ltd crematorium is scoped out.	Agreed.
FL01	Wheelablator Technologies	Parc Adfer Energy Recovery Facility	1	No	Yes	Out	The facility would be approximately 100km from the Wyfia Newydd Development Area. No spatial link is present with the Wyfia Newydd Project, therefore it is scoped out.	Agreed.
CR01	Chelverton	A multi-million pound development of Aberystwyth's Mill Street, including two superstores, has been approved by councillors.	1	No	No	Out	The construction of this project was completed in advance of the Wyfia Newydd Project, Aberystwyth is approximately 120km from the Wyfia Newydd Development Area. As there are no anticipated spatial or temporal links with the Wyfia Newydd Project, the project is scoped out.	Agreed.

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PM01	Renewable Developments Wales Ltd in conjunction with The Valley Pembrokeshire Ltd	25MW wood-fuelled power station at Treecrown Valley, Pembrokeshire.	1	No	Potential	Out	The site is in Pembrokeshire in South Wales. There is no spatial link with the Wyfia Newydd Project and therefore the project is scoped out.	Agreed.
PM02	Greenwire Transmission	Ireland – United Kingdom electricity interconnection, which aims to deliver additional transmission capacity between Ireland and United Kingdom. The Greenwire Interconnector would connect between Great Island, Wexford County (IE) and Pembroke (UK).	3	Potential	Potential	Out	The project is at the scoping stage and insufficient information is available.	Agreed.
PM03	Stena Line Ports	Fishguard Port Linkspan Replacement	2	Potential	Potential	In	Potential effects on subtidal and intertidal habitats and communities (including those of conservation importance) and marine mammals	Agreed.
WR01	Nicklaus Joint Venture Group	Golf resort and hotel development in Hoylake, Wirral.	3	No	Potential	Out	Hoylake is more than 80km from the Wyfia Newydd Development Area. No spatial link with the Wyfia Newydd Project and so the project is scoped out.	Agreed.
WR02	Peel Group	New campus for Wirral Met College at the Wirral Waters development in Birkenhead. The waterfront site is part of a 30-year plan to transform 500 acres of dockland.	1	No	No	Out	The construction of the Wirral Met College campus has been completed in advance of the Wyfia Newydd Project. As there are no spatial or temporal links with the Wyfia Newydd Project, the project is scoped out.	Agreed.
WR03	Peel Group	Wirral Waters regeneration – a 30-year to 50-year project.	3	No	Potential	Out	Birkenhead is on the Mersey Estuary, over 30km from the Wyfia Newydd Development Area. No spatial link with the Wyfia Newydd Project, so the project is scoped out.	Agreed.
LV01	Absolute Living Developments	White House, Runcorn A project in Runcorn to convert East Lane House into 448 one-bedroom flats.	1	No	No	Out	Runcorn is approximately 115km from the Wyfia Newydd Development Area. As there are no anticipated spatial or temporal links with the Wyfia Newydd Project, the White House development is scoped out.	Agreed.
LV02	Liverpool Football Club	The expansion of Liverpool Football Club's Anfield Main Stand (Stadium).	1	No	No	Out	Any environmental effects would not be significant and would be local to the site in Liverpool. As there are no anticipated spatial or temporal links	Agreed.

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LA 01	Environment Agency	Hesket Out Marsh managed realignment	1	Potential	No	Out	With the Wyfia Newydd Project, this project is scoped out.	Agreed.
FY 01	Fylde Borough Council	Fairhaven Lake and Church Scar Coastal Defence Scheme	2	Potential	No	Out	No temporal link with the Wyfia Newydd Project	Agreed.
CU 01	Dong Energy	Barrow Offshore Wind Farm Export Cable Repair and Remediation	1	Potential	Potential	Out	The coastal defence scheme is to be completed by November 2018 so there is no temporal overlap.	Agreed.
OK 01	Scottish Power Renewables	Marwick Head Wave Farm	2	No	Potential	Out	Small scale and short duration of works. Effects are likely to be insignificant.	Agreed.
AR 01	Argyll Tidal Ltd	Argyll Tidal Demonstration Array, Mull of Kintyre	1	No	Potential	Out	Long distance from the Wyfia Newydd Project. Also, the environment effects relate to the potential disturbance of gannets. Gannets have been recorded in extremely low abundance within the Wyfia Newydd Development Area and whilst this species has been assessed under the 'secondary species' receptor, on its own there is barely a pathway of effect from the Wyfia Newydd Project and so no scope for cumulative effect.	Agreed.
DO 01	Atlantis	Strangford Lough – decommissioning of marine-current turbine	1	Potential	No	Out	Long distance from the Wyfia Newydd Project. Also, the environment effects relate to the potential disturbance of gannets. Gannets have been recorded in extremely low abundance within the Wyfia Newydd Development Area and whilst this species has been assessed under the 'secondary species' receptor, on its own there is barely a pathway of effect from the Wyfia Newydd Project and so no scope for cumulative effect.	Agreed.
DO 02	Newry, Mourne and Down District Council	Newcastle Harbour – relocation of sand bar from harbour entrance	1	Potential	No	Out	Dismantling is already underway and there will be no temporal overlap with the Wyfia Newydd Project.	Agreed.
BL 01	Belfast Harbour Commissioners	D3 Terminal cruise ship facility	1	Potential	No	Out	The project is likely to be complete before construction starts on the Wyfia Newydd Project.	Agreed.
							Due to be completed by March 2018	

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BL02	Belfast Harbour Commissioners	Disposal of dredge material from the D3 approach channel	1	Potential	No	Out	A temporal link is considered unlikely as the timescales would link to the cruise ship facility project.	Agreed.
RI01	Electricity Supply Board	Electricity Supply Board plans to demolish and redevelop its Fitzwilliam Street, Dublin headquarters.	1	No	Yes	Out	This is a commercial development involving the refurbishment and replacement of buildings within the urban centre of Dublin. No spatial link with the Wyfia Newydd Project, therefore the project is scoped out.	Agreed.
RI02	Dublin Port Company	Alexandra Basin Redevelopment Project  Extension of infrastructure to open up Dublin Port to larger cruise and cargo ships.  The port will dredge the river Liffey to increase the depth of its berths and the entrance channel from 7m to at least 10m. This will eliminate access issues caused by tides and enable large cruise and cargo ships to turn in Alexandra Basin and dock at East Link Bridge, rather than reversing up the Liffey to their berth as they do now.	1	Yes	Yes	In	A spatial link exists in the marine environment. Inter-project cumulative effects are possible as a result of the Wyfia Newydd Project's construction and operation and Alexandra Basin Redevelopment's proposed construction and operation.	Agreed.
RI03	Dun Laoghaire Harbour Company (Ireland)	Proposed New Cruise Berth For Large Cruise Ships at Dun Laoghaire Harbour	1	Yes	Yes	In	A spatial link exists in the marine environment. Inter-project cumulative effects are possible as a result of the Wyfia Newydd Project's construction and operation and Dun Laoghaire Harbour's proposed construction and operation.	Agreed.
RI04	Fred Olsen Renewables and Hazel Shore	Cooling Wind Park	2	Potential	Potential	Out	Timeframes for this project are unclear and it appears to have stalled. No documents have been made available since 2013.	Agreed.
NU01	Horizon Nuclear Power	Oldbury  Construction, operation and decommissioning of a new nuclear power station using UK Advanced Boiling Water Reactor technology.	3	No	Potential	Out	Oldbury is in South Gloucestershire, to the north of Bristol. The development of the Oldbury site is in the very early stages and as such it is scoped out at this time.	Agreed.
NU02	EDF Energy	Hinkley Point C (Somerset)	1	No	Yes	In	Hinkley is in Somerset. No spatial link is present between EDF Hinkley and the Wyfia Newydd Project; however, it is considered that the inclusion of planned new nuclear power stations	Agreed.

Ref. No.	Developer	Project title & description	Tier	Spatial link	Temporal link	Scoped in or out	Justification for scoping project in or out	IACC Comment
		Construction, operation and decommissioning of a new nuclear power station using AREVA EPR technology.					that are at a reasonable stage in their development is appropriate.	
NU03	EDF Energy	Sizewell C (Suffolk) Construction, operation and decommissioning of a new nuclear power station.	2	No	Yes	In	No spatial link is present between Sizewell C and the Wyfia Newydd Project; however, at this time it is considered that inclusion of planned new nuclear power stations that are at a reasonable stage in their development is appropriate.	Agreed.
NU04	NuGen	Moorside (Cumbria) Construction, operation and decommissioning of a new nuclear power station using Westinghouse AP1000 technology.	2	No	Yes	In	Moorside is in West Cumbria. No spatial link is present between Moorside and the Wyfia Newydd Project; however, at this time it is considered that inclusion of planned new nuclear power stations that are at a reasonable stage in their development is appropriate.	Agreed.
CIS01	N/A	Commercial fishing operations in the Celtic and Irish Seas Marine Unit.	N/A	No	Yes	Out	This is not a project and does not need to be considered within the scope of the EIA. The Habitats Regulations Assessment will consider it as part of their scope.	Agreed.
PM03	Stena Line	Fishguard Linkspan Replacement Construction of a new double deck loading linkspan to facilitate two separate roadways onto the ferries to allow the rapid discharge and loading of vehicle decks.	3	No	Yes	In	Project scoped in for potential cumulative marine environment effects.	Agreed.

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