

From: [Marlborough, Neil](#)
To: [Wylfa Newydd](#)
Subject: Deadline 4 North Anglesey Council's Partnership: Post hearing notes
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Attachments: [image001.png](#)
[NACP 7-1-19 post hearing note.pdf](#)
[NACP 8-1-19 post hearing note.pdf](#)

Please find attached two documents produced on behalf of the North Anglesey Council's Partnership providing post-hearing notes following the ISHs held on 7th and 8th January. These two documents should be considered alongside Deadline 4 submissions made by Roger Dobson and Dafydd Griffiths which are also on behalf of the Partnership.

Regards

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Technical note:

Wylfa Newydd – 7 January 2019 Hearing

1. Introduction

1.1.1 The Wylfa Newydd Nuclear Power Station Project Development Consent Order Application, Issue Specific Hearing: Second ISH on Socio-Economic Matters was held on 7 January 2019 at The Trearddur Bay Hotel. The North Anglesey Council's Partnership attended the hearing due to an interest in the following agenda items which have previously been identified in the Written Representations submitted (REP2-336, REP2-337, REP2-340, REP2-341 and REP2-342).

3. Accommodation

- a. To establish whether there has been any change in the position of Interested Parties (IPs) regarding the accommodation needs of the project and how they might be fulfilled since those stated by IPs at deadlines (D) 2 and 3.
- b. In particular to understand the differences of opinion over the proposals for Temporary Worker Accommodation (TWA) including when this would need to be provided; where this should be provided and the quantity and quality of the accommodation proposed including alternatives.
- c. To establish what the effects of providing the TWA on-site would have on Welsh language and culture; health and well-being; recreation and tourism and law and order.
- d. To establish what effects providing TWA at an alternative location(s) would have on the Welsh language and culture; health and well-being; recreation and tourism and law and order.
- e. To establish whether the alternative accommodation for workers (other than that provided through the TWA) would be sufficient and the effect that the proposal may have on housing stock within the Key Socio-Economic Study Area (KSA) and Daily Constriction Commuting Zone (DCCZ) with particular reference to availability and affordability.
- f. To understand whether these differences could be resolved through additional work, mitigation or changes to requirements of the draft development consent order (dDCO).

5. Health and wellbeing

- a. To establish whether there has been any change in position of the IPs regarding the effects of the proposal on health and wellbeing since those stated by IPs at D2 and D3.
- b. To better understand the potential effect on existing health and wellbeing services that may arise from construction and operational workers residing in the KSA or DCCZ and whether these would be adequately mitigated.

c. To consider the effect on staffing of existing services within the KSA and DCCZ with particular reference to the ability to retain staff and the desirability of providing services in the Welsh language.

d. To understand whether these differences could be resolved through additional work, mitigation or changes to the requirements of the dDCO.

6. Recreation and tourism

a. To establish whether there has been any change in position of the IPs regarding the effects of the proposal on recreation and tourism since those stated by IPs at D2 and D3 and to better understand the importance of the tourist industry to the economy of Ynys Môn and North Wales.

b. To consider the potential effects on the tourist industry within the KSA and DCCZ with particular reference to the availability of holiday accommodation; the ability of businesses to retain staff given the potential to work at Wylfa Newydd and the possible long-term effects to the tourist industry.

c. To understand whether these differences could be resolved through additional work, mitigation or changes to the requirements of the dDCO.

7. Law and Order

a. To establish whether there has been any change in position of the IPs regarding the effects of the proposal on law and order since those stated by IPs at D2 and D3.

b. To examine the potential effects on the provision of existing services within the KSA and DCCZ with particular reference to safeguarding the existing community; policing of the night time economy; potential increase in incidents/crimes requiring police attention and the effect on response times.

c. To understand whether these differences could be resolved through additional work, mitigation or changes to the requirements of the dDCO.

1.1.2 The North Anglesey Council's Partnership have submitted this note to confirm their position on the following items, including on the matter of alternative sites for the Temporary Workers Accommodation on which they were invited to make oral representations at the hearing. The note also provides references to where representations from IACC into the Examination accord with the North Anglesey Council's Partnership local knowledge on these subjects, and provide more detailed evidence on the matter than the Partnership have been able to provide. The Partnership support the IACC position provided in these representations.

Table 1.1 Agenda Item 3 - Accommodation

Agenda Item	NACP Position	References
3a. To establish whether there has been any change in the position of Interested Parties (IPs) regarding the accommodation needs of the project and how they might be fulfilled since those stated by IPs at deadlines (D) 2 and 3.	<p>After reading Horizon's Response to Written Representation – North Anglesey Council's Partnership (REP3-032) NACP position remains the same as those stated in REP2-337.</p> <p>The NACP do welcome Horizon revisiting the opportunity to provide legacy housing at Madyn Farm (para 2.3.3, REP3-032), although no details are provided in regard to this opportunity at the present time and final judgement is retained until firm proposals are available.</p>	REP3-032 REP2-377
3b. In particular to understand the differences of opinion over the proposals for Temporary Worker Accommodation (TWA) including when this would need to be provided; where this should be provided and the quantity and quality of the accommodation proposed including alternatives.	<p>The NACP's position remains the same as set out in REP2-337 with regard to the location for a TWA campus/s and the quantity of accommodation provided. This is that a single TWA campus, would not provide benefits to the local community and/or it would lead to local services being overwhelmed by the numbers of TWs. The NACP consider that a more balanced approach would see more than one accommodation site provided. This spread numbers out over a wider area and allow the campus more chance of providing a suitable level of facilities for the TWs and decrease TW numbers in any one area to reduce stress on local services.</p> <p>The NACP also consider that the proposed location for a single TWA campus on site would not realise any direct legacy benefits.</p> <p>The NACP retain their support for use of the Rhosgoch site for a TW campus for the reasons set out in REP2-337. A further submission on behalf of the North Anglesey Council Partnership has been made by Roger Dobson as a Deadline 4 submission.</p> <p>With regard to issues of when TWA should be provided, the NACP agree with IACC's consideration of this matter in their LIR (Chapter 8 REP2-068, Chapter 18 REP2-078).</p>	REP2-337 REP2-068 REP2-078
3c. To establish what the effects of providing the TWA on-site would have on Welsh language and culture; health and well-being; recreation and tourism and law and order.	<p>The NACP believe that a concentration of up to 4,000 TWs on site, would lead to pressure on local communities and services which are not of a scale to accommodate large numbers of additional people. This could create problems with all of the matters mentioned here (REP2-337). The NACP support the detailed position provided by IACC on Welsh language and Culture (REP2-069), health and well-being (REP2-075) and Tourism and recreation (REP2-065), and additional concerns are raised by NACP regarding tourism and recreation in REP2-340. It is noted that a provision is made within the draft S106 (REP3-042, REP3-043) for funding to assist with the emergency services role although no confirmed details are provided of this fund. The emergency services' response to the details of this funding will be critical to determining if health and well-being and law and order can be appropriately managed, whatever the final agreement of TW accommodation locations/quantity.</p>	REP2-337 REP2-069 REP2-075 REP3-042 REP2-340 REP3-043
3d. To establish what effects providing TWA at an alternative location(s) would have on the Welsh language and culture; health and well-being;	See response to 3c.	

Agenda Item	NACP Position	References
recreation and tourism and law and order.		
3e. To establish whether the alternative accommodation for workers (other than that provided through the TWA) would be sufficient and the effect that the proposal may have on housing stock within the Key Socio-Economic Study Area (KSA) and Daily Constriction Commuting Zone (DCCZ) with particular reference to availability and affordability.	The NACP support IACC's position on this matter as set out in their LIR (Chapter 8 REP2-068): that the current proposals are likely to lead to availability problems for local population and could see them priced out of the housing market.	REP2-068
3f. To understand whether these differences could be resolved through additional work, mitigation or changes to requirements of the draft development consent order (dDCO).	The NACP has not seen any information from Horizon that has changed its position and the NACP remains of the view that TW accommodation campuses should be located in more than one location. In addition, the IACC's position on the availability of rented, private and latent accommodation, the likely effects on affordability and the availability of accommodation in the tourism sector is supported (REP2-068). The NACP believe that more work is therefore required on the proposals in order for the matters to be resolved.	REP2-068

Table 1.2 Agenda Item 5 – Health and well-being

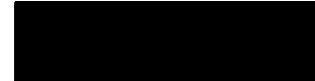
Agenda Item	NACP Position	References
5. Health and well-being	<p>The concerns the NACP have raised with regard to health wellbeing are noted in response to agenda item 3 and the concentration of TWs in one campus site and the effect this could have on local services.</p> <p>The NACP also raised a concern in the WRs (REP2-342) with regard to construction working hours. It is noted that Horizon are proposing to submit revisions to shift practices and verbal discussions with Horizon staff indicate that these amendments will take into consideration the NACP concerns. The NACP await the details of the amendments.</p> <p>The NACP have not previously raised concerns over the impact of increased workers on services across the KSA and DCCZ and would support the position asset out by IACC and NHS organisations on this matter.</p>	REP2-342

Table 1.3 Agenda Item 6 – Tourism and recreation

Agenda Item	NACP Position	References
6a. a. To establish whether there has been any change in position of the IPs regarding the effects of the proposal on recreation and tourism since those stated by IPs at D2 and D3 and to better understand the importance of the tourist industry to the economy of Ynys Môn and North Wales.	<p>The NACP's concerns over tourism and recreation were on the use of tourism accommodation by TWs and the impacts on the Wales Coastal Path (WCP) and Copper Trail (National Cycle Route) (REP2-340). The hearing focussed on the use of tourism accommodation.</p> <p>The NACP support the IACC's position on the potential impact on tourism accommodation (REP2-068) and have no further comments to add on this matter.</p> <p>Other concerns that the NACP had with regards to tourism and recreation related to the diversions of the WCP and the Copper Trail and these are detailed REP2-340. Horizon's response to this WR (REP3-032) provides some additional information in places which the NACP would like to discuss further with Horizon before confirming their position. However, REP3-032 discusses the diversion routes proposed, it does not answer the NACP's concerns in REP2-340 – in some cases seemingly answering questions raised by other organisations and not the NACP. The NACP's position therefore remains unchanged.</p>	REP2-340 REP3-032 (chapter 6) REP2-068
b. To consider the potential effects on the tourist industry within the KSA and DCCZ with particular reference to the availability of holiday accommodation; the ability of businesses to retain staff given the potential to work at Wylfa Newydd and the possible long-term effects to the tourist industry.	The NACP support the IACC's position on the potential impact on tourism accommodation (REP2-068) and have no further comments to add on this matter.	REP2-068
c. To understand whether these differences could be resolved through additional work, mitigation or changes to the requirements of the dDCO.	It is considered that minor additional work would be needed to re-route the WCP diversion to address the NACP concerns.	

Table 1.4 Agenda Item 7 – Law and order

Agenda Item	NACP Position	References
7. Law and order	The concerns the NACP have raised with regard to law and order are noted in response to agenda item 3 and the concentration of TWs in one campus site and the effect this could have on local services/community.	REP2-342

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Technical note:

Wylfa Newydd – 8 January 2019 Hearing

1. Introduction

1.1.1 The Wylfa Newydd Nuclear Power Station Project Development Consent Order Application, Issue Specific Hearing: Second ISH on Socio-Economic Matters was held on 8 January 2019 at The Trearddur Bay Hotel. The North Anglesey Council's Partnership attended the hearing due to an interest in the following agenda items which have previously been identified in the Written Representations submitted (REP2-335, REP2-338 and REP2-339).

4. Traffic and Transport

- a. To establish whether there has been any change in position of the IPs regarding the effect on the transport network during construction, operation and decommissioning since those stated at D2 and 3.
- b. To understand in further detail:
 - i. traffic generation and modelling matters – has the traffic model been agreed? If not, what specifically is in dispute?
 - ii. the adequacy of the proposed highway improvements to accommodate the predicted construction traffic and an update on the progress with the planning application for the on-line highways works on the A5025;
 - iii. the reasoning behind the location and provision of a separate logistics centre and park and ride facility and parking provision across the whole project; and
 - iv. the benefits and disbenefits of the provision of a separate logistics centre and park and ride facility including proposed alternatives.
- c. To understand whether any differences between the IPs on these matters could be resolved through additional work, mitigation or changes to requirements of the dDCO.

5. Other Road Users

- a. To consider the effect of additional traffic during construction on other road users with particular reference to severance, delay and blue light services.
- b. To understand effects on non-motorised users and what provision has been made in the Application for non-motorised users.
- c. To understand whether any differences between the IPs on these matters could be resolved through additional work, mitigation or changes to requirements of the dDCO.

1.1.2 This technical note confirms the North Anglesey Council's Partnership position on the following items.

Table 1.1 Agenda Item 4 - Traffic and Transport

Agenda Item	NACP Position	References
4a. To establish whether there has been any change in position of the IPs regarding the effect on the transport network during construction, operation and decommissioning since those stated at D2 and 3.	<p>After reading Horizon's Response to Written Representation – North Anglesey Council's Partnership (REP3-032) NACP position remains the same as those stated in REP2-335, 338 and 339.</p> <p>The exception being Section 2 of REP2-335 which refers to Highway Maintenance and where the NACP requested reassurance that a suitable strategy is in place that addresses treating exiting HGV for debris, monitoring highway surfaces and undertaking timely remedial works. It is considered that suitable reassurance has been given in paragraphs 5.4.6 to 5.4.8 of REP3-032.</p> <p>The NACP remain concerned about the effects the proposals will have on the highway environment:</p> <ul style="list-style-type: none"> • on the A5025 through Tregele; • on the A5025 between Amwlich and the site; and • through the villages of Llanfechell and Tregele. <p>In paragraphs 5.2.6, 5.3.9, 5.3.16, 5.3.20 and 5.4.4 of REP3-032 Horizon state the calculations are incorrect. The NACP acknowledge that the traffic flow calculations presented in REP2-335, 338 and 339 show the combined effect of Wyfia Newydd traffic and background traffic; this is to replicate the actual change that residents and road users will experience. This calculation has been presented so that it can be determined if the cumulative effects are acceptable, regardless of their origin or purpose.</p>	REP3-032 REP2-335, 338 and 339 Section 4 REP2-339
4b. To understand in further detail: i. traffic generation and modelling matters – has the traffic model been agreed? If not, what specifically is in dispute?	<p>The NACP contend that the assumption used in the traffic model that construction traffic will only use the A5025 south of the site is incorrect. It is the opinion of the NACP that some construction traffic will use other routes within North Anglesey and therefore, either an allowance for this should be incorporated within the traffic model or a sensitively test should be undertaken.</p> <p>In paragraphs 5.2.4 and 5.4.3, of REP3-032 Horizon suggest that if the NACP quote specific locations, then data will be supplied. The following is a line item from the Statement of Common Ground requesting this data which has not been forthcoming. The NACP would welcome receiving this data at the same time as IoACC receive their data which was quoted as week beginning 14 January 2019 during the hearing was</p> <p><i>"The raw ATC data to obtain traffic speeds on the following links is still required.</i></p> <p><i>Link 21: A5025 Section 9 – along the A5025 crossing Tregele</i></p> <p><i>Link 22: A5025 Tregele to Amwlich</i></p> <p><i>Link 38: Rhos-y-bol to Cemaes</i></p> <p><i>Link 45: Ffordd-Y-Felin to Tregele via Cromlech Terrace"</i></p>	Section 4 REP2-339 REP2-338 and 339
4b. To understand in further detail: ii. the adequacy of the proposed highway improvements to accommodate the predicted construction traffic and an update on	<p>The NACP are concerned that the proposed highway improvements are limited to the A5025 south of the proposed roundabout access and do not include improvements on other highway routes such as the A5025 between Amwlich and the site and through Llanfechell and Tregele villages. These concerns are set out in REP2-338 and 339.</p>	REP2-338 and 339

Agenda Item	NACP Position	References
the progress with the planning application for the on-line highways works on the A5025;	During the hearing there was mention of an "early years highway strategy" this is a document that the NACP would like to be party to as this is the time period when the effects on the A5025 through Tregele will be most pronounced and it is the time period when the NACP would like to see mitigation proposed.	Section 3 REP2-335
4b. To understand in further detail: iii. the reasoning behind the location and provision of a separate logistics centre and park and ride facility and parking provision across the whole project; and	The NACP are concerned about undesirable parking practices that may result as a consequence of the proposed worker transport plan. Their opinion is set out in REP2-335.	Section 3 REP2-335
4b. To understand in further detail: iv. the benefits and disbenefits of the provision of a separate logistics centre and park and ride facility including proposed alternatives.	The NACP would like to see an additional park and share facility for local workers in the north Anglesey areas to help alleviate fly or undesirable parking practices.	REP2-335, 338 and 339
4c. To understand whether any differences between the IPs on these matters could be resolved through additional work, mitigation or changes to requirements of the dDCO.	The NACP have set out in REP2-335, 338 and 339 mitigation schemes which would alleviate their concerns these include: - the investigation and implementation of road safety improvements on the A5025 between Amlwch and the site; - the installation of a CCTV/Automatic Number Plate Recognition system in Llanfachell and Tregele to monitor Wylfa construction traffic passing through; and - an additional park and share facility for those workers living locally.	REP2-335, 338 and 339
Table 1.2 Agenda Item 5 – Other Road Users	NACP Position	References
5a. To consider the effect of additional traffic during construction on other road users with particular reference to severance, delay and blue light services.	The NACP have set out in REP2-338 their interpretation of the effects during construction that they believe will lead to unacceptable levels of severance in the form of fear and intimidation in Tregele between the village and the filling station/shop/post office. This is particularly during the early years; prior to the construction of the site access roundabout. The NACP are also concerned about the severance effects in Llanfachell and Tregele villages throughout the duration of the project due to the constrained highway environment; such as limited footway provision.	Section 3 REP2-338
	It is noted that in Horizon's response REP3-032 that they questioned the accuracy of calculations within REP2-338. This has arisen as a result of a misinterpretation between the titles of the graph in Figure 7-6 App C2-4 DCO Transport Assessment which state that the HGV flows are one-way and a footnote in paragraph 7.5.3 of the same document which says that each delivery includes one vehicle to and one	

Agenda Item	NACP Position	References
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movement from the site, ie two-way. Therefore, the flows within the Table in 3.1.1 of REP2-338 can be revised as shown below. The two data sets now largely align with one another and so the conclusion that they contradict one another is inaccurate. However, the NACP maintain that the increased volume (from 2016 levels) and the increased percentage of HGV (from 2016 levels) in conjunction with people crossing the road, the lack of protection and perceived speeding will all contribute to increased fear and intimidation that should be mitigated.

Corrections to Table in 3.1.1 of REP2-338

	2016			2020			Increase due to Wylfa Newydd and background traffic growth		
	AADT	HGV	%HGV	AADT	HGV	%HGV	AADT	HGV	%HGV
Appendix C2-03	3,184	126	4%	4,068	235	6%	884	109	12%

* 23 HGV/ per hour assuming a 12 hour working day

** Estimated using the Appendix C2-03 AADT and the anticipated increase in HGV from Figure 7-6 App C2-4

The NACP also acknowledge that the calculations presented in REP2-335, 338 and 339 show the combined effect of Wylfa Newydd traffic and background traffic; this is to replicate the actual change that residents and road users will experience. This calculation has been presented so that it can be determined if the cumulative effects are acceptable, regardless of their origin.

5b. To understand effects on non-motorised users and what provision has been made in the Application for non-motorised users.

The NACP are concerned that the effects on non-motorised users in particular in the highly constrained areas of Llanfachell and Tregele and in the vicinity of Ysgol Gynraad Cemaes and Ysgol Syr Thomas Jones are not provided for. This has been set out in REP2-339.

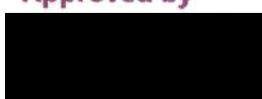
Section 4 REP2-339

5c. To understand whether any

differences between the IPs on these matters could be resolved through additional work, mitigation or changes to requirements of the dDCO.

The NACP have set out in REP2-335, 338 and 339 mitigation schemes which would allay their concerns these include:

- speed reductions, traffic calming measures and pedestrian crossing facilities on the A5025 at Tregele village;
- a commitment from Horizon that no construction traffic will pass through Cemaes roundabout or along Tan y Bryn Road during school peak hours throughout the whole construction period unless there are exceptional circumstances and there is prior agreement with the school in question; and
- the installation of a CCTV/ANPR system in Llanfachell and Tregele to monitor Wylfa construction traffic passing through.

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Helen Harding**Approved by**
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