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ISLE OF ANGLESEY COUNTY COUNCIL	
MEETING:	THE COUNTY COUNCIL
DATE:	18th October, 2016
TITLE OF REPORT:	Isle of Anglesey's County Council Response to Horizon Nuclear Power's Second Stage Pre-Application Consultation (PAC 2)
REPORT BY:	Dr. Gwynne Jones, Chief Executive Author: Energy Island Programme Office ladpl@anglesey.gov.uk 01248 752 435
PURPOSE OF REPORT:	To obtain the approval of Full Council upon the Authority's Response to Horizon Nuclear Power's Second Stage Pre-Application Consultation (PAC 2) upon the Wylfa Newydd Project.

1.0 Introduction

- 1.1 The proposed New Nuclear Build at Wylfa Newydd is a Nationally Significant Infrastructure Project as defined in the Planning Act 2008. This requires a development consent order (DCO) application to be submitted in respect of the main power station and offsite integral developments. Horizon Nuclear Power (HNP) anticipates submitting the DCO application to the Planning Inspectorate in May 2017. Following an examination into that application a recommendation will be made by the Planning Inspectorate to the Secretary of State for Business Energy and Industrial Strategy who will determine the application and the final conditions (called requirements) which will apply to any consent if granted.
- 1.2 Under the statutory regime in Wales all enabling works such as highways improvements and site preparation, and associated developments e.g. Workers Accommodation, Park and Ride and the Logistics Centre cannot be include in the DCO application and will be the subject of 10 separate Town and Country Planning Act (TCPA) applications. These applications are to be submitted to the IACC as planning authority for determination over the coming months.

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- 1.3 This second stage pre application consultation (PAC2) follows PAC1 carried out in September 2014 and an interim consultation in January 2016. PAC2 is the final formal consultation prior to submission of the DCO and covers all of the main nuclear site, the integral offsite developments and the associated development.
- 1.4 PAC2 has an 8 week consultation period which began on 31 August and closes 25 Oct 2016. It seeks responses on HNP's preferred proposals and requests answers to a series of specific questions.

2. Horizon's PAC2 Consultation Documents

- 2.1 The suite of documents submitted as part of Horizon's PAC2 submission consists of the following material:

Technical Documents

- Main Consultation Document
- Preliminary Environmental Information Report (and Appendices)
- Language Impact Assessment Interim Report
- Health Impact Assessment Interim Report
- Habitats Regulations Assessment Draft Evidence Plan Interim Report
- Equality Impact Assessment Interim Report
- Sustainability Assessment Interim Report
- Draft Master Plans (Main Site)
- Draft Master Plan Report (Off-Site Power Station Facilities)
- Draft Master Plan Report (Temporary Workers Accommodation)
- Draft Master Plan Report (Park and Ride and Logistics)
- Strategic Questions

Non-Technical Documents

- Consultation Overview Document
- Community Benefits Scheme
- Local Noise Mitigation Plan

Topic Papers

- Associated Development Site Selection Report
- Off-Site Power Station Facilities Site Selection Report
- Construction Worker Accommodation Report (Strategy)
- Traffic and Transport Technical Note
- Planning Statement Framework (and Appendices)

3. Approach to the IACC response

- 3.1 For consistency the structure follows previous responses;

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- Covering letter from IACC Chief Executive
- Appendix A High level Strategic Report
- Appendix B Response to the Strategic Questions
- Appendix C Comments on the Preliminary Environmental Information Report

3.2 In preparing this detailed response comments have been sought from Officers in services areas across the IACC, feedback from Elected Member briefing sessions and specialist input from professional and legal consultants (funded by HNP via the Planning Performance Agreement agreed with IACC). They have been collated in a way so as to be strategic, constructive and evidence based. The response seeks to follow the vision and objectives for Wylfa Newydd as set out in the Supplementary Planning Guidance which was approved by the IACC (2014).

3.3 PAC2 seeks to provide much more of the detail of the proposals which was requested by IACC in the response to PAC1 but as the project design is not yet finalised HNP cannot yet provide all of the information which will be required to accompany the applications. A number of the IACC responses accordingly seek to highlight areas where further information is required before a final view can be taken. This response has also sought to identify alternatives or amendments to HNP's preferred proposals and sets out proposals for the realisation of benefits arising from the project and mitigation measures to deal with the inevitable adverse impacts of a project of this scale and complexity.

4. Overview of IACC response

4.1 The covering letter from the IACC Chief Executive confirms that the IACC remain supportive in principle to the Wylfa Newydd project. Whilst there has been significant progress since PAC1 and the Project Update there are a number of key issues highlighted. These relate to:

- Level of PAC2 Information
- Education, Skills and Jobs
- Supply Chain
- Worker Accommodation/Housing
- Welsh Language & Culture
- Tourism
- Health & Wellbeing
- Site Selection Methodology

4.2 In the high level Strategic Report (Appendix A) the main themes identified in previous two responses are maintained and built upon, these include:

- Local Employment Opportunities

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- Education, Skills and Training
- Supply Chain
- Displacement
- Welsh Language and Culture
- Highways and Transport
- Tourism
- Construction Worker Accommodation Strategy
- Legacy
- Cumulative Impacts
- Nuclear Waste
- Wellbeing, Cohesion and Equality
- Site Selection

4.3 Detailed comments to the Strategic Questions and Preliminary Environmental Information Report can be found in appendix B & C respectively.

4.4 In preparing this comprehensive response Officers of the IACC have engaged with other stakeholders including Natural Resources Wales, North Wales Police, Fire and Rescue Service, Welsh Ambulance Service Trust and Betsi Cadwaladr University Health Board. Each of these organisations will be submitting their own responses to this consultation.

5. Conclusions

5.1 Members will be familiar with the key issues and main themes arising from this and previous consultations. Whilst this is the last formal stage of the consultation process opportunities will still arise for officers to inform the content of the eventual DCO submission. Also, the comments in this response which relate to those elements of the project requiring a TCPA will inform the respective pre-application discussions. Officers will endeavour to work with HNP to establish an agreed Statement of Common Ground; however where there are differences of opinion these will form the basis for the IACC's Local Impact Report. Members will be updated on a regular basis.

5.2 Members are respectfully requested to approve the attached suite of documents which combine to form the IACC formal response to PAC2. Subject to Elected Member endorsement it is also requested that delegated authority is given to the Chief Executive to carry out any minor amendments, variations or corrections which are identified and reasonably necessary prior to the formal issue of the response.

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5.3 Delegation is also sought for the Chief Executive to conduct negotiations on the overall obligations package which will be comprised of the respective planning obligation (S106) and related agreements for the DCO and TCPA applications.

END OF REPORT



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Ein Cyf - Our Ref. WGJ/VLJ
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Dear Mr Hawthorne,

RESPONSE TO THE HORIZON NUCLEAR POWER WYLFA NEWYDD PROJECT PRE-APPLICATION CONSULTATION – STAGE TWO

INTRODUCTION

I am writing to you on behalf of the Isle of Anglesey County Council setting out its formal response to the PAC2 consultation. In doing so I am following a similar approach and structure to that adopted in my letters to Mr Alan Raymant in response to the two previous consultations. This is with the aim of demonstrating consistency and transparency through a coherent narrative of the IACC's position as HNP's proposals for the Wylfa Newydd Project have evolved over time.

The IACC appreciates the clearly substantial amount of work which has gone into the preparation of PAC2 and considers that many of the issues raised in this and previous responses are now appropriately included in headline terms within the documentation. While further detail is sought on many issues it is noted and positively received that the main issues have been considered and this will provide a good basis for discussions on detail to be taken forward. The IACC remains supportive of the Wylfa Newydd Project in principle and wishes to work with HNP to help the Project to succeed and deliver positive outcomes for the Island.

This letter follows and builds on previous correspondence in highlighting key issues and is not an exhaustive assessment of the proposals. The IACC has presented high level views on various points including potential mitigation measures; however, these are offered as guidance and basis for further discussion as without a full and detailed picture of the proposals and baseline conditions it is difficult to gauge and measure

the impacts and effects to assess the level of mitigation required. This letter is supported by the following Appendices which provide more detail in areas of both established and emerging common ground and disagreement, and combine with this letter to form the Council's formal, detailed response:

Appendix A: High Level Strategic Report

Appendix B: Responses to the Strategic Questions asked in PAC2

Appendix C: Comments on the Preliminary Environmental Information

Wherever possible the IACC has sought to ensure consistency in the wording of these documents and avoid duplication. However, given the tight timescale for responding to PAC2 and collation of the inputs required from Services across the organisation there may be some mismatches in the text.

BACKGROUND

The IACC Vision for the New Nuclear Build at Wylfa, as set out in the Supplementary Planning Guidance, is that it is “a positive driver for the transformation of the economy and communities on Anglesey, providing sustainable employment opportunities, improving the quality of life for existing and future generations and enhancing local identity and distinctiveness”. This Vision translates into a set of expectations that the construction and operation of Wylfa Newydd will:

1. Contribute to the UK's needs for secure and affordable low carbon energy;
2. Comply with all safety and security requirements to ensure a secure and safe Project with robust emergency planning provisions;
3. Contribute significantly to long term sustainable economic growth and local prosperity through the provision of quality employment, training and workforce development opportunities;
4. Support the prosperity of local businesses by providing appropriate inward investment and supply chain opportunities;
5. Support the sustainability, vibrancy and quality of life of Anglesey and its communities (including support for the Welsh language and culture) and promote low carbon living and behaviours;
6. Take into account environmental, social, economic and health impacts and provide mitigation and 'or compensation for any adverse impacts whilst maximising positive social, economic and environmental benefits;
7. Contribute to an enhancement of local community infrastructure, facilities and services;
8. Promote sustainable modes of transport and undertake infrastructure improvements to minimise the impact of the developments on local capacity and resilience, and enhance connectivity;
9. Contribute to the biodiversity of the island and the quality of its natural environment; and
10. Recognise the support of local communities in hosting the Project (during its construction and operation up to the point of decommissioning) by

compensating for impacts that cannot be mitigated and otherwise securing the goodwill and understanding of the population of the Island as a whole.

The continued support of the IACC for the Project is based on the expectation that this Vision and Outcomes will be achieved by the following seven Objectives being met through ensuring that Wylfa Newydd:

1. Contributes to the delivery of the Anglesey Energy Island Programme and the Anglesey Enterprise Zone, placing the island at the forefront of energy research and development, production and servicing;
2. Drives the transformation of the Anglesey and North Wales economies and maximises opportunities for the employment and upskilling of local people;
3. Delivers significant and enduring infrastructure benefits to the Island's communities;
4. Supports improvements to the quality of life (including health, wellbeing and amenity) of the Island's residents, visitors and workers during its construction and operation;
5. Recognises and strengthens the unique identity of the Island and its communities;
6. Promotes the sustainable movement of people and materials and provides resilient transportation infrastructure capable of attracting and sustaining economic growth and creating sustainable communities; and
7. Conserves and enhances the Island's distinctive environment and resources, taking into account climate change.

The Vision, the expected Outcomes of the Project and the Objectives for their achievement continue to underpin the overall approach of the authority to the Project in seeking to ensure that the right developments are located in the right places and realising the benefits and mitigating the impacts throughout its lifecycle. They have also combined to form the basis for this response and in so doing have re-affirmed the main themes arising which were highlighted in the IACC's responses to the two previous consultations. As evidenced by the respective Consultation Feedback Reports these themes also broadly reflect the feedback from the general public.

KEY ISSUES

The key issues outlined below are in headline terms so as to avoid repetition. They therefore need to be read in conjunction with the more detailed comments in the Appendices.

Level of PAC2 Information

The IACC acknowledges that much more detail has been provided in the PAC2 proposals. It is, inevitably, the case that substantial further detail is under preparation for the application submissions. The IACC has endeavoured to be

constructive in striking the balance between noting where detailed work is in hand and providing meaningful feedback wherever possible.

The IACC wishes to underline the importance of engagement with HNP between now and submission to take forward the various issues raised in this response, to ensure a suite of applications which is fit for purpose and which can deliver the combined objectives of the parties. The IACC particularly highlights that considerable further work is needed to develop the proposals for mitigation of impacts, the provision of positive legacy from the project and how HNP intends to address unforeseen or unquantified issues as and when they arise throughout the project lifecycle and not just in the construction phase.

Education and Skills, Jobs

The IACC has been and remains supportive of the project on the basis of the jobs which it will deliver locally both during its construction and operational phases. To maximise local take up of these opportunities there is a need for HNP to make an early commitment to promoting STEM subjects in the Island's primary and secondary schools. This is necessary in order to stimulate interest amongst pupils and to inform subject choices so that they gain the relevant examination results to take up apprenticeships or go on to pursue further and higher education qualifications to equip them for jobs on offer with Wylfa Newydd. Such a commitment of the necessary scale and timing is not apparent in the PAC2 documentation.

A similar view is taken by the IACC on the HNP proposals for skills training for young people not in education, employment or training (NEETs) and the long term unemployed. With early specialist support these people can secure the skills sets required for the large number and variety of support jobs which will be created by the project.

The IACC acknowledges the support from HNP for the establishment of an Employment and Skill Brokerage and looks for its support in its piloting with the contracts for the Site Preparation and Clearance works.

The IACC remains concerned that due regard to and assessment of potential displacement of jobs in the supply chain, social care, domiciliary support and tourism and hospitality sectors through people currently in work moving to better paid jobs in connection with Wylfa Newydd has not been demonstrated. Far more information is required on the roles to be created to allow proper assessment of the consequences of displacement and the methods by which this can be mitigated.

Supply Chain

The IACC welcomes the Horizon Supply Chain Charter and continues to advise that this should be in place for the early works and associated developments in order to allow local businesses to capture the maximum opportunities and gain experience in the tendering system ahead of the main construction tendering commencing.

The IACC welcomes the promotion of supply chain engagement through the Business Readiness Programme Menter Newydd, the development of the Wylfa Newydd Employment and Skills Service concept. The comments on the support required from HNP to help local people, and young people in particular, to be competitive in the jobs market for Wylfa Newydd are seen as being equally applicable to the support needed for local businesses to compete for supply chain and service contract opportunities.

Worker Accommodation/Housing

The bulk of the IACC's response to the Project Update consultation focussed on this topic. This was expanded upon in a series of 26 questions forwarded to HNP, but to which there has been no direct reply. The principle of first considering the potential of existing housing and tourist stock for temporary use as worker accommodation has always been supported by the IACC. The IACC also agrees to latent and empty accommodation being taken up along with new developments, such as Land & Lakes, being brought forward through initial use as worker accommodation with long term legacy uses following construction.

The IACC is of the firm belief that there is scope to increase the availability of worker accommodation for the construction period through the bringing forward of other residential development sites. These include single plots and small estates as well as larger sites which HNP referred to in the Project Update, referencing 'sites in Holyhead', but not pursued; with the IACC proposing further potential sites, for example in Amlwch (in addition to Madyn Farm).

The IACC has made continual reference to the potential impacts on the Private Rented Sector and the need to help offset this through a Social Housing Fund for the provision of additional homes to let.

The IACC has always accepted that there may be a need for temporary worker accommodation in temporary buildings which would be removed following the construction period. However, such accommodation should only be considered once all of the other sources, including those described above, have been exhausted and then located on sites which comply with Planning Policy (including the spatial strategy), do not give rise to highways issues and are accessible for servicing.

Welsh Language & Culture

From the outset the IACC has stressed the importance of Welsh language and culture as a golden thread running through the whole Wylfa Newydd project. The authority has been consulted upon HNP's proposed Welsh Language and Culture Strategy and welcomes this acknowledgement of the importance of these elements to the Island's communities. These elements all go some way to addressing the concerns previously raised by the IACC and the authority would be pleased to engage with HNP in developing them further.

The IACC is pleased to see that HNP are acknowledging the importance of the Welsh language and aligning their impact assessment with its Welsh Language Strategy in the PAC2 documentation and in their recently announced "Pledge". The IACC welcome HNP's Welsh language pledge however there is a lack of clarity on any accountability arrangements, the scale and extent of the mitigation measures are still awaited, as is evidence of the HNP commitment to Welsh Language proofing of all aspects of its proposals and their impacts.

The Welsh Language Impact Assessment does not yet fully recognise the enormous scale of the project and the direct and indirect impact of transient construction workers and their dependants will have on the Welsh Language and culture. This results in the report lacking sufficient commitment to undertaking mitigation steps immediately. The impact of this project will be significant and far reaching in terms of the Welsh Language and culture; it is therefore essential that HNP demonstrates a firm commitment, including through appropriate mitigation, towards maintaining and strengthening the Welsh Language and culture. The authority continues to recommend that Welsh language is not looked at in isolation and is addressed across the topic areas and, in particular, is included as a receptor in the environmental impact assessments.

Tourism

The authority continues to highlight its concern that tourism as a key economic sector on the island has not been given enough consideration or weight. Tourism will be directly impacted through possible diminishment of visitor numbers due to building works) and indirectly affected by the use tourist accommodation to house workers decreasing supply, displacement of staff and increased demand on facilities by a number of features of the projects and merits consideration as a key theme.

Health & Wellbeing

The IACC has pressed Horizon on a consistent basis to take a wider view than that adopted in its Health Impact Assessment work to date. This is based on the National Assembly for Wales's legislation which requires the IACC and other public bodies to

take the wellbeing goals and principles of sustainable development into account in its decision making. The Wellbeing legislation must be taken into account and this wider scope must be reflected in any application coming forward.

Site Selection Methodology

The IACC made representations on the Horizon methodology for site selection in its previous response which were followed up in detailed correspondence. The IACC in its capacity as the Local Authority has provided comments on these sites in response to the details given in PAC2 without prejudice to any future decision of any part or function of the IACC and for the purposes of this consultation only.

The IACC remains of the view that the site selection reports are inconsistent, do not properly justify the criteria used and are heavily influenced by HNP's existing land options and acquisitions. The previous consultation responses have generally not properly been taken into account in the site selection, other than to be mentioned very briefly and then discounted with little evidence. Operational prerequisites have been applied as a filter with little justification and the IACC does not accept that a suitable case has been made that all the applicable sites have been properly considered. The locational restrictions on the off-site facilities are not set out in any detail. In particular the non-inclusion of Llangefni in the 4 stage assessment process skews the process by excluding a number of large sites. The separate consideration of sites in Llangefni is inadequate and does not accord with the SPG guidance. The Llangefni sites identified as potentially suitable are dismissed on the basis of travel time, the assessment of these sites is cursory and appears to have been included only to address the IACC's previous request for their consideration and allow them to be dismissed.

Site specific comments are given in response to question 8 of Appendix B.

CONCLUSIONS

The IACC's conclusions are based on the statements HNP have made in the Foreword to the PAC2 Consultation Overview Document.

HNP's statement that "Wylfa Newydd has the potential to change lives for the better across Anglesey and bring major investment and opportunities for communities and individuals across North Wales and beyond" is fully endorsed by the IACC. This high level objective now requires to be translated into tangible commitments and actions which meet the expectations of people, businesses and communities in the area, and for which they are equipped to capitalise upon.

The concept of a 'social licence' to operate is also endorsed. The documentation sets out what HNP have been told on a consistent basis, and how it has responded

to the calls for investment in education and skills programmes, creation of thousands of local jobs during construction and high quality careers for generations during the life of the power station, and respect for and championing of the local heritage, culture and language. These calls have been echoed in this response.

In approaching this issue the IACC has introduced the concept of a Community Resilience Fund. Given the complexity of the Project, and as you state, “a busy period for consultation on big projects” there is a need to deliver a mitigation response that has sufficient flexibility to respond to what is going to be a very dynamic and complicated construction process. As a means of helping answer that challenge, a Community Resilience Fund would:

- a) address the consequences of development;
- b) specifically target and empower local people in responding to the impacts of development; and
- c) be intentionally flexible in order to be able to address impacts as they occur and tackle the problem of unusable funds arising from overly restrictive distribution criteria.

The IACC considers the principle of this fund to be essential in “building the genuine partnerships with the communities which Horizon plan to be part of” over the next 60 years and more. This would be separate to Voluntary Community Benefits which is currently out to consultation, and on which the IACC is responding separately.

I look forward to continued constructive engagement with HNP.

Yours sincerely,

Gwynne Jones
Prif Weithredwr / Chief Executive

APPENDIX A

HIGH LEVEL STRATEGIC REPORT ON THE WYLFA NEWYDD PROJECT PRE-APPLICATION CONSULTATION STAGE 2 (OCTOBER 2016)

1 INTRODUCTION

- 1.1 The Isle of Anglesey County Council (IACC) welcomes the opportunity to comment on Horizon Nuclear Power's (HNP) Wylfa Newydd Pre-Application Consultation Stage Two (known as PAC2). The IACC takes this opportunity to provide strategic and constructive comments to help shape the proposal and where possible to provide suggestions and/or solutions as mitigation to overcome challenges as to make the development a success for the Isle of Anglesey's residents, its economy and its environment.
- 1.2 The IACC appreciates the large amount of work which has clearly gone into the preparation of PAC2 and the attempts Horizon Nuclear Power (HNP) have made to strike an appropriate balance between providing the detail sought by the IACC and others and presenting a meaningful consultation where not every element is finalised and can be amended in response to the feedback sought. The IACC considers that many of the issues raised in this and previous responses are included in headline terms within the documentation and while further detail is sought on many issues it is noted and positively received that the main issues have been considered and are set out allowing a base for discussions on detail to be taken forward.
- 1.3 The IACC remains supportive of the Wylfa Newydd Project in principle and wishes to engage and work with HNP to help the Project to succeed and deliver positive outcomes for the Island. However, as host authority to this Nationally Significant Infrastructure Project the IACC will not support development at all costs and an appropriate level of firm commitment on many of the themes set out in this response is now required to secure the confidence of the local community ahead of the submission of planning applications and the DCO. The commitments of HNP should enable impacts mitigated, the host community to be adequately compensated when this is not achievable and the project benefits (including legacy benefits) to be fully realised.
- 1.4 This response comprises high level comments and is not an exhaustive, detailed assessment of each Main Theme or Issue. The IACC has presented high level views on potential mitigation measures; however, these are offered as guidance and basis for further discussion as without a full and detailed picture of the proposals and baseline conditions it is difficult to gauge and measure the impacts and effects to assess the level of mitigation required. Detailed information will need to be discussed as the project enters pre-application discussion on the Town & Country Planning Applications (TCPA) and prior to submission of the Development Consent Order.

- 1.5 These comments are provided to ensure that impacts are fully mitigated, benefits (including legacy benefits) are realised to their full potential and the Island's communities are supported and strengthened in return for hosting this major development. As the detailed information within the documentation was in some cases limited these comments are caveated on the basis that further, more detailed discussion is required as the various aspects of the project are developed. The IACC fully commits to engaging in these discussions prior to the submission of an application for a DCO.
- 1.6 For consistency and transparency, the comments presented below are structured around themes which are very similar or identical to the Main Themes raised during the IACC's response to Pre-Application Consultation (Stage 1) and Informal Consultation as outlined in the covering letter. The IACC has also included within the Appendices a response to HNP's Preliminary Environmental Impact Report (PEIR). The IACC's review of the PEIR documents suggests that the scope of the assessment and identification of receptors is appropriate. However there is considerably less certainty on the conclusions reached in relation to significance of effects as there is insufficient baseline information and assessment contained within the report and its appendices. Upon responding to the Pre-Application Consultation Stage 2 (PAC2) it was apparent to the IACC that these strategic themes remained as high priority issues that need to be considered further and discussed with the IACC as the project continues to be developed.
- 1.7 HNP are fully aware of the public and community expectation that the employment and supply chain opportunities created by the development (direct and indirect) on Anglesey and across North Wales will be fully realised. Greater clarity is required on how this will be achieved, and the impacts on the environment, language, well-being and quality of life managed and mitigated – particularly in the adjacent communities (Tregele, Llanfechell and Cemaes).
- 1.8 The PAC2 documentation is, understandably, voluminous however IACC consider that in places information was duplicated and contained too much sign-posting to other documents instead of having all of the information on a specific topic presented in one place. It is considered that a more topic based approach would have made it more manageable for the public and other interested parties to digest the information and provide meaningful responses by the end of the consultation period. HNP is asked to consider reordering how some of the information is presented in future public engagement including the statutory consultations required for the applications.

2 WYLFA NEWYDD SPG

- 2.1 The adopted Supplementary Planning Guidance (SPG) outlines the IACC's vision and objectives for the New Nuclear Build (NNB) and crucially, outlines the IACC's Guiding Principles on each of the Main Themes with supporting Topic Papers.
- 2.2 The Wylfa NNB SPG provides a framework and material consideration for future decisions by the IACC on planning applications, but it is also designed to influence, inform and help shape the promoter's proposals and decision making by providing clarity in relation to the IACC's aspirations and expectations of the proposed NNB.
- 2.3 The IACC reiterates its position that Horizon Nuclear Power should have full regard to the SPG for each of the Main Themes and for any site selection assessment. A review of the SPG is currently being undertaken in conjunction with the process of formulating and adopting a new Joint Local Development Plan (JLDP). The scoping of that review and updated evidence base prepared conclude that substantive change is only required to the Temporary Workers Accommodation section to reflect the increase in worker numbers advised by HNP which requires amendment to the basic "thirds" approach previously adopted. Other than updates to reflect minor legislative, policy and factual changes substantive changes are not expected to the other topics. At present time, the SPG remains a relevant material planning consideration and should be at the forefront of HNP's proposals.

3 LOCAL EMPLOYMENT OPPORTUNITIES

- 3.1 The IACC recognises that the job creation opportunities associated with Wylfa Newydd have the potential to transform the economy long term. The commitment to using existing local labour and businesses to construct and operate Wylfa Newydd is a key factor in the ability of the project to contribute to economic growth in Anglesey and North Wales. As such, the labour participation rate is an important consideration in both mitigating negative impacts and maximising the benefits of the project over the short to long term.
- 3.2 The consultation presents new figures around the peak demand from the Wylfa Newydd development which have changed significantly from those previously advised and are still subject to further change. This brings uncertainty as to the level of impact and subsequent benefits and mitigation required. Further work is required to clarify "maximum/peak scenario" and main risks/changes that would impact the figures and the distribution of job numbers and roles across the project programme.
- 3.3 The development of the Wylfa Newydd Employment and Skills Service concept is ongoing - a commitment by HNP to enhance local job opportunities by

formally collaborating through the proposed Service is essential. The IACC requests that HNP set out an early commitment to engage in practical collaboration through this proposed Service so that it can be progressed ahead of the start of the associated development allow opportunities created by earlier works to be captured.

- 3.4 The North Wales Economic Ambition Board's recently adopted Regional Skills and Employment Plan recommends as a key priority that "local authorities across North Wales work with employers, developers and providers supporting key transformational projects within the energy sector to deliver the necessary facilities and expertise to equip local people with the knowledge and skills so that they can gain employment in the upcoming developments". This approach would support and promote local careers, economic and community growth (short and long term). HNP's commitment to work with the North Wales Economic Ambition Board to ensure that the Regional Skills and Employment Plan becomes a reality for people across the region is requested. Formal commitment, engagement and collaboration through the Wylfa Newydd Employment and Skills Service is required at an early stage and before the submission of applications.
- 3.5 IACC have significant concerns over the level of ambition in the use of local labour especially in the setting of a target of 45% during the operational phase as stated in paragraph 20.22 of HNP's Main Consultation Document. The IACC believes that this target for operational jobs is too low and does not demonstrate the level of long term commitment to the local area which was expected given HNPs previous assurances. This target does not reflect the considerable nuclear related capability and experience which exists on Anglesey and in North West Wales. There are clear opportunities to significantly increase this percentage by capturing:
- Returning workers from the UK and elsewhere in the world;
 - Long term unemployed and NEETS;
 - Existing nuclear capabilities and experience;
 - College and University graduates with the relevant qualifications for the apprenticeships (non-age specific) and jobs on offer;
 - An increased flow of school pupils who wish to be part of the low carbon energy sector;
 - Opportunities to move the underemployed into better jobs.
- 3.6 The IACC request that HNP enter into further discussions on this matter to identify how to collaboratively put mechanisms and conditions in place to increase the target figure and to ensure that local businesses do not suffer from the displacement effect that is likely to occur during the construction phase of the project.

- 3.7 Preparatory work by HNP suggests that in many previous developments the majority of the construction workforce has been sourced from the “local” area in question. Taken together with reviews of previous evidence from other major infrastructure projects (including Hinkley Point C) as to the proportions of local labour employed in different project phases, and allowing for differences in labour market dynamics, this would suggest that a more ambitious target than currently set should be used.
- 3.8 The local labour figures also determine the extent and scale of a range of other impacts of the project. The larger the proportion of the project labour requirement that is drawn from the workforce already resident in the relevant catchment or commuting zone, the lower the overall impact made by workers moving or commuting to the project from outside the area.
- 3.9 There is also a need to understand the effects on sectors other than construction, such as opportunities from higher level managerial and professional through to supporting functions such as food, catering, security, administration etc. No detail is provided and this omission impacts the IACC’s ability to identify the potential opportunities to maximise local labour. This is of critical importance to realising a potential beneficial impact of the project. This data is required to inform the nature of training resources to mitigate impacts around employment, skills provision and labour displacement. It is essential that HNP fully resource an effective process to ensure that local people and businesses are given support, understand and can access the opportunities to participate in the supply chain during construction, operation and eventual decommissioning of the station.
- 3.10 IACC, in partnership with other North Wales Local Authorities and the North Wales Economic Ambition Board (NWEAB) are developing a database which will highlight the capacity and capability of all North Wales Businesses (including those with nuclear related experience). This database has already been successfully utilised to address a number of intelligence requests from HNP (and its partners). The IACC believes that the objectives set out by IACC in the SPG and by IACC in the Local Purpose will be furthered if HNP and all its contractors should commit to utilising this approach/ data base going forward. Commitment to adopting a procurement strategy which enables local and regional companies to take full advantage of opportunities is essential. Support to enable the development of small business consortia is required to ensure that local SMEs can realistically tender for work packages and the IACC would welcome discussions on this point to establish how it can support the delivery of this objective.
- 3.11 The IACC welcomes the Business Readiness Programme (a result of successful collaboration between the IACC, HNP, WG, NWEAB and NAMRC)

which helps local companies develop the skillsets needed to take part in the nuclear industry's supply chain. This needs to continue and grow/ expand and we look forward to continuing to engage with HNP on this.

4 EDUCATION, SKILLS AND TRAINING

- 4.1 Setting realistic targets for local employment and achieving or exceeding them requires a clear understanding of the demand for and supply of labour. Allied to this is the effective communication and promotion of the opportunities available on both supply and demand sides. There will need to be much greater clarity as to the specific mechanisms, targets, timing and duration of demand and associated measure to maximise the supply of local labour and provide the means for effective education and training investment to ensure a supply of labour for the project over the short to long term. There are a number of specific issues in relation to education:

Emphasis of Education engagement strategy

- 4.2 In maximising the opportunities created by the Project it is essential to support primary and secondary schools to ensure young people obtain the capabilities, education and skills required and are inspired to participate in the construction and operational workforce. This requires investment in high quality resources and equipment for Technology and Science and upskilling in STEM subject teaching for local primary phase teachers and specialist technology and science teachers at secondary school phase. HNP is requested to consider and present firm proposals in relation to this.
- 4.3 Recognising that an influx of residents to the Island is likely to include the families of some workers and increase the demand on the educational provision available and the demand on the education authority's resources HNP is asked to consider and present firm proposals on how they can mitigate this and support the objectives of fostering interest in relevant subjects amongst people already resident to help supply the trained workforce HNP will require. Ensuring that persons already resident are supported to access job opportunities will also reduce the impacts of having to encourage appropriately skilled persons to move to the Island and align with HNPs stated objective of being a good neighbour, creating a positive legacy and enhancing communities. This would also respond (in part) to the Welsh language and culture challenges.
- 4.4 There is an emphasis on the 16+ year's education sector but little beyond awareness raising of STEM subjects at pre 16 level. The IACC raises this as a risk to the local labour employment objective and the longer term legacy in general as recruiting young people into jobs created by the project in due course will be necessary to achieve these objectives. This early engagement approach is required to underpin a long term employment strategy which

necessitates the encouragement of appropriately skilled local young people to fill future vacancies in line with the 100 year commitment to the Island. In the same way that local businesses will need support, it is vital that HNP and their contractors fully engage with training providers and colleges so that there is a clear understanding of the requirements for workers and training standards.

- 4.5 There is currently a lack of clarity as to how the local employment figures (25% of total construction workforce/ 45% of operational) translate to actual numbers to be trained to achieve the targets and what resource this will require. The IACC as local authority and education authority is eager to collaborate to formulate an integrated, realistic and deliverable plan to ensure that suitably educated people are available to meet achieve these targets.

Primary/Secondary school capacity

- 4.6 There is some inaccuracy at times within the documents as to schools capacity and the subsequent impact on them of an increase in demand for places. As a result the related mitigation is not accurate or adequate. In some instances older data has been used to make assumptions about local school capacity, the assessment of the influx of school age children is deemed too small in number, and the evidence base for the assumed numbers is unclear and unquantified. HNP is therefore required to present updated information of the demand likely to come forward related to persons moving to the Island for the project using a clear and up-to-date evidence base. IACC strongly suggest that written agreement is reached on an appropriate evidence base to allow the required reassessment to be undertaken.
- 4.7 Primary schools across the Island are oversubscribed and pupil number prediction data points to increased demand and further pressure on school places until 2025 due to increase in births and housing developments. This does not include HNP-related employment led increases which will further increase demand on the oversubscribed schools. Mitigation of the impact of the increased numbers of required school places needed related to the HNP project will be required and HNP is requested to engage with the authority to develop proposals for this ahead of the submission of applications.

Skills and Training

- 4.8 There is a lack of detail on skills and training elements with regards to qualifications, apprenticeships, work placements and competencies required across the project phases (construction/operation/decommissioning) and what quantity and scope of training will be provided to up-skill the local labour force to ensure that they have the necessary skills to obtain employment at Wylfa Newydd. Upfront investment in training provision and facilities will be required to facilitate alignment between labour/skills supply and demand. The early provision of training and skills support is required to allow local people to take

up jobs in both the construction and operation phases. This will also assist in reducing some of the potential negative impacts of the project attributable to an influx of new residents. Allowing people currently in the community to access these roles will strengthen community cohesion and help to integrate the project with the community as a key employer.

- 4.9 As already noted the North Wales Economic Ambition Board Regional Skills and Employment Plan recommends as a key priority that local authorities across North Wales work with employers, developers and providers supporting key transformational projects within the energy sector to deliver the necessary facilities and expertise to equip local people with the knowledge and skills so that they can gain employment in the upcoming developments. This approach will support and promote local careers, economic and community growth for the current and future generations. The IACC would encourage the delivery of HNP's commitment to work with the North Wales Economic Ambition Board progress to delivery and implementation of additional provision to ensure the Regional Skills and Employment Plan.
- 4.10 Clarity is required on the measures proposed for investment in education, training and skills development, focusing on existing regional training providers and new provision linked to Coleg Menai as a complement to HNP's bespoke training programmes (MCD chapter 8).
- 4.11 The technical apprenticeship programme is welcomed. The IACC is keen to ensure that the placements lead to permanent jobs wherever possible and would invite HNP to collaborate in establishing a programme to assist with this objective. The IACC would expect to see provision of graduate and post-graduate placements within the construction and operational workforces and a suitable programme for this strand should also be developed as part of the overall strategy. Clear targets need to be set in relation to the number of apprentices, not limited to age 24 and under and work placements in different trades and occupations across the different phases of development (construction/ operation/ decommissioning) from Anglesey and North Wales. Outside of the potential workforce that already has many of the health, safety and quality assurance requirements to operate in the nuclear environment and workplace there is a need to provide resource to address the differing requirements of the local labour force that do not currently meet the standards needed across different occupational profiles, job types and workplace locations. There is accordingly a need to understand the effects on sectors other than construction, e.g. opportunities from higher level managerial and professional through to supporting functions food, catering, security, administration etc. There is no detail within the documents as to these impacts and this affects any ability to identify the potential to maximise local labour. This is of critical importance to capturing the potential beneficial impact of the

project. This requires to be understood in order to inform the nature of training and related financial resources to be provided to mitigate impacts around employment, skills provision and labour displacement.

- 4.12 The retention and use of skills and knowledge contained within the existing Wylfa workforce is a key objective in the legacy to be delivered by the project. This ensures that positive benefits from the Wylfa Newydd project can be enhanced.

Mitigation Proposals

- 4.13 As the list of proposals is not exhaustive the IACC suggests that HNP consider the following key themes to help address the above issues:

4.13.1 More information on worker numbers, job types and roles is required. This needs to go beyond the construction and operation staff and include the ancillary roles which will also be created.

4.13.2 More information on the skills available within the local community and how this aligns to the needs of the project is required to allow the appropriate targeting of training and educational opportunities ahead of the roles becoming available so that local people are enabled to take up jobs when they do arise.

4.13.3 Emphasis and validity of Education engagement – more consideration is needed of the pre-16 years education sector to deliver the workforce required for Wylfa Newydd over the longer term. This requires investment in high quality resources and equipment for Technology and Science teaching in secondary schools, in addition to the provision of curriculum resources.

4.13.4 Primary/Secondary school capacity – The evidence base and assessment of impacts on school place demand requires to be updated. Contributions to funding school places to meet the demand created by the project and to allow for effective integration on non-Welsh/ English speaking children will be required.

4.13.5 An overarching programme of awareness raising and promotion of opportunities for the existing and future workforce utilising existing stakeholders, training and education providers and wider press and promotional channels should be delivered, including careers advice. The IACC would recommend that this programme should start ahead of the submission of the DCO to allow the necessary lead-in time for training and skills programmes to address the anticipated demand.

- 4.14 Further specific suggestions on how the uptake of labour opportunities by local people can be maximised have been given in response to question 2 of the PAC2 consultation and are set out in Appendix B of this response.

5 SUPPLY CHAIN

- 5.1 The IACC recognises the progress made within this Theme over recent months through activities undertaken by HNP and their respective consultants. We acknowledge and appreciate HNP's commitment to the formation of Menter Newydd and the creation of the Supply Chain Charter and are committed to continuing to work with HNP to build, promote and maximise supply chain opportunities for local businesses across Anglesey and North Wales.
- 5.2 Currently the level of detailed information surrounding the Supply Chain charter is very limited. More constructive and detailed comments can be given as further details emerge. In principle, the IACC is supportive for a continuation of the suppliers register, series of supply chain events, initiatives and programmes (from Tier 1 to Tier 5), including the planned recruitment of a supply chain development team based on Anglesey to continue to drive engagement with local and regional businesses.
- 5.3 The supply chain charter proposals and their effectiveness depend to a large degree on the intent of the supply chain to adopt supportive procurement policies and the ability of local businesses to compete effectively for the contracts available. Appropriate monitoring arrangements will be critical from the onset.
- 5.4 The IACC suggests that HNP consider the following in order to ensure that supply chain opportunities are maximised:
- 5.4.1 HNP, Menter Newydd and partners should ensure that the supply chain charter is effective in engaging and encouraging existing businesses to compete and win contracts in the Wylfa Newydd supply chain. This would be supported by the setting of agreed targets by value and number. Such an approach will support the growth of the existing business base and retention of staff and thereby reduce the potential for negative impacts of the project due to displacement of jobs. The IACC would encourage the use of consortia's as otherwise many local / regional firms will not be able to compete for the tender opportunities and would welcome the opportunity to work with HNP to facilitate that.
- 5.4.2 HNP and Menter Newydd are required to work with partners including the IACC, North Wales Economic Ambition Board (NWEAB), North Wales Business Council, Business Wales and Welsh Government to identify and maintain information on Welsh businesses that can be matched to appropriate work

packages in the Wylfa Newydd supply chain. This will require resources to be made available throughout the construction, operational and decommissioning phase of the project to maintain Welsh SME involvement in the project supply chain.

5.4.3 Funding of an extension to the Anglesey Business Centre or a dedicated Energy Island Enterprise Centre and members of staff to provide direct support to local businesses and start-ups providing dedicated services to the Wylfa Newydd project during construction and operation.

5.4.4 HNP and Menter Newydd to provide a means of monitoring and reporting expenditure with local firms through the use of existing procurement systems to determine progress towards targets or statements made in the existing assessment. The same system could also be used to understand expenditure during the main construction phase.

5.4.5 The IACC would wish to discuss an HNP/ Menter Newydd commitment to a level of value of contracts (for example under £250,000) that will be offered to companies locally before attempting to procure more nationally. The database of North Wales companies would inform and facilitate this process.

5.4.6 There will be a need for transparency and early detail surrounding what the work packages will look like and when they will be available so that companies – local and regional – can begin to prepare for them through training and upskilling. This will also provide confidence to businesses that opportunities will be real.

5.4.7 HNP and Menter Newydd should make full use of existing procurement portals such as Sell2Wales for tender opportunities as these are embedded into current best practice with companies and will ensure consistency in their tender approaches.

5.4.8 The IACC expect any procurement exercise to include the requirement to recruit/ employ locally where possible – this would ensure that local benefits are maximised.

5.5 There will be a need for continuous review of the Supply Chain Charter and supply chain related activities to ensure it remains fit for purpose for all stakeholders.

6 DISPLACEMENT

6.1 Although the potential jobs and skills opportunities which will be created by the project are welcomed it is considered that labour displacement remains an issue which requires to be addressed more fully than it has been to date. As

was highlighted in the IACC's response to PAC1 and 2016 Project update consultation, there is little detailed recognition of potential displacement effects. Further work is required to develop a suitable mitigation plan to manage the effects of labour displacement. The IACC expected this to have been given greater thought and prominence in the current consultation and reiterates the need to progress this as part of the evidence base, effects assessment and mitigation strategy development which will be required prior to the submission of the application. The IACC strongly urges HNP to investigate displacement effects on Anglesey (and beyond) as this could have a considerable adverse impact on the labour market, existing businesses and tourism providers. The IACC would wish to be involved in detailed discussion on these points and invites HNP to share information to allow the development of this element of its proposal in partnership with the IACC. The current baseline position, analysis on wage levels and associated impacts all require to be progressed in the short term to allow proper consideration of this aspect to be carried out.

- 6.2 Labour displacement impacts from the project could be significant. For example, skilled labour may move to take advantage of opportunities for higher wages. This could then have an adverse impact on the firm or contract they leave so that any economic effect e.g. Gross Value Added may be reduced or delayed. In relation to labour the Wylfa Newydd construction period is projected to start in 2018 with completion of the second unit in 2027. Beyond that the operational phase of the station will cover another 60 years. The numbers of construction workers at the peak of the construction period could exceed 10,000 people across a range of occupations and skill levels. In addition to this many further ancillary roles will be created to service the construction workforce against a working age population of only 31,972 on Anglesey (approximately 33% increase). Given the scale of demand relative to the available supply of labour there is likely to be a significant pull factor created on labour in existing firms from the Wylfa Newydd project. This will create vacancies in those existing firms which in turn could potentially weaken individual company ability to compete for contracts and work packages within the supply chain.
- 6.3 Additional demand will have knock on effect on other construction projects e.g. housebuilding, schools improvement programme and a range of other projects scheduled for construction in the same period as Wylfa Newydd. On this point the issue of labour displacement from the cumulative effects of different projects will likely exacerbate displacement effects.
- 6.4 Displacement of skills/jobs will not be confined to the construction sector. People employed in low paid and seasonal jobs will be attracted to higher wages on offer with Wylfa Newydd – in particular the health and social care sector which are critical to the economy of the Island. The health and social

care sector is already vulnerable to losing staff and some of these positions are already difficult to fill. In addition skilled labour from local SMEs within other sectors outside of construction may move to companies from outside of North Wales which would impact the local SMEs significantly. This is also the case for skilled labour moving to work for HNP, Menter Newydd or the main Tier 2/3 companies. Ways in which to backfill these vacancies within local businesses needs to be considered. Consultation work from the Wylfa Newydd: Wider Impacts Study (not yet published) suggests that some existing companies would probably lose staff rather than pay them more but this ultimately depends on the percentage increase in wages that occur

- 6.5 Evidence from the Wylfa Newydd North Wales Business Survey (2016) suggests that some businesses are concerned that the project will take construction workers away from them for better paid jobs. This may have knock on effect on other construction projects e.g. housebuilding, schools improvement programme and a range of other projects scheduled for construction in the same period as Wylfa Newydd. On this point the issue of labour displacement from the cumulative effects of different projects will likely exacerbate displacement effects.
- 6.6 The displacement effect on labour and businesses who hope to maximise supply chain opportunities and other existing businesses could impact negatively and considerably on Anglesey's economy. Appropriate strategies and programmes need to be investigated and adequately considered to assess how the issue of displacement can be minimised and/or overcome. The IACC request to discuss the issue of displacement as a matter of urgency with HNP to design the best method to introduce mitigation measures to address the situation as far as possible.
- 6.7 The IACC consider that the following strategies should be considered to mitigate the displacement effects:
- 6.7.1 It is recognised that there is an opportunity to back fill opportunities as employees move from existing employers to be employed directly or through the supply chain of the Wylfa Newydd Power station (construction and operational phases). However the pull factor of higher wages would likely result in the most qualified and skilled local labour being taken up by Wylfa Newydd and as such create a need for training to provide suitable replacement labour in vacated roles. Assessing the demand created for and proposing means of providing additional support for training in the areas where there is likely to be displacement activity relating to the local labour force i.e. the areas where local labour will take up job opportunities during the construction and operational phases of the power station. As indicated by the work to date this would include "construction trades and specialists" (40% of predicted local labour). The

remaining 60% of local labour would be in “engaged in work supporting the construction workforce in a wide variety of roles”. As such it would be suggested that further work to define these groups is undertaken and appropriate training support and associated resources for these areas is included as mitigation.

6.7.2 Further information and analysis on wage levels to be paid at the development and the impacts of this on the local economy in displacement terms requires be providing in short course and analysing against the current income profile on the Island.

6.7.3 In some cases the loss of employees from businesses may have a negative impact in terms of reducing that firm’s ability to service existing and potential future contracts including those tendered to the market by HNP, Menter Newydd and its supply chain. An assessment of the likely impact on this aspect is required to allow the development of mitigation strategies.

6.8 The supply chain charter requires being effective in engaging and encouraging existing businesses to compete and win contracts in the Wylfa Newydd supply chain through pro-active policies and agreed targets by value and number. This will help growth of the existing business base and retention of staff. A monitoring and review regime which can amend the approach to address any identified deficiencies during its operational period is therefore essential. The IACC expect that the monitoring and review will be undertaken in partnership with the authority and other relevant bodies including representatives of the business community.

7 WELSH LANGUAGE AND CULTURE

7.1 Anglesey is recognised as one of the strongholds of the Welsh language. The Welsh language is a natural element of everyday life on the island and is a reflection of its traditions and culture. Linked to this is the rich history and Welsh culture that defines the area and its inhabitants. The sustainability of the Welsh language is dependent upon improving Welsh communities by providing ample employment, educational, cultural and social opportunities to use the language on a daily basis.

7.2 As previously stated in our response to PAC1 and the Project Update the IACC expects the Welsh Language and Culture to be treated as an all-encompassing theme and golden thread underpinning consideration of impacts and mitigation of all aspects of the Wylfa Newydd project. The authority does not consider that this approach has been taken by HNP in the PAC2 documentation as despite the statements that the Welsh Language is recognised as being important and running through all of the consideration of the impacts on it has been compartmentalised and considered in isolation on various elements.

- 7.3 The IACC recognise that the impact of this project is at risk of being significant and far reaching in terms of the Welsh Language and culture. It is therefore essential that HNP demonstrates a firm commitment, including through appropriate mitigation, towards maintaining and strengthening the Welsh Language and culture ensuring a sustained legacy for future generations as outlined above. Robust planning is required to successfully mitigate the cumulative effect of the project both short term and long term on the language and culture within all communities.
- 7.4 The initial commitment shown by HNP in the early workshops with the aim of developing an action plan and mitigation strategy is welcomed and the authority remains committed to continue with this dialogue based on the above. All key strategies need to state HNP's unequivocally commitment to mitigate against negative effects upon the Welsh Language and Culture.
- 7.5 The IACC is aware that HNP is developing a Welsh Language and Culture Strategy and welcomes this acknowledgement of the importance of these elements to the Island's communities and welcomes the consultation HNP has under on that element. HNP is encouraged to share this strategy with the IACC throughout its development in order to achieve the shared objectives of protecting and promoting these elements through pooling of expertise and local knowledge. The clear conclusion that there will be an overall adverse effect on Welsh language and culture through inward migration requires HNP to engage in short course to identify and develop suitable mitigation proposals.
- 7.6 The IACC have recently adopted the Isle of Anglesey Welsh Language Strategy 2016-2021 which aims to increase the number of Welsh speakers on the island from 57.2% to 60% by 2021 in accordance with the Welsh Government's draft strategy 'A Million Welsh Speakers by 2050'. The strategy recognises the potential impact that the Wylfa Newydd development is likely to have on the Welsh Language and defines the key considerations for any measures aimed at enhancing any benefits and reducing the negative effects on the Welsh Language. This strategy is a key consideration in any measures aimed at enhancing any benefits and reducing the negative effects on the Welsh Language and should be given appropriate weight in progressing proposals. The IACC expects to see clear acknowledgement of and alignment with this strategy in forthcoming Welsh Language and Culture Strategy.
- 7.7 HNP has made a high level commitment to use the Welsh Government's Risk Assessment Methodology to risk assess and validate the WLIA and mitigation strategy. This needs to be used to validate the robustness of impact assessing methodology, baseline information, assessment findings and proposed mitigations. The IACC welcome HNP's Welsh language pledge however there is a lack of clarity on any accountability arrangements, we would suggest that

an accountability framework needs to be adopted for example e.g. MOU or contract in relation to that Pledge. In addition, actions and measures to ensure the pledge is delivered need to be defined and implemented.

- 7.8 At this time, the WLIA does not fully recognise the enormous scale of the project and the direct and indirect impact of transient construction workers and their dependants will have on the Welsh Language and culture. This results in the report lacking sufficient commitment to undertaking mitigation steps immediately. It is essential to take action now in order to counteract the influx of workers engaged in the project.
- 7.9 The IACC considers that the overall number of workers' dependants at 480 (including 170 children) is of concern as this will have implications on schools, services and communities and greater clarity and certainty in terms of precise number of workers and expected dependents is requested ahead of submission to define impacts on schools, services and communities and allow work to identify clear mitigation requirements to be progressed.
- 7.10 It is noted that the WLIA interim report does not include education in the five key aspects of community life; the IACC considers that this is an omission which should be rectified.
- 7.11 In addition there is a need for appropriate interface with the Welsh Education Strategic Plan (WESP) and the specific targets which must be met at a local level. There is also insufficient interface with the Gwynedd and Anglesey's Single Integrated Plan 2014 and the document fails to acknowledge sufficiently the statutory footing of wellbeing in Wales and the requirements of the Well-being of Future Generations (Wales) Act 2015 and the Social Services and Well-being (Wales) Act 2014.
- 7.12 Further specific suggestions on how the Welsh language and culture should be considered within proposals, protected and strengthened have been given in response to question 5 of the PAC2 consultation and are set out in Appendix B of this response.

8 HIGHWAYS & TRANSPORT

- 8.1 The IACC is supportive of the online and offline works to the A5025 from Valley to the Wylfa Newydd site which will be a direct benefit to the developer to enable a safer travel route for its workers and contractors. We recognise the collaborative work which has been ongoing between the IACC and HNP to develop these proposals. The IACC expects this to continue as the proposals are refined.

- 8.2 The IACC also recognise that HNP has prepared an Integrated Traffic and Transport Strategy (ITTS) detailing proposals as part of the Wylfa Newydd Project and appreciate that this will continue to evolve as further details emerge. It will be important that there is further collaboration with HNP on the development and refinement of the ITTS.
- 8.3 Given that pre-application discussions have not yet commenced on the majority of the Associated Development and Off-Site Power Station Facilities we will only be offering high level comments on individual locations. IACC in its capacity as the Local Authority has provided comments on these sites in response to the details given without prejudice to any future decision of any part or function of the Council and for the purposes of this consultation only. Nothing in these comments may be taken to be the Council as Planning Authority's position on any of the matters considered should they be included in any application and any such application will be determined or responded to on its merits as made. Nothing in these comments can or should be taken as the acceptance by IACC of the principle of a proposed use for any site. The IACC would encourage HNP to take up the opportunity for further discussion on this at the Pre-Application Stage.
- 8.4 The IACC has provided specific comments on the bus routes and stops identified in response to question 4 of the PAC2 consultation and are set out in Appendix B of the response and that response should be read along with this section.
- 8.5 Further consideration is recommended to assess how linkages between the Parc Cybi site and the Port of Holyhead can be improved to complement and support the delivery of the Enterprise Zone site and enhancing connectivity with the Port which is a key international gateway. Consideration should also be given to whether any upgrade of Holyhead Port to accommodate shipments by sea is required or if improvement of linkages with the port to the transport links will be necessary.

Sustainable Travel (including HNP Shuttle Buses and Park & Ride)

- 8.6 The IACC welcomes HNP's objective to seek infrastructure improvements and promotional initiatives to increase levels of public transport, walking and cycling and to ensure that schemes offer efficient, flexible, reliable and sustainable modes of transport for the workers. However, with the increase in traffic especially in larger vehicles such as HNP Shuttle Buses along the A5025 between Wylfa and Amlwch there is increased risks to cyclists due to reduced road width and lack of roadside verges.
- 8.7 Whilst acknowledging that the proposed strategy of providing 'multi-stop' shuttle services to pick-up workers at numerous stops along North West and North

East Anglesey, may be feasible in theory, the IACC would question whether it is reasonable to assume that in practice all workers would be willing or able to walk or cycle to the nearest bus pick-up point.

- 8.8 As constantly highlighted in its earlier responses the IACC has serious concerns regarding the use of the A55 Junction 4 and the associated roundabouts capacity with the large number of vehicles entering and departing the proposed Park & Ride site. The comments below are without prejudice to that stance. Comments on the Dalar Hir site are provided in response to question 8 of the PAC2 consultation and are set out in Appendix B of the response and that response should be read along with this section.
- 8.9 HNP figures suggest that single car occupancy will be utilised at the Park and Share facility which goes against numerous local and national policies such as Planning Policy Wales, Edition 8 and the SPG GP 14 on Transport. Planning Policy Wales “PPW” and TAN 18 seek to ensure that the location of major travel generating uses are located near district centres, public transport interchanges and that facilities are located in close proximity to their users (3.7 TAN 18). PPW also promotes a resource efficient settlement pattern by locating developments so as to minimise the demand for travel, especially by the private car. Similarly, these policies expect major generators of travel demand to be located within centres or on accessible sites. It is highly likely that a high proportion of the workers would travel to the nearest pick-up point via car, particularly in times of inclement weather, which would increase the likelihood of indiscriminate and/or anti-social parking, causing obstruction and the potential for traffic congestion.
- 8.10 IACC envisage that workers will make informal arrangements to meet each other near the A55 corridor, most likely at junctions 6, 7 and 8 and on the mainland to car share their onward journeys to Dalar Hir. IACC also envisage existing Park & Share facility at St Tysilio, Llanfairpwll will fill up early with Horizon workers, thus depriving local car sharing opportunities as well as introducing parking problems. The provision of facilities along these junctions therefore needs to form part of the measures proposed by Horizon in connection with their park and ride strategy.
- 8.11 To increase the number of people sharing a vehicle, the IACC would recommend that smaller scale Park and Share facilities are constructed at strategic junctions (6, 7, and 8) on the Island and on the mainland along the A55. This would reduce the need for HNP to construct such a large facility irrespective of its location and would encourage car sharing and reduce the need for single occupancy car travel (there by promoting sustainable travel). This proposal would address foreseen problems of illegal and informal parking

arrangements and provide long term parking benefits similar to the existing Park & Share at St. Tysilio.

- 8.12 The solution of creating a number of Park and Share facilities would also add value to HNP's Integrated Traffic & Transport Strategy and also contribute to HNP's Operational Travel Plan. This would also help reduce congestion levels on Britannia Bridge and at A55 Junction 4.
- 8.13 HNP's statement that the majority of 800+ workers living in the Holyhead area are likely to be within easy walking or cycling distance of the shuttle bus terminus adjoining the railway station is not accepted and the IACC does not consider this conclusion to be robust. Proceeding on this flawed basis would increase the likelihood of illegal / anti-social parking, traffic congestion and road safety issues in the local area as workers drive to the pickup point where insufficient parking is available and the road impacts of the increased traffic have not been properly assessed or mitigated. HNP also need to provide further details of the parking provision that will be provided to the 3,500 workers staying at Kingsland / Cae Glas Temporary Workers Accommodation.
- 8.14 In order to address the IACC's concerns HNP should consider:
- 8.14.1 Providing additional pick-up points along the route for the 800+ workers anticipated to be residing in the Holyhead Area (at locations to be agreed with IACC).
- 8.14.2 Provide parking facilities at the Kingsland / Cae Glas Temporary Workers Accommodation to allow a proportion of the 800+ workers living/staying in the Holyhead area to use the Shuttle Bus service from this location. This would reduce the need for such a large car park at the chosen Park & Ride facility.

Travel to and from HNPs preferred Temporary Workers Accommodation from Mainland (at beginning/end of shift pattern)

- 8.15 The strategic road network on Anglesey does not include the Class III road to Rhosgoch and Burwen, as shown in numerous figures within the PAC2 documents Should the preferred site at Rhosgoch be brought forward there is likelihood of significant increase in uncontrolled traffic numbers using Class II, III and unclassified roads to access Rhosgoch Workers Accommodation from/to the A55. The IACC are concerned that workers will be 'rat running' across the island on unsuitable country roads at the beginning and end of the shift pattern. It would be naïve to expect that the majority of the construction workers to head north from Rhosgoch to the A5025, travel along the A5025 to Valley before joining the A55 on their way home. The likelihood is that they will follow the shortest route on Satellite Navigation and travel via the unsuitable Class III road to Tyn Ffrwd, before progressing along the B5111 to Llannerchymedd and then

onto the A55 via Trefor or Llangefni. That road infrastructure is unsuitable for the anticipated volumes of vehicles which would arise at shift changes. There is significant risk that this would lead to issues such as road safety concerns, increased congestion and increased potential for vehicle collisions, edge of carriageway damage and complaints by local residents which will lead to a negative legacy in terms of the construction of Wylfa Newydd. The IACC will require discussions with HNP to agree on adequate mitigation measures along the Class III road between Rhosgoch and Burwen if the Rhosgoch site is progressed.

Marine Off-Loading Facility (MOLF)

8.16 Although HNP proposed that the MOLF will deliver between 60-80% of material to the site the IACC believe that the numbers of HGV movements are not being given sufficient weight or consideration by HNP. At Hinkley Point C, EDF proposed to bring in 80% of materials by sea but still have up to 500 HGV movements per day site.

Highway Improvements and Enhancement Measures on the A5025 between Wylfa Newydd and Amlwch, including the road linking the A5025 to the proposed Temporary Workers' Accommodation at Rhosgoch.

8.17 The strategic road network on Anglesey does not include the Class III road between Rhosgoch and Burwen as shown in numerous figures within the PAC2 documentation.

8.18 IACC considers that the road is unsuitable to accommodate an increase in number of large vehicles (buses) due to restrictive widths and lack of roadside verges. Despite the relatively small overall increase in traffic volume, IACC considers the percentage increase in large vehicles (e.g. shuttle buses) at shift start/end times is very significant. The traffic flow increase should be assessed as an hourly increase in bus traffic (to include all Temporary Workers' Accommodation and 'Anglesey North East' bus shuttle service), rather than the vehicle Annual Average Daily Traffic (AADT). Accident data should be analysed for large vehicle types, as well as recognising the very high severity index. i.e. the ratio of killed and seriously injured compared to the total number of accidents.

Resilience of Britannia Bridge

8.19 The IACC re-iterates its position with regards to the resilience of Britannia Bridge. Local experience and traffic data already suggests that the Britannia Bridge is a pinch point on the A55 and at peak periods (eastbound AM and westbound PM), during summer months, or when the ferry has disembarked at Holyhead; this has considerable traffic implications on the Britannia Bridge. This is the only section of the E22 Euro Route which is single carriage so this is already a concern which will be further compounded by traffic generated by

Wylfa Newydd. Additionally, adverse weather conditions have a significant impact on both the Britannia Bridge and Menai Bridge (diversion route) where the bridges may be closed to high sided vehicles. This raises significant concerns with regards to resilience.

- 8.20 HNP need to work closely with the IACC, the Welsh Government, National Grid and other public sector partners (such as North Wales Police) to fully assess the potential impacts on the Britannia Bridge and develop appropriate mitigation to reduce the volume of HNP traffic crossing the bridge. These issues have been raised previously and need to be investigated further.

Operational and Emergency Arrangements

- 8.21 The IACC would welcome discussions with HNP regarding arrangements to deal with emergency events. We request that HNP engage with North Wales Emergency Planning Department on the Emergency Plan to adequately deal with various situations.
- 8.22 Currently there is no consideration of how HNP will manage a situation should a serious incident fully close the A5025, thus prohibiting access to the Wylfa Newydd Site and Associated Development Sites. No alternative suitable routes have been identified between Wylfa Newydd and the various Associated Development sites. Neither has there been consideration to targeted winter maintenance on Wylfa Newydd access routes or where there is potential for delay and disruption due to uncontrolled utility street works on Wylfa Newydd access routes.
- 8.23 The IACC considers that it may be expedient to consider the introduction of the Street Works Permit Scheme to manage utility works on Wylfa access routes to mitigate against delays caused by street works. Such a scheme would require to be publically consulted upon, submitted to and approved by the Welsh Ministers and therefore has a substantial lead in time before taking effect. HNP is therefore encouraged to engage with IACC in short course to establish whether such a scheme could mitigate some of the concerns raised and allow assessment work to undertaken to underpin the preparation of any scheme.

Traffic Management

- 8.24 HNP acknowledge that during the construction phase of the Associated Developments there will be increased traffic levels in the transportation of goods, materials and workers. The IACC have concerns on the significant increase in uncontrolled traffic numbers and use of unsuitable roads which will lead to a number of road safety concerns as has already been outlined. In addition to the suggested capital works to help overcome these concerns, the IACC suggest that HNP create the following:

- 8.24.1 A comprehensive and robust Associated Development Sites Construction Traffic Management Scheme for IACC's approval.
- 8.24.2 A detailed Project Execution Plan whereby the Logistics Centre and Park & Ride facility are constructed first as to minimise the impacts on the local road network.
- 8.25 At both the construction and operational phase of the project, HNP have acknowledged the need for a Travel Information Pack to be included in workers' contracts to encourage travel by more sustainable means. This proposed approach is insufficient and a more robust Travel Plan which would be monitored and updated regularly is required. The plan should provide incentives for workers to travel sustainably and to avoid dependence on the private car. The IACC will require further discussions with HNP to formulate an adequate and robust Travel Plan that is fit for purpose for both the construction and operational phase.
- 8.26 From a Highways and Transport perspective, the IACC suggests that HNP consider the following (not exhaustive):
- 8.26.1 Improvements on the direct route from Rhosgoch to the A55 which is the B5112 (A5 Treban to Llannerch-y-medd), B5111 (Llannerch-y-medd to Ty'n Ffrwd junction) and the Class III road from Ty'n Ffrwd junction to Rhosgoch TWA site - make suitable alternative route during an emergency event.
- 8.26.2 Specifying a contractual obligation that all workers must use a particular route as part of their employment contract.
- 8.26.3 Road improvements to the A5025 from Cemaes to Amlwch which would benefit the Wylfa Newydd project in the following ways:
- 8.26.3.1 Improved route for HNP shuttle buses to access Temporary Workers' Accommodation (TWA) as well as the proposed North-East service.
- 8.26.3.2 Improving the road linking Rhosgoch TWA to the A5025 to an acceptable standard.
- 8.26.3.3 Provide a suitable alternative route during an emergency event to similar standard of the Online Works to A5025 Valley to Wylfa Newydd.
- 8.26.3.4 Improve the road to a standard where it could be considered as an alternative emergency route in the event of an incident on the A5025 West.

- 8.26.3.5 Reduce the risk of HNP shuttle buses colliding with each other.
 - 8.26.3.6 Potential to link the improvements with cycling provision.
 - 8.26.3.7 Improved safety for non-motorised users (NMU's) to mitigate against the increase in large vehicles, e.g. HNP shuttle buses.
- 8.26.4 Improved safety for Copper Trail Cycle Route users.
- 8.26.5 A dedicated additional winter maintenance provision for Wylfa Newydd access routes;

9 TOURISM

- 9.1 Tourism is the largest sector of the Anglesey economy generating over £256M annually. We acknowledge that HNP and their consultants have submitted a Tourism Assessment for the IACC's consideration. The IACC are considering and will respond to the Tourism Assessment separately however in general we would comment that this Theme has not been considered in sufficient depth and detail within the PAC2 documentation. Issues arising from this assessment include adverse impacts on tourism accommodation availability, reduced visitor numbers during construction period, disruption to visitors through increasing congestion/trips generated by the development. Whilst noting the tourism survey results, surveying reaction to a project that is not yet built is presuming some certainty of the actual outcome which cannot be relied upon when dealing with people's perception.
- 9.2 The IACC welcomes the potential significant positive tourism benefits from this project with the site itself being an attraction and the potential increased use of local restaurants, pubs and food. The PAC2 documents do not acknowledge in detail the potential benefits/impacts and the IACC along with the Destination Anglesey Partnership would welcome further discussions surrounding enhancing the positive elements as well as adequately mitigating against adverse impacts. As previously stated in the IACC's response to PAC1 and Project Update, detailed tourism assessments require to be undertaken and mitigation measures to be developed with the IACC to ensure that adverse tourism impacts are either avoided, mitigated or compensated for.
- 9.3 The risk of deterioration in accommodation standards in the tourism accommodation assessment is recognised in the Tourism Assessment but the reference to proposed mitigation (B1.214) relates to the possible provision of leisure services not any reference to maintaining accommodation standards in the tourism sector.

- 9.4 The overall approach to assessing impacts on all types of accommodation is based on the availability of bed spaces and does not take into account the way in which accommodation would be let. In many instances this would not be on a bed space basis but for a whole property. The use of bed spaces underestimates the demand and also relies on having the ability to manage demand across tenures and types of accommodation as well as control the accommodation decisions of a significant in-coming labour force. The assessment of minor adverse impacts for the tourism sector would appear to downplay impacts and this is likely to be the case for other accommodation particularly in the private rented sector.
- 9.5 Maintaining and improving the tourism offer during the construction of Wylfa Newydd is of critical importance. Attractions are an important element within the wider tourism offer and the IACC sees the construction of tourism facility as being a unique proposition to our visitors. Hence, the IACC are supportive in principle of the concept of creating a Visitor and Media Centre. IACC needs greater dialogue with HNP on the creation of this centre, the exact location and the planned construction period. Anecdotal evidence from other sites is showing a large following for construction tourism, and the IACC believes the centre should be operational at an early stage of the project build in order to maximise on this potential and create a central focus for visitors wishing to view the site. The IACC envisages the new visitor centre being a major conduit between the community and the power station as HNP has identified within the consultation documents. This would provide a very popular wet weather visitor attraction, add to the range of educational facilities on Anglesey and make an ideal stop whilst circumnavigating the coastal path, or visiting the North of the island.
- 9.6 Overall there is limited additional work on tourism impacts and mitigation proposals. On the basis of the information provided it is not clear as to the extent of impacts on the tourism sector from the perspective of visitor activity, impacts on accommodation and wider impacts on activity within the sector including displacement of employment from businesses in sectors including hospitality, food, catering and other sectors of central importance to the tourism sector and wider economy. Reference to a tourism strategy which sets out mitigation measures is made but this is neither provided nor any detail given on mitigation.
- 9.7 This is highlighted as a topic that contributes to the wider case being made regarding uncertainty in assessments and the case for a Community Resilience Fund to enable intervention where impacts are occurring for which mitigation has not been proposed or is not proving effective. Other mitigation suggestions for further consideration include:

- 9.7.1 Monitoring officer/ resource to provide regular surveys with visitors to gauge impacts and adapt mitigation as the Wylfa Newydd development progresses.
- 9.7.2 Contribution to resource to existing activity to mitigate the loss of visitor and associated income.
- 9.7.3 Resources for training in wider sectors that would suffer from displacement effects e.g. food sector, hospitality/catering and other areas that could support the construction phase of the project to reduce the impact of employment loss/displacement in existing businesses and ensure a supply of suitably skilled labour. Accommodation and Food is highlighted in recent analysis as an important growth sector for Anglesey along with transport and distribution.
- 9.8 Wylfa Newydd will have a major impact on the Wales Coastal Path. There will be a significant loss of amenity to coastal path users, local residents and visitors to the area during the construction phase and potentially during the operational phase. During the operational phase, the permanent route of the Coastal path should be positioned as close to the sea as possible offering users the best coastal route option with enhanced sea views. One of the proposed alternative options achieves this aim, is therefore preferable and should be explored in more detail. The IACC would be pleased to discuss this further with HNP prior to finalisation of this aspect.
- 9.9 Where rights of way, byways and cycle paths are affected by the development of major projects, alternative routes should be planned for and promoted to both residents and visitors to encourage travel by sustainable modes and further discussions is required with the IACC to come to an agreement.
- 9.10 The IACC re-iterate this point as at this time Tourism has not yet been considered in sufficient depth and detail and would encourage HNP to give much more weight and consideration to this Theme ahead of any application.

10 CONSTRUCTION WORKERS ACCOMMODATION STRATEGY

- 10.1 The IACC welcome the inclusion of the Construction Worker Accommodation Strategy as part of the PAC2 consultation. This is a significant step forward from the PAC1 consultation and the Project Update (January 2016) which had little information on HNP's Strategy for accommodating temporary construction workers (in terms of number of workers, potential locations and distribution by accommodation type/sector).
- 10.2 There remains however concerns regarding the limited detail within the Strategy and the suggestion that there will be limited impacts from hosting the workforce for the Wylfa Newydd project. The IACC has significant concerns regarding HNP's proposed distribution of workers into the various sectors.

Private Rented Sector

- 10.3 HNP state that there is capacity of 1,300 bed spaces in the Private Rented Sector (PRS) and in the Construction Worker Accommodation Strategy it states that at peak, 1,100 workers will be accommodated in the sector. The IACC have serious reservations about this statement as HNP will effectively take up most of the headroom capacity in the PRS and yet appears to fail to recognise that this will have a considerable impact on this sector.
- 10.4 Evidence commissioned by the IACC suggests that only 260 private rented properties become available in Anglesey each year (churn). The evidence also states that if north Gwynedd was included, then the figure would be 858 properties each year (however this includes Bangor which is a University City).
- 10.5 The IACC appreciate that the above references properties and not bed spaces, however the lack of availability in the PRS will have a significant detrimental impact on future rental prices. Based on HNP's current Strategy, this will result in increased rent prices (due increased demand and less supply available on the market) and landlords being incentivised to end existing tenancies rather than renewing them in order to obtain higher rental income from construction workers. This will result in local people will not be able to afford to rent a house and this could significantly increase the risk of homelessness on the Island, displacement of local people who have to move to find affordable accommodation and the subsequent impacts on community cohesion, Welsh language and culture and availability of labour.
- 10.6 Given that lack of existing capacity in the PRS and the number of people currently on the waiting list for a Council property (350), any decrease in availability of houses to rent or increase in rental prices as a result, would cause a significant adverse impact to Anglesey's PRS which is unacceptable. HNP needs to address this up front by increasing supply of permanent houses available to rent (both for construction workers and local people) thus providing long lasting legacy.
- 10.7 The IACC fully recognise that Wylfa Newydd will provide an opportunity for PRS Landlords for the duration of the construction period (and potentially beyond) and this is welcomed and supported in principle, however this should not be to the detriment of the sector as a whole and more particularly the more vulnerable families who are currently housed in this sector.
- 10.8 The IACC suggests that the proposed mitigation include:
- 10.8.1 Supporting or promoting measures to increase supply of Private Rented Accommodation available on Anglesey. HNP will need to work with the IACC, Welsh Government and other partners to increase the supply of new

permanent accommodation, bringing empty homes back in to active use and encouraging landlords to increase the supply of PRS available and to ensure that it is of a sufficient standard.

10.8.2 Provide the IACC with a Housing Fund for the purpose of providing financial support for initiatives designed to deliver additional housing capacity in order to mitigate any potential adverse effects on the local housing market that will arise from the Wylfa Newydd Project. In respect of the PRS, the Housing Fund shall be used for initiatives such as:

- 10.8.2.1 The accreditation of Landlords;
- 10.8.2.2 Stimulating new supply in the private rented sector through financial assistance for minor improvements;
- 10.8.2.3 Supporting a rent deposit or guarantee scheme through the provision of rent deposits for households moving into the private rented sector;
- 10.8.2.4 Funding the employment of IACC Housing Officers to manage, administer and monitor the Housing Fund and Initiatives in addition to the funding of extra resources to enable the IACC's Environmental Health team to monitor the additional houses in multiple occupation.
- 10.8.2.5 Supporting other housing mitigation measures, such as emergency housing services, if residents do become homeless or displaced.
- 10.8.2.6 Monitoring supply and demand in the PRS.

Owner Occupied

10.9 HNP assumes that 730 construction workers will purchase their own property which in the context of Anglesey is a significant figure. HNP state that 9,561 bedspaces are available (of a stock of 38,450) and that the current turnover in the market suggests that 950 bedspaces are available. Based on this level of demand (i.e. 730); no direct effect on availability is expected therefore this will not have a significant effect on the owner occupied sector.

10.10 The IACC believe this is misleading and over simplistic, as the workers who are likely to purchase a property could be well-paid, senior workers who are likely to be on Anglesey for the duration of the construction period (and potentially beyond) and are likely to bring their families. These will most likely not be houses in multiple occupation which may house 3-4 construction workers to a property but family homes bought one per worker for them and their dependents. People do not purchase bedspaces they buy properties,

950 bedspaces cannot be compared to 730 properties; if 3 bedrooms is taken as an average for a property the 730 properties is 2,190 bedspaces.

- 10.11 Furthermore, in terms of the location of these properties, they are more likely to be on Anglesey (the wards of North Anglesey and potentially within 30 minutes of site) and could be 3+ bedroom family style properties. The number of available properties in this owner occupied sector (i.e. within 30 minutes of site) is therefore expected to be much less than what HNP are assuming (i.e. within the KSA, or 60 minutes to site). HNP cite that developers will anticipate and respond to demand to create additional bedspaces. The IACC consider there is little evidence to suggest this will actually happen, and this approach cannot be relied upon.
- 10.12 The potential impacts of workers purchasing properties on the Island on the existing housing market could be profound without appropriate mitigation being put in place. By reducing the number of houses available to buy for local people, this is likely to push up house prices meaning that local people cannot afford to buy a house in their local communities. This could lead to displacement of local people from their communities which could have a significant adverse impact on the sustainability of Anglesey's rural communities and on other key issues such as the Welsh language.
- 10.13 HNP will need to considerably increase the supply of houses on Anglesey to meet this increased demand through initiatives such as bringing back empty properties (which the IACC acknowledge and welcome), but also by building or stimulating the building of much more permanent accommodation on Anglesey than the 50 units proposed at Madyn Farm. As mentioned above, 730 dwellings during the construction period is a huge amount of properties in the context of Anglesey and this could result in significant long term adverse impacts on the local housing market and the communities, facilities and services of Anglesey.
- 10.14 The IACC suggests that the proposed mitigation includes:
- 10.14.1 Provide the IACC with a Housing Fund for the purpose of providing financial support for initiatives designed to deliver additional housing capacity in order to mitigate any potential adverse effects on the local housing market that might arise from the Wylfa Newydd Project.
- 10.14.2 Work collaboratively with the IACC, Welsh Government and other housing partners to provide more permanent accommodation on the Island which will ease the pressure on the housing market and will provide a legacy for both Wylfa Newydd operational workers and the residents of Anglesey.

- 10.14.3 Financial contribution and/or provision of social infrastructure facilities and services on Anglesey (details to be confirmed following assessment of capacity and quality of existing provision against future requirements) to provide adequate provision for the construction workers and the residents of Anglesey.
- 10.14.4 Any new housing built on the island must be in line with the LDP, and in areas where residents will want to live in the future (looking at future legacy) and must not adversely impact on language, and local infrastructure. The legacy should not be housing which cannot be sold in future years, which may result in a negative legacy.

Empty Homes

- 10.15 The IACC recognise and welcomes HNP's commitment to bringing back empty homes to active use. The IACC is supportive of the commitment to facilitate a reduction in the number of empty homes in Anglesey, but this should not only be to directly provide accommodation for construction workers but also to mitigate for wider displacement effects caused by the influx of workers and any consequential effects on rent levels and house prices.
- 10.16 To encourage owners/landlords to provide accommodation for both uses careful planning will required. Whilst there are in the region of 800 empty properties on the Island at any one time, there are many reasons why a property remains empty and therefore when making assumptions on the number of empty properties which could accommodate Wylfa Newydd Workers the figure should take account of those properties which are unlikely to be made available, for example:-
- "Transactional" vacancies, i.e. properties which are empty between let or whilst they are in the process of being sold;
 - Properties under renovation either to owner occupy or to let;
 - Properties unsuitable for upgrade to rental standards e.g. because of a lack of services or their location;
 - Owners not wishing to return their properties back into use for a variety of reasons.
- 10.17 On the Main Transport Route, there are currently 200 long-term empty properties. This demonstrates the extent of the problem on this side of the island which is going to be further impacted by HNP development. HNP should therefore commit to providing grants/loans to bring empty properties back to use as a means of mitigating against the potential displacement of local people from the PRS and owner occupied sector.

- 10.18 Uptake of the existing Houses into Homes loan scheme for landlords renovating/converting properties to rent has been high, and from discussions with some of the smaller developers and landlords, at least 6 of the projects have been developed with Wylfa Newydd construction workers in mind. However, many owners are awaiting the announcement of a definite starting date for the Wylfa Newydd build (Final Investment Decision) before making a decision to invest in their existing empty properties to prepare them for the rental market and before adding to their rental portfolio. It is therefore difficult to predict the demand for future funding.
- 10.19 Whilst empty homes can support the accommodation needs of construction workers, consideration should also be given to the under-utilised empty commercial buildings and chapels on the Island, which may be suitable for conversion into worker accommodation and become part of the housing legacy thereafter. This would align with the guidance given in the SPG which promotes and supports the conversion of existing buildings to provide worker accommodation.
- 10.20 The IACC recognise the role empty properties can play in increasing the supply of housing on the Island and welcome bringing these empty properties back to active use. This had many social benefits which should be encouraged. The IACC would urge HNP to work with the IACC and property owners in order to bring these properties back into use before HNP's Final Investment Decision. This will allow enough lead in time for these properties to be identified, a scheme to be established and work to commence on these properties.
- 10.21 The IACC suggests that the proposed mitigation includes:
- 10.21.1 HNP to fund an Empty Homes Scheme to encourage people to bring empty homes back into the housing market. This Empty Homes Scheme shall include properties for Wylfa Newydd Workers as well as for local people in order to mitigate against any displacement issues in the PRS and to ensure that local people can purchase a home during the construction phase.
- 10.21.2 HNP to fund 2 Empty Homes Officers for the build period and financial grant availability for owners of empty properties. These properties can be brought back into use, and could for example house 3 contractors in each dwelling. This initiative would improve the condition of the existing housing stock in the private rented sector, which would be monitored for health and safety for the future through Rent Smart Wales and our local Environmental Health Service. This work needs to

start in 2017. Waiting until Wylfa Newydd Final Investment Decision (FID) will be too late.

Horizon's Construction Worker Accommodation Strategy

- 10.22 Although we recognise that a buffer/contingency is required for construction worker accommodation, Temporary Construction Worker Accommodation should not be seen as a default position if adequate provision is available in other sectors. HNP will need to provide a choice of accommodation and up front mitigation will be required to increase the level of housing stock (supply) to meet the demand. This includes bringing empty homes back to active use (as identified above), increase the supply of permanent accommodation (to rent and to buy) and provide contingency for the IACC to mitigate against any adverse impacts on existing residents (e.g. private rented sector and the ability of local people to afford a house due to HNP taking up the available stock driving up property prices).
- 10.23 The IACC understands the proposal for 500 bed spaces on site (although this requires significant further clarification/justification in terms of what type of worker is 'essential' to be housed on site) and are fully supportive of the use of Land & Lakes to provide 3,500 bedspaces given that it has recently secured planning permission and leaves an acceptable legacy for Anglesey. The IACC is however concerned that if a deal cannot be struck with Land & Lakes then this provision will automatically default to the HNP preferred site at Rhosgoch and other accommodation types/sectors. Although this deal is subject to a commercial negotiation between Horizon and Land & Lakes (which the IACC wish to play no part or influence whatsoever) a contingency must be factored in at this stage for the IACC and the public's consideration (i.e. a credible alternative to Land & Lakes).
- 10.24 The IACC also require more permanent accommodation than just 50 units at Madyn Farm to be provided. There are numerous other potential sites which are suitable in Amlwch, including Amlwch A which has a housing allocation in the forthcoming JLDP and other areas within 30-60 minutes as sites which are suitable for permanent accommodation. Working collaboratively with the IACC and the WG, the IACC believes that more permanent housing should be developed which will provide a greater legacy and could provide accommodation for the 730 workers who are anticipated to purchase their own home during construction and the operational workforce thereafter.
- 10.25 Furthermore, if adequate provision is not available in the other sectors (i.e. tourism, PRS and owner occupied) equally, the default should not be Rhosgoch. HNP will need to ensure that adequate provision is available in the PRS so as not to drive up rental prices and adversely affect resident's ability to afford to rent a house. In the same vein, tourism capacity should be

carefully considered (i.e. in terms of the number of bed spaces available) but also this analysis should be looked at spatially in order to maintain an appropriate balance between tourism and construction workers accommodation provision.

- 10.26 HNP will also need to ensure that the Island's facilities and services are not adversely affected during the construction phase. This includes for example leisure facilities, GP Surgeries, Dentists, schools, Post Office etc. Being a 9 year construction project, Wylfa Newydd could have an impact on Anglesey's facilities and services for a number of years which needs to be adequately and appropriately mitigated. This is particularly relevant to Horizon's Construction Worker Accommodation Strategy as the majority of these social impacts will dependent on this Strategy (i.e. where the workers are going to be located and in what numbers, what social infrastructure requirements do the workers require and what is the capacity of existing provision, who has responsibility for providing this provision, how is this going to be provided and where.
- 10.27 Given the scale of this project and the number of construction workers anticipated, this will undoubtedly have an impact on Anglesey's social infrastructure. Although it is difficult to account for personal choice and human behaviour, the number of workers who will not be in purpose built campus style accommodation is still significant and will have an impact on Anglesey's facilities and services. Even the workers in the temporary camps will seek facilities and services in their 3 days off which needs to be considered. The IACC will therefore seek mitigation for both these quantifiable and unquantifiable impacts. This could for example be improvements to leisure facilities, healthcare facilities and similar provision.
- 10.28 The IACC suggests that the proposed mitigation includes:
- 10.28.1 HNP to increase supply of accommodation in other sectors (particularly PRS, owner occupied and latent accommodation). This will reduce pressure on an already constrained housing market and will ensure that the default position is not temporary workers accommodation. Any additional housing should be quality housing, which can be as part of future housing legacy for the Island. The IACC will work with HNP to create accommodation models which can be transferred from construction workers accommodation into quality family homes, post construction period.
- 10.28.2 Continue to develop and fund the Construction Worker Accommodation Management Portal (CWAMP). This will ensure that an appropriate mix of accommodation type is utilised and will ensure that an appropriate

spatial distribution of the workers is achieved. Monitoring of the portal should be undertaken against a set of agreed thresholds which when reached, trigger the release of a defined number of temporary construction worker housing.

- 10.28.3 The CWAMP concept will only partly answer the issues which relate to the local housing market context, but will help towards managing the contractors based in the PRS and will also help raise the condition of the PRS stock on the Island, through regular checks of the properties by Environmental Health Officers and Housing Officers. Membership and governance arrangements of the CWAMP will be essential to get this right, together with an agreed code of conduct and implications of breaking the code, being made explicit. This will lead to reduced social cohesion issues on the Island, thereby reducing the workload of the IACC's Officers, in particular the Anti-Social Behaviour Officer. There will be a need for HNP to employ additional ASB officers, or fund the IACC and Police to do so.
- 10.28.4 Work collaboratively with the IACC, Welsh Government and other housing partners to provide more permanent accommodation on the Island which will ease the pressure on the housing market and will provide a legacy for both Wylfa Newydd operational workers and the residents of Anglesey.
- 10.28.5 Financial contribution towards and provision of adequate social infrastructure provision for the construction workers and Anglesey residents. In response to a question raised by HNP in the Project Update 2016, improvement of existing facilities and services was the preferred option and the IACC would support this view.
- 10.28.6 There is a need for a specific package and strategy, working with the IACC's Housing Services, on how HNP will support the vulnerable households potentially displaced by Wylfa Newydd development. We estimate that 2,000 Anglesey households will be at risk, if rent is increased by 10% locally in the PRS, of these 330 will be pensioners, and 598 lone parents.

11 LEGACY

- 11.1 The IACC believes that Wylfa Newydd has the potential to bring significant benefits and impacts to Anglesey and its communities for a number of years. The development, operation and legacy of the Wylfa NNB (and its associated developments) will be key to transforming the long term sustainability, wellbeing and vibrancy of the island and its residents.

- 11.2 Legacy needs to be better defined. At present there is a complete lack of detail, on how funding may be provided and there is limited clarity on the mechanics of delivery, of targets, scope, timing and duration. For all legacy benefits identified, the IACC will expect such details to be provided in advance of submission so that it can comment appropriately within the Local Impact Report. We also understand that such information will be of value to the examining authority which (see NPS EN-1 paragraph 5.12.8) is required to consider any legacy benefits that may arise.
- 11.3 The IACC is currently developing a thematic framework to outline our legacy vision and aspirations from the various major developments proposed for the island and we will be engaging further with HNP, other companies, communities and organisations to secure support for its delivery. For the purpose of this framework, 'legacy' means ensuring a positive impact for Anglesey and its communities from the development, delivery and hosting of all proposed major projects.
- 11.4 The IACC's legacy aspirations are also encompassed within its vision for the Wylfa Newydd project. This vision is set out clearly within the Wylfa Newydd SPG:
- 11.5 The New Nuclear Build at Wylfa is a positive driver for the transformation of the economy and communities on Anglesey, providing sustainable employment opportunities, improving the quality of life for existing and future generations and enhancing local identity and distinctiveness.
- 11.6 Legacy benefits are not seen by the IACC in purely monetary terms and value. Legacy can relate to the spatial impacts of Wylfa Newydd and what Anglesey will look like post construction - including the location and purpose of all associated developments - and what additional facilities and resources will be required to service these sites. Achieving a positive legacy is also linked to providing future employment for the island's residents; ensuring local businesses can capitalise upon supply chain opportunities; improving or developing new community facilities and enhancing Anglesey's infrastructure. Legacy benefits are also integral to improving health, well-being, quality of life and the Island's natural environment, as well as supporting and strengthening the Welsh language and culture. These legacy benefits can be delivered through both statutory and voluntary mechanisms, and are an appropriate means to mitigate and/ or compensate for adverse impacts.
- 11.7 We recommend that meaningful and proactive legacy discussions begin as soon as possible with HNP in order to ensure that all opportunities to improve the quality of life and wellbeing for the island's existing and future generations are capitalised upon. There is a need to ensure that Wylfa Newydd (and its

associated development) are developed, constructed and operated in a co-ordinated and integrated manner to best influence and support the short and long term future of Anglesey.

- 11.8 The inclusion of a Chapter within the Main Consultation report which establishes HNP's commitment to ensuring that the Project delivers long-term benefits and enhancements for communities throughout its life, including positive legacy benefits, is welcomed. However, many of the legacy benefits listed within the document represent, in the opinion of the IACC, secondary benefits resulting from project requirements rather than legacy benefits in their own right. For example the legacy resulting from the A5025 improvements is a by-product of the requirement to enhance the safety of the highway in order to facilitate the project. Similarly the renovation of the existing housing stock is required to mitigate the effects of the project on the local housing market, the continued occupation of the properties following construction is again a by-product of the project.
- 11.9 In addition, some of the benefits identified, such as the retention of leisure facilities at Rhosgoch would be entirely inconsistent with the IACC planning policy and lead to a facility some distance from the main population centre in Amlwch. Local community legacy would be better served by the enhancement of the existing Amlwch Leisure Centre.
- 11.10 In view of the above the list of legacy benefits set out by HNP forms, in the opinion of the IACC a starting point rather than a comprehensive list of what local communities would expect as a result of hosting a project with a lifespan of up to 100 years. Reference by HNP to the list of benefits still being under consideration and remaining "along the lines of those discussed at Stage One Pre-Application Consultation" is disappointing and given HNP's declared timetable to submission suggests that a great deal of work requires to be done, in partnership with the IACC over the coming months.
- 11.11 The IACC remains of the position that opportunities to enhance legacy, in order to secure the greatest positive outcome from the project should be identified against a range of social, economic, environmental and cultural measures. The IACC provides a large number of possible legacy examples throughout its SPG and in many cases the potential to maximise benefits arises with the appropriate siting of facilities. For example, were HNP to revisit its current unacceptable disregard of Llangefni as a location for any form of project related development opportunities for legacy within or in close proximity to the Island's largest community, then significant legacy benefits could be realised.

11.12 In addition to a lack of appropriate consideration given to effects that location can bring for legacy HNP should also consider legacy in addition to the socio-economic sphere. There is presently a total lack of reference to environmental legacy, including improvements to the culture of the island, its historic places and landscapes and to its natural history. Located alongside SSSI's, SPA's, an AONB and Registered Park and Garden for example the IACC would expect to see commitments to long term enhancement and stewardship leaving a strong environmental legacy for future generations.

11.13 The following list is non-exhaustive but includes some of the potential thematic areas which the IACC would expect to see legacy benefits to assist in:

Creating a thriving and prosperous economy

- A confident island that prides itself on its strong economy, providing employment opportunities for all.
- An island recognised globally for the scale and diversity of its energy research, development, production and servicing.
- A hub for sustainable businesses that support a prosperous, low carbon society and encourage innovation and entrepreneurship.
- A well connected place with robust transport infrastructure.
- An island that continues to attract a diverse range of visitors.

Enabling residents to achieve their full potential

- A place where opportunities exist for young people to remain on the island to live and work.
- A well-educated and highly skilled population.
- A place where communities and individuals can maintain and develop their independence.
- A place where people choose to live and thrive.
- An island which projects a positive image regionally, nationally and internationally.

Ensuring residents are healthy, safe and equal

- A safe, secure and attractive island to live and work.
- An island with excellent community services and facilities, including high quality and modern schools, affordable housing and effective health provision.
- A place where deprivation, inequality and social immobility have been reduced; and services meet the needs of vulnerable groups.
- An island where people actively participate in recreation, leisure and cultural activities.

Protecting and enhancing the natural and built environment

- An island that recognises the value and quality of its environment.
- An island with a rich and diverse natural environment that supports resilience.
- A place where the natural and built environments are used sustainably.
- An island with a high quality public realm.

Maintaining and promoting the language and culture

- A place that celebrates its unique cultural and geographical identity and distinctiveness.
- An island that embraces and promotes its proud cultural heritage and the Welsh language.

11.14 An important aspect of securing a positive legacy will be the ability of the community to address unforeseen or unquantified issues as and when they arise. There is a need to deliver a mitigation response that has sufficient flexibility to respond. Where impacts cannot be fully assessed in advance or fully mitigated then alternative mitigating measures will be required. This would include the Community Resilience Fund designed to deal with unanticipated or underestimated impacts or those which are simply not quantifiable. The Community Resilience Fund would:

- address the consequences of development;
- specifically target and empower local people in responding to the impacts of development;
- be intentionally flexible in order to be able to address impacts as they occur and tackle the problem of unusable funds arising from overly restrictive distribution criteria.

11.15 The IACC considers that detailed legacy discussions need to begin as soon as possible in order to ensure that all opportunities to improve the quality of life for the island's existing and future generations are taken.

12 CUMULATIVE IMPACTS

12.1 Given the number of major developments proposed on Anglesey over the next 5 to 10 years, there is a real risk of adverse cumulative impacts on the Island. This includes cumulative impacts within HNP's development (i.e. Wylfa Newydd Site and associated developments) and cumulative impacts with other major development such as Land & Lakes, National Grid, LNG Great Lakes, Orthios and others.

12.2 The IACC re-iterates that HNP will need to consider and account for these cumulative impacts throughout the project going forward. The IACC would

expect to agree in advance the approach and methodology to assess the cumulative impacts on the Island and to monitor the cumulative impacts as major projects develop with HNP.

- 12.3 Key cumulative issues for the IACC include the potential economic opportunities afforded to the local workforce as a result of a number of projects coming forward on Anglesey at the same time. We are aware that HNP is looking at the skills required locally with a view to increasing training to enable workers to take advantages of employment opportunities and supporting STEM awareness and training in schools in addition to post-secondary education to ensure that younger residents are able to identify and take advantage of future workplace opportunities. Precise details of the measures to be taken should be provided.
- 12.4 Support for improved educational attainment and the raising of aspirations will also be important in addressing the potential for significant cumulative effects from all of the Wylfa Newydd Project developments on businesses and the supply chain. Such effects are broadly considered to be beneficial due to an increase in demand. However local businesses may struggle to retain and recruit in the face of competition from the project and a requirement to support existing businesses through skills development and training support will be needed.
- 12.5 Cumulative effects will be felt on the Island's tourist industry. HNP identifies mitigation such as marketing and 'Brand' support for the tourism sector as a means to reduce effects. This commitment is supported but mitigation in the form of potential alternative tourism attractions to maintain numbers of visitors during construction (e.g. improvements elsewhere to the long distance footpath network, cycle network, and early introduction of the visitor centre or a temporary facility) will also be required. Marketing and branding should also commence in advance of construction to ensure that visitors are not dissuaded initially from visiting Anglesey.
- 12.6 Cumulative environmental effects upon local communities and the environment may include those arising from air quality, noise and from visual effects. A combination of effects may give rise to a significant level of disturbance upon communities which surround the site and the main transport corridors which connect it. The IACC expects to see sufficient information, including cumulative visualisations, to enable robust conclusions to be reached on the significance of effects upon local communities. Similarly sufficient information will be required to enable consideration of the combined effects upon the AONB and other designated sites.

- 12.7 We remain concerned over the lack of consideration of the Welsh Language as a receptor in the cumulative environmental documentation submitted. It is considered that cumulative effects upon the Welsh language should be assessed and mitigation identified where conclusions of significance are reached.
- 12.8 The above effects are not exhaustive. The IACC are also eager to explore the cumulative impacts on housing, social infrastructure, highway infrastructure and health well-being.
- 12.9 The IACC has reviewed HNP's cumulative assessment. Comments on the level of information provided, the methodological approach, and the long and short lists of sites are provided within the IACC's PEIR Response document.

13 NUCLEAR WASTE

- 13.1 The consideration of radiological issues within the PEIR is welcomed by the IACC although further detail is still required. The lack of a chapter at PAC1 was a concern of the IACC and it is noted that the Secretary of State did request consideration of such effects within the EIA Scoping Opinion.
- 13.2 The IACC accepts that the control of radiological emissions will be controlled by other regulators however the authority is keen to understand the potential for cumulative effects between the operation of Wylfa Newydd and the decommissioning of the existing Wylfa Power Station. Whilst the PEIR references consideration of such effects within the cumulative assessment, and whilst the existing Wylfa Power Station is scoped in, no subsequent reference is made and no assessment is provided.
- 13.3 On the issue of cumulative effects the IACC also would wish to see information provided on the type, number and frequency of vehicle movements associated with the movement of radiological material through the communities which live alongside the A5025 and an estimate of the dosing that may result. HNP will be aware that matters of perception around health are a key concern of local communities and the implement of mitigation and/or compensation measures agreed with the IACC, should be considered where the potential for adverse impacts on local communities, the economy or the environment are identified.
- 13.4 We note the potential for the continued storage of spent fuel up to 140 years post operation (with HLW also, potentially being stored at least until after decommissioning). The environmental statement should consider the effects of retaining such a facility over such a long period of time which represents the lifetimes of generations of Anglesey residents.

13.5 Information on the type of waste generated, amount and requirement for storage is welcomed. We would in addition wish to see information provided on the anticipated variance in waste over the operation of the plant and significant variances should be modelled both for their effects upon transportation (where the waste is to be exported off site).

13.6 The potential for climate change effects so long into the future will be difficult to accurately analyse but we do expect HNP to demonstrate the safe storage of spent fuel over the lifetime of the facility.

13.7 In going forward, the IACC would expect the environmental statement to include quantitative analysis and evidence to support the assertions and conclusions contained within the PEIR. In addition, and consistent with the SPG, the IACC expects HNP to:

- Identify and assess the potential effects of nuclear waste storage;
- Fully engage with the Island's communities in developing proposals for nuclear waste storage;
- Implement mitigation and/or compensation measures as appropriate;
- Provide adequate site security via the Nuclear Constabulary;
- Provide clarity on the means of decommissioning.

13.8 HNP require undertaking more work to identify the potential effects upon local communities and identify mitigation and compensation measures in line with SPG GP17. This will include providing a fund to cover residual impacts which have not been contemplated and are either unquantifiable or capable of mitigation but will nevertheless be experienced by communities and their residents. Such impacts will include dealing with the prospect of nuclear waste and spent fuel being stored at Wylfa Newydd not for an 'interim' period but for up to 140 years.

14 WELLBEING, COHESION AND EQUALITY

Wellbeing, Scope of Impact Assessments

14.1 Specific responses on health well-being and equalities queries raised in PAC2 have been given in response to questions 6 and 7 of the PAC2 consultation and are set out in Appendix [B] of the response which should be read along with this theme.

14.2 As previously stated in the Local Authority's response to the Wylfa Newydd Project Update and the Health Impact Assessment Progress Report (HIAPR), the Council expects Wellbeing to be treated as an all-encompassing theme underpinning consideration of impacts and mitigation of all aspects of the Wylfa

Newydd project. It is of concern that this approach has not been taken by HNP in the PAC2 documentation and the IACC would encourage HNP to revisit this aspect prior to progressing the final HIA.

- 14.3 The PAC2 documentation is based on the narrower health impact assessment requirement (which pre-dates the Wellbeing legislation) and does not appropriately address wellbeing. This is despite the issue being raised by the Council in its response to the Project Update document and the HIAPR and also a number of discussions between HNP, the Council and Wellbeing partners over the past 6 months.
- 14.4 The HIAIR discusses the demand for some medical and health care services but does not make any reference to social care and wellbeing services. This is a significant omission as the Social Services and Wellbeing (Wales) Act 2014 provides a framework for further collaboration and integration of health, social care and wellbeing. This is regrettable as the Council has previously stated this in its response to the Project Update document and the HIAPR.
- 14.5 The three draft Impact Assessments (Health, Environmental and Equalities) and any mitigating actions cannot be developed in isolation, without full consideration of the entire project. The proposals continue to lack sufficient detail. Clarity on these matters is crucial in order to enable:
- A well informed assessment of community, health, social care and wellbeing impacts
 - Development of ambitious legacy investments for communities on Anglesey for the mitigation of adverse impacts (both locality specific and Anglesey wide).
- 14.6 There are significant data gaps in the community, health, social care and wellbeing aspects of the impacts assessments being:
- 14.6.1 Current data on health, social care and wellbeing services and capacity
- 14.6.2 Qualitative information collated from vulnerable children, young people and adults on care and support services and capacity
- 14.6.3 Factors that have an effect on the quality of life of individuals and communities on the Island
- 14.6.4 Community wellbeing baseline profiles and state of reports for each electoral ward on the Island from an economic, social, environmental and cultural wellbeing perspective (underpinned by the Wellbeing of Future Generations sustainable Development principle).

14.6.5 Critical assessment, analysis and interpretation of likely impacts of Wylfa Newydd on social care and wellbeing and the resilience of the Island's communities.

14.7 As previously stated in the IACC's response to the Project Update document and the impact assessment progress reports, the current Impact Assessments are fragmented and are not integrated assessments across the plethora of community, health, social care and wellbeing considerations. Information in the individual impact assessments is contradictory. The Equality Impact Assessment has been developed within the framework of the English legislative requirement and makes no reference at all to the Welsh specific duties. Also, the EIAIR discusses a very narrow interpretation of public services, makes no explicit reference to services that are commissioned to meet the needs of vulnerable children, young people and adults and mental health/illness issues are a significant omission. The IACC suggests the following points are considered:

14.7.1 Steps should be taken to ensure that Wellbeing is treated as an all-encompassing theme throughout the Project.

14.7.2 As previously proposed, the IACC requests a more detailed discussion on how the health, social care and wellbeing impacts of the proposed developments are addressed as part of the entire project. Consideration should be given to including this within the scope of the community cohesion assessment (which was not included in PAC1 or PAC2 and is yet to commence). The proposed Health and Wellbeing Strategy should also be a focus for these discussions.

14.7.3 An assessment of the impacts on demand for social care and wellbeing services should be undertaken jointly with the work planned on identifying the impacts on demand for medical and healthcare services and mitigation measures.

14.7.4 Early sight of the final proposals for the whole project is required in order to ensure a well-informed assessment of impacts and proposals for mitigation. There are key considerations for statutory services and partner organisations in the 3rd Sector and independent sector which will require adequate time to provide a robust response and propose mitigation.

14.7.5 Urgent steps should be taken to commission work packages to fill the data gaps identified in order to ensure a robust baseline profile and impact assessment of community, health, social care and wellbeing conditions upon which to develop sustainable mitigation measures.

- 14.7.6 Steps require to be taken to ensure that the impact assessments are integrated assessments across the spectrum of community, health, social care and wellbeing considerations. Information in the individual impact assessments should be reviewed to ensure that the information is current and is not contradictory.
- 14.7.7 The scope of the HIA must be broadened to include people with learning difficulties, cognitive impairments and additional learning needs and also long term chronic conditions as affected population groups.
- 14.8 Local data for the population near the Wylfa Newydd development area suggest above average rates of obesity compared to Anglesey and Wales. Any reduction in the availability of sports and leisure facilities or the attractiveness of outdoor spaces for recreation may make this aspect harder to address. Relocating activities to Amlwch Leisure Centre is not a sufficient measure to mitigate against these impacts. Noise, dust and visual appeal may also affect how areas are used for physical activity.

15 SAFEGUARDING, COMMUNITY COHESION AND IMPACTS

- 15.1 Safeguarding, lifestyle and behaviours are all issues of significant concern which will affect community cohesion of local communities. HNP have not properly recognised the importance of ensuring robust safeguarding arrangements in place as proposed by IACC in its response to the Project Update Document and HIAPR.
- 15.2 The IACC notes that HNP intend to have policies in place for workforce conduct which will set a clear expected standard of conduct. IACC believes that HNP should also apply similar, robust conduct expectations for its contractors.
- 15.3 Any increase in risk taking behaviours by the population hosting the construction workforce and young people will have an impact on community cohesion. For example an increase in alcohol consumption whilst boosting the general night time economy is highly likely to have adverse effects such as increase in community tensions, rate of anti-social behaviour incidents, violent/hate crime incidents and consequently increase the fear of crime.
- 15.4 The IACC believes that a goal of an Island of cohesive communities is essential and safer communities through our joint working with the Police and other Blue Light services and the Community Safety Partnership should be a given. IACC are concerned about the potential increase in Human Trafficking and modern day slavery activities as a direct impact of Wylfa Newydd. These behaviours have serious, adverse impacts on local communities. PAC2 does not include proposals to illustrate how HNP intends to inter-connect with existing groups

and structures who lead on modern slavery and human trafficking, these should be set out and consulted upon ahead of submission of the applications.

- 15.5 IACC agrees with the view of HNP that it is imperative that consideration be given to how health promotion activities amongst the workforce, dependents, facilities management, supply chain and local communities can be effectively targeted and sustained during the construction phase of Wylfa Newydd. We are of the view that vulnerability will be particularly significant in the following situations – people living close to construction worker accommodation buildings, young adults and people with learning difficulties, cognitive impairments or with additional learning needs (being more impressionable) and people who already engage in behaviours for which the health risks may increase.
- 15.6 In addition to young people, vulnerable adults with care needs and older people should also be considered as groups being particularly sensitive in the population. These adults are often integrated in local communities, living independently and supported to meet their care needs. It is absolutely paramount that these potential safeguarding risks are managed and minimised through effective mitigation measures. The IACC suggests the following are considered:
- 15.7 HNP should engage with IACC and partner agencies to ensure robust, integrated safeguarding arrangements in order to minimise any potential safeguarding risks during the construction phase of Wylfa Newydd and beyond. These arrangements should include, amongst other matters, the following elements:
- 15.7.1 Vulnerable adults in the vicinity of the development and also further afield across the Island be encouraged to engage with activities as part of Agewell and Community Hub activities. Capacity of these hubs will require expansion and investment by the developer
- 15.7.2 In addition to a 24/7 hotline, there also needs to be a financial agreement in place between HNP, partner agencies and community representatives to deal with lifestyle issues resulting from crime and disorder etc.
- 15.7.3 Human Trafficking and modern day slavery - HNP should engage with the relevant authorities to ensure greater controls are in place during the construction phase in order to proactively respond to and minimise the potential for significant safeguarding issues
- 15.7.4 A mechanism be established to monitor the wellbeing of affected communities and robust baselines established against which to evaluate impacts of lifestyle

and risk taking behaviours (this is currently a data gap which forms part of a resource bid to HNP in July, 2016)

- 15.7.5 Diversify the functions of the Housing Hub in order to minimise any potential safeguarding risks to adults should they choose to rent out spare rooms.
- 15.7.6 Urgent steps require to be taken to complete the proposed assessment of community cohesion to realise the goal of an Anglesey of cohesive communities. The impact assessment should also include mitigation measures to minimise adverse impacts including:
- HNP to acknowledge the obligations that will be required of the Blue Light organisations in the form of extra policing, manpower and resources, facilities etc all of which will be as a direct consequence of the HNP proposals
 - Further discussions with IACC and partner organisations to integrate with existing safeguarding structures to tackle modern slavery (both in terms of intelligence sharing and bolstering of victim support capacity)
 - A shared ambition of communities across the Island which are more attractive, viable, safer and better connected as a consequence of Wylfa Newydd.
- 15.7.7 Consider how health promotion activities (including sexual health) with the workforce and local communities can be effectively targeted and sustained during the construction phase of Wylfa Newydd.

16 ACCESS AND SERVICES

- 16.1 On air quality, HNP are anticipating periodic elevated levels of Particulates (Dust) and Nitrogen Dioxide. Consideration is being given to what air quality monitoring should be conducted and how vulnerable people living nearby can be alerted when the combination of weather conditions and Wylfa Newydd activities impact adversely on air quality.
- 16.2 Noise is anticipated as being a significant impact; it is likely that the IACC will receive complaints on this issue which it is obliged to investigate. Of those residents living closest to the construction works, people who spend a large amount of time at home during the day, including older people, people with disabilities and parents at home with children, will be most likely to be affected. Children at Cemaes Primary School will experience an increase noise levels during construction.
- 16.3 Accommodating workers in private rented sector (such as spare bedrooms) poses the potential for significant safeguarding issues unless managed

appropriately to minimise risk. The IACC is concerned as regards how to ensure adequate measures in place to:

16.3.1.1 Protect vulnerable children, young people and adults within dwellings where occupiers let spare rooms or empty properties

16.3.1.2 Respond to the consequences of utilising housing options for construction workers that would otherwise have been available to accommodate vulnerable individuals living in local communities who are reliant on state benefits as their only source of income.

16.4 There remains insufficient recognition of impacts on local transport infrastructures – in particular the A5025 between Cemaes and Amlwch. As previously advised in response to PAC1, Project Update and HIAPR, this is a high profile, political issue and has not been fully addressed despite it being the main highway artery between the proposed development site and possible locations for temporary worker accommodation. The HIAIR does not adequately consider how the resilience of both the Menai and Britannia Bridges between the Island and the mainland will be assessed should there be a major incident. Users of health, social care and wellbeing services and also the professionals who support their health and social care needs travel extensively on the Island and on the mainland – to access or provide health and social care services.

16.5 The IACC suggests that the following are addressed:

16.5.1 IACC will expect a scheme of monitoring for Nitrogen Dioxide in and around the development, A5025 and A55 (Llanfairpwll By-pass). There should also be a further scheme of monitoring for fine particulates (PM10 & PM2.5) and nuisance dust. The Council has already expressed its preference for adoption of WHO levels for PM2.5 as there is no recognised safe limit for this pollutant. We concur that given the potential impacts on health, there should be a method used to alert people when levels are high.

16.5.2 IACC expects HNP to work with communities, 3rd sector and other providers in developing community activities, clubs or respite centres where individuals can seek refuge from the effects of construction.

16.5.3 Resilience of both the Menai and Britannia Bridges should be fully considered in the impact assessments and discussions between IACC, Welsh Government and HNP on a mitigation strategy.

16.5.4 Improvements to the main artery highways on the Island should be assessed and consideration given to alternative transportation options (other than roads)

16.5.5 Have in place a fully costed and funded traffic management plan which factors in scenarios in the event of major incidents.

Displacement of health and social care workforce

16.6 As considered under theme 6 above, displacement of skills/jobs will not be confined to the construction sector and it is disappointing that this has not been recognised by HNP.

16.7 HNP should recognise the significant risk of health and social care job displacement and commit to working with the IACC and other providers to address this issue through a long term workforce strategy

Engagement and consultation

16.8 Multiple references are made in the PAC2 documentation to an intention on the part of HNP to undertake further engagement and consultation with local communities and effected groups which in the arena of health, social care and wellbeing will include vulnerable and hard to reach groups however the PAC2 documentation does not explicitly make reference to this. IACC believes that this engagement and consultation work needs to be undertaken in a meaningful and engaging manner. This has been previously raised with HNP and formed part of the IACC response to the Project Update Report and the HIAPR.

16.9 As previously proposed by IACC, HNP should adopt the Participation Cymru 10 National Principles of Public Engagement framework as a foundation for a robust programme of engagement and consultation with local communities and vulnerable groups.

APPENDIX B

STRATEGIC QUESTIONS

1 **Q1 “Do you have any general comments about the Wylfa Newydd Project as described in this Consultation?”**

1.1 The IACC refers HNP to the high level strategic report submitted as part of the IACC response¹ where this question is fully addressed. In particular please see the introduction (section 1). The IACC reiterates its continuing support for the Wylfa Newydd project and its stance that greater engagement on the detail of proposals, including mitigation and legacy, is needed as a matter of urgency to allow these to be properly developed ahead of the submission of any applications.

1.2 We provide the following specific comments in response to this question under reference to the Main Consultation Document paragraph numbers:

- 1.19: The description of the Wylfa Newydd Power Station includes the proposed power station on the Wylfa Newydd site and ‘supporting structures and features to be constructed and operated on Anglesey’. We assume that the supporting structures and features includes what are described elsewhere as ‘offsite Power Station Facilities’ which will be physically separate from, but local to, the Power Station Site and are an integral part of Horizon’s the overall nuclear development. This should be made explicit in the description of the project along with the proposed consenting routes for the different elements, including Associated Development described in the second bullet point.
- 1.20: Reference to the ‘surrounding land and marine areas’ should be clarified to confirm that this refers to land and sea within the Wylfa Newydd Development Area which needs to be included in the above project definition.
- 1.21: The opportunities arising from the construction and operation of the Wylfa Newydd Power Station are not limited to training for jobs. Also, the IACC’s aspirations are not limited to the creation of ‘a world renowned centre of excellence for the production, demonstration and servicing of low carbon energy’. These are encapsulated in the Vision and seven Objectives for the Wylfa New Nuclear Build Project as set out in Chapter 3 of the Supplementary Planning Guidance which was formally adopted by the IACC following widespread public consultation. This is discussed further in the response below to your sub question on your project Vision and Objectives. Reference to the opportunities presented by the project must also include the inevitable impacts of a project of this scale and complexity and their mitigation.

¹ Appendix A of the Isle of Anglesey County Council’s Response to Horizon Nuclear Power’s Second Stage Pre-Application Consultation (PAC2)

- 1.22: Reference to the number and range of job and supply chain opportunities on offer to local people and businesses both during construction and operation is welcomed. A general statement on HNP's commitment to providing support to help people and businesses to take advantage of these opportunities would be appreciated. The IACC considers that going forward and ahead of the submission of applications greater clarity and detail is required on labour requirements and profile to ensure there is an appropriate, collaborative response and mitigation is appropriately targeted.

1.3 Turning to the Project Vision and Objectives Question ***“Do you have any comments on our Project Vision and objectives?”*** in Chapter 2 of the Main Consultation Document, the IACC wish to make the following observations for HNP to consider further:

1.3.1 2.2: The Horizon Nuclear Power Wylfa Ltd main offices as opposed to premises, are in Gloucester, the site office on Anglesey is very small in comparison. There is clear expectation in GP1 of the IACC SPG that an establishment of a Corporate Hub is located on the Island which would increase HNP's profile in North Wales and provide support for the promotion of inward investment with a focus upon the establishment of companies involved in low carbon technology on Enterprise Zone sites. While it is known that HNP have moved away from the concept of a Corporate Hub as originally envisaged, enhanced local visibility and presence is critical to demonstrating clear commitment and action to the Island and region. The alternatives to the Corporate Hub being proposed to achieve the Local Purpose aim of strengthening the economy and community should therefore be set out.

1.3.2 2.3: The Local Purpose embraces the economy, environment and communities. This aligns directly with the definition of Sustainable Development, a principle which underpins the Wellbeing Goals in National Assembly for Wales legislation which forms the basis for decision making by the IACC and other public bodies who are stakeholders in the Wylfa Newydd project.

1.3.3 2.8: The IACC welcomes the upfront recognition of the importance of legacy in the project vision. It is however noted that legacy extends to Associated Development as well as the Power Station and should be delivered at all stages of its lifespan from development to construction to operation to decommissioning and after use of the Project sites and this could be more clearly expressed. Going forward the IACC wishes to engage with HNP on legacy in much greater detail and that will include an expectation in line with the SPG that this has been

considered on all elements of the project including site selection and proposals for Associated Development as well as the Power Station proposals.

- 1.3.4 2.9: In line with the Local Purpose HNP states that it will also seek to maximise the benefits and reduce the effects on the economy and culture. The IACC welcomes this clear intention and the alignment of the vision with the SPG objective which this creates. The IACC considers that this element could be strengthened by specific reference being made to the adjacent communities to the Wylfa Newydd development.
- 1.3.5 The project vision is somewhat generic and unrelated to the Wylfa site. The IACC would expect the vision to include reference to partnering with the host community to ensure the successful delivery of a sustainable energy future. It should include reference to the project itself and its host community as it is this location that will serve the New Nuclear Build for a period of 100 years or more. Stronger commitment is required between the developer and the host. It is recommended that the project vision mirrors the IACC's SPG vision 3.1: "The New Nuclear Build at Wylfa is a positive driver for the transformation of the economy and communities on Anglesey, providing sustainable employment opportunities, improving the quality of life for existing and future generations and enhancing the local identity and distinctiveness". Reference should be made to adjacent communities as there is no doubt there will be impacts resulting from the Wylfa Newydd Development.
- 1.3.6 In relation to the Project Objectives, (Paragraph 2.10), we ask that you align these Objectives with those the IACC have set out in the SPG, i.e to ensure that the Wylfa Newydd Project:
- 1.3.6.1 Contributes to the delivery of the Anglesey Energy Island Programme, and the Anglesey Enterprise Zone, placing the Island at the forefront of energy research and development, production and servicing;
 - 1.3.6.2 Drives the transformation of the Anglesey and North Wales economies and maximises opportunities for the employment and up-skilling of local people;
 - 1.3.6.3 Delivers significant and enduring infrastructure benefits to the Island's communities;
 - 1.3.6.4 Supports improvements to the quality of life (including housing, health well-being and amenity) of the Island's

residents, visitors and workers during its construction and operation;

- 1.3.6.5 Recognises and strengthens the unique identity of the Island and its communities;
- 1.3.6.6 Promotes the sustainable movement of people and materials and provides resilient transportation infrastructure capable of attracting and sustaining economic growth and creating sustainable communities;
- 1.3.6.7 Conserves and enhances the Island's distinctive environment and resources, taking into account climate change.

With regard to the second sub question: ***“Do you have any general comments on the Project components and their distribution?”***

- 1.4 This is assumed to relate to the different elements which make up the overall Wylfa Newydd Project. The response is set out in the covering letter to this response and the within the Appendices..

Q2. Do you have any specific suggestions that we can consider to maximise uptake of these jobs and skills opportunities by local people?

- 2.0 This topic area is addressed more broadly in the high level strategic report² submitted as part of the IACC response at sections 3 (Local Employment Opportunities), 4 (Education, Skills and Training) and 6 (Displacement). This section provides answers to the specific question asked but should be read along with the high level strategic report.
- 2.1 It is acknowledged that this is a pre-application consultation and all of the information for the project may not yet be available in its final form however the IACC would welcome further information and clarity on the current estimated timing, type and numbers of workers and skills required at different stages of the construction period to inform discussion on this point. The initial breakdown of construction disciplines in table 9.1 is useful and further detail on that is sought. This information was requested in the IACC response to PAC1³ and to the informal consultation⁴. The IACC considers that this information is now required as a priority to inform the approach and discussion on jobs, skills, education and displacement.

Jobs

- 2.2 The Wylfa Newydd Employment and Skills Service requires to collaborate with the North Wales Economic Ambition Board to ensure that the approach taken is appropriately reflects and is aligned with the recently adopted Regional Skills and Employment Plan.
- 2.3 It is essential that HNP commit to clear and practical mechanisms to secure and maximise local labour recruitment (including monitoring through the project's supply chain). In addition to the Employment and Skills Service a commitment to advertise job opportunities locally, host/ attend recruitment and career events will ensure greater visibility and active promotion of opportunities.
- 2.4 The IACC suggests that HNP consider the following to maximise uptake of local labour:
- 2.4.1 Support increase resources for training in wider sectors to support construction e.g. security, clerical, administrative, catering and hospitality to maximise the use of local labour
- 2.4.2 Consider further investment to increase the target percentages in managerial/supervisory roles and further improvements in mechanical/electrical and civils occupations.

² Appendix A of the Isle of Anglesey County Council's Response to Horizon Nuclear Power's Second Stage Pre-Application Consultation (PAC2)

³ Isle of Anglesey County Council's Response to Horizon Nuclear Power's First Stage Pre-Application Consultation (PAC1) dated 04 December 2014, covering letter at page 6 item III.

⁴ Response to the Horizon Nuclear Power informal Public Consultation on Project Update (January 2016) dated 24 March 2016, Appendix 1, item 3.3

- 2.4.3 Assist in the development of consortia so that local companies can come together to bid for tenders confidently.
- 2.4.3 Assess ability of Menter Newydd and the supply chain allied to existing FE and training network (based in N Wales) to determine maximum possible labour participation in construction and operation (Grwp Llandrillo Menai) based on lead in times for specific training matched against occupations/skills demands.
- 2.4.4 Commitment to and funding for advertising relevant job opportunities in local and regional press and through local intermediaries including Job Centre Plus, colleges, higher education providers, training providers and other relevant intermediaries involved in the delivery of training, job matching, recruitment and careers advice. The Employment and Skills Service should be utilised here.
- 2.4.5 Commit to working collaboratively with the IACC to attract returning workers.
- 2.4.6 Utilise Sell2Wales wherever possible on tender opportunities.

Education, Skills and Training

- 2.5 The IACC suggests that HNP consider the following to help address concerns raised on education, skills and training and thereby to maximise the uptake of opportunities by local people:
 - 2.5.1 Work to determine a more precise view of training requirements and skills demands to hit and exceed the local employment targets – currently there is no information on this demand within the PEIR.
 - 2.5.2 Create apprenticeships and work placements leading to permanent jobs and set a clear target and commitment to a number of apprentices and work placements in different trades and occupations across the different phases of development (construction/ operation/ decommissioning) showing how this is broken down and what resource (financial and staff) is dedicated to delivering it.
 - 2.5.3 Provision of training to provide individuals with necessary nuclear health and safety and quality assurance requirements prior to on-site work e.g. Nuclear passport.
 - 2.5.4 Growth/ expansion on the Business Readiness Programme (a result of successful collaboration between the IACC, HNP, WG, NWEAB and NAMRC) which helps local companies develop the skillsets needed to take part in the nuclear industry's supply chain.
 - 2.5.5 Investigate the potential to transfer trained labour from construction into operational phase – look at opportunities from professional/managerial roles through civils/mechanical/electrical through to trades and support. Have a “life cycle” training and employment package to demonstrate

long term commitment and longevity of economic and social opportunities.

- 2.5.6 Invest in training provision and new training facilities to maximise the proportion of job opportunities being taken by labour resident in the labour market/travel to work area in construction and operational phases. Includes capital investment in facilities both for construction trades, mechanical and electrical, civils, managerial and professional and support occupations to maximise the use of local talent and labour and address the impacts of labour displacement.
 - 2.5.7 Resources and investment for training in wider sectors that would suffer from displacement effects e.g. food sector, hospitality/catering and other areas that could support the construction phase of the project to reduce the impact of employment loss/displacement in existing businesses and ensure a supply of suitably skilled labour. Accommodation and Food is highlighted in recent analysis as an important growth sector for Anglesey along with transport and distribution. These sectors could become quickly overheated through high levels of demand from Wylfa Newydd and also offer good entry level opportunities for the longer term unemployed and underemployed groups.
 - 2.5.8 Focus on under-utilised or employed elements of the working age population e.g. unemployed, low skilled in order to maximise the economic and social benefits of investment.
 - 2.5.9 Provision of graduate and post-graduate placements within the construction and operational workforces.
 - 2.5.10 Monitor and publicise performance around the recruitment, employment and training and apprenticeships achieved by the project during construction, operation and decommissioning. This would have a staff and training resource implication for the authority.
 - 2.5.11 Deliver a programme of awareness raising and promotion of opportunities for the existing and future workforce utilising existing training and education providers and wider press and promotional channels.
 - 2.5.12 IACC and HNP to work in partnership to introduce performance measures for local recruitment, employment, training and apprenticeships should also be set, promoted, and progress monitored to ensure that objectives are being achieved and any deficiency in delivery identified and addressed.
- 2.6 The IACC invites HNP to collaborate to utilise established digital platforms to promote employment opportunities and directly target individuals from Anglesey and North Wales (who work across the world), but interested to return.

- 2.7 All of the above activities are critical to enhance local employment which would in turn retain Welsh speakers and persons who are already part of the community and protect the Welsh language and culture.
- 2.8 Please refer to the relevant section of the Nuclear New Build SPG for further advice and guidance on how the IACC expects the issues associated with this thematic area to be progressed.

Q3 *Temporary Worker Accommodation in the Amlwch area (including Rhosgoch and land adjacent to Madyn Farm, east and west of the B5111).*

Our preferred proposal is to provide accommodation for up to 3,500 workers at Holyhead (Cae Glas and Kingsland), 1,500 workers at Rhosgoch, 500 workers on-site for critical construction workers, 200 workers at Madyn Farm. However, we are considering alternative accommodation for up to 800 workers at Amlwch next to the permanent housing at Madyn Farm, east and west of the B5111.

Now that we have developed more detailed proposals for both Rhosgoch and Amlwch (adjacent to Madyn Farm, east and west of the B5111) we welcome your views on the choice of sites, and the reasons for your preferences.

- 3.0 HNP's preferred proposal does not outline the sequence in which the proposed accommodation will be brought into use. Clarity will be critical to influence and inform further impact assessment, management arrangements, mitigation and compensation.
- 3.1 The IACC welcomes the fact that Land & Lakes is HNP's preferred option to accommodate up to 3,500 workers and are fully supportive of this position given that it recently secured planning permission and provides a clear legacy benefit for the Island.
- 3.2 We understand however that no commercial agreement has yet been reached with Land & Lakes and there is no credible alternative proposed in this consultation to house this number of workers elsewhere. Given the lack of capacity in the other accommodation sectors (PRS, owner occupied and tourism) and the fact that the alternative site which could be expanded to accommodate this number of workers (Rhosgoch) is contrary to planning policy and therefore not supported in principle by the IACC, this is a significant risk to the project and local host community. HNP is fully aware of the IACC's position on Rhosgoch. This site is a large, partly brownfield rural site with poor road infrastructure and access, it's remote from all facilities and services and this proposal will result in a large number of vehicular movements to and from the site on a daily basis. The use of the site for temporary workers accommodation is contrary to planning policy (as outlined in the SPG and the emerging JLDP).
- 3.3 The IACC has commented in general terms on the site selection methodology for the associated development at question 8 below and does not accept that HNP have demonstrated that there is no suitable sequentially preferable site. IACC is concerned that the site selection leading to the decision to progress Rhosgoch as the preferred site has been inappropriately influenced by the weight given to the fact that HNP have concluded a land agreement for that site and are therefore unwilling to properly consider alternatives.

3.4 Given their different planning policy status, Amlwch A and B are addressed separately below.

3.4.1 **Amlwch A** – This site is allocated in the emerging Joint Local Development Plan (Policy TA14: Housing In Sub---Regional Centre & Urban Service Centres, site T8) for housing, is sustainable and has the potential for good connectivity to the settlement, in particular along existing rights of way. The use of the site for residential accommodation is therefore accepted in principle however issues of density and the impacts of the numbers of residents would still need to be carefully considered. The IACC would support proposals which assist in bringing forward permanent housing on this site to meet the needs of the construction workers and also local residents. Permanent houses could be used by temporary construction workers in the first instance and then released as open market dwellings (with 50% being affordable) thereafter. This along with the Madyn Farm proposal would provide a better long term legacy for the people of Amlwch than temporary modular accommodation. Where HNP can demonstrate the permanent housing is not feasible for this site the legacy benefit of providing servicing to an allocated housing site would be considered to be positive and supported.

3.4.2 **Amlwch B** – This site is in open countryside and is not currently allocated or proposed to be allocated in the forthcoming JLDP however its location neighbouring the Amlwch A allocated site and therefore the settlement boundary makes it sequentially preferable to an isolated site in the open countryside without these qualifiers. The A and B sites together would provide the critical mass HNP have advised is necessary to make modular accommodation proposals economically viable. The site is more distant from the edge of the existing settlement and the meaning that impacts on amenity of the residential area can be limited.

3.5 The IACC would need to ensure that Amlwch retained a 5 year land supply for housing if this site was utilised as temporary workers accommodation and this would require to be addressed in the planning statement for any application.

3.6 If HNP were minded to develop more permanent accommodation in Amlwch, IACC would suggest that sites to the western side of Amlwch would be preferable to minimise the number of vehicular movements and other impacts on the town. The IACC would be keen to work with HNP and the Welsh Government to identify the most sustainable solution which works commercially for HNP but also works for the community affected in Amlwch with appropriate mitigation for the impacts on the housing sector and provides a legacy.

3.7 The IACC has undertaken work to update the locational guidance given the SPG in response to the increased worker numbers advised by HNP which necessitate the review of the general approach. The IACC maintains its' position that locations must be sustainable, that sites adjacent to settlements

as are preferable over rural locations on sustainability grounds and that the search area for sites has been drawn too narrowly and inappropriately excludes sites in the vicinity of Llangefni despite its status as a Centre. The work to update and reassess the IACC position is ongoing and ties also into the work on the progressing Joint Local Development Plan for which a sub-policy specifically dealing with TWA has been proposed. The IACC strongly advises HNP to enter into discussion on this point with the planning authority ahead of submission of the TWA applications.

Q4 We have improved our proposals for transporting workers around the island to minimise the impact on local roads and this now includes detail of our proposed bus routes and our preferred locations for bus stops. Do you any views on the bus routes and stops that we have identified?

- 4.0 This topic area is addressed more broadly in the high level strategic report submitted as part of the IACC response at section 8 (Highways and Transport). This section provides answers to the specific question asked but should be read along with the high level strategic report.
- 4.1 The routes identified by HNP already accommodate a bus service. However, these are generally very minor and narrow roads and a number of these services are infrequent, with only a small number of buses on the road network. HNP's proposed shuttle bus service will potentially significantly increase the proportion of buses / large vehicles on these routes, resulting in additional conflict and congestion. The scale of mitigation proposals is dependent on the level of increased buses on the road network. This could be from widening the road and providing passing bays or if the road network is deemed unsuitable due to the significant increase level of buses then Park & Share facilities would be required at strategic locations. Further details is given below.
- 4.2 The IACC is supportive of a shuttle bus route serving Amlwch. However, road improvements to the A5025 between Wylfa Newydd and Amlwch would be essential in order to accommodate the percentage increase in large vehicles. The existing route has reduced verge width / clearance in places. Therefore upgrades to the road/verge width would be required to mitigate against the increased use of large vehicles. Other mitigation measures would be for HNP to utilise smaller buses which are more suitably designed for rural roads. The IACC would welcome further discussions with HNP on this to adequately mitigate against adverse impacts.
- 4.3 A section of road network included within the central area of Anglesey route may be deemed unsuitable to accommodate shuttle buses (Carmel via Elim). It is not clear from the indicative map which road it is intended to use, particularly at the Carmel end. The side roads in this area are very narrow and unsuitable for larger vehicles. Horizon will need to clarify the intended route and demonstrate that it has sufficient capacity and width to accommodate shuttle buses.
- 4.4 The shuttle bus route along the improved A5025 to a Park and Ride facility is supported in principle however the route shown is predicated on the facility being located at Dalar Hir and the IACC maintains its' objection to this site at this time.

- 4.5 The route along the A5025 up to Pentraeth (North East Area) is supported, subject to the provision of suitable parking / park and share facilities strategically located for easy access to the proposed bus stop locations to avoid increases in the likelihood of illegal parking and traffic congestion near the bus stop as a high proportion of workers in rural areas will depend on the private car to reach the closest bus stop from their home. The same is applicable for the route from Benllech via Llannerch-y-medd to Amlwch. However, the section of this route from Benllech to Llannerch-y-medd is narrow and winding. Whilst it currently serves an existing bus service, HNP's proposed shuttle bus service will potentially significantly increase the proportion of buses / large vehicles on this section, resulting in additional conflict and congestion.
- 4.6 The North West area route is supported, subject to the provision of suitable parking / park and share facilities strategically located for easy access to the proposed bus stop locations.

The Holyhead and mainland route

- 4.7 Current proposals indicate a single pick up point in the 'Holyhead Terminus'. It is considered that due to the large number of potential workers within the Holyhead Town area, additional pick up locations around the town should be provided.
- 4.8 To mitigate the potential impacts outlined above it is essential that HNP provide a number of parking / park and share facilities along the North East and North West bus service routes. This would address parking concerns and mitigate against indiscriminate parking, provide parking legacy, contribute to HNP's Operational Travel Plan whilst encouraging car sharing and reduce single occupancy car travel where workers chose to drive to the pick-up points.
- 4.9 The IACC invites HNP to discuss the potential leasing of existing under-used IACC car parks in Amlwch with it to address some of the points raised.
- 4.10 The use of appropriately sized buses which are more suitable for rural roads and the routes proposed are also an essential mitigation consideration.
- 4.11 Please refer to the relevant section of the Nuclear New Build SPG for further advice and guidance on how the IACC expects the issues associated with this thematic area to be progressed.

Q5 *The Welsh Language Impact Assessment Interim Report sets out our initial proposals for enhancing the benefits and reducing the negative effects of the Project*

Do you have any specific suggestions on the measures that we have identified to enhance benefits and reduce negative effects to Welsh-speaking communities, or the Welsh language and culture?

- 5.0 This topic area is addressed more broadly in the high level strategic report⁵ submitted as part of the IACC response at section 7 (Welsh Language & Culture). This section provides answers to the specific question asked but should be read along with the high level strategic report.
- 5.1 It is difficult to comment upon the measures identified by Horizon to enhance benefits and reduce negative effects to Welsh-speaking communities, or the Welsh language and culture since there is a general lack of clarity of wording and commitment to specific detail of proposed mitigation measures. The interim WLIA contains all of the topics the IACC would expect to be included however it is lacking in detail and it is accordingly difficult for the IACC to make comments upon it as the Welsh language has been separated out from the PEIR meaning it lacks this information.
- 5.2 The IACC has some concern that the study areas shown in figure 4.1 of the WLIA interim report are too narrowly defined at 1km and 5km from sites and should be wider to encompass the impacts across communities and the Island as a whole.
- 5.3 The expected numbers of dependants moving to the Island (480) is of concern as this will have implications on schools, services and communities and the IACC requests greater clarity and certainty in terms of precise number of dependents expected to be provided to assist in defining the impacts on schools, services and communities in order to identify clear mitigations.
- 5.4 The IACC has recently adopted the Isle of Anglesey Welsh Language Strategy 2016-2021 which should be a key consideration in any measures aimed at enhancing any benefits and reducing the negative effects on the Welsh Language. IACC considers that the following points require to be addressed to ensure that this element is properly considered and addressed:

Children and Young People

- 5.4.1 Employment opportunities for local people enabling them to remain on the Island to live and work
- 5.4.2 To support projects to ensure that the Welsh Language is transferred within families, including incoming families of workers (both

⁵ Appendix A of the Isle of Anglesey County Council's Response to Horizon Nuclear Power's Second Stage Pre-Application Consultation (PAC2)

construction and operation) moving into the area as a result of the project

- 5.4.3 Support improved resources for primary and secondary schools and colleges to promote the uptake of STEM subjects
- 5.4.4 Commitment to support the language immersion/ learning project in the 5 secondary school catchment areas (a peripatetic team of 6/ or a Language Centre in each)
- 5.4.5 Adequate resources to promote and monitor the Language Charter
- 5.4.6 Commitment to fund Welsh Social activities Co-ordinators for children and young people

The Workforce

- 5.4.7 Ensure that all apprentices can speak Welsh or are given the opportunity as part of their training to learn Welsh
- 5.4.8 Ensure that HNP, Menter Newydd and the cascading supply chain commit to measures promoting the employment of local people via the Employment & Skills Service by advertising jobs locally in the first instance and by providing opportunities to train & up-skill local people before widening the net.
- 5.4.9 Develop packages for all Wylfa Newydd workers to raise the awareness of the Welsh Language and Culture
- 5.4.10 Facilitate and/or fund marketing campaigns to track migrant workers and attract them back to Anglesey

The Community

- 5.4.11 To create language profiles of every Anglesey ward in order to inform the strategic placement of workers
- 5.5 It is noted that the Key Socio-economic study Area (KSA) in the WLIA interim report is subdivided into the following sub-areas:
- Anglesey North;
 - Anglesey West;
 - Anglesey South; and
 - Menai Mainland

This does not align with the strategy which breaks these areas down further into wards and or with the local areas of influence identified in table 4.1. HNP is requested to consider refining these areas ahead of the final WLIA.

- 5.6 The initial commitment shown by HNP in the early workshops with the aim of developing an action plan and mitigation strategy is welcomed and the IACC remains committed to continuing this dialogue.

Q6 The Health Impact Assessment Interim Report sets out our initial proposals for enhancing the benefits and reducing the negative effects of the Project on health and wellbeing.

Please can you provide thoughts on the positive benefits and potential risks to your wellbeing that you might expect from the Power Station? If so, please tell us how these might affect your overall views about the Project

Welsh Legislative Framework

6.0 Similar to Welsh Language Culture Wellbeing including health must be treated as an all-encompassing theme underpinning our consideration of impacts and mitigation of Wylfa Newydd. Wellbeing has a statutory footing in Wales⁶ and should be accorded greater weight in this assessment. .

Scope and Limitations of the Assessment

6.1 The current scope of the HIAIR focuses on a narrow and deep assessment of public health and environmental health issues and does not consider the broader health, social care and wellbeing impacts of Wylfa Newydd. This has been raised previously by the IACC⁷. The HIAIR discusses the demand for medical and health care services but does not make any reference to social care and wellbeing services. This is a significant omission. There are significant data gaps in the assessment. IACC believes that the authority and HNP should urgently work towards a common baseline which is agreed by key partners⁸, to ensure that risks and impacts are identified and mitigation agreed

Positive benefits and potential risks to wellbeing

6.2 Potential opportunities and impacts of Wylfa Newydd on communities, health and wellbeing are likely to be profound. Wellbeing issues are partly covered by the Health Impact Assessment but also need to be fully reflected in the Equalities, Welsh Language and Environmental Impact Assessments and also the community impacts chapter of the Main Consultation Document.

6.3 The IACC has prepared detailed comments on these potential benefits and negative impacts; a summary of the key Wellbeing themes is given here

⁶ Wellbeing of Future Generations (Wales) Act 2015 / Social Services and Wellbeing (Wales) Act 2014

⁷ Response to the Horizon Nuclear Power informal Public Consultation on Project Update (January 2016) dated 24 March 2016

⁸ Local Authority, Health Board, Public Health Wales, Blue Light organisations, Natural Resources Wales, 3rd Sector

which should be read in conjunction with the thematic response at Appendix A :

- 6.3.1 **Safeguarding and community cohesion** – a number of risks have been highlighted around the protection of vulnerable children, young people and adults as a direct consequence of risk taking behaviours, human trafficking and modern slavery. These behaviours have adverse impacts on the fabric and cohesion of local communities. Safeguarding is everyone’s business and mitigation measures will need to be in place to minimise any potential safeguarding risks. It is understood that HNP intend to have policies in place for workforce conduct which will set a clear expected standard of conduct. IACC believes that HNP should also apply similar, robust conduct expectations for its contractors. Chapter 15.7 of Appendix A provides a comprehensive list, although not exhaustive, of suggestions on ways of providing arrangements in place to minimise any potential safeguarding risks.
- 6.3.2 **Displacement of health and social care workforce** – displacement of skills/jobs will not be confined to the construction sector. People employed in low paid and seasonal jobs will be attracted to higher wages on offer with Wylfa Newydd – in particular the health and social care sector which are critical to the economy of the Island. The health and social care sector⁹ is vulnerable to losing staff. Some of these positions are already difficult to fill. The impacts on highly critical services for vulnerable and older people could be far reaching. It is suggested that the mitigation for the displacement of health and social care should be a priority as part of the wider issue of displacement of labour as discussed in Chapter 6 of Appendix A.
- 6.3.3 **Access to services: traffic and transport** – there remains insufficient recognition in the HIAIR of the impacts on local transport infrastructures and the assessment does not adequately consider resilience of the bridges between the Island and the mainland. These will have significant negative effects on users of health, social care and wellbeing services and also on the professionals who support their health and care needs as they travel extensively to either access or provide services. The identification of moderate adverse impacts on journey time after mitigation¹⁰ is clearly of concern and the IACC would welcome discussion on how this can be addressed. The IACC recommends that this topic needs to be considered further when discussing the resilience of the highway network to agree on suitable mitigation measures.
- 6.3.4 **Wellbeing** – the statutory footing of wellbeing in Wales has not been reflected in the HIAIR. HNP should reflect wellbeing through all aspects of Wylfa Newydd and associated developments and as with

⁹ Local Authority, Health Board, private and voluntary sector service providers

¹⁰ HIAIR, table 8.1

the Welsh Language should be treated as an all- encompassing theme underpinning the consideration of the impacts and mitigation

- 6.3.5 **Health impact assessment based on narrow requirements** – Wylfa Newydd is a complex and evolving project. This work-stream started a number of years ago because of the requirement upon HNP to prepare a Health Impact Assessment, however, in the meantime, new Welsh legislation has been enacted relating to health and wellbeing¹¹ which encompasses health impacts but is much broader in its coverage as set out in the 7 national wellbeing goals. PAC2 is based on the original narrower health impact assessment requirement despite numerous discussions on the matter between IACC and its Wellbeing partners with HNP. The National Assembly for Wales Wellbeing legislation must be taken into account as is the case for any legislation and this wider scope must be reflected in any application coming forward.
- 6.3.6 **Air quality and noise** –a scheme of monitoring for Nitrogen Dioxide in and around the development and other locations on the Island is required and given the potential impacts on health, there should be a method in place to alert people when levels are high. Noise is anticipated to have a significant impact and HNP is expected to have robust mitigation measures in place to limit noise levels. This is especially important for adjacent communities. The mitigation proposals given in the HIAIR are preliminary and not detailed at this stage making it difficult for constructive comment to be given, for example " we are considering how support could be provided... to ensure a robust noise complaints and reporting mechanisms"¹². HNP is strongly encouraged to discuss these proposals with the authority ahead of any submission. Noise mitigation and monitoring requires to be set out in detail in any application and we would suggest that noise management plans will be required.

Dalar Hir's use as park and ride could also lead to significant effects upon air quality. The one and a half pages of baseline information is entirely insufficient to allow the IACC to understand the baseline situation and hence the magnitude of change as a result of the development proposed. Whilst the project specific NO₂ diffusion tube survey will be useful and help clarify the baseline air quality, it is not considered that this approach is sufficient for a project of this size. It is not clear whether any diffusion tubes have been located with a reference method chemiluminescent analyser so that a project specific bias adjustment factor can be developed. It would also be hoped that, given the significant construction impacts, a dust and particulate monitoring survey could be established so that baseline concentrations and deposition rates can be quantified and compared to concentrations and deposition rates during the construction phase.

¹¹ Wellbeing of Future Generations (Wales) Act 2015; Social Services and Wellbeing (Wales) Act 2014

¹² HIAIR, para 6.13

- 6.3.7 **Engagement and consultation** – there are risks associated with failing to engage and consult fully with local communities and effected groups which in the arena of health, social care and wellbeing include vulnerable and hard to reach groups. HNP should therefore adopt the Participation Cymru National Principles of Public Engagement framework as the foundation for a robust programme of engagement and consultation with local communities and vulnerable groups.
- 6.4 The inclusion of housing effects in this assessment is welcomed but the mitigation proposals are too vague and high level to allow meaningful comment to be made at this time.
- 6.5 Please refer to the relevant section of the Nuclear New Build SPG for further advice and guidance on how the IACC expects the issues associated with this thematic area to be progressed.

Q7 We want to reduce the potential effects on social and equality issues on Anglesey. Our initial work can be found in the Equality Impact Assessment Interim Report.

Do you have any information on equality issues on Anglesey, or suggestions for measures to help reduce effects, that may help us in further work on the Equality Impact Assessment?

Welsh Legislative Framework

7.0 *A more equal Wales* is one of the 7 National Wellbeing Goals. Wellbeing must be treated as an all-encompassing theme underpinning our consideration of impacts and mitigation of Wylfa Newydd. Wellbeing has a statutory footing in Wales¹³, the Equality Impact Assessment Interim Report (EqIAIR) does not reflect this Welsh legislative context.

Scope and Limitations of the Assessment

7.1 The current scope of the EqIAIR has been developed within the framework of the English legislative requirements for equality but needs to be grounded in Welsh specific duties¹⁴. Consideration of cohesion issues in the EqIAIR does not reflect Welsh national policy; the assessment should be undertaken within this context¹⁵. The EqIAIR discusses a very narrow interpretation of public services and makes no explicit reference to services that are commissioned to meet the health, care and wellbeing needs of vulnerable children, young people and adults. Also, mental health/illness issues are a significant omission as they directly affect and impact on protected characteristic groups. There are significant data gaps in the assessment. IACC believes that we should urgently work towards a common baseline which is agreed by key partners¹⁶, to ensure that risks and impacts are identified and mitigation agreed. Also, as is the case with the other impact assessments, the EqIAIR and any mitigating actions cannot be developed in isolation without full consideration of the entire project but the Wylfa Newydd proposals continue to lack sufficient detail and clarity on these matters are crucial.

Information on equality issues and measures to help reduce effects

7.2 Potential opportunities and impacts of Wylfa Newydd on communities, protected characteristic groups, health and wellbeing are potentially profound. Equality issues are partly covered by the Equality Impact Assessment but also need to be fully reflected in the Health, Welsh Language and Environmental Impact Assessments and also the community impacts chapter of the Main Consultation Document.

¹³ Wellbeing of Future Generations (Wales) 2015 / Social Services and Wellbeing (Wales) Act 2014

¹⁴ Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 / Equality Objectives 2016-2020 (Welsh Specific Duties)

¹⁵ Community Cohesion National Delivery Plan 2016/17 (Welsh Government) and All Wales Community Cohesion Strategy

¹⁶ Local Authority, Health Board, Public Health Wales, Blue Light organisations, Natural Resources Wales, 3rd Sector

7.3 To directly answer the question posed, the IACC has prepared detailed comments on the potential benefits and negative impacts and these can be found in the covering letter and accompanying appendices, which comprise the IACC's formal response to PAC2. Below is a precise of the key equality related themes which should be read in conjunction with the IACC's detailed response to PAC2:

7.3.1 **Safeguarding and community cohesion** – a number of risks have been highlighted around the protection of vulnerable children, young people and adults (protected characteristic groups) as a direct consequence of risk taking behaviours, human trafficking and modern slavery. These behaviours have adverse impacts on the fabric and cohesion of local communities. Safeguarding is everyone's business and mitigation measures will need to be in place to minimise potential safeguarding risks. There is frequent reference to community cohesion in the EqIAIR. The proposed assessment of community cohesion is a fundamental component of the Equalities Impact Assessment and as such needs to be completed as a matter of urgency. This cohesion assessment must identify potential impacts and provide the platform for consideration of mitigation measures. These impacts could be far reaching. The IACC would welcome discussions surrounding the impact assessment on cohesion and it should be undertaken with key partner organisations. Potential mitigation proposals have been identified in Chapter 15.7 of Appendix A. These could be considered further upon completion of the assessment.

7.3.2 **Access to services: traffic and transport** – there remains insufficient recognition in the EqIAIR of the impacts on local transport infrastructures and the assessment does not adequately consider resilience of the bridges between the Island and the mainland. These impacts will have significant negative effects on users of health, social care and wellbeing services many of whom are protected characteristic groups of the EqIA. There are also significant negative impacts for the professionals who support individuals' health and care needs as they travel extensively to provide services. The IACC recommends that additional clinics or facilities are provided across the island to deal with any effects on the users of health, social care and wellbeing services.

7.3.3 **Wellbeing** – the statutory footing of wellbeing in Wales has not been reflected in the EqIAIR. HNP should reflect wellbeing through all aspects of Wylfa Newydd and associated developments and as with the Welsh Language should be treated as an all-encompassing theme underpinning our consideration of the impacts and mitigation

7.3.4 **Narrow interpretation** – Wylfa Newydd is a complex and evolving project. The current EqIA has been written within a narrow brief/interpretation of equality and lacks substance and an appreciation of the Island's characteristics. IACC has not yet had sight of some of

the 5 strategies¹⁷ cited in the assessment as mitigation measures. Also, the document should include consideration of the proposed temporary workers accommodation on the sites at Holyhead. The EqlAIR does not include any mitigation measures despite the assessment referencing section E of the document as a summary of mitigation. IACC expects HNP to ensure robust, sustainable mitigation measures to be in place in response to the impacts of Wylfa Newydd

7.3.5 Engagement and consultation – there are risks associated with failing to engage and consult fully with protected characteristic groups, local communities and other effected groups which in the arena of health, social care and wellbeing include vulnerable and hard to reach groups. HNP should therefore adopt the Participation Cymru National Principles of Public Engagement framework as the foundation for a robust programme of engagement and consultation with local communities and vulnerable groups. Engagement with stakeholder groups directly representing the interests of protected characteristic groups should be an integral part of this activity. This has been previously raised by the IACC¹⁸. The IACC and partner organisations are eager to work collaboratively with HNP to ensure conformity with Participation Cymru National Principles of Public Engagement.

7.4 Please refer to the relevant section of the Nuclear New Build SPG for further advice and guidance on how we expect the issues associated with this thematic area to be progressed.

¹⁷ Jobs and Skills, Public Access and Recreation, Education Engagement, Construction Worker Accommodation and Integrated Traffic and Transport

¹⁸ Project Update document (January, 2016) and the HIA Progress Report (February, 2016)

Q8 Given the information provided on our Associated Development, Off-Site Power Station Facilities and On-site Temporary Workers Accommodation. Do you have any views on:

1.How we can improve the preferred plan, including such issues as the layout of the buildings and parking areas.

2.How can we improve the external appearance of the buildings, landscaping and boundary treatment.

3.Our proposed legacy for each site.

- (i) Rhosgoch**
- (ii) On Site Temporary Workers Accommodation**
- (iii) Mobile Emergency Equipment Garage (MEEG)**
- (iv) Alternative Emergency Control Centre/Environmental Survey Laboratory (AECC/ESL)**
- (v) Kingsland / Cae Glas**
- (vi) Amlwch, adjacent to Madyn Farm east and west of the B5111**
- (vii) Madyn Farm (permanent homes)**
- (viii) Dalar Hir**
- (ix) Parc Cybi**

Please fill in the boxes on our feedback form for each site you are commenting on:

8.0 IACC note that comments on the details proposed for the Associated Development, Off-Site Power Station Facilities and On-site Temporary Workers' Accommodation are sought for the sites listed in the question. IACC in its capacity as the Local Authority has provided comments on these sites in response to the details given without prejudice to any future decision of any part or function of the IACC and for the purposes of this consultation only. Nothing in these comments may be taken to be the IACC as Planning Authority's position on any of the matters listed should they be included in any application and any such application will be determined or responded to on its merits as made. Further, while IACC has responded on the site specific matters set out IACC this response does not constitute acceptance of the preferred sites as being suitable locations for any of the developments considered.

8.1 Site specific comments:

(i) Rhosgoch

IACC considers that temporary worker accommodation at Rhosgoch does not conform to the development plan's spatial hierarchy as expanded upon within the SPG and that it is inappropriately located due to its remote location, lack of

sustainable transport links and inability to contribute to existing sustainable transport strategies. The proposal would effectively result in the creation of a temporary settlement in an open countryside location which is isolated from all of the facilities which are required of a 'settlement'. The IACC has further concern with regard to the reliance upon the private car to access the site by construction workers and the 1160 car parking spaces provided as part of this proposal together with the resultant movement of vehicles to and from this isolated location.

Ecological impacts associated with the scheme also need to be taken into consideration. The information contained within the PEIR is insufficient to verify the conclusions reached. The baseline report contains no survey information including the detailed botanical survey which is referenced as being appropriate.

The IACC notes that the CWAS states at 5.8 that campus style accommodation has been moved to be concentrated outside settlements following previous consultation. The authority does not agree with this statement. The TWA proposals have always been concentrated outside of settlements and in particular have been directed towards Rhosgoch where HNP have a land interest.

(ii) MEEG

IACC support this site in principle. As the site currently stands, there is ample opportunity to improve its visual amenity and enhance its general appearance whilst ensuring that it is adequately screened and landscaped from open countryside to the rear and adjacent residential properties. The IACC would encourage continued dialogue with respect to the drafting and refining of proposals for this site. Whilst it is acknowledged that opportunities exist, these opportunities are reliant upon the submission of a design which is functional and at the same time an exemplar of high architectural quality as previously discussed with the Design Commission for Wales. It is important that the proposals for the site should not only form a strategic function in terms of the overall project requirements, they should also demonstrate the values and commitment of HNP towards the local community and residents of the island.

(iii) AECC/ESL

With respect to the proposal for the AECC/ESL facility at Cefn Coch the IACC understand and accept that the location of this facility is in part governed by criteria which are set by the Regulators. Little substantive detail has been presented to the IACC which clarifies the precise specifics which have been laid down by the Office for Nuclear Regulation (ONR) in terms of its own requirements in this particular instance which clearly serve to demonstrate that the proposal presently under consideration would have to be a new build development which was constructed at this particular location. In particular the IACC requires additional justification as to whether, and why, the greenfield site in the countryside is preferred over the potential alternative previously developed site at Cylch-y-Garn school.

(iv) On-site temporary workers accommodation

No detail has been presented which provides a breakdown of the key construction and security personnel who are considered critical throughout the main construction period such that they have to be accommodated at this particular location. Having received this detail it could well transpire that there are other more appropriate locations within the Wylfa Newydd Development Area where the key workers could be accommodated. The logic of siting HNP's On Site Temporary Workers Accommodation at this coastal location adjacent to the Tre'r Gof SSSI is questioned. It is imperative that the design and evolution of the development pays due regard to the environmentally sensitive nature of the site irrespective of the fact that it should be designed for short term use. In line with the spirit of the Wellbeing and Future Generations (Wales) Act any legacy use should, at the very least, continue to facilitate public access for all ability levels to enjoy this attractive coastal location.

v) Kingsland and Cae Glas

IACC emphatically support the use of Cae Glas and Kingsland as temporary workers accommodation. In accordance with the planning permission granted the Reserved Matters application to be submitted will require that the development attains an Exemplar standard as both sites are within the Area of Outstanding Natural Beauty "AONB". Under the terms of the planning permission this means that an exceptionally high quality, sympathetic and sustainable development appropriate to the landscape context within the AONB.

IACC support the full legacy use of Cae Glas as an extension to Penrhos leisure village providing up to 315 holiday units and the residential use of Kingsland for up to 320 residential units of which 50% will comprise affordable housing.

(vi) Amlwch A and B

Whilst the consultation is being undertaken on these sites collectively, given that they are two separate sites each having different planning merits and as such separate consideration is needed.

The IACC would strongly prefer to see at least some permanent housing come forward on the Amlwch A site given its designation as a housing allocation in the forthcoming JLDP. The three story massing of the temporary accommodation blocks proposed and their curved form does not accord with the settlement pattern of the adjacent settlement and it is considered that the accommodation blocks could have an unacceptable effect on the character and appearance of the area.

Amlwch B is very prominent in landscape and visual impact terms as the site is prominent in an area which forms part of the Special Landscape Area and is visible from Parys Mountain which is included on the Register of Landscapes of Outstanding Historic Importance in Wales. The three storey massing of the temporary accommodation blocks and curved form does not accord with the settlement pattern of the adjacent settlement. The impact of the proposals would be compounded by the siting of the main car park adjacent to the A5025 rather

than screened by building. In order to understand both the potential for effects upon landscape designations, and the closer visual effects relative to the existing settlement IACC will require photomontages from key viewpoints which should be first agreed with the IACC in order to establish the potential for significant effects.

(vii) Madyn Farm

IACC in principle support the location of permanent workers accommodation at Madyn Farm. The proposed dwellings should be kept away from the boundaries with commercial properties abutting on to the north-west and north east of the site, and positioned and orientated such that the principal elevations do not have views of the commercial premises. The layout and illustrative material in the consultation documents indicate dwellings in close proximity to the boundary with these commercial properties and with their rear elevations facing the commercial sites. These arrangements have the potential to detrimentally affect the amenities of the occupants of these dwellings. In addition these arrangements have the potential to inhibit and cause complaint in relation to lawful commercial activities on these commercial premises. It is suggested that the orientation of the proposed dwellings and a landscaping buffer along the boundary could mitigate these impacts.

(viii) Dalar Hir

The imposition of a 30 minute maximum commute time between the park and ride and the Wylfa site is not properly justified. The justification given is that this is the maximum reasonable time when workers have an onward further journey, however this does not accord with reasoning in the TWA broad area of search which provides for a maximum 30 minute commute rather than the daily construction commuting zone of 90 minutes from the site or the “standard travel to work area” which is given in the CWAS as a 60 minute drive. A longer commute to a park and ride in Llangenfi would accord with the CWAS which anticipates workers taking accommodation in the town as it is a major service centre and would shorten the onwards journey for workers travelling east within the standard travel to work area. It is accepted that Llangefni would be east of the settlement of Holyhead however it is already proposed to bus workers separately from the sites in the vicinity of Holyhead so alternatives could be explored. It is not considered that traveling to Dalar Hir would be attractive to workers residing in Llangefni as it would involve travel away from the Wylfa site to reach the park and ride. HNP’s pre-determined “strong preference” for a single park and ride site in the east of the Island¹⁹ and the exclusion of Llangenfi has produced a sub-standard solution which discounts a major settlement. The site selection process is flawed as it is based on an arbitrary and unjustified area of search which excludes a major settlement near to the A55.

Dalar Hir is in clear conflict with policy on development in the open countryside and provides no opportunity for legacy proposals.

¹⁹ P19, 4.9

Visitor centre

- 8.2 In principle IACC is supportive of creating a Visitor and Media Centre in association with the development needs of Wylfa Newydd. We would welcome greater dialogue with HNP in the creation and design of this centre, the exact location and the planned construction period. It is considered that the centre should be developed sooner than planned in order to maximise the potential of tourists and residents that wish to view the construction of the New Nuclear Build. HNP's preferred site for its Visitor and Media Reception Centre is effectively a green field site in an attractive, unspoilt and open countryside setting immediately adjacent to the Cae Gwyn SSSI and comprising, in part a prehistoric mound and ditch system. HNP will need to provide assurances and supporting evidence to justify that any adverse environmental and ecological impacts will be overcome. IACC appreciate that this particular scheme is at an early stage of the development process and only limited information is currently available. In going forward, The IACC would welcome further engagement and discussions on the Visitor Centre and its proposed location.

Logistics centre

- 8.3 In principle the Logistics Centre would be appropriately located at Parc Cybi being situated with an industrial allocation and being in general conformity with policies in the Development Plan as referenced by the SPG. The planning history of the site also indicates the principle of the development would be acceptable and planning permission has been granted for industrial warehousing on the site. HNP would need to overcome concerns about the capacity of Junction 2 of the A55 to ensure that the junction would cope with the worst case traffic scenario. Traffic modelling will be required on junction 2 and associated infrastructure to understand whether improvements to the junction can cope with the potential volume of vehicle movements. We recommend that the traffic modelling needs to include all cumulative projects and projected future traffic volume such as the Land & Lakes Development, Orthios, full expansion of Parc Cybi and Penrhos Retail Park.
- 8.4 The legacy use of the proposed Logistics Facility for B8 (Storage & Distribution) either in connection with the project or another employment use is also supported. It is recommended that confirmation is provided as to whether this legacy use will be required in connection with the operation of Wylfa Newydd.

The IACC also takes this opportunity to respond to the site selection methodology and reports.

8.5 Associated development

- 8.5.1 The IACC considers that the site selection reports are inconsistent, do not properly justify the criteria used and are heavily influenced by HNP's existing land options and acquisitions rather than giving due weight to planning policy and the locational guidance provided by the IACC in planning policy and in particular the SPG.

- 8.5.2 The previous consultation responses have generally not properly been taken into account in the site selection, other than to be mentioned very briefly and then discounted with little evidence. Some responses have been taken into account in temporary workers' accommodation section but the conclusions have not altered.
- 8.5.3 Operational prerequisites for the AD are not the same as for the offsite nuclear facilities which the IACC accepts are subject to some locational and spatial requirements under the relevant consenting regimes. These requirements and how they have been applied as a filter have not however been clearly enough set out in the report and the IACC does not accept that a suitable case has been made that all the applicable sites have been properly considered. In the case of AD the operational requirements are HNP's preferences and cannot be accorded the same degree of weight. HNP's preferences have been built into a number of assumptions underpinning the site selection approach which are not fully explained or justified. Of particular concern is the complete discounting of Llangefni despite it being a major settlement and service centre on the Island.
- 8.5.4 The non-inclusion of Llangefni in the 4 stage assessment process skews the process by excluding a number of large sites. The broad area of search set out at Para 3.22 is a 30 minute commute to the centre of the Wylfa Site and 10 minutes to the A55 or A5025. The rationale for this that construction workers on a shift pattern living in purpose built accommodation will not want to travel for more than 30 minutes each way. This does not accord with the areas of search for all other accommodation types in the CWAS where the daily construction commuting zone is set at 90 minutes from the site and extends to Bangor. The "standard travel to work area" is given in the CWAS as a 60 minute drive and includes Holyhead and Bangor, to reach Bangor workers would pass Llangefni. Further the considerations for the park and ride provide for a maximum 30 minute travel zone because workers have a further journey following that, it is not clear why it is anticipated that all other workers can have a longer commute but it would be unacceptable for workers residing in purpose built accommodation to have a circa 40 to 45 minute commute to the majority of sites in Llangefni. Given that the AD site selection report notes that Llangefni is situated "very close" to the edge of the preferred 30 minute commute zone this exclusion is not accepted.
- 8.5.5 The separate consideration of sites in Llangefni is inadequate and does not accord with the SPG guidance. The Llangefni sites identified as potentially suitable, while noted as having similar constraints to those at Amlwch, are dismissed on the basis of travel time. The assessment of these sites is cursory and appears to have been included only to address the IACC's previous request for their consideration and allow them to be dismissed. There is no real scoring of the sites and impacts, consideration of potential legacy or assessment of the environmental constraints. Instead a brief description and the travel time are the only

details given. The IACC does not accept that a 10 minute difference in travel time which would still be within the standard travel to work area is a good enough basis to exclude all of the sites. This assessment is not considered to comply with policy.

- 8.5.6 The commitment to legacy uses is sub-standard and does not comply with the SPG which requires these to be considered and factored into site selection.

8.6 Off-Site Power Station Facilities Site Selection Report

- 8.6.1 It is not clear what other alternative sites were also included in the consultation.

- 8.6.2 The locational restriction and the operational requirements of the various facilities are not set out in any detail. For example it is known that some facilities require to be within set kilometre limits of the main site and that this requirement clearly limits the sites which can be considered but this is not fully explained. Rather at 6.10 it is stated that a distance of 5km has been “allocated” to AECC and ESL to ensure appropriate timescales in responding but travel time in different directions from the main site will be affected by the road network as well as pure distance and this has not been set out.

- 8.6.3 Para 3.8 provides that it is HNP’s preference to co-locate the AECC and ESL but does not explain the operational requirements of these facilities or how they would complement each other in an emergency, which is the justification for co-locating the two buildings.

- 8.6.4 Consultation responses aren’t demonstrated as being taken into account anywhere in the methodology. Although Para 5.2 does seem to suggest that additional sites identified through public consultation were considered this is not fully explained.

- 8.6.5 Para 6.29 highlights that where planning and environmental considerations were similar as between different sites, commercial factors were then taken into account when deciding the preferred sites – it is flagged at para 6.33 that the preferred site is available on reasonable commercial terms, which provided additional weight to its selection.

Q9 Do you have comments on our proposals for enhancing the benefits or reducing any negative effects of the Project, or suggestions that we should consider to develop our proposals further?

- 9.0 This answer should be read along with Theme 11 (Legacy) of the high level strategic report submitted as part of the IACC response
- 9.1 At present many of the proposals to enhance benefits and reduce and mitigate negative effects in relation to the key economic and social development aspects in the short and long term, namely employment, supply chain, skills development and training, tourism, housing, health and wellbeing, community cohesion and service delivery are vague in their description and lack detail as to quantification, timing, duration and delivery. There are also a range of references to work in progress that promises further information on measures to enhance benefits and reduce negative impacts but without these proposals it is difficult to comment on them.
- 9.2 In a number of instances it will be difficult to predict the future impacts of the Wylfa Newydd development. Instances include the impact on the labour market and existing employers in terms of displacement and wage inflation, related to this, impacts on key sectors of the economy including tourism, construction and ancillary services and health and social care services.
- 9.3 The IACC recommend that HNP should give much greater consideration to pro-actively supporting the delivery of more permanent housing dispersed over the Island in addition to the fifty units proposed for Maydn Farm. This would help to address not only the impacts on the housing market of HNP workers purchasing properties during the construction period and the demand created by the permanent operational jobs which will be multigenerational and therefore may require more than one house per role as people retire, but will also address many of the other impacts of the project which are harder to quantify including community cohesion and Welsh Language.

Enhancing benefits

- 9.4 There is limited clarity on how the project benefits will actually be delivered in a range of incidences (skills and training opportunities, employment opportunities, value of business to local firms) as there is no specific reference to measurable targets, scope, value, timing and duration or the mechanics of how those benefits will be achieved. Draft or approved investment plans should be provided.
- 9.5 What is the funding being provided to Grwp Llandrillo Menai? Scale and nature of outputs? Throughput of people – does it have the capacity to deliver the numbers? What is the breakdown between construction phase related training and operational phase training? How long does the education engagement programme deliver for? Can this be extended if necessary? In broader terms how long does the jobs and skills strategy remain in place? How long does the programme of supplier engagement and promotion of contract opportunities deliver for?

- 9.6 Assessment of displacement and knock on needs - there is a need to understand the effects on sectors other than construction, e.g. opportunities from higher level managerial and professional through to supporting functions such as food, catering, security, administration, health and social care etc. – there is no detail here and this impacts the ability to identify the potential to maximise local labour. This is critical. When better understood this will inform the nature of training and related financial resources to be provided to mitigate impacts around employment, skills provision and labour displacement.
- 9.7 There is a focus on awareness raising and outreach work with schools but very little on actual investment. What are the proposals that are being put forward for investment? The Education engagement strategy focuses heavily on the post 16 years sector and beyond “awareness raising with pre-16 years age group” there is little actual detail or proposals for investment. This additional investment will be critical if longer term benefits and a supply of labour are to be delivered. An Investment fund for upgrading the teaching facilities for science and technology teaching across the five secondary schools is proposed to help address this as well as upskilling in STEM subject teaching for local primary phase teachers and specialist technology and science teachers at secondary school phase.

Reducing negative impacts

- 9.8 Thought needs to be given to how the Employment and Skills Service monitors negative impacts in general and also specifically issues around labour displacement in businesses and other negative impacts relating to the tourism sector e.g. visitor numbers and expenditure impacts?
- 9.9 What provision is there to allow a feed of information from HNP/Menter Newydd and subsequent suppliers to understand progress in a) Number of local people in employment b) value and number of contracts awarded c) Number of apprenticeships/training places provided
- 9.10 What control will you have to compel workers to use temporary accommodation? What contingency is in place if a suitable supply of temporary accommodation cannot be provided? How will the accommodation be paid for – out of wages (before or after these are paid)/as a benefit?
- 9.11 There is currently very little on displacement or what training for trades and “other roles to support construction” is in place to mitigate this? (8.44 Main consultation document) Should a specific proposal be developed to respond to this?
- 9.12 Further investment should be made to train and provide labour to “back fill” job roles vacated by those moving to work in the various stages of the Wylfa Newydd development and associated development.

Any other suggestions

- 9.13 What possibility is there to use existing/current Wylfa expertise in Wylfa Newydd project phases, this is being explored but can we get a feel for numbers that might transfer across?
- 9.14 Resources are needed for training in wider sectors that would suffer from displacement effects e.g. food sector, hospitality/catering, health and social care and other areas that could support the construction phase of the project to reduce the impact of employment loss in existing businesses and ensure a supply of suitably skilled labour.
- 9.15 Investigate the potential to transfer trained labour from construction into operational phase – look at opportunities from professional/managerial roles through civils/mechanical/electrical through to trades and support. Have a “life cycle” training and employment package to demonstrate long term commitment and longevity of economic and social opportunities.
- 9.16 In a number of instances supporting information (e.g. Jobs and skills strategy/Education engagement strategy/ Health and Wellbeing Strategy) has not been provided. The IACC Education Department is eager to engage and collaborate more effectively going forward.
- 9.17 Safeguarding, lifestyle and behaviours are all issues of significant concern which will affect community cohesion of local communities. Further detail is required to put robust safeguarding arrangements in place. Along with partner organisations we are eager to engage and collaborate to ensure robust, integrated safeguarding arrangements and monitoring in order to minimise any potential safeguarding risks during the construction phase and beyond.
- 9.18 More prominence/ recognition should be given in the document to people living in adjacent communities.

Question 10 Consultation Overview Document- Landscape and Environmental Masterplan (LEMP)

Do you have any comments on the following refinements that we (HNP) have made to the LEMP, or these proposals in general?

The ground levels for the Power Station buildings, to reduce visual impacts to the areas south of the Power Station Site

The shape and height of mounding around the training and simulator building, to reduce visual impacts to the South of the Power Station site

The on-site Temporary Workers Accommodation to reflect the latest accommodation design and construction works in the area

The profile and height of mounding where it is closest to existing communities.

- 10.0 The IACC remains concerned about the retention of 10 million cubic tonnes of material on site, compounded by the fact that HNP's stance remains that all excavated material will remain on site with no alternative provision having been factored into calculations despite our repeated advice²⁰.

The ground levels for the Power Station buildings, to reduce visual impacts to the areas south of the Power Station Site

- 10.1 The IACC understands that the final ground levels for the Power Station site itself have yet to be confirmed as different scenarios have been presented by HNP. This results in differing depths of excavation and as a consequence the quantity of material to be removed, which in turn will have a direct effect upon the amount of material which will be recycled on site and utilised as part of HNP's re-profiling of the land surrounding the Power Station and its associated buildings. The preferred option needs to be discussed to understand how best to reduce adverse visual impacts to areas to the south of the Power Station Site.

The shape and height of mounding around the training and simulator building, to reduce visual impacts to the South of the Power Station site

- 10.2 The shape and height of the mounding around the training and simulator building appear to be recent amendments and the final design of the building and profiling of the material which is to envelope this structure are yet to be agreed.
- 10.3 The IACC would strongly encourage that both elements of the project (building design and landscaping) continue to be worked upon and refined in unison as opposed to being approached as two different work packages if an

²⁰ Isle of Anglesey County Council's Response to Horizon Nuclear Power's First Stage Pre-Application Consultation (PAC1) dated 04 December 2014 Appendix 2; Response to the Horizon Nuclear Power informal Public Consultation on Project Update (January 2016) dated 24 March 2016, appendix 1 item 13

effective solution is to be achieved at this critical location which is highly visible from publicly accessible locations.

- 10.4 With HNP's position remaining that of retaining all excavated material on site it is imperative that the above approach is adopted if an effective solution is to be achieved and the risk of sediment runoff reduced. Any alternative approach could result in artificial and unsightly gradients and/or an adverse interaction between the built form and surrounding topography.

The on-site Temporary Workers Accommodation to reflect the latest accommodation design and construction works in the area

- 10.5 Issues have previously been raised by the IACC regarding the suitability of the location as well as the numbers of 'key workers' which HNP state that they require on site as well as the duration.
- 10.6 The proposal as it presently stands when viewed from publicly accessible areas will be framed against the backdrop of the existing Magnox Power Station and surrounding structures. Given the environmental sensitivity of this location within an exposed coastal location it is imperative that the final design pays cognisance to these issues.
- 10.7 The IACC would welcome further dialogue and discussions in this respect to limit any adverse visual and long terms environmental impacts upon this attractive coastal location which is flanked by a Site of Special Scientific Interest to the east, a Local Nature Reserve to the North and Dame Sylvia Crowes mound to the South.

The profile and height of mounding where it is closest to existing communities.

- 10.8 The effect of the LEMP on adjacent land users will only be fully realised once there is certainty provided with respect to what the final design and finally agreed ground levels will be. The effects upon adjacent landowners will predominantly be during the construction period and such effects will be significant. It is therefore imperative that extensive mitigation solutions are programmed into the construction timetable and deployed well in advance in an effort to limit the impacts upon the surrounding communities and their residents.
- 10.9 The height, mass and shape of the mounding is yet to be confirmed although the preferred option is for a gentle sloping drumlin shaped pastoral landscape setting to the new power station and again the risk of sediment runoff needs to be highlighted.
- 10.10 This is in contrast to the existing setting for 'Wylfa A' which is a combination of steep mounds with woodland planting. This approach provides the main screening close to the main reactor with a traditional agricultural landscape on the periphery of the site. Further consideration is warranted when developing the LEMP to include more strategic woodland planting as part of the overall mitigation and softening of the engineered built form.

- 10.11 The IACC re-iterates the importance of providing advanced off site planting and mitigation to strategic areas similar to HNP's bio-diversity compensation measures in an effort to mitigate the visual impact of the complex and assist in its assimilation into the wider landscape setting.
- 10.12 By way of general commentary and feedback upon HNP's efforts to refine their LEMP it is acknowledged that this process is still evolving and is yet to be finalised. It is hoped that the IACC will remain a party to this process as these proposals are refined for submission. However, the IACC view remains that the final design will be primarily dictated by the fact that HNP do not wish to remove material off site irrespective of any negative impact which this might have upon the final landscaping proposals and that this accordingly limits the proposals which are likely to come forward and does not suitably prioritise good design and long term visual and landscape considerations over material movement preferences.

Q11 Do you have any comments on the Preliminary Environmental Information Report?

- 11.0 We welcome the provision of the PEIR and in its review it has identified a number of common themes. We accept that the document contains preliminary information but it is of the opinion that there is insufficient information within many of the chapters to enable it to reach its own conclusions within regard to the likely environmental effects of the project. In essence, the conclusions recorded within the various chapters require the IACC to accept them at face value because of the absence of sufficient baseline data. We are therefore eager to continue to work with HNP as the assessment chapters evolve and baseline information is collated to ensure that sufficient information is contained within the environmental statement.
- 11.1 The Planning Inspectorate Advice Note Six 'Preparation and submission of application documents' provides advice on the presentation of information contained within an environmental statement including information on figures and drawings, and a requirement to provide all baseline surveys relied upon within the assessment. We advise that HNP follows the guidance contained within the document when preparing the submission documents. Furthermore it should consider discussing the most appropriate means of presenting the environmental statement with the Planning Inspectorate given the lessons that it will have learned from other applications. We would welcome the opportunity to be included in such a discussion with the common aim of producing a suite of environmental documents that are easily navigated.
- 11.2 A detailed response on the PEIR is provided within the IACC's PAC 2 PEIR response Document.

APPENDIX C

CONSULTATION RESPONSE TO PRELIMINARY ENVIRONMENTAL IMPACT REPORT

1.0 Introduction

1.1 Background

- 1.1.1 On 31st August 2016 Horizon Nuclear Power Wylfa Limited (HNP) commenced pre-application stage 2 consultation on its proposals for the Wylfa new nuclear power station, its associated development and facilities.
- 1.1.2 The consultation includes a number of documents which together provide information on the project, its evolution to date and the potential effects upon the environment (social, economic and environmental) that could arise.
- 1.1.3 This document represents the Isle of Anglesey County Council's (IACCs) response to one of the consultation documents, namely the Stage 2 Preliminary Environmental Information Report (PEIR) and its associated appendices.

1.2 The Role of Preliminary Environmental Information

- 1.2.1 The Planning Inspectorate's Advice Note 17 summarises the role of the PEIR. In referring to The Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 ('the EIA Regulations') it states that it should contain information , reasonably required to assess the environmental effects of the development)and of any associated development).
- 1.2.2 It notes that the PEI need not replicate or form a draft Environmental Statement but that it should enable consultees (such as IACC) to understand the likely environmental effects of the proposed development and help them to inform their consultation responses on the proposed development.
- 1.2.3 The Advice Notes encourages applicants to provide PEI when undertaking their formal consultation to enable the statutory consultees to understand the environmental effects of the development and to inform the context of consultation and that whilst PEI does not have to be the draft ES, the the use of a draft ES may be appropriate when consulting in the later stages of the pre-application process.
- 1.2.4 Ultimately is it advised that it will be for applicants to decide at what stage in the pre-application process they wish to commence statutory pre-application consultation and at what point they feel consultation on PEI will be most effective.

1.3 **The Structure of this document**

- 1.3.1 The remainder of this chapter contains general observations on the way in which the PEIR report has been presented and the level of information contained within.
- 1.3.2 Chapter 2 provides a summary of the key comments made by IACC with respect to the various topic chapters concerned with the main site (the power station). Chapter 3 provide comments and advice from the Council with regard to the cumulative assessment. Comments on individual site assessments are provided within the Council's overarching response to the PAC2 consultation.
- 1.3.3 The IACC comments are made based upon the information contained within the Preliminary Environmental Information Report and the Appendices document together with other consultation documents (e.g. the Welsh Language Impact Assessment Report) as appropriate.

1.4 **Structure and presentation of the PEIR**

- 1.4.1 Topic assessments are contained within the main PEIR whilst assessment methodologies and baselines form the appendices. Both documents (the PEIR and Appendices) could be improved through the consistent use of contents pages to aid navigation.
- 1.4.2 The rationale for the separation of topic baselines into an appendix is understood. However the IACC would anticipate that appendices are used to present detailed technical baseline reports, for example the results of ecological surveys, site investigations for example, as opposed to the baseline as a whole. The IACC would expect to see comprehensive baseline summaries provided within the main assessment chapters of a future environmental statement.
- 1.4.3 The consultation process has benefited from the separation of the project description into the Main Consultation Document, with the preliminary environmental assessment presented within the PEIR. It will be important to include the development description and how it will be built, operated and decommissioned within the environmental statement. Similarly a summary of the mitigation and enhancement proposed within the environmental statement, and the means by which item will be secured should sit within the document.

1.5 **Information contained within the PEIR**

- 1.5.1 In the review of the PEIR a number of common themes have emerged. The IACC accepts that the document contains preliminary information but is

concerned that there is insufficient information within many of the chapters to enable it to reach its own conclusion within regard to the likely environmental effects of the project. In essence, the conclusions recorded within the various chapters require acceptance at face value given the absence of sufficient baseline data. The IACC remain committed to continued collaboration with HNP as the assessment chapters evolve and baseline information is collated to ensure that sufficient information is contained within the environmental statement.

- 1.5.2 Some of the preliminary assessments reported within the document reference the need for additional modelling before the level of effect can be confirmed. The Council would favour continued liaison with Horizon as the modelling concludes so that it can comment upon the methodologies, results and possible mitigation requirements in advance of submission.
- 1.5.3 The PEIR chapters include figures to illustrate environmental conditions and study areas. However the scale at which some of the figures are presented and their coloration has made certain aspects difficult to understand. The IACC would expect a full suite of figures at an appropriate scale to be included within each chapter of an environmental statement.
- 1.5.4 The Planning Inspectorate Advice Note Six: Preparation and submission of application documents provides advice on the presentation of information contained within an environmental statement including information on figures and drawings, referencing and the use of appendices, including a requirement to provide all baseline surveys relied upon within the assessment. The IACC propose that it is consulted informally on the layout of the document, discussing the most appropriate means of presenting the statement (including Planning Inspectorate input), in the light of the lessons learned from the Hinkley Point C submission.

2. Comments on Technical Chapters

2.1 Introduction

2.1.1 This chapter summarises the IACC'S response to the information presented within the chapters and appendices of the PEIR. They are informed by detailed comments which are provided separately.

2.2 Introductory Chapters A1-A4

2.2.1 The IACC welcomes the information contained within the chapters and has little comment to make.

2.2.2 A number of commitments are outlined in Chapter 2 including that the environmental statement will address the requirements of the new EU EIA Directive (2014) e.g. risks from major accidents or disasters. The IACC welcomes this commitment, recognising that it was a requirement of the Secretary of State's Scoping opinion.

2.2.3 Chapter 3 includes for the definition of significant effects in EIA terms and the implications arising from such definitions within the assessment. The IACC suggests that reference is also made to compensation and off-setting in circumstances when mitigation is not possible or practical.

2.2.4 Chapter 3 paragraph 3.19 sets out the levels HNP defines as significant in EIA terms. The IACC welcomes this clarification which was a request of the Secretary of State's Scoping Opinion. The definition includes 'as a precautionary approach' effects of minor significance. Setting the level of 'EIA significance' at this level requires the identification of mitigation/compensation across a wide number of effects and from the review of the environmental topic chapters it is clear that mitigation has not, in all cases been identified for levels of minor significance and above. The IACC welcomes the precautionary approach taken but suggests that this is revisited as the assessments progress. Ultimately however a common definition of EIA significant applied consistently across all topic chapters should be employed.

2.2.5 HNP states that it is developing a strategy for the decommissioning of the Power Station proposing prompt commencement of decommissioning with a target timeframe for completion of main decommissioning activities of 20 years following the end of power generation. The IACC welcomes this commitment which is consistent with Secretary of State's Scoping Opinion and the Wylfa Newydd SPG. Specific comment on some of the considerations to be included when assessing the effects of decommissioning are referenced later in this document.

2.3 **Socio-economics**

- 2.3.1 The IACC has reviewed the information contained within Chapter B1 and has a series of observations to make.
- 2.3.2 At PAC1 it was the opinion of the IACC that the issue of displacement was insufficiently covered. The IACC is of the opinion that labour displacement impacts from the project could be significant. For example, skilled labour may move to take advantage of higher wages available for jobs at the power station development (and associated development). This could then have an adverse impact on the firm or contract that those workers leave so that any economic effect e.g. Gross Value Added may be reduced or delayed.
- 2.3.3 Additional demand will also have knock on effect on other construction projects e.g. housebuilding, schools improvement programme and a range of other projects scheduled for construction in the same period as Wylfa Newydd. On this point the issue of labour displacement from the cumulative effects of different projects will likely exacerbate displacement effects and this point is returned to later in this document.
- 2.3.4 Paragraphs B1.132 – 137 references a calculated level of current displacement of 9%. The IACC considers the effect to be underplayed and questions how displacement is calculated at 9%? The baseline report contained within the PEIR appendices should provide information on wage levels and the current baseline position.
- 2.3.5 With reference to the mitigation of displacement effects the IACC would seek support in addition to reference to engagement. This would include additional support for training in the areas where there is likely to be displacement activity relating to the local labour force i.e. the areas where local labour will take up job opportunities during the construction and operational phases of the power station and measures to deliver training to help fill vacated positions as a result of the Wylfa Newydd project. Further commitment to ensure that the supply chain charter and Employment and Skills Service are effective in engaging and encouraging existing businesses to compete and win contracts in the Wylfa Newydd supply chain through proactive policies and agreed targets by value and number will help the growth of the existing business base and retention of staff.
- 2.3.6 The PEIR references the number of home-based staff that are considered likely to take up job opportunities associated with the construction of the Wylfa Newydd project. The commitment to using existing local labour and businesses to construct and operate Wylfa Newydd is welcomed and will be a key factor in the ability of the project to provide Anglesey and North Wales

with additional economic growth. The labour participation rate is an important consideration to inform activity to maximise benefits and mitigate negative impacts. It also determines the extent and scale of a range of other impacts. The larger proportion of the project labour requirement that is secured from the workforce already resident in the catchment or commuting zone the lower the overall impact made by workers moving or commuting to the project from outside the area. Experience of similar projects suggests that there could be higher levels of opportunity for the construction phase as opposed to the 25% referenced albeit that the proportion of the local workforce employed could differ in relation to the type of jobs and phasing of the project. Greater clarity on the likely take-up by local workers of different job types is required.

- 2.3.7 The PEIR references the Education Engagement and Jobs and Skills strategy which are essential elements of any approach to maximising local labour. These have not been consulted on widely, distributed across all relevant stakeholders or developed in conjunction with IACC education. The emphasis should be extended beyond 16+ to 'awareness raising of STEM subjects' at pre -16 level. This is a substantial omission in the approach to providing a longer term legacy and supply of labour for the development and is referenced again elsewhere within this document.
- 2.3.8 The skills strategy should also include measures designed to retain and use skills and knowledge contained within the existing Wylfa A workforce. This ensures that positive benefits from the Wylfa Newydd project can be enhanced.
- 2.3.9 Outside of the potential workforce that already has many of the health, safety and quality assurance requirements to operate in the nuclear environment and workplace there is a need to provide resource to address the differing requirements of the local labour force that do not currently meet the standards needed across different occupational profiles, job types and workplace locations. This is an essential measure in the ability of the local workforce to participate and have the correct ethos and approach to the Wylfa Newydd project.
- 2.3.10 HNP should undertake work to determine a more precise view of training requirements and skills demands to meet and exceed the local employment targets – currently there is no information on this demand. Opportunities should be taken to support 'life cycle' training to allow workers involved in construction to move into the operation phase. These could include for training to provide individuals with necessary nuclear health and safety and quality assurance requirements prior to on-site work e.g. nuclear passport.

- 2.3.11 At paragraph B1.125 reference is made to a 2% - 4% local contribution towards the power station development. HNP must set out how they intend to support the achievement of the higher figure and the IACC suggest that consideration be given to the funding of an Enterprise Centre to house and provide direct support to local businesses and start-ups. Furthermore HNP should set in place the means to monitor the take up of opportunities by local firms either through the use of existing procurement systems such as sell2wales. Consideration, within procurement rules to a level of contract value (eg less than £250,000) that will be offered to companies locally through engaging with the Local Authority/ NWEAB before attempting to procure more nationally should be given.
- 2.3.12 The IACC considers tourism (and the impacts upon the sector) not to have been dealt with sufficiently within the PEIR. At PAC1 the IACC requested a specific topic paper for tourism and a means for understanding and monitoring impacts. The IACC remains concerned about the potentially significant, adverse effects upon the Island's image and perceptions, tourism accommodation availability, reduced visitor numbers during construction period and disruption to visitors through increasing congestion/trips generated by the development.
- 2.3.13 The overall approach to assessing impacts on all types of accommodation is based on the availability of bed spaces and does not take into account the way in which accommodation would be let. In many instances this would not be on a bedspace basis but for a whole property. The IACC considers that the use of bedspaces underestimates the demand and also relies on having the ability to manage demand across tenures and types of accommodation as well as control the accommodation decisions of a significant in-coming labour force. HNP should consider committing to the monitoring of the accommodation supply, particularly within the tourism and private rented sectors.
- 2.3.14 There is limited assessment on tourism effects and mitigation proposals. From the information provided within the PEIR it is not clear as to the extent of impacts on the tourism sector from the perspective of visitor activity, impacts on accommodation and wider impacts on activity within the sector including displacement of employment from businesses in sectors including hospitality, food, catering and other sectors of central importance to the tourism sector and wider economy. Reference to a tourism strategy which sets out mitigation measures is made within the PEIR but this is not provided. The IACC welcome discussion of the mitigation and compensation of tourism impacts with HNP to inform the strategy referred to.

- 2.3.15 In view of the comments provided the IACC considers it appropriate that HNP consider the development of a Community Resilience Fund. Such a fund would be informed by robust monitoring of many activities that may combine to affect local communities (both social, economic and environmental) The Community Resilience Fund would:
- a) address the consequences of development;
 - b) specifically target and empower local people in responding to the impacts of development; and
 - c) be intentionally flexible in order to be able to address impacts as they occur and tackle the problem of unusable funds arising from overly restrictive distribution criteria.

2.4 **Public Access and Recreation, Traffic and Transport**

- 2.4.1 The Chapter references the requirement to divert the Wales Coastal path suggesting two alternative routes. The IACC would favour the seaward option recognising is the shorter of the two options and its benefits relative to the other option. The IACC would advise that a Health Economic Assessment Tool (HEAT) is used to assess the effects of the diversion upon local communities.
- 2.4.2 The Wylfa Sports and Social Club is owned by Magnox and is currently due to close when defueling of the Existing Power Station is complete. However due to the requirement to clear the site for Wylfa Newydd HNP proposes its early closure. The Council considers the club to be a valuable asset for the local community and requests that consideration is given to the impact of the closure. Mitigation in the form of alternative locations in the area that could host current users of the club and/or levels of support which could be given to the users in the transitional period including compensatory investment in local community halls, leisure centres, playing fields and pitches and sports clubs would provide a legacy for the community.
- 2.4.3 Reference is made to construction workers living in the temporary workers accommodation using Amlwch Leisure Centre, leading to potentially a minor to moderate adverse effect on existing users of Amlwch Leisure Centre. The IACC are committed to collaboration to ensure appropriate mitigation is developed and the opportunity to leave a lasting positive legacy for the people of Amlwch and surrounding communities is captured. The IACC welcomes the HNP objective to increase the usage of public transport, walking and cycling however it remains concerned over the potential effects upon highway safety as a result of the movement of construction works from sites in and around Amlwch to the power station. This concern is particularly with regard to the proposed HNP Shuttle Buses and the IACC considers that

their use of the A5025 will lead to an increased risk to cyclists due to reduced road widths and lack of roadside verges.

- 2.4.4 The IACC suggests that the PEIR seriously underemphasises the number of bus trips from the proposed park and ride and therefore the impact of buses. The figures presented in the PEIR seem to suggest that every single bus travelling from the Park and Ride site will be full. This might be the position at the beginning and at the end of shifts however, experiences from Hinkley Point C indicate that personnel are going to travel to and from the site throughout the day. Furthermore buses will need to travel at very regular intervals in order to prevent the use of the private cars to site.

2.5 **Noise and Vibration, Air Quality.**

- 2.5.1 The noise and vibration chapter identifies various mitigation measures as a common thread of Best Practice; for example within the CEMP (Construction and Environmental Management Plan). The mitigation is based upon an assessment of likely environmental effects which is unsupported within the document by any evidence to confirm its veracity. The IACC would therefore wish to see the results of the noise modelling in order to better understand the potential for significant effects. Noise modelling should also include for consideration of underwater noise and the IACC will require more information on the methods to be employed to excavate rock including the anticipated number and frequency of blasting.
- 2.5.2 The IACC has concerns over the high number of residential properties experiencing major adverse effects during the construction phase. The PEIR assessment has considered different construction scenarios and concerns relate to Scenario B during the day (60 properties) and more particularly Scenario C during the night. Mitigation measures do not appear to reduce the levels of significance which are presented within the PEIR and the IACC considers that insufficient information is provided to enable it to understand the magnitude of the effects, in particular the length of time and frequency over which the effects would be experienced.
- 2.5.3 The baseline presented with Appendices document references at Table 4.4 the use of professional judgement to define and select a suitable typical value. Confirmation that suitable analysis methods have been used (eg BS4142:2014 for LA90s) to determine the mean and modal background noise levels should be provided.
- 2.5.4 Many of the environmental aspects which are discussed throughout the chapter are encapsulated within various other Environmental Management Plans; such as the CNVMP (Construction Noise and Vibration Management

Plan), MMP (Materials Management Plan) and EMP (Environmental Management Plan). The Council would confirm that it will be responsible for the ensuring compliance against the measures contained within these documents and as such their provision should form individual requirements of the Development Consent Order (DCO). Additionally, the Council will require HNP to apply for Control of Pollution Act 1974 Section 61 Consent Notices prior to commencing construction activities to ensure Best Practice is maintained.

- 2.5.5 Owing to the vast scale and variety of construction works being proposed the ability to monitor such effects on a 'real time' basis as they occur shall be fundamental to mitigation. Similarly, the engagement of the Local Community in various liaison groups is paramount when looking at Best Practice for mitigation measures owing to the numerous environmental aspects associated with this development.
- 2.5.6 In view of the above, the ability to inform local communities, by offering 'real time' web based monitoring data should be an intrinsic part of any Environmental Management Plan proposed by Horizon Nuclear Power.
- 2.5.7 With regard to air quality it is not clear what significance criteria have been used to conclude that the impact of road traffic during construction is not significant. Despite the concentrations being within Air Quality Objectives, the conclusion that the impact will be not significant requires further clarification given that construction traffic will increase by 2,600 on the A5025 West, where there are properties close to the road.
- 2.5.8 Similarly whilst the impact of operational traffic may be lower than the impact of construction traffic, HNP should give consideration to the combined effect of operational combustion plant (which is considered to be a significant adverse impact with regards to ecological receptors), shipping emissions and operational traffic. The likely long-term impact of the project on human and ecological receptors cannot be considered by the IACC without this being undertaken.
- 2.5.9 At present, no mitigation measures are offered within the PEIR for construction and operational road traffic. Given the size of the project and the volumes of traffic generated, it is considered that mitigation to reduce construction and operational traffic flows and/or emissions should be included. For example, emission class standards could be specified.

2.6 **Soils and Geology, Ground and Surface Water**

- 2.6.1 The Soils and Geology chapter and appendices provide a summary of the findings of the site investigation. The environmental statement will need to include for the full details of the site investigations in order that the IACC and consultees can undertake an independent assessment of the baseline and potential impacts.
- 2.6.2 Reference is made to the preparation of a remediation strategy which identifies a number of activities that should take place in order to reduce the risk of harm to human health, or to the environment, from sources of contamination identified on site. The IACC seeks clarity on proposed remediation strategy in order to ensure that appropriate protection of health and the environment is provided.
- 2.6.3 The assessment chapter recognises that there is the potential for effects to nearby residents to occur, (inter-project effects) from a combination of dust arising from contaminated soils, noise and emission of air pollutants from plant and machinery and that this may increase the overall significance of effect to these receptors during construction. It points to chapters B4 and B5 for detailed assessments however the risk from contaminated soil is not fully addressed. Whilst accepting that the document is preliminary environmental information, the IACC would expect that consideration is given to the combination of effects upon receptors.
- 2.6.4 The IACC's review of the Ground and Surface Water chapter concludes that, there is insufficient information contained within the baseline to justify the descriptions of the baseline conditions and the value of receptors. For example no figures are provided within the baseline except a single rainfall plot. There are no spatial plots provided of monitoring locations and as a consequence there is currently no evidence to support the statements regarding the hydrological and hydrogeological environments.
- 2.6.5 Whilst the chapter provides a comprehensive list of receptors together with potential environmental effects and of mitigation measures these represent good practice and the level of site specific details is presently insufficient to enable the IACC to determine the adequacy of the assessment of significance.
- 2.6.6 A key receptor in the context of the chapter is the Tre'r Gof and Cae Gwyn Sites of Special Scientific Interest (SSSIs). The PEIR assessment of both sites concludes that they will not be significantly affected based upon a robust monitoring regime and implementation of remedial measures, 'if a significant effect is identified'. The Council will require further information to

be included within the environmental statement in order to understand the extent to which there is connectivity between existing surface and groundwater sources and the SSSI's and the extent to which their features are dependent upon existing hydrological and hydrogeological conditions. It will also need to agree a series of appropriate remediation and compensation measures.

2.7 **Terrestrial and Freshwater Ecology**

- 2.7.1 The chapter identifies the key ecological receptors with the potential to be affected. Whilst recognising the preliminary nature of the document, there is insufficient baseline information (e.g. no mapping of species finds / records / survey data) and the absence of details on the proposed mitigation strategy and how this will integrate with the site preparation and clearance works.
- 2.7.2 For example there is little data on the reptile site populations other than approximate location. A lack of mapping and descriptions of the location and characteristics of the receptor site does not enable the IACC to consider the likelihood of effects. A similar issue arises with regard to water voles and other receptors.
- 2.7.3 The IACC understands that survey work is still being undertaken on terns and data collected in respect of Tre'r Gof SSSI. As such definitive conclusions with regard to assessments of significance cannot yet be made.
- 2.7.4 The IACC considers the basing of likely significant effects upon the Special Protection Area (SPA) using the Habitat Regulations Assessment is reasonable. Clarity is requested over the use of terms within these different assessment processes as they may not always be directly transferrable.
- 2.7.5 HNP recognises that the assessment of effects upon certain ecological receptors will be informed by the conclusions reached in chapters such as noise and vibration (chapter B4), air quality (chapter B5), soils and geology (chapter B6), groundwater and surface water (chapter B7), marine environment (chapter B10) and landscape and visual amenity (chapter B11). Currently not all of these chapters reference ecological effects. Subsequent assessment will also need to include for the possible effects due to changes in coastal processes (e.g. effects on shingle bar associated with SPA).

2.8 **Coastal process and the Marine Environment**

- 2.8.1 The Coastal Processes Chapter sets out the potential effects arising from marine based activities. The IACC considers that the preliminary information provided contains insufficient design information on the structure and location of the MOLF (both the bulk quay and the ro-ro quay) and would

expect the environmental statement to contain detailed drawings of the proposal and description of construction methods and timescales. Additionally, similar information on the breakwaters and level of dredging and blasting is required, along with details of shipping traffic during construction and operation.

- 2.8.2 Sediment transportation, hydrological and thermal plume modelling of the proposals has not been undertaken and the baseline characterisation is very high level, as such conclusions within the PEIR regarding significance (and subsequent identification of mitigation) cannot be confirmed.
- 2.8.3 With regard to the Marine Environment chapter there is a lack of data to support the baseline characterisation statements and the IACC would recommend that inclusion of technical appendices with baseline survey results, particularly fish populations. In addition it is considered that the fish section would benefit from inclusion of historic/third party data for the study area.
- 2.8.4 Further information on the survey methodology is required and the IACC notes that underwater noise and hydrodynamic modelling is outstanding (underwater noise is also referred to in the Council comments on the Noise and Vibration chapter, see above).
- 2.9 **Landscape and Visual, Archaeology and Cultural Heritage**
- 2.9.1 The Landscape and Visual assessment presented within the PEIR, which is supported by baseline information within the appendix enables the IACC to understand the breadth of likely effects. However there is insufficient baseline, including figures, to enable the IACC to arrive at its own conclusions on the relative significance of effect upon certain receptors.
- 2.9.2 The assessment chapter correctly identifies the AONB as a key receptor in landscape and visual terms. The importance of AONBs is reflected within National Policy Statement EN-1 which recognises that together with National Parks and the Broads such areas have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty (paragraph 125). The Policy statement goes on to states that substantial weight should be given to the protection of these areas when deciding upon an application and that whilst consent can be granted in exceptional circumstances it should consider any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

- 2.9.3 In view of the above, the IACC requires further information on the mitigation measures proposed to reduce the significance of effects upon the AONB. In particular it would agree that the construction of the MOLF, breakwater and cooling water intake structures would result in a major adverse effect on the local seascape character of Porth-y-pistyll bay but conclude that there would be a major adverse effect on AONB and Heritage Coast due to scale, location and prominence of the structures at least until specific designs for the breakwater and its mitigation (particularly how restorative mitigation can achieve a 'natural appearance' of the affected section after removal of the temporary structure).
- 2.9.4 The IACC welcomes the acknowledgement that despite the new Power Station buildings and structures being outside the AONB and Heritage Coast they would detract from the special qualities of the AONB and its setting, including peace and tranquillity, expansive views, the rural agricultural landscape and coastal landscape features. The IACC recommend the preparation of a comprehensive and overarching landscape/seascape mitigation and management strategy (as referenced at PAC1) for these designations to include mitigation tailored to individual localities. Early dialogue with the IACC and NRW on mitigation and compensation measures would be welcomed.
- 2.9.5 The PEIR recognises that Anglesey is predominantly a dark environment at night and correctly identifies the IACC's intention to seek Dark Sky Status (although this would be at the Community level as opposed to Reserve Status). HNP states that the lighting design would be developed with regard to Dark Sky status with a key aim to limit light spill onto adjacent areas. The IACC is eager to review the lighting strategy referred to, but not provided, within the PEIR. The potential adverse impact of lighting is likely to be significant and we suggest the 6km study area is extended. Consistent with IACC comments at PAC 1 and scoping it is recommended that an assessment of lighting for all stages of operations should be classified as a separate chapter but with links to ecology, landscape and visual and socio-economic. The linkage between lighting and ecological receptors was explicitly referred to by the Secretary of State within the April 2016 Scoping Opinion.
- 2.9.6 The IACC welcomes the submission of photomontages within the PEIR appendices. It does have concerns over the accuracy of the montages and reliance upon the limited guidance included within the Landscape Institute's Advice Note 01/11. The IACC notes that the scaling of some if not all of the montages has been adjusted to fit the page template and as such is not consistent with the information on viewing distances provided. HNP should

ensure that photomontages can be reproduced in a manner that respects the parameters identified by its consultants (in this case SLR). Provision must be made for large format figures (i.e. larger than A3) if necessary.

- 2.9.7 Whilst developed for a specific type of development, much of the guidance contained within Visual Representation of Wind Farms published by Scottish Natural Heritage is readily applicable to other large scale developments, including Wylfa Newydd. Although some elements of the guidance may not be appropriate to the assessment of Wylfa Newydd and other elements may be impractical to adopt at this point in the development of the scheme given the inadequacy of the presentation of the photomontages in the PEI Report, the IACC considers that elements of the SNH guidance should be adopted for all future visualisations. The IACC would welcome the opportunity to discuss this matter further.
- 2.9.8 In addition to montages showing daytime conditions images should be produced to show night-time effects and also should include cumulative views with the proposed National Grid North Wales Connection.
- 2.9.9 A review of the submitted montages suggests that there will be areas of the development site subject to large blocks of woodland. However the LEMP currently does not appear to propose large areas of woodland planting but a more open pastoral landscape with hedgerows providing main planting mitigation. That said the drawing 'Key' explaining the proposed works contained within the LEMP is difficult to decipher and some of the notation on the plan does not appear to match. Clarification is therefore required if there is to be a change in of approach in the LEMP to now propose large blocks of woodland planting on mounds.
- 2.9.10 Chapter B12 of the PEIR presents the preliminary archaeology and cultural heritage assessment. The IACC's archaeological comments which are provided by GAPs welcome the amount of survey work undertaken by HNP acknowledging that a certain amount is not provided within the PEIR to the extent that there is little primary data presented in the environmental baseline to allow proper scrutiny of how judgements have been made. This primary data will need to be submitted with the environmental statement in order to enable the IACC to come to its own conclusions with regard to the significance of effects.
- 2.9.11 The IACC welcomes the commitment to include archaeology as one of the exhibits within the proposed Visitor centre. However whilst the mitigation measures will increase the understanding of Welsh culture it is only by disseminating this information to the widest possible audience and engaging

with the community that real value from the data is obtained. As such, ensuring that the programme of archaeological work provides opportunities for the public to engage with their culture through public access to the excavations and even participation is essential. Providing a legacy in the long term can also ensure good value, maximise public benefit, and given the interest in the discoveries there is scope to be more ambitious.

- 2.9.12 As a result of the Historic Environment (Wales) Act 2016 the Register of Historic Parks and Gardens has become a statutory designation and nationally important.
- 2.9.13 Both the direct and indirect effects on Cestyll Garden are a significant concern to the IACC. An assessment of significance for Cestyll Garden needs to be completed and distributed to all relevant parties so that an understanding of the potential effects can be made. The assessment needs to identify the individual attributes that together contribute to the significance of the asset and the extent to which they would be affected. Impacts therefore need to be fully understood and robust and comprehensive compensation measures need to be guaranteed if no other mitigation is possible. Given the minor to major direct and indirect effects on this nationally designated asset the IACC notes that a conservation statement for the Garden is proposed. Such a statement should include for mitigation and/or compensation of effects and an outline management plans and should be subject to a requirement of the DCO.
- 2.9.14 The IACC is also concerned about the effects upon the setting of the Felin Gafan Corn Mill. This is a grade II* listed building which Tables B12.1 and 12.2 state would experience a moderate effect to its setting during construction and operation. According to the PEIR EIA methodology effects identified as minor or above are significant in EIA terms.
- 2.10 **Radiological Issues and Radiological Waste Management**
- 2.10.1 The presentation of a chapter setting out radiological issues is welcomed by the IACC. The lack of a chapter at PAC1 was a concern and it is noted that the Secretary of State did request consideration of such effects within the Scoping Opinion. The IACC recognise that regulating radiological emissions is the responsibility of other organisations, but is eager to understand the potential for cumulative effects between the operation of Wylfa Newydd and the decommissioning of Wylfa A. The IACC would expect the environmental statement to include quantitative analysis to support the assertions and conclusions contained within the PEIR. On the issue of cumulative effects it would wish to see information provided on the type, number and frequency of vehicle movements associated with the movement of radiological material

through the communities which live alongside the A5025. HNP will be aware that matters of perception around health are a key concern of local communities and the implement of mitigation and/or compensation measures agreed with the IACC, should be considered where the potential for adverse impacts on local communities, the economy or the environment are identified.

2.10.2 The IACC notes that the PEIR confirms the potential for the continued storage of spent fuel up to 140 years post operation (with HLW also, potentially being stored at least until after decommissioning). The environmental statement should consider the effects of retaining such a facility over such a long period of time which represents the lifetimes of generations of Anglesey residents. The potential for climate change effects so long into the future will be difficult to accurately analyse but the IACC expect HNP to demonstrate that the safe storage of spent fuel over the lifetime of the facility.

2.11 **Conventional Waste and Materials Management**

2.11.1 The information contained within the PEIR is helpful and the IACC recognises that estimates on volumes of waste, including dredgings remain preliminary and that there are still a number of uncertainties in relation to all the quantities and end-use of materials. To understand the environmental and infrastructure effects further information will be required on how much waste and materials will be generated and how it will be managed. This is important for two reasons:

- To ensure that all environmental effects of the proposed scheme are assessed e.g. if large quantities of material / waste will be screened and crushed on site, then this will have noise / air quality effects. Alternatively, if large quantities are to be exported, then this would have traffic effects – all effects that require assessing.
- To ensure that as accurate as possible information is included within an overall waste need assessment, which will demonstrate whether or not the proposed scheme can be adequately supported (or otherwise) by the existing network of waste management infrastructure.

2.11.2 HNP will need to demonstrate that there is sufficient spare capacity within the network of waste management facilities that will be relied upon for the off-site disposal of the waste generated by the one-off enabling and construction activities and the on-going operational waste management requirements of the site. As the proximity principle is a cornerstone of Welsh waste management legislation and policy, demonstration that where

possible, local facilities can manage any waste requiring off-site treatment is required. To this end, it is considered that some form of 'need' assessment should be included in the waste section.

2.11.3 The preliminary assessment considers the waste arisings generated from the decommissioning of the Power Station but the decommissioning of temporary developments associated with the construction of the site is not mentioned. There is insufficient information within the respective chapters relating to their decommissioning to explain how they are to be cleared and restored, especially in relation to how inert waste/material is to be processed and managed and utilised.

2.12 **Climate Change**

2.12.1 The inclusion of consideration of the effects upon the project resulting from climate change is welcome and responds to both the IACC and Secretary of State's response to scoping. The PEIR provides preliminary information on how the power station has been designed with climate change in mind (Table B16.3) and further detail on these adaption measures should be provided within the environmental statement. In particular information should include how the design aspects have been reviewed to account for the climate change effects and whether mitigation measures for these design aspects have been identified in relation to the potential effects.

2.12.2 The IACC noted within its scoping response that climate change is likely to change baseline conditions during the lifetime of the project and an assessment of how the baseline might evolve, relative to each environmental topic chapter should be included even where the conclusion that it can be scoped from assessment is reached. In response the PEIR recognises the fact that the power station will be in operation for 60 years and that the local environment is likely to have been affected by climate change over time which might increase the sensitivity of the environment. Table 16.2 therefore sets out those environmental topics with the potential to be affected.

2.12.3 The IACC considers that in addition to the topics identified consideration should also be given to the changes to the landscape as a result of climate change as well as the potential for increased pressure upon certain terrestrial and freshwater species.

2.12.4 Whilst the commitment to a consideration of climate change effects during the operational phase is welcome consistent with earlier comments the IACC would also wish to be assured of the safety of the spent fuel store over the period of 140 years following the cessation of operations at the power station.

2.13 **B-17 to H-01**

- 2.13.1 The IACC's comments on the individual sites are contained within its overarching response to the main Consultation document, with the exception of any cumulative comments which are included below.
- 2.13.2 Irrespective of the policy compliance of the site and uses proposed the overriding conclusion is that there is insufficient information presented either within the main document or baseline appendices to enable the IACC to reach its conclusion on the likelihood of potentially significant effects.

3. Cumulative Effects

- 3.1.1 The cumulative assessment defines a number of study areas. The figure and colours chosen are difficult to interpret, especially the air quality/noise and vibration study areas.
- 3.1.2 The PEIR provides a long-list and short-list of projects considered for cumulative effects. It notes that the list of projects has not yet been frozen ahead of the DCO application and that it is actively seeking views on projects that should be added to the long-list for consideration.
- 3.1.3 The suggestion contained within the PEIR that the cumulative list should be frozen four months from submission appears reasonable but HNP should always retain an element of flexibility to assess the cumulative effects of more recent projects should they have the potential to affect the conclusions contained within any of HNPs assessments. The IACC believes that early agreement on the list (subject to change) is essential.
- 3.1.4 The proposed cumulative assessment recognises advice contained within the Planning Inspectorate's Advice Note 17. This includes for tiers 1-3 with tier 3 projects including projects yet to reach scoping or development plan allocations. HNP proposes to scope out tier 3 projects. The IACC advises that development plan allocations, particularly in and adjoining Amlwch should be taken into consideration.
- 3.1.5 The intra-cumulative effects section brings together some of the individual assessments reported within the topic chapters on individual project elements to understand the potential for cumulative effects. The way in which the information is presented is easily understandable and the IACC recognises that there are still a number of assessments and studies which require completing before a full assessment can be undertaken. The full assessment to be reported within the environmental statement should include for the consideration of the receptor sensitivity, magnitude of cumulative effect and provide a reasoned conclusion on significance. The IACC will expect to see mitigation identified for cumulative significant effects.
- 3.1.6 Contained within the intra-project cumulative effects is the acknowledgement that some receptors may be affected successively by one or more different activities. The Council welcomes this recognition. Given the number of years over which the construction of the power station will take place it is important to understand the cumulative impact of potentially recurring effects and whether the recurrence will be significant even when individual activities in themselves may not.

- 3.1.7 The IACC is aware that HNP is looking at the skills required locally with a view to increasing training to close any identified skills gaps. The IACC will also expect HNP to support science and skills training in schools in addition to post-secondary education to ensure that younger residents are able to identify and take advantage of future workplace opportunities.
- 3.1.8 Support for improved educational attainment and the raising of aspirations will also be important in addressing the potential for significant cumulative effects from all of the Wylfa Newydd project developments on businesses and the supply chain. The PEIR suggests that such effects are broadly considered to be beneficial due to an increase in demand. However for the reason cited by HNP in paragraph 13.2 local businesses may struggle to retain and recruit in the face of competition from the project and a requirement to support existing businesses through skills development and training support will be needed.
- 3.1.9 Intra-project cumulative effects are also identified upon the tourist industry. Mitigation such as marketing and Brand support for the tourism sector on Anglesey is identified as a means to reduce effects. The IACC supports this commitment but would also suggest mitigation in the form of potential alternative tourism attractions to maintain numbers of visitors during construction (e.g. improvements elsewhere to the long distance footpath network, cycle network, early introduction of the visitor and media centre). Active promotion should commence in advance of the main construction period to ensure that visitors are not put off from visiting Anglesey.
- 3.1.10 The IACC believes that there is limited reference to both an intra and inter project context with regard to socio-economics. There is currently very limited assessment of the likely impacts and interaction and given the scale of the Wylfa Newydd development including the integral and associated development alongside what is a large number of projects drawing on the resources of a comparatively sparsely populated area this is a major concern. The key concerns from a socio-economic perspective reflect those identified within the socio-economic section above and include the cumulative demand on labour, housing, wider social and community infrastructure and services, key sectors of the economy including tourism, accommodation, construction, service sector and wider issues of displacement covering all of the areas above.
- 3.1.11 The PEIR recognises that there is potential for communities close to the Power Station to be affected by a reduction in air quality as a result of the Wylfa Newydd project but that all potential effects are associated with construction of the Power Station, therefore no intra-project cumulative

effects have been identified. Similarly, it states that no potentially significant cumulative effects (in addition to the significant effects identified in the relevant topic chapter) are anticipated in communities in close proximity to the A5025 or A55. The IACC questions the lack of operational air quality assessment for power station alone and hence the conclusions reached with regard to cumulative assessment. Furthermore and consistent with other topics considered within this section of the PEIR the IACC would require that consideration be given to the potential for successive (potentially not-significant) effects which in succession may become cumulatively significant, ie effects upon air quality as a result of the construction of the A5025 works, MEEG, AECC and power station on the same receptor.

- 3.1.12 The consideration of cumulative visual effects will be important. Communities likely to experience significant cumulative visual effects are Treglele and Cemaes, where the power station and National Grid connection may be visible. Some residents in parts of Treglele for example may also have views towards the A5025 Highway Improvements, Visitor and Media Reception Centre and Magnox AECC/DSL. Cemaes residents may also have views towards the construction of the A5025 the power station, the decommissioning of Wylfa A and Rhyd y Groes wind farm. For such receptors the Council would wish to see the use of cumulative photomontages and ZTVs in order to understand the potential for effects prior to agreeing with the statement of no significance contained within the PEIR.
- 3.1.13 The IACC agrees that potential significant effects on coastal processes, coastal geomorphology and the marine environment receptors are all associated with the construction or operation of the Power Station. It recommends that consideration does also need to be given to the potential for successive effects leading to significant effects arising from the site clearance (SP&C) works followed by the power station construction with particular attention given to the length of time over which effects might be experienced.
- 3.1.14 The PEIR states that with the adoption of a Construction Environmental Management Plan to manage accidental pollution incidents, no intra-project cumulative effects have been identified for surface water receptors. The IACC assumes that the CEMP will therefore cover both the power station and all other intra-development projects.
- 3.1.15 Concerning archaeology and cultural heritage the IACC would wish to see the result of all individual EIAs and the finalised cumulative impact assessment which should identify the settings of the assets and the extent to

which various individual developments may or may not intrude upon them before agreeing to a conclusion of limited potential for cumulative effects.

- 3.1.16 The IACC remains concerned over the lack of consideration of the Welsh Language as a receptor within the PEIR and potentially the environmental statement. It is considered that cumulative effects upon the Welsh language should be considered. Subject to further agreement it may be possible to use the findings of the Welsh Language Impact Assessment to inform the environmental statement conclusions should it also contain a cumulative assessment.
- 3.1.17 The PEIR recognises that a number of property occupiers are likely to be subject to a loss of, or reduction in, amenity from the Wylfa Newydd project combined with decommissioning of the Existing Power Station, utilities diversions, and the North Wales Connection Project. The recognition is welcomed as the IACC does agree that both construction and operational effects arising from the combination of projects could give rise to cumulative impacts. Given the linkage between the power station and the grid connection HNP should consider opportunities to consider joint mitigation, or the mitigation of effects from one project to reduce the combined significant effects cumulatively with the other. They need not be treated in isolation. In situations where design changes cannot be made to reduce effects to 'not significant', or where mitigation is not achievable project promoters should consult one another and the IACC on potential compensation measures. Similarly compensation for effects upon archaeology and cultural heritage should be presented where mitigation is not possible.

4. Conclusion

- 4.1.1 The Preliminary Environmental Report and supporting documentation provides a significant amount of information on the potential for likely significant effects. The IACC's review of the documents suggests that the range of receptors identified and the causation of effects is appropriate. The IACC has less certainty on the conclusions reached in relation to the magnitude and significance of effects. This is because there is insufficient baseline information and assessment contained within the report and its appendices.
- 4.1.2 The previous chapters represent the key issues arising from the IACC's review of the PEIR. The following recommendations are made:
- a) HNP should discuss with the IACC and PINs the approach to be taken to the presentation of information that will comprise the Environmental Statement to ensure that it will be easily navigable.
 - b) Confirmation on what level of significance constitutes 'EIA significance' should be provided, mitigation measures should be accompanied by compensation, off-setting and enhancement where appropriate;
 - c) Where changes to the design which is presented within the PEIR are made, or where designs have yet to be confirmed, HNP should consider additional, focussed consultation in advance of submission;
 - d) Further assessment and mitigation should be undertaken and identified to address issues of displacement in the job market;
 - e) Consultation is required with stakeholders to agree the plans and strategies which are referenced within the document in advance of submission;
 - f) Further assessment should be given to the potential for effects upon tourism with a commitment to the monitoring of effects and the identification of necessary mitigation;
 - g) Real-time monitoring of effects upon amenity should also form a commitment within the environmental statement;
 - h) The ES should include details of all ecological surveys, site investigations and modelling to enable the Council to reach its own conclusion with regard to baseline conditions and the potential for significant effects;
 - i) Further baseline information and assessment is required to enable the Council to understand the potential for significant effects upon the Tr'e Gof and Cae Gwyn SSSIs;
 - j) Greater clarity on the potential for effects upon the AONB, including its individual attributes and cumulative effects is required with a commitment to mitigate effects and enhance other parts of the

designation via the preparation of a comprehensive landscape/seascape management strategy;

- k) Similarly additional, detailed consideration is required on the potential direct and indirect effects upon Cestyll Garden whilst consultation is required on the contents of the conservation strategy;
- l) Further assessment of radiological effects arising from the transportation of waste, including cumulative effects with the decommissioning of Wylfa A should be provided;
- m) The ES should include for an assessment of the site post-decommissioning of the main plant and buildings to include for the potential for climate change effects arising from the retention of the spent fuel store for a period of up to 140 years.
- n) Consideration should be included within the ES of the potential for cumulative environmental effects upon the welsh language.

4.1.3 In view of the above, continued collaboration and information sharing is critical.

Glossary of Terms

AADT	Annual Average Daily Traffic
ASB	Anti-Social Behaviour
AD	Associated Development
AECC	Alternative Emergency Control Centre
AONB	Area of Outstanding National Beauty
CEMP	Construction and Environmental Management Plan
CNVMP	Construction Noise and Vibration Management Plan
CWAMP	Construction Workers Accommodation Management Portal
CWAS	Construction Worker Accommodation Strategy
DAP	Destination Anglesey Partnership
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EqIA	Equality Impact Assessment
EqIAIR	Equality Impact Assessment Interim Report
ES	Environmental Statement
ESL	Environmental Survey Laboratory
EZ	Enterprise Zone
FID	Final Investment Decision
GAPS	Gwynedd Archaeological Planning Service
GP	Guiding Principle
HEAT	Health Economic Assessment Tool
HGV	Heavy Goods Vehicle
HIA	Health Impact Assessment
HIAIR	Health Impact Assessment Interim Report
HIAPR	Health Impact Assessment Progress Report
HLW	High Level Waste
HNP	Horizon Nuclear Power
IACC	Isle of Anglesey County Council
ITTS	Integrated Traffic & Transport Strategy
JLDP	Joint Local Development Plan
KSA	Key Study Area
LDP	Local Development Plan
LEMP	Landscape and Environmental Masterplan
MCD	Main Consultation Document
MEEG	Mobile Emergency Equipment Garage
MMP	Materials Management Plan
MOLF	Marine Off-Loading Facility
MOU	Memorandum of Understanding
NAMRC	Nuclear Advanced Manufacturing research Centre

NEETs	Not in Education, Employment or Training
NMU	Non-Motorised User
NNB	New Nuclear Build
NPS	National Policy Statement
NWEAB	North Wales Economic Ambition Board
ONR	Office of Nuclear Regulation
PAC	Pre-Application Consultation
PEIR	Preliminary Environmental Impact Report
PM	Particulate Matter
PPW	Planning Policy Wales
PRS	Private Rented Sector
SME	Small-Medium Enterprises
SNH	Scottish Natural Heritage
SPA	Specially Protected Area
SPG	Supplementary Planning Guidance
SSSI	Site of Special Scientific Interest
STEM	Science Technology Engineering Mathematics
TAN	Technical Advice Note
TCPA	Town & Country Planning Application
TWA	Temporary Workers Accommodation
WESP	Welsh Education Strategic Plan
WG	Welsh Government
WHO	World Health Organisation
WLIA	Welsh Language Impact Assessment
ZTV	Zone of Theoretical Visibility