



Llywodraeth Cymru
Welsh Government

WYLFA NEWYDD NUCLEAR POWER STATION

Summary of Relevant Representation

DEADLINE 1 – 13 NOVEMBER 2018



INTRODUCTION

Welsh Government is listed in legislation as a Statutory Party in respect of any Nationally Significant Infrastructure Project in Wales. On 10 August 2018, Welsh Government provided an outline of the principle issues on which the Welsh Ministers proposed to make further representations during the examination.

This document provides a summary of the Relevant Representation, requested for submission for Deadline 1 of the Examination.

In principle Welsh Government is supportive of a new nuclear facility at Wylfa in the context of energy security, contribution towards meeting our decarbonisation agenda, and the potential social and economic opportunities that could be provided over its lifetime for future generations. However, this support is conditional on all the potential impacts being sufficiently mitigated. In relation to key areas of interest and matters of devolved responsibility, Welsh Government is particularly concerned that, in the event that there is insufficient mitigation, the costs to address these do not fall on the Welsh public purse.

SUMMARY OF MAIN ISSUES

Economic Development

- Welsh Government are seeking to ensure the provision of a valuable economic legacy.
- Through active promotion, a positive impact of supplier investment must be experienced in Anglesey, North West Wales and North Wales. This could also be in relation to specialist products, advanced manufacturing capability construction and services across the whole of Wales.
- A Supply Chain Action Plan is required to provide significantly more detail on how Horizon Nuclear Power (HNP) aim to effectively and proactively engage with the Welsh supply chain over the short, medium and long term.
- There is no evidence that digital infrastructure (broadband and mobile capacity) has been considered in support of the DCO application and it should be explored further as part of the Examination.
- HNP should conduct an urgent audit of existing digital networks infrastructure to fully understand the potential implications of introducing congestion and performance degradation to the existing network.

Education, skills and training

- Wylfa Newydd could provide great opportunities to the economy and communities in North Wales.
- There is a significant risk to the skills landscape and the local employer base.
- There is the risk of displacement of skilled and experienced individuals.
- The potential impacts could be experienced in Anglesey, Gwynedd and Conwy, and the wider North Wales region and further into Wales.

Environment

- There is a major adverse impact identified on Cestyll registered historic park and garden and its setting through the unmitigated removal and levelling of the kitchen garden.
- Greater detail is requested on the design of the proposed landscaping around Wylfa Newydd, as well as visualisations which show how the power station will appear in adjacent views.
- There are nationally important archaeological remains and features within the development area; an agreed archaeological excavation and recording programme will need to be adhered to and completed before the main development of this area starts.
- Mitigation, monitoring and management of noise and light pollution and dust associated with the construction, operation and decommissioning of Wylfa Newydd.
- There is a risk of flooding identified to residential properties upstream of Cemaes village. There is also a risk of flooding at the proposed Dalar Hir park and ride site.
- Clarification is required on the volume of waste from construction and demolition and if the trip generation associated with the waste tonnage and impact on the road network has been included within the Transport Assessment.
- Welsh Government requires further understanding in relation to water demand, supply and water stress, and the proposals for the management and treatment of waste water from the construction site and temporary workers accommodation.



Health and health services

- Wylfa Newydd must not have an adverse effect on the physical, mental and social well-being of both the workforce and the local population.
- There should not be a reduction or deterioration in the access and quality of health services for the local communities and population of North Wales.
- Further details of the Site Campus Medical Centre and onsite provision of health services is needed.
- Mitigation of any health impacts arising from the development should not fall on the public purse.
- There will be an effect of the construction workforce on:
 - demand for primary and secondary healthcare services and emergency services;
 - demand for subsidised healthcare services, including prescribed medication, dental, and optical health services;
 - local community health and well-being because of hosting large numbers of construction workers;
- Consideration needs to be given to the effect on the well-being and health of the workforce being housed in temporary worker accommodation in a remote exposed location;
- There is inadequate consideration of and planning for the safeguarding of vulnerable parts of the community.
- Further information is required to properly assess and reach agreement on the proposed mitigation and monitoring arrangements for the above.

Highways and transport

- There will be an impact on the trunk road network and potential worsening of existing congestion as a result of the increased volume of construction and operational traffic.
- There could be a negative impact on response times of the emergency services.
- There should be a recognition of the knock-on impact on the local economy and health services.
- Potential for increased maintenance costs, on Welsh Government owned infrastructure such as the Britannia Bridge.
- Provision for construction traffic prior to the construction of the Site Campus and Dalar Hir Park & Ride site, and the effects of changes in shift patterns.
- Capacity of planned parking provision, assumptions around car sharing, management of the scheme, and the appropriateness of the management tool.
- Need for consideration of an early years scenario that does not include the MOLF.
- Clarification of the traffic modelling carried out (inclusion of non-work trips; general car sharing factors; mode share and car occupancy for weekend trips; shift assumptions; junction modelling outside of peak hours).
- Cumulative assessment of the impacts of both Wylfa Newydd and other reasonably foreseeable projects in the region.

Housing and accommodation

- Welsh Government is concerned about the impact of Wylfa Newydd on the housing market and those seeking accommodation, both construction workers and the local community including:
 - Pressure on local housing stock, particularly the private rented sector and tourist accommodation. This would adversely affect the local community and local tourist economy.
 - Reduced provision and choice of accommodation for local households at an affordable price.
 - Risk of displacement and homelessness within the local community (including Welsh speakers).
 - The need for triggers for the requirement to deliver phases of on-site temporary worker accommodation, and detail on how the uptake of accommodation will be monitored and enforced.
- A lack of contingency planning should any assumptions about the distribution of workers amongst accommodation types not reflect the modelled assumptions.
- Insufficient detail has been provided around the Workforce Accommodation Strategy, the scale of the Housing Fund, the capacity to extend the fund through a contingency fund if more is needed, and the way the fund is to be accessed or managed.

Tourism

- The tourism sector is key to the economic and social well-being on Anglesey and North Wales. It is estimated that Anglesey's economy alone currently benefits by £304m annually from tourism (STEAM, 2016).
- There will be an impact through of the demand of temporary construction workers on the supply and viability of tourism accommodation stock.



- The impact on accommodation demand and prices, attractions, events and activities on Anglesey and the North Wales region.
- The impact on employment and skills within the tourism sector has not been assessed (e.g. displacement of hospitality skills).
- Effect on visitor numbers, both during the construction term and longer term, through deterrent effect of perceived and actual construction impact and through increased road traffic and road congestion.
- Further detail is required on the provisions for mitigating, monitoring and managing the impacts to tourism and the extent, role, and governance structure of the Tourism Fund and introduction of a Tourism Action Plan.

Welsh language and culture

- Welsh Language is a cross-cutting consideration across all topic areas; it is a 'golden thread'.
- *Cymraeg 2050: Welsh language strategy* is committed to increasing the number of Welsh speakers, increasing the use of Welsh, and creating favourable conditions for Welsh language and culture through strategic frameworks, programmes, and planning policy.
- Welsh Government has acted as an observer to the Welsh Language Impact Assessment (WLIA) Steering Group through the development of the DCO application and was therefore party to the work to development Welsh Language Risk Assessment Framework
- Welsh Government welcomes the 24 mitigation measures proposed in the WLIA, but further detail and discussions are required with HNP before this can be agreed.

CONCLUSION

While Welsh Government welcomes the provisions for mitigation and management of impacts described by HNP for the Wylfa Newydd development, we consider that insufficient detail has been provided in a number of areas. Extensive discussions throughout the pre-application and pre-examination periods have not addressed our concerns and at present we do not consider that the minimum requirements for mitigation in the above areas have yet been met.