



ISLE OF ANGLESEY COUNTY
COUNCIL AND GWYNEDD COUNCIL
JOINT LOCAL DEVELOPMENT PLAN

SESSION 1 (PLAN PREPARATION,
VISION AND STRATEGY)
HEARING STATEMENT

RESPONDENT: HORIZON NUCLEAR
POWER WYLFA LIMITED (REF: 2919)

August 2016

Our Ref: Q60570

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This statement should be read in conjunction with the Respondents' separate submissions, as listed below:

SESSION 2 HEARING STATEMENT: HOUSING PROVISION

SESSION 5 HEARING STATEMENT: ECONOMY - EMPLOYMENT, RETAIL AND TOURISM

SESSION 6 HEARING STATEMENT: HISTORIC AND NATURAL ENVIRONMENT

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1 INTRODUCTION

a) The Respondent

- 1.1 The Respondent, Horizon Nuclear Power Wylfa Limited (“Horizon”), is advancing proposals for the construction and operation of a new nuclear power station at Wylfa and associated development (“Wylfa Newydd Project” or “Project”). This Hearing Statement (the “Statement”) specifically deals with Session 1 – Plan Preparation, Vision and Strategy.
- 1.2 Horizon has continued to maintain a productive dialogue with the Isle of Anglesey County Council (“IACC”) and Gwynedd Council (collectively, “the Councils”) following the submission of its representations to the various consultation stages of the Joint Local Development Plan (“the Plan”). Horizon has worked with the Councils to reach agreement on matters, where possible, and this will be detailed in the Statement of Common Ground (“SoCG”) to be filed on 23 August.
- 1.3 This Statement therefore addresses the remaining outstanding matters where agreement has either not been reached, or where discussions are on-going.
- 1.4 As explained within this Statement, Horizon considers that specific amendments are required to policies PS1, TAI3, CYF1, CYF4, PS12, MAN6, TWR1, PS16; paragraphs 7.3.25 and 7.3.55; and Proposals Map 1 (reintroduce the A5025 proposals) and Constraints Map 1 (removal of designation of Wylfa Head as a LNR) to ensure the soundness of the Plan.
- 1.5 The details of the proposed changes considered necessary to those policies are not all detailed within this Statement, only those relating to Strategic Policy PS1 ‘*Welsh Language and Culture*’. Proposed changes to other policies are set out in detail in Horizon’s hearing statements in relation to sessions 2, 5, 6 and 9.
- 1.6 This Statement sets the overarching context and basis for Horizon’s concerns that flow through all of its hearing statements.

b) Wylfa Newydd

1.7 The Overarching National Policy Statement for Energy ("NPS") EN-1 ("EN-1") outlines the need for at least 22GW (about a quarter) of existing electricity generating capacity to be replaced in the coming years, rendering the need for investment in new generating capacity urgent. Wylfa is identified as a site suitable for the development of a new nuclear power station in the NPS for Nuclear Power Generation ("EN-6"). The Project is also a Nationally Significant Infrastructure Project ("NSIP").

1.8 NPS EN-1 stresses the urgency of the need for new electricity capacity. Paragraph 3.5.15 of NPS EN-1 states that:

"In order to secure energy supplies that enable us to meet our obligations for 2050, there is an urgent need for new (and particularly low carbon) energy NSIPs to be brought forward as soon as possible, and certainly in the next 10 to 15 years, given the crucial role of electricity as the UK decarbonises its energy sector".

1.9 Paragraph 3.3.23 of NPS EN-1 goes on to explain that in seeking to minimise the risks to energy security and resilience, the Government believes it is prudent to plan for a minimum need for 59GW of new electricity capacity by 2025.

1.10 Accordingly, in referring to the role of nuclear electricity generation, paragraph 3.5.1 states that:

"For the UK to meet its energy and climate change objectives, the Government believes that there is an urgent need for new electricity generation plant, including new nuclear power. Nuclear power generation is a low carbon, proven technology, which is anticipated to play an increasingly important role as we move to diversify and decarbonise our sources of electricity".

[Our Emphasis]

1.11 The urgency of the need for new nuclear power in the UK is also emphasised in paragraph 3.5.9:

“Given the urgent need for low carbon forms of electricity to contribute to the UK’s energy mix and enhance the UK’s energy security and diversity of supply, it is important that new nuclear power stations are constructed and start generating as soon as possible and significantly earlier than 2025 (see Section 2.2 of EN-6, which sets out policy in respect of the IPC’s consideration of early deployment of new nuclear power stations). Based on the availability of – amongst other things – construction materials, skills, investment, the timescale for licensing, and related investment in transmission and distribution infrastructure, the Government believes that it is realistic for new nuclear power stations to be operational in the UK from 2018, with deployment increasing as we move towards 2025”.

[Our Emphasis]

1.12 NPS EN-6 (taken with NPS EN-1) provides the primary basis for decisions on DCO applications for nuclear power stations.

1.13 NPS EN-6 identifies Wylfa as one of eight sites that the Government has determined are potentially suitable for the deployment of new nuclear power stations before the end of 2025.

1.14 In considering its assessment of alternatives and the need for the listed sites to be included in NPS EN-6, paragraph 2.4.4 makes clear that:

“Given the very limited number of sites identified as potentially suitable for the deployment of new nuclear power stations before the end of 2025, the Government considers that all eight are required to be listed in this NPS. This is to allow sufficient flexibility to meet the urgent need for new nuclear power stations (see Part 3 of EN-1) whilst enabling the IPC to refuse consent should it consider it appropriate to do so”

1.15 It is crucial therefore that emerging planning policies recognise the Project and do not undermine or underestimate the urgency of delivering new nuclear power required by national policy.

1.16 Although section 104 of the Planning Act 2008 requires that DCO applications are to be determined in accordance with relevant national policy statements, local planning policy is also very relevant, both for the NSIP and its associated development¹ (see also 2.9).

¹ Development to support delivery of Wylfa Newydd. This comprises: on and off-line highway improvements; a park and ride facility for construction workers, a logistics centre; a visitor centre, and off-site temporary construction worker accommodation.

1.17 Associated development in Wales (subject to changes proposed by the Wales Bill) is determined under the Town and Country Planning Act 1990 (“TCPA”). Appendix 1 to this Statement describes the consenting regime in Wales in more detail. The scale and range of associated development for such a project as Wylfa Newydd is very significant, this is set out in more detail in Horizon’s hearing statements.

1.18 Particularly because of the unique consenting regime for NSIPs in Wales, it is crucial that local planning policies anticipate the Project and provide a clear planning policy framework that does not frustrate the determination of the associated development applications. The failure to do so could prejudice or delay the delivery of very urgent new nuclear power generation.

c) Structure of Hearing Statement

1.19 This Statement demonstrates that, in the context of (b) above, the Plan is unsound in so far as it relates to the three matters set out in paragraph 1.20 below, when assessed against the soundness tests in Planning Policy Wales² (Edition 8, 2016) (“PPW”), and the ten criteria of soundness set out in the Plan³.

1.20 This Statement is confined to matters raised by the Inspector, in the Matters and Issues Agenda for Session 1.

1.21 Horizon is also relying on its submissions in respect of Sessions 2, 5, 6 and 9.

1.22 Section 2 of this Statement provides an analysis of the Plan and an assessment of its soundness against the criteria set out in both PPW and the Plan itself, in relation to the identified matters raised by the Inspector.

1.23 Section 3 sets out Horizon’s proposed changes it considers to be crucial in ensuring the soundness of the Plan.

² Paragraph 2.5.11, Planning Policy Wales (Edition 8, January 2016)

³ Paragraph 1.17, Composite Version of the JLDP Written Statement (April 2016)

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2 PLANNING ANALYSIS

- 2.1 The Plan does not currently provide a sufficiently clear policy framework to support and provide the necessary control for significant elements of the Wylfa Newydd Project. There is considerable uncertainty over which policies are relevant, and how they will be applied. Because Horizon needs the associated development to deliver Wylfa Newydd, this presents a very clear risk to the Project itself.
- 2.2 Horizon considers the most effective way to provide a clear planning policy framework, and therefore make the Plan sound, would be through the introduction of Wylfa specific policies. The Joint Planning Policy Unit (“JPPU”) has however rejected Horizon’s proposed Wylfa Newydd specific policies during the various stages of plan preparation.
- 2.3 The JPPU considers the Wylfa Newydd specific policies are not necessary and on that basis has declined Horizon's request to engage on the drafting of such policies.
- 2.4 Horizon accepts it is unlikely to achieve the Wylfa Newydd specific policies without JPPU engagement and support. In light of this, Horizon does not pursue the approach of Wylfa Newydd specific policies, but instead only pursues its alternative approach of specific amendments to current draft policies.
- 2.5 It is crucial that the Plan is refined and amended so that there is a clear distinction between those policies that relate to general application proposals and those that relate to the Wylfa Newydd Project (associated development in particular). Without this refinement, there is too much uncertainty over which policies will apply and how they will be applied.
- 2.6 Horizon is seeking amendments, as detailed in this Statement and its other Hearing Statements, to policies PS1, TAI3, CYF1, CYF4, PS12, MAN6, TWR1, PS16; paragraphs 7.3.25 and 7.3.55; and Proposals Map 1 (reintroduce A5025) and Constraints Map 1 (removal of designation of Wylfa Head as a LNR).
- 2.7 Horizon considers it essential that its amendments are made to ensure that the Plan meets the various soundness tests set out in PPW.

a) **Does the Plan reflect the strategies and proposals of infrastructure providers?**

(Question 6(d), Hearing Session 1 Plan Preparation, Vision, Objectives & Spatial Strategy - Matters & Issues Agenda)

- 2.8 The Plan does not appropriately reflect Horizon's strategy or proposals for the delivery of Wylfa Newydd (or the urgent need for nuclear power stations identified in NPS EN-1 and EN-6). The Plan does not provide a sufficiently clear policy framework to consent significant elements of the Project.
- 2.9 In deciding an application for a DCO, the Secretary of State ("SoS") must have regard to matters including:⁴
- any NPS which has effect in relation to the proposed development;
 - any local impact report submitted to the SoS; and
 - any other matters which the SoS thinks are both important and relevant to the decision.
- 2.10 NPS EN-1 states that the decision-maker may consider "Development Plan Documents" and other documents in the "Local Development Framework" as "important and relevant" matters. S.104(2) and NPS EN-1 therefore make clear the importance of local planning policy providing an appropriate policy framework for Wylfa Newydd Project, as well as being the policies by which the associated development will be determined.
- 2.11 As drafted the Plan is not clear as to which policies are relevant to the Wylfa Newydd Project and its associated development, and how they will be applied. This creates a real risk that associated development which is crucial in the delivery of Wylfa Newydd could be prejudiced. This principle underpins Horizon's concerns for all hearing sessions, with specific examples as to the appropriateness of this approach set out in the statements for Sessions 2 (Housing provision), 5 (Economy – employment, retail and tourism), 6 (Historic and natural environment), and 9 (Wylfa).
- 2.12 In terms of the need for the associated development, at the peak of construction the Project would account for around a third of all jobs (approximately 6,000 for around four years) in Anglesey (which

⁴ Section 104(2) Planning Act 2008

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has a total number of 19,000 workers as explained in paragraph 2.22). Once operational it would increase employment on Anglesey by 4.5% (expected to be up to 850 workers). During outages, up to 1,000 additional workers would be needed.

- 2.13 Although Horizon is committed to maximising employment of local people, a large proportion of the construction workforce will not be local. To minimise adverse effects on local communities and to ensure appropriate facilities are available, Horizon needs to construct purpose-built accommodation and invest in significant transport infrastructure improvements. Appendix 2 provides a more detailed description of the Wylfa Newydd Project and the various components required.
- 2.14 To efficiently deliver this scale of development to programme, Horizon needs policies that provide clarity and certainty about how planning applications will be determined. Failure to do so could unduly delay such applications and subsequently impact on the grant of DCO.
- 2.15 Horizon considers that the size, timing (in terms of Project length), and national context of the Project justify specific amendments to the Plan to ensure its policies provide a clear planning policy framework against which the Project and its associated development can be considered. This will reduce uncertainty for all parties – the Councils, Horizon and the local community – as to what policies the Councils will apply in responding to the DCO application and when determining planning applications for associated development. A snapshot of the scale of the Project is provided below.
- 2.16 Horizon estimates that it will need between 8,000 and 10,000 construction workers at the peak of the construction phase (and workers would exceed 6,000 for around three to four years). Most workers will not already live in and around Anglesey and will therefore require temporary accommodation for the period of their work on the site. In addition, there will be operational and facilities management workers employed, resulting in a total peak workforce of up to 10,720. Managing a construction workforce of this size is highly significant in land use planning terms and Horizon believes it merits detailed and specific treatment in policy.
- 2.17 For example, of the 10,720 estimated peak workforce, Horizon estimates that 2,700 would commute daily from home and therefore would not require specific accommodation provision. It is therefore estimated that just over 8,020 construction workers would need to seek new or existing accommodation to allow them to be based closer to the Power Station site. Horizon is working with

the Councils and the Welsh Government to develop a Construction Worker Accommodation Strategy (CWAS). Whilst this work is on-going, the CWAS presently concludes that workers will be accommodated as follows:

Table 1: Summary of supply and demand

Accommodation type		Total Numbers
Home based workers		2,700
Temporary workers accommodation comprising	On-site provision of Temporary Construction Worker Accommodation for essential workers	500
	Madyn Farm	200
	Kingsland and Cae Glas (part of the development known as Land and Lakes, which already has an outline planning permission)	3,500
	Rhosgoch	Up to 1,500
	Amlwch Sites A and B	800 (possible alternative provision)
Sub-Total		5,700
Existing accommodation	Rented Existing Tourist Sector Stock	1,100
	New Owner Occupier	730
	Rented Existing Private Sector Stock	1,100
	Latent accommodation	400
Sub-Total		3,300
Total		Up to 11,700

2.18 There is a degree of uncertainty about the precise number of workers that will require accommodation. Accordingly, the CWAS take a precautionary approach and includes space for up to 5,700 workers in Temporary Worker Accommodation; this is 1,000 more bed spaces than would be needed. Making provision for the additional 1,000 bed spaces is considered sufficient to cope with any extra demand in the event that the number of home based workers is less than 2,700, as it is extremely unlikely that the home based proportion of workers could fall below 1,700.

2.19 The final number of bed spaces required to support Wylfa Newydd construction will only be known once the Project commences. Horizon would only wish to deploy bed spaces where a demand exists, but must ensure there is consented capacity to deploy temporary bed spaces quickly up to the maximum requirement. Other large UK complex engineering projects such as Hinkley Point C and major oil and gas construction projects have adopted this approach to ensure efficient construction of projects. It also enables management of worker behaviour and effects on existing accommodation and other impacts in the wider area.

- 2.20 Paragraph 7.3.16 of the Composite Plan (2016) notes that it is currently anticipated that the peak construction period will result in around 8,500 workers. It goes on to recognise the influx of construction workers will be accommodated through various means, including private housing units to buy or rent, holiday accommodation and purpose built accommodation provided by Horizon or through a third party.
- 2.21 Draft Policy PS13 goes on set a requirement for 7,184 new homes during the Plan period. This figure is based on Topic Paper 20 which seeks to provide a housing trajectory incorporating the likely phasing/delivery of housing schemes and indicating the housing land supply position throughout the plan period. However, paragraph 3.1 of Topic Paper 20 acknowledges that:
- “To meet this requirement, completions would need to be at an average of 479 housing units per annum during the Plan period. The development of land is generally complex with a number of factors affecting the release of land for development. This basic housing requirement reflects what the housing market is likely to deliver during the Plan period. It would not be reasonable to expect an even distribution of new housing units either on a year by year basis or indeed in spatial terms”**
- 2.22 Furthermore, the Office of National Statistics (ONS) business register and employment survey (2014) confirms that there were around 19,000 employees in Anglesey in 2014. The influx of around 8,000 workers (the approximately number from outside the local area) in the peak construction period would result in a maximum increase of over 40% and over 30% for over four years (over 6,000 workers). A peak operational workforce of 1,000 would represent around 5% increase.
- 2.23 Within the constraints of a hearing statement such as this, Horizon cannot provide a full survey of the scale and range of needs and impacts arising from the Wylfa Newydd Project. However, the above details alone clearly indicate how the Project presents unique requirements that are hugely relevant and significant and require detailed specific treatment by amending policies within the Plan.
- 2.24 The need to accommodate approximately 8,000 construction workers is clearly of such significance that it requires specific treatment in planning policies. Planning policies must recognise the need for sufficient flexibility to respond to the evolving programme and construction worker numbers of the Project. These requirements clearly need to be addressed outside of policies that deal with general development.

2.25 Several of the policies do not contain sufficient flexibility and could result in a situation where development proposals are considered to be a departure from the Development Plan when it is not the intended purpose. Horizon therefore considers that the rigidity of the Plan renders it unsound, unable to meet both soundness test 3 in PPW⁵ and test CE4⁶ in the Plan itself.

b) Does the Plan's strategy adequately safeguard the interests of the Welsh language?

(Question 9, Hearing Session 1 Plan Preparation, Vision, Objectives & Spatial Strategy - Matters & Issues Agenda)

2.26 Horizon is fully committed to the protection and promotion of the Welsh language and culture and is developing comprehensive mitigation proposals in this regard. However, elements of the Plan relating to the protection of the Welsh language are inconsistent with the approach set out in national policy, and therefore fail soundness test 1 in PPW⁷ and CE1⁸ in the Plan itself. Horizon consider that criterion 4 of policy PS1 in the Composite Version (2016) is too restrictive in respect of associated development proposals.

2.27 Criterion 4 states that the Councils will protect the Welsh language and culture by *"refusing proposals that due to its size, scale or its location, would cause significant harm to the character and language balance of a community"*.

2.28 Horizon notes that adopted Technical Advice Note 20 (2013) ("TAN 20") makes clear at paragraph 4.1.2 that in determining individual planning applications where the needs and interests of the Welsh language may be a material consideration, decisions must be based on planning grounds only and be reasonable. It is considered that a blanket refusal of any applications which are to have a significant effect on the Welsh language and culture, regardless of proposed mitigation measures and other material considerations, is inconsistent with TAN 20.

⁵ Paragraph 2.5.11, Planning Policy Wales (Edition 8, January 2016)

⁶ Paragraph 1.17 in the Composite Version of the JLDP Written Statement (April 2016)

⁷ Paragraph 2.5.11, Planning Policy Wales (Edition 8, January 2016)

⁸ Paragraph 1.17 in the Composite Version of the JLDP Written Statement (April 2016)

c) Can the Plan respond effectively to changes in the Wylfa Newydd project?

(Question 11, Hearing Session 1 Plan Preparation, Vision, Objectives and Spatial Strategy - Matters & Issues Agenda)

- 2.29 Horizon consider that the Plan is not sufficiently flexible to respond effectively to changes in the Project. Numerous examples are been set out in Horizon’s other hearing statements for Sessions 2 (Housing provision), 5 (Economy – employment, retail and tourism), 6 (Historic and natural environment), and 9 (Wylfa).
- 2.30 This is mainly due to the inflexible wording of several policies within the Plan, such as criterion 4 in policy PS1, which Horizon considers currently render it unsound with specific regard to both soundness test 3 in PPW⁹ and test CE4¹⁰ in the Plan itself.
- 2.31 Several policies need to be amended to ensure that the Plan is sufficiently flexible and provides a clear mechanism for implementing policies in relation to the Project.
- 2.32 The inflexibility inherent in these policies, and the specific amendments sought, are described in detail in Horizon’s other hearing statements.
- 2.33 This Statement only seeks specific amendments to policy PS1 (but also sets the context for Horizon’s overarching concerns with the Plan that flow through all of its hearing statements).

⁹ Paragraph 2.5.11, Planning Policy Wales (Edition 8, January 2016)

¹⁰ Paragraph 1.17 in the Composite Version of the JLDP Written Statement (April 2016)

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3 CHANGES SOUGHT

- 3.1 Horizon pursues its alternative option of seeking specific amendments to policies in order to ensure the soundness of the Plan.
- 3.2 Horizon considers that amendments are necessary to provide the certainty required, the absence of which could otherwise prejudice the delivery of the Wylfa Newydd Project.
- a) **Amendments to Policy PS1: Welsh Language and Culture to align with national policy**
- 3.3 Horizon are fully committed to the protection and promotion of the Welsh language and culture. However, it is considered that amendments are required to criterion 4 of policy PS1 in order ensure that it accords with national planning policy, as detailed within Appendix 5 of this Statement.

APPENDIX 1 – CONSENTING REGIME AND KEY ISSUES

The consenting regime for NSIPs in Wales operates alongside the town and country planning regime. Whilst Wylfa Newydd itself will be determined under the Planning Act 2008 and consented by a Development Consent Order (“DCO”), associated development will need to come forward under the Town and Country Planning Act 1990 (as amended) (“TCPA”). (Although some associated development may be able to be consented through the DCO if the changes currently proposed through the draft Wales Bill come into effect.)

Crucially, Horizon anticipates the need for TCPA applications for associated development to be consented early will become increasingly necessary. This is because examining authorities for Welsh DCO’s continue to put increasing pressure on developers to have their TCPA applications approved by the time of DCO examination. This is to provide certainty and to ensure that there is no impediment for bringing forward such important and significant infrastructure projects. It is critical therefore that the Plan provides the appropriate planning policy framework so as not to create a barrier or unnecessary hurdles for associated development TCPA applications. Doing so could prejudice the timely delivery of one of the UK’s priority infrastructure projects of national importance.

Horizon considers that the Plan (and has maintained throughout the plan making process) does not currently contain a clear planning policy framework, against which the Councils can make their consultation responses to the DCO application and determine associated development applications. Horizon considers that this poses a fundamental risk to the timely delivery of Wylfa Newydd and associated development.

Horizon considers that the most efficient and effective way to ensure the Plan provides the appropriate, clear and robust planning policy framework required to deliver Wylfa Newydd is through the introduction of Wylfa Newydd specific policies. However, the JPPU have strongly opposed the incorporation of such policies, leaving Horizon with no option but to pursue specific changes to other policies to ensure the soundness of the Plan.

Horizon consider that it is therefore crucial that the Plan is refined and amended so that there is a clear distinction between those policies that relate to general application proposals and those that



relate to the Wylfa Newydd Project (and associated development in particular). Without this refinement, there is too much uncertainty over which policies will apply and how they will be applied.

APPENDIX 2 – WYLFA NEWYDD PROJECT DESCRIPTION

The components of the Wylfa Newydd Project outlined above are set out in further detail in this Appendix. This includes those elements to be located on the Power Station Sites, Off-site Power Station Facilities, Associated Development, Power Station construction activities and the strategic approaches to be employed in the delivery of the Project.

a) **Power Station Site and Surroundings**

i) Main Plant

The positioning and layout of the various structures and buildings comprising the Main Plant have been developed and optimised taking into account regulatory and technical design requirements.

Each of the two Advanced Boiling Water Reactor (“ABWR”) Units would comprise the following buildings and plant:

- Reactor building;
- Control building;
- Turbine building, containing steam turbine, condenser, electrical generator, various auxiliary plant and connecting systems;
- Heat exchanger building;
- Filter vent building;
- Back-up building;
- Radioactive waste building;
- Service building; and
- Emergency generators.

The following components are associated with the conversion of the energy contained in the steam generated in each nuclear reactor into electrical power for export to the national grid:

- Generator transformers and auxiliary transformers; and
- Integral connection of the transformers to the grid substation.

ii) Common Plant

The common plant would serve the two UK ABWR Units and would comprise:

- Cooling Water System (intake structures, screens and fish deterrent and return system, pump house structures, pumping plant and equipment, seal pits, ball strainers, discharge culverts/tunnels and outfall), together with a biocide treatment plant and two marine breakwaters that maintain a favourable wave climate at Porth-y-pistyll where the intake structures are located;
- Auxiliary ('House') boilers and fuel tanks;
- Makeup water treatment building (and associated water and chemical storage tanks);
- Fire-fighting buildings (and associated water storage tanks);
- Storage of spent fuel and other types of radioactive waste, and
- Additional structures or facilities such as security fences and gatehouses, site lighting, garages and workshops, distributed power supply buildings, administration building, an outage building to be used during refuelling and for the use of temporary maintenance staff, a main power station site access road and various internal roads and car parking.

iii) Supporting Facilities, Buildings, Structures and Features

In addition, there would be supporting structures such as offices, maintenance and managerial facilities, roads and other features necessary to support the construction, operation and management of the power station. These would be integral to the Wylfa Newydd Power Station, but would not be process related.

iv) Radioactive waste storage

The Wylfa Newydd Power Station would give rise to radioactive waste and spent fuel. Horizon has developed an Integrated Waste Strategy that includes proposals for specially designed facilities to be constructed to store various types of radioactive waste and spent fuel. Horizon is fully cognisant of the responsibilities that come with operating a nuclear power station and all necessary safety, environmental and security arrangements for the Wylfa Newydd Power Station would be put in place in accordance with the UK regulatory regime. Horizon has commenced preparatory work on its Safety Case Strategy to illustrate how these responsibilities will be met.

v) Marine works

A number of Wylfa Newydd Project components would be required in the marine environment to support the construction and operation of the Wylfa Newydd Power Station. Water for the CWS, which is used to condense steam, would be taken from and returned to the Irish Sea via intake and outfall structures. A cooling water intake and pumphouse would be located at Porth-y-pistyll. Breakwater structures are required at Porth-y-pistyll to protect the cooling water intake and pumphouse structures.

vi) On-site Temporary Workers' Accommodation campus

A campus-style development is required at the Power Station Site to house up to 500 construction workers who will need to be located on-site to undertake essential and multi-shift tasks, such as 24-hour nuclear concrete pouring for the main works.

vii) Training and Simulator Building

The Horizon Training and Simulator Building would contain two full scope simulators of the UK ABWR Units, together with a range of classrooms and training spaces. As well as testing responses to non-routine situations, the building would be used for the specialist training of Horizon's operational workforce.

viii) Landscape works

In order to provide some visual and noise screening of the Power Station Site for neighbouring communities, earth mounds would be formed during the construction phase and landscaped as soon as practicable, helping to create an appropriate setting for the Power Station. To achieve this, material excavated during construction activities would be used and, as such, the appearance of the land within the Wylfa Newydd Development Area will change as construction progresses. A phased approach would be taken to the implementation of the landscaping, in accordance with an overall Landscape and Environmental Masterplan.

ix) Public access

A number of public rights of way, including the Wales Coast Path, would be affected by construction activities, necessitating the creation of diversions and some closures. The existing Cemlyn Road, which is part of the Copper Trail cycle route, would also need to be closed through the Power Station Site. Nanner Road provides an alternative access to Cemlyn Bay from the A5025 and highway works will deliver improvements to this route.

x) Power Station Access Road

There would be a single principal point of access for staff and the majority of vehicles approaching the Power Station under normal operational conditions - the Power Station Access Road. This would approach the Power Station at the south-east corner, connecting to the A5025 via a proposed new roundabout junction to the south of Tregele.

xi) Car parking

The Power Station Site layout includes car parking for three main user groups, with a number of locations identified within the Power Station Site.

xii) Main perimeter fence and construction fence

Construction fencing

During Site Preparation and Clearance works, a perimeter fence would be erected to define the extent of the construction works. The perimeter fence would provide gaps to preserve access to public footpaths. Where required these gaps would be closed temporarily and affected public footpaths temporarily diverted to enable clearance and development works to be undertaken. Public footpaths would not be diverted or closed permanently until the DCO was granted.

For the main construction works further perimeter fencing may be installed and upgraded to suit the stage of works being undertaken and the requirements of a nuclear construction site. The construction fence, where appropriate, would meet the Centre for the Protection of National Infrastructure standards and may require approval from the Office for Nuclear Regulation.

Main perimeter fence

There would be both an inner and an outer security fence. The fences would meet the Centre for the Protection of National Infrastructure standards and would require approval from the ONR. Each fence would comprise a double fence structure with clear zones between them.

The operational site would also require permanent perimeter lighting and it is assumed the fences would be monitored by alarm systems and CCTV. Both the inner and outer security fences would include gatehouses for site security control. A third entrance (without gatehouse) would be provided at the south west corner of the site.

Clear signage would be erected on the Power Station Site boundary (which would sit within the construction boundary) in accordance with ONR licensing requirements, to define the boundary clearly.

b) Off-site Power Station Facilities

These facilities would be sought to be consented under the DCO but would be located outside the Wylfa Newydd Development Area¹¹, as they are required to be physically separate from the Power Station Site in order to provide essential emergency support services during the commissioning and operation of the Power Station.

i) AECC and ESL

The AECC would provide back-up command and communications facilities to facilitate the strategic management of the required response in the extremely unlikely event of a Power Station Site incident if the main Emergency Control Centre is unavailable or if there is no access to the Power Station Site.

The ESL would provide facilities to manage environmental monitoring and radiological surveys in the local area, including radiation monitoring equipment controls, for analysing samples and assessing the implications for people and the environment. A small number of vehicles would need to be based at this facility.

It is proposed that the AECC and ESL would be co-located in a single building with associated access, utilities and communication links to the Power Station Site. There are specific locational factors that must be met in selecting a site for these facilities. Horizon has identified a preferred site at Cefn Coch, adjacent to the A5025 just south of the hamlet of Pandy, on land that will be affected by the proposed A5025 Off-line Highway Improvements in this area. An alternative site at Cylch y Garn School, Llanrhyddlad, is also being considered.

ii) MEEG

The MEEG would store a number of specialist vehicles at a location close to but separate from the Power Station Site, which would allow them to be rapidly deployed if needed to support an incident.

The MEEG could also be used as a marshalling point for support arriving on Anglesey before onward dispatch to the Power Station Site in an emergency situation.

Similarly to the AECC and ESL, as part of the emergency arrangements for the Wylfa Newydd Generating Station, there are certain locational criteria that must be met in selecting a site for this facility. Horizon has identified a preferred site for the MEEG on a parcel of land currently in use as a bus depot and maintenance garage for commercial and heavy goods vehicles, towards the northern end of Llanfaethlu, with direct access to the A5025.

c) Associated Development

There are other proposed facilities that are needed for the construction and operation of the Power Station that are not considered integral to the Generating Station. Under the current Welsh regulatory system, such Associated Development cannot be included in the DCO application and would therefore currently require separate applications for planning permission under the TCPA. The Wales Bill introduced in June 2016 by the Wales Office would allow for Associated Development related to electricity generation Nationally Significant Infrastructure Projects (NSIPs) in Wales of over 350MW to be consented by a DCO. Horizon may therefore have the ability to consent some of its Associated Development in its DCO. To preserve this opportunity Horizon is consulting on its Associated Development in the same way as is required under the Planning Act 2008 for the NSIP; this is also consistent with Horizon's commitments in its Statement of Community Consultation.

i) A5025 Highway Improvements

Horizon intends to define and enforce the use of a specific route for the movement of construction workers from its Park and Ride site and the Temporary Construction Worker Accommodation sites to the Power Station Site, in addition to road-based freight associated with the Wylfa Newydd Project. The improvements focus on the section of the A5025 between Valley and the Power Station Site and include a number of by-passes and sections of carriageway widening to improve the geometry for HGVs to pass and deliver environmental improvements as part of the Wylfa Newydd Project.

The proposed Off-line Highway Improvements on the A5025 comprise:

- A5/A5025 Valley Bypass - a four-arm roundabout junction connecting the A5 with the A5025 to the east of the existing signalised junction that connects the A5 with the A5025 and B4545;
- Llanfachraeth Bypass (A5025) - a new 2km highway to provide a bypass to the east of Llanfachraeth village;
- Llanfaethlu Bypass (A5025) - proposed to eliminate two existing substandard bends near the Black Lion pub and through Llanfaethlu village; and
- Cefn Coch Bypass (A5025) - proposed to eliminate two existing substandard radius bends in Llanrhwydrus near two farms.

The proposed On-line Highway Improvements on the A5025 predominantly relate to carriageway widening in locations where the constrained nature of the carriageway could restrict two-way HGV movements. It is proposed to widen the existing A5025 to a standard minimum carriageway width of 6.7m with two 0.3m hardstrips on either side of the carriageway to provide a minimum paved width of 7.3m, wherever possible. The design includes a number of departures and relaxations from standards. Either side of the paved area a minimum of 450mm verge width will remain within the existing highway boundary, where possible.

Nanner Road would be upgraded to cater for the additional traffic movements following the closure of Cemlyn Road (which leads from the A5025 at Tregale to Cemlyn Bay) to allow site clearance. The upgrades will be in the form of some local widening to a standard width of 3.3m, additional passing places and pavement re-construction.

A scheme of localised road signage and markings is also currently being investigated on the A5025 between Amwlch and the Power Station Site. These works would be within the existing highway boundary.

ii) Park and Ride

A Park and Ride facility is proposed at Dalar Hir, immediately to the north-east of Junction 4 of the A55. This would act as a hub for the transfer of construction workers from private vehicles to buses, to reduce the effect of vehicles travelling along the A5025 to the Power Station Site. The facility

allows for secure vehicle parking and transportation of the workers to the Wylfa site by bus in a controlled manner. The facility would become operational once the number of workers at the Power Station Site reaches around 1,500.

Once operational, this facility would provide secure car parking for around 2,700 vehicles, including staff parking and a Bus Waiting, Pick-up and Drop-off Zone for up to 40 buses. The level of provision depends on the shift pattern and the final parking number and may be between 25 and 40 buses. A Bus Transport Facility Building would provide transport information, waiting area, welfare facilities, a bus driver canteen, cycle store and management office facilities. It would be manned 24 hours a day with lighting, secure fencing and CCTV.

iii) Logistics Centre

A Logistics Centre is proposed at a site within Parc Cybi close to Junction 2 of the A55, south of Holyhead. This facility is intended to control the timing of construction related traffic movements to the Power Station Site and to allow consolidation of deliveries into fewer loads. This will ensure vehicle movements along the A5025 are managed, reducing the potential for congestion. Construction deliveries would be directed to this facility for registration and either holding or short term storage and repackaging prior to onward movement to the Wylfa Newydd Development Area. This would enable Horizon to control the times that deliveries are able to travel onward from the Logistics Centre to the Power Station Site.

iv) Off-Site Temporary Workers' Accommodation

Many of the construction workers would be housed off-site in campus style modular development, based on a minimum of 500 bed spaces per location, and designed for temporary occupation. There would also be provision of some permanent housing that would be used in the short term by construction workers. Horizon's preferred sites for the development of Temporary Construction Worker Accommodation campuses are in Holyhead, Amlwch (Madyn Farm) and Rhosgoch, with further optionality in the vicinity of Amlwch, as follows:

v) Preferred sites:

Kingsland and Cae Glas at Holyhead, identified for up to 3,500 temporary bed spaces. This would provide a legacy of holiday accommodation and permanent residential development following the completion of the construction works. This site has outline planning permission as part of the land and Lakes development.

Madyn Farm, Amlwch (west of the B5111), identified for construction of 50 houses to provide 200 bed spaces for construction workers. These would become permanent housing (a proportion of which would be affordable housing) after their use by construction workers.

Rhosgoch (former Shell site) for the provision of up to 1,500 bed spaces for temporary workers. This would be brought forward in blocks of 500 bed spaces as required to meet demand for worker accommodation beyond the supply of existing accommodation (private rented, tourism bed spaces, owner occupied stock, latent supply and re-use of empty homes).

vi) Alternative site:

Amlwch (sites A and B, east and west of the B5111), for the provision of up to 800 bed spaces for temporary workers. This site is considered as an alternative site.

Each site would accommodate a range of worker facilities. For instance, the campus facilities at Rhosgoch and Cae Glas (which serves Kingsland also) (and Amlwch sites A and B, if brought forward) would include:

- Amenity and welfare building to include catering and dining; administration and facilities management; TV common room; medical treatment/first aid room; security/control office; laundry drop and collection area; shop for basic provisions; recycling point;
- Ancillary buildings for support services such as site utilities; laundry requirements; waste management; general materials/equipment storage; cycle storage; energy centre;
- Parking areas; and
- Bus waiting, pick up and drop off zone.

vii) Visitor and Media Reception Centre

A facility to inform the public about Horizon, nuclear energy and the Wylfa Newydd Power Station and to provide information about how it is operated and managed. The Visitor Centre would host exhibitions, conferences and educational events. It could also accommodate a media briefing and marshalling point where the press could gather and receive briefings in the event of a large event, or an incident, at the Power Station.

The proposed site for the Visitor and Media Reception Centre is at the proposed junction of the A5025 and new Power Station Access Road, just under a kilometre south of Tregele.

APPENDIX 3 – STRATEGIC POLICY PS1: ‘WELSH LANGUAGE AND CULTURE’ (PROPOSED CHANGES)

Table 1: STRATEGIC POLICY PS1: WELSH LANGUAGE AND CULTURE

Horizon amendments in **red text** (based on Policy PS1 contained in the Composite Version of the JLDP Written Statement (2016))

“Strategic Policy PS1: Welsh Language and Culture

The Councils will promote and support the use of the Welsh language in the Plan area. This will be achieved by:

- 1. Requiring a Welsh Language Statement, which will protect, promote and enhance the Welsh language, where the proposed development falls within one of the following categories:***
 - a) Retail, industrial or commercial development employing more than 50 employees and/or with an area of 1,000 sq. m. or more; or***
 - b) Residential development which will individually or cumulatively provide more than the indicative housing target set out for the settlement in Policies TAI 14 – 18; or***
 - c) Residential development of 5 or more housing units on allocated or windfall sites inside development boundaries that doesn’t address evidence of need and demand for houses recorded in Housing Market Assessments and other relevant local sources of evidence propose to provide an adequate range of sizes and types of housing units;***
- 2. Requiring a Welsh Language Impact Assessment, which will set out how the proposed development will protect, promote and enhance the Welsh Language, where the proposed development:***
 - a) involves a windfall site outside development boundaries for the development of large-scale housing development or developing employment on a large scale which would mean a significant flow of workforce; and***

b) will attract or accommodate significant number of people than originally anticipated in the Plan's policies and proposals;

3. Using appropriate mechanisms to ensure that suitable measures that mitigate negative impacts are provided or contribution is made towards mitigating those impacts;

~~*4. Refusing proposals that due to its size, scale or its location, would cause significant harm to the character and language balance of a community.*~~

~~*5. 4. Requiring all operational signage by public bodies and by commercial and business companies to be bilingual;*~~

~~*6. 5. Expect that Welsh names are used for new developments, house and street names."*~~