

Complete Agenda

CABINET

GWYNEDD COUNCIL

| | |
|----------------------|--|
| DATE | Tuesday, 27th November, 2018 |
| TIME | 1.00 pm |
| LOCATION | Siambr Hywel Dda, Council Offices, Caernarfon, Gwynedd, LL55 1SH |
| CONTACT POINT | Annes Siôn 01286 679490 cabinet@gwynedd.llyw.cymru |

GWYNEDD COUNCIL CABINET MEMBERS

| Members | |
|---------------------|---|
| Dyfrig L. Siencyn | Leader |
| Dafydd Meurig | Deputy Leader, Cabinet Member for the Environment |
| Craig ab Iago | Cabinet Member for Housing, Leisure and Culture |
| Gareth Wyn Griffith | Cabinet Member of Highways and Municipal |
| Nia Wyn Jeffreys | Cabinet Member for Corporate Support |
| Peredur Jenkins | Cabinet Member for Finance |
| Dilwyn Morgan | Cabinet Member for Children and Young People |
| W. Gareth Roberts | Cabinet Member for Adults, Health and Wellbeing |
| Gareth Thomas | Cabinet Member for Education |
| Ioan Thomas | Cabinet Member for Economic Development |

AGENDA

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THE CABINET TUESDAY, 6 NOVEMBER 2018

Present -

Councillors: Craig ab Iago, Dyfrig L. Siencyn, Dafydd Meurig, Gareth Wyn Griffith, Nia Wyn Jeffreys, Peredur Jenkins, Dilwyn Morgan, W Gareth Roberts and Gareth Thomas

Also present-

Dilwyn Williams (Chief Executive), Iwan Evans (Monitoring Officer), Dafydd Edwards (Head of Finance Department) and Lowri Haf Evans (Member Support Officer)

Others invited: Councillor Elin Walker Jones (Local Member - Bangor Glyder) and Councillor Gareth A Roberts (Member - Bangor Dewi)

Item 6: Diane Jones (Arfon Area Education Officer), Dafydd Gibbard (Senior Corporate Property Manager)

Item 7: Llyr B Jones (Senior Economy and Regeneration Manager)

1. APOLOGIES

Cabinet Members and Officers were welcomed to the meeting.

Apologies were received from the Cabinet Member Cllr Ioan Thomas.

Best wishes for a speedy recovery were extended to the Councillor's wife who had undergone an operation.

2. DECLARATION OF PERSONAL INTEREST

A declaration of interest was received from Councillor Elin Walker Jones as she was a Governor at Ysgol y Garnedd, but it was not a prejudicial interest.

3. URGENT ITEMS

There were no urgent items.

4. MATTERS ARISING FROM OVERVIEW AND SCRUTINY

There were no matters arising from overview and scrutiny.

5. THE MINUTES OF THE MEETINGS HELD ON 2 AND 16 OCTOBER

The Chair signed the Minutes of the Cabinet meetings held on 2 October and 16 October 2018, as a true record.

6. REORGANISATION OF BANGOR PRIMARY SCHOOLS

RESOLVED

To implement the proposal issued on 4 May 2018 to close Ysgol Glanadda and Ysgol Babanod Coedmawr on 31 August 2020, and offer places to the pupils at Ysgol y Garnedd (subject to parental choice); and increase the capacity of Ysgol y Garnedd to 420 effective 1 September 2020.

DISCUSSION

The report was submitted by Councillor Gareth Thomas.

Following an announcement from Welsh Government noting that there was an opportunity for Local Authorities to deliver additional projects within Band A of the 21st Century Schools Programme, Gwynedd succeeded to ensure a bid to reorganise primary schools in the Bangor catchment area. A report was submitted to Cabinet (January 2017) and the recommendation to hold discussions at a local level was approved as outlined in the report on reviewing primary school education provision in Bangor. In June 2017, a Catchment Review Panel was established to discuss a number of options which would improve and maintain the standard of education. The options were submitted to Cabinet in March 2018 and the recommendation to hold a statutory consultation on the process of reorganising primary schools was approved. A statutory consultation was held and 68 responses had been received; the main observations from that consultation had been submitted to Cabinet in July 2018. The Cabinet's decision at that meeting had been

To approve the proposal to close Ysgol Glanadda and Ysgol Babanod Coedmawr on 31 August 2020, and offer places to the pupils at Ysgol y Garnedd (subject to parental choice); and increase the capacity of Ysgol y Garnedd to 420.

To approve the issuing of statutory notices on the proposal in (i) above in accordance with the requirements of Section 48 of the Schools Standards and Organisation (Wales) Act 2013.

Following the decision, in accordance with the Schools Standards and Organisation Act 2013, a statutory notice had been issued on 4 September 2018 and a statutory objection period on the proposal had been held (between 4/9/18 and 2/10/18).

It was highlighted that one objection had been received during the objection period which involved matters relating to transport, child safety, finance, education and the Welsh language. It was added that one piece of correspondence had arrived late in the day and that this correspondence needed to be addressed as part of the discussions.

The Cabinet was requested to support the proposal which would greatly improve education standards for Ysgol y Garnedd children together with Ysgol Glanadda and Ysgol Coedmawr children.

The objections were discussed.

In response to concerns regarding traffic on Penrhos Road, the Senior Property Manager (Corporate) noted that every attempt had been made to seek to mitigate the situation which was causing difficulties in the area in the mornings and afternoons. He noted that 30 additional parking spaces had been planned for staff and visitor parking together with a drop-off point which would be controlled off the highway.

It was highlighted that a planning application for the development had been

approved at the Planning Committee on 5.11.18 and traffic concerns had been discussed. It was noted that the Transportation Department was happy with the new combination of adaptations which would address the problems.

In response to traffic concerns during the construction phase, it was noted that every effort was being made to reduce any disruption to local residents. It was added that discussions had been held with the residents and some adaptations had been made to the plans. It was noted that a traffic control plan had been drawn up which would respect the considerations of local residents.

It was suggested that consideration could be given to the start and finish time of the five schools in the area, which would reduce traffic density. This would be a matter for the schools themselves to decide.

In response to a comment regarding footpaths, it was stated that an assessment had been carried out to find out where the pupils' homes were, and as a result the main footpaths to get to the school came from three different directions. Although there was no intention to change the footpaths, it was noted that work would be carried out to promote road safety with the children.

Despite the response, the Member for Dewi Ward noted that rumours of closing one of the footpaths for two years had caused great concern among local residents. The Senior Manager responded by noting that there were arrangements to close some of the footpaths temporarily (for approximately 8 weeks) but also that he was willing to discuss the matter with the Member.

Taking advantage of the right to speak the Local Member for Glyder Ward noted the following main points:

- That she was completely supportive of the new school. She added that there was a great need for a new building and that she was very happy with the design.
- She welcomed the observations of the Senior Property Manager about concerns regarding the public footpaths and his willingness to hold discussions locally.
- Attention was drawn to the residents of Penrhos Avenue who had paid for a new road surface as the road had not been adopted by the Council. The Local Member wished to see these residents being fully compensated should any damage be caused to the road during the development phase.
- That it would be possible to consider keeping Ysgol Glanadda open as there was an increase in the numbers and the school was under new leadership.
- That parents of Ysgol y Garnedd had chosen Welsh-medium education for their children. She added that there was a special ethos in the school and that the Council's commitment and support was needed to protect the Welshness of the school.
- That she was supportive of the plan, that it was an exciting period and that it was possible to resolve any issues together.

In response to a comment about protecting the Welsh language, the Cabinet Member for Education noted that every school in Gwynedd had the same language policy. With the strength of the language at Ysgol y Garnedd, it was

noted that there was an opportunity to strengthen the Welsh language in Bangor and that the use of the Language Charter was an additional resource which would ensure social use of the Welsh language.

The Area Officer added that it was reasonable to expect to see more non-Welsh-speakers in the school and it was accepted that support work needed to be carried out in the short term. Nevertheless, it was reported that many non-Welsh-speaking children had attended Ysgol y Garnedd and succeeded.

In response to an observation regarding keeping Ysgol Glanadda open, the Area Officer noted that the financial situation of both schools was fragile and though the school appeared full the situation was not ideal or sustainable.

In response to the late correspondence received which highlighted concern that the response given to the linguistic concerns had not been based on facts, the Cabinet Member for Education noted that a linguistic assessment had been implemented as part of the process. He added that every child should have equal opportunities and Welsh-speaking children should not be kept separate. No child should be deprived of the opportunity to access a new building and new resources and children should not be treated differently on any basis.

Members were reminded that the proposal was a result of a long period of planning within a tight timescale and any delay with the decision would affect the period of releasing the money. It was added that statutory steps had been completed and should a consultation on another option be needed the process would have to be recommenced.

7. TARGETED REGENERATION INVESTMENT PROGRAMME: BANGOR CITY CENTRE REGENERATION SCHEME

The item was submitted by Cllr. Dyfrig Siencyn

RESOLVED

- a) To support the intention of targeting the Targeted Regeneration Investment Programme to develop and implement projects within the Bangor City Centre Regeneration Scheme
- b) To commit, in principle, £250k from the Match-funding Fund which was established to provide match funding for external funding programmes but ask for a further report on the final Scheme in order to ensure that it meets the Council's objectives and represents value for money.

DISCUSSION

The report was submitted by the Senior Manager - Economy and Community and a summary of the programme's context and background was given which anticipated up to £22m capital funding for North Wales between 2018 and 2021.

It was reported that Welsh Index for Multiple Deprivation data for Wales, which used cluster methodology, had been used to identify those areas (towns) that

had the greatest concentration of residents living within the 10% most deprived communities in Wales. In terms of priorities for the TRI programme during the period 2018 - 2021, town centre regeneration projects had been identified for four locations - Rhyl, Colwyn Bay, Wrexham and Bangor.

It was noted that notional financial allocations had been proposed and that any funding commitment would be dependent on presenting detailed Project Plans which would meet the requirements of the TRI Programme. It was noted that the indicative regional allocation for TRI Programme funding in Gwynedd included £3m for the Bangor City Centre Regeneration Scheme, and approximately £1.5m in respect of the housing theme (renovating empty properties) which would contribute towards priorities within the Regional Strategy (approved by the Cabinet on 22.5.2018).

It was noted that the Bangor City Strategic Partnership had drawn up a Regeneration strategy for the City and the work programme had been reviewed during the summer of this year, confirming priorities which would contribute to the main objectives and guidelines of the TRI Programme. Reference was made to the projects in the report and it was noted that further preparatory work was needed to develop detailed proposals. It was highlighted that it was possible to submit bids for the funding on an individual project basis instead of one bid consisting of a package of projects.

In terms of financial considerations, the members were reminded that the TRI Programme provided capital funding and the maximum Welsh Government intervention rate per project was 70%. This meant that at least 30% of match funding was required. Whilst partnership working was a key characteristic in each of the projects, the lead body would be responsible for developing the details of the project including the proposed funding package and securing the match funding. It was highlighted that Gwynedd Council would be responsible for leading on three of the projects with the intention of contributing / releasing £250k from the Match-funding Fund to meet the financial deficit. It was added that other partners such as BCUHB, Bangor University and CCG wished to lead on / contribute to other projects.

In response to the presentation, it was noted that the spending constraints on the money was not suitable and that the money was needed across the County. It was suggested that this was another example of Welsh Government funding being distributed at a regional level and then being limited by stringent guidelines.

In response to an observation regarding the likely success of the expenditure, it was noted that the resources were not likely to be sufficient to regenerate Bangor City centre in three years. It was added that the vision had been established and that substantial work was being carried out to try to address elements of that vision. The main emphasis of the programme was to change the function of the City centre which was a 10 - 20 year vision, but that this programme set the foundations for that. It was added that there was an opportunity here to be innovative, to link opportunities and improve the community provision.

In response to a question regarding the financial timeframe, it was noted that expenditure had not been considered for year 1 and therefore there was no risk

of losing money.

In response to an observation regarding sharing feedback with Bangor City Council, it was noted that the Mayor of the City was the Chair of the Partnership and that this strengthened the element of communication.

The following points were noted by the Members

- c) Restrict areas which were selected by the Government. Possibility of being dazzled by promises with an expectation of 'generous' contributions by the Council to realise the projects.
- d) The contribution would have to be of benefit to Bangor - the money must be spent wisely.
- e) Welsh Government had cut budgets, yet expected contributions and support for commitment to programmes led by the Government.
- f) That the Cabinet needed an opportunity to see the individual projects prior to them being submitted - the report was premature.
- g) That there was a need to plan for the future and for what local residents needed.

The meeting commenced at 1.00pm and concluded at 2.20pm

CHAIR

GWYNEDD COUNCIL CABINET



Report for a meeting of Gwynedd Council Cabinet

| | |
|----------------------------------|---|
| Date of meeting: | 27 November 2018 |
| Cabinet Member: | Councillor Gareth Thomas |
| Contact Officer: | Debbie Anne Williams Jones |
| Contact Telephone Number: | 32489 |
| Title of Item: | Resources for the Gwynedd Secondary Sector Language Strategy Coordinator |

1 THE DECISION SOUGHT

- (a) To commit £20,000 of funding from now until the end of March 2019 from the Transformation Fund to fund the Gwynedd Secondary Sector Language Strategy Coordinator post. The post will be a means of delivering on one of the commitments in the Council Plan, which will lead to further increase in pupils' social and curricular use of the Welsh language.

- (b) To return to the Cabinet with a request for further resources to fund the Gwynedd Secondary Sector Language Strategy Coordinator post from 2019/20 onwards, should the discussions with the regional consortium (GwE) to fund the post in future not prove successful.

2 THE REASON FOR THE NEED FOR A DECISION

Realising the vision and objectives of the Gwynedd Secondary Sector Language Strategy has been included in the Council Plan for 2018-2023.

Forming and implementing the requirements of the Secondary Sector Language Strategy is a direct response to the call from the county's primary and secondary schools, along with Elected Members to see succession to the primary schools Language Charter, ensuring further increase in the social and curricular use of the Welsh language among young people.

A report was submitted to Cabinet a year ago requesting commitment of additional resources over a three year period in order to realise the Strategy's objectives, and be able to provide specialist support to the county's secondary schools over time.

The request for additional resources was based on the same commitment of resources that was provided to establish the Language Charter in the primary schools, by funding the Coordinator post over a three-year period.

The Cabinet's response at the time was for Councillors Mair Rowlands and Gareth Thomas to write to the relevant Welsh Government Cabinet Secretaries requesting that they provide the £120,000 (£40,000 a year for three years 2018/19 -2020/21) to fund the Gwynedd Secondary Sector Language Strategy Coordinator post to lead on further increase in pupils' social and curricular use of the Welsh language.

As a result of the Cabinet's response, we have corresponded with Eluned Morgan AM, Minister for the Welsh Language and Lifelong Learning, requesting financial backing to support the Secondary Sector Language Strategy via the post of Coordinator. As a result of this correspondence, we were referred by Welsh Government to the regional consortium (GwE); however, following discussions, it is given to understand that it would not be possible for the consortium to fund the Coordinator post during 2018/19. (A copy of the correspondence can be seen in Appendix 1).

3 INTRODUCTION

The purpose of this project in the Council Plan is to ensure firm progression and to build on the success of the pioneering project of the Language Charter which is operational in Gwynedd's primary schools, and which has now been rolled out nationally. At the request of Welsh Government, following the positive reports about the success of the Charter in Gwynedd, permission was granted to use Gwynedd's expertise and good practice to extend the project to other areas in Wales.

To ensure firm progression to the Primary Language Charter, and to continue to improve our young people's Welsh language skills, the Secondary Sector Language Strategy was developed to provide clear guidance on how to plan intervention to improve awareness and increase the use of the language among young people in the secondary sector.

The Strategy focuses on the Welsh language and on education, and includes curricular elements as well as social use of the language. There are four main fields to which the Strategy attempts to respond:

- Welsh First Language
- Second Language Welsh
- The Welsh Language as a medium
- Social use of Welsh among young people

Since April 2017, a Coordinator was appointed on secondment from the Secondary Sector Language Centre at Porthmadog - a person who possesses expertise and credibility among the heads of secondary schools, and has the ability to convince and challenge accordingly - to lead the Secondary School Language Strategy.

The following has been achieved following the Coordinator's appointment:

- forming the Secondary Sector Language Strategy jointly with a working group of Gwynedd secondary school heads;
- a unique action plan has been formed by every secondary school in response to the objectives of the Language Strategy;
- meetings and discussions between the Coordinator and staff at a number of secondary schools have been held;
- a brand new partnership has been established with hunaniaith to respond specifically to two aims within the strategy, namely:
 - young people
 - the school and the community.

The Coordinator's employment ended on 31 August 2018, after she accepted a post with the regional consortium, GwE.

Consequently, since October 2018, a new Coordinator has been appointed, who will focus on achieving the following elements:

- Further supporting the 14 secondary schools to implement the main priorities of the Strategy
- Create and implement comprehensive training programmes for secondary teachers in the methodologies of bilingual teaching and learning
- Further promote the value and advantages and usefulness of bilingualism in order to strengthen the pupils' incentive to develop into people who are fluent in both languages.
- Create and implement effective arrangements to monitor the implementation of the strategy.

4 THE REASONING AND JUSTIFICATION FOR RECOMMENDING THE DECISION

Receiving the additional resource from the Council would provide the project with firm continuity and progress via the Coordinator post, and would ensure that Gwynedd continues to lead on pioneering work across the north and nationally.

5 NEXT STEPS AND TIMETABLE

In accepting the Cabinet's decision to fund the Gwynedd Secondary Sector Language Strategy Coordinator post, every secondary school will receive appropriate guidance and support to implement the requirements leading to an increase in young people's social and curricular use of the Welsh language.

Should the discussions with the regional consortium (GwE) not lead to financial support for the Coordinator post from 2019/20 onwards, it is requested that we return to the Cabinet with a request for further resources to continue to fund the Gwynedd Secondary Sector Language Strategy Coordinator post.

6 ANY CONSULTATIONS UNDERTAKEN PRIOR TO RECOMMENDING THE DECISION

6.1 Views of the Statutory Officers:

i. Monitoring Officer:

No observations from a propriety perspective.

ii. Head of Finance Department:

“As neither Welsh Government nor the Regional Consortium has freed up funding for the Secondary Coordinator post, resources are requested from the Council’s Transformation Fund. There will be several deserving needs / uses competing for the scarce resources from this fund and prioritising the relevant requests will be a matter for the Cabinet members.”



Aelod Cabinet dros Addysg
Cabinet Member for Education
Cyngorydd/Councillor Gareth Thomas

Gofynnwch am/Ask for: Gareth Thomas

Dear Eluned Morgan AM,

Re: Gwynedd Secondary Sector Language Strategy

Gwynedd Council is an organisation that has always taken its duty to promote the Welsh language seriously, and through its internal administration it enables all Council staff to work through the medium of Welsh naturally, while developing Welsh language oral, reading and understanding, and written skills on a daily basis.

In addition, through its language policy, the Council is also committed to promoting the Welsh language beyond the Council; with partners and in communities. As a result of this commitment, and the strength of the Welsh language in many of the county's communities, the Council also acts as the lead body for hunaniaith, which is what the language initiative is known as in Gwynedd.

In addition, the Council, in partnership with hunaniaith, was responsible for developing the Language Charter for the county's primary schools, in order to have a positive influence on children's social use of the Welsh language. As you may know, since the launch of the Language Charter in Gwynedd in June 2011, Welsh Government has taken a keen interest in the innovative work that was underway here, and the positive impact the charter was having on children's use of the Welsh language. Consequently, the Language Charter has now been rolled-out regionally and nationally, and it is now funded by Welsh Government through the four education consortia.

Gwynedd is now looking at the secondary sector, in order to ensure appropriate succession to the successes of the Charter in the primary sector. On 26 October 2017, Gwynedd Council Cabinet adopted a Secondary Sector Language Strategy for the county, and I enclose a copy of the document for your attention. The Council has also created a Coordinator post as a resource to support and challenge our secondary schools to deliver. In a period of unprecedented financial hardship for Local Authorities, the challenge is to secure financial support to continue with the Coordinator post as a key resource to drive this work forward.

Based on Gwynedd's success with the Language Charter in primary schools, I would urge Welsh Government to consider giving financial support to allow Gwynedd to pioneer once more in the field of supporting young people's use of the Welsh language in our secondary schools. Financial support of £120,000 would allow us to employ a Coordinator for the Secondary Sector Language Strategy for a period of three years. This period is considered reasonable for trialling, pioneering and proving the

worth of the investment on young people's use of the Welsh language within the curriculum and socially. Following this, Welsh Government would be in a strong position to consider how appropriate it would be to disseminate this scheme across the secondary sector regionally and nationally.

Of course, Gwynedd's efforts to support children and young people to use the Welsh language also support and contribute towards the Government's vision as outlined in *Cymraeg 2050*. In addition, the variances found in the position of the Welsh language in Gwynedd, reflecting the range of variances found in communities as varied as Llanrug and Aberdyfi, means that Gwynedd is in a good place to trial and pioneer in the linguistic planning field. Should you wish to hear more about what has been achieved in Gwynedd to promote the use of the Welsh language among children and young people, I would be very happy to welcome you here and take you around some of our primary and secondary schools for you to see the plans at work.

In the meantime, I trust that you will give our request for financial support due attention, in order to realise our agreed vision of young people using the Welsh language every day.

We look forward to hearing from you.

Yours sincerely

Gareth Thomas
Cabinet Member for Education

Eluned Morgan AC/AM
Gweinidog y Gymraeg a Dysgu Gydol Oes
Minister for Welsh Language and Lifelong Learning



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref GT/AS
Ein cyf/Our ref EM/00115/18

Cynghorydd Gareth Thomas
Aelod Cabinet dros Addysg a Phlant a Phobl Ifanc
Cyngor Gwynedd Council
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27 February 2018

Dear Councillor Thomas

Thank you for your letter dated 6 February regarding the Gwynedd Secondary Sector Language Strategy. I was pleased to read about the attention Gwynedd Council is giving to this important field. As you mention in your letter, work in this field is crucial in order to reach the target of a million Welsh-speakers as outlined in the *Cymraeg 2050* strategy, and Gwynedd Council has an important role to play, as do all local authorities, as we seek to reach that target.

I am pleased that Welsh Government has been able to provide financial support to Gwynedd Council annually since the establishment of the Language Charter, via the main grant to Hunaniaith initially, and more recently via the education department in order to support the wider work of disseminating the Charter across the north Wales region and to other regions.

We are also pleased to have been able to provide financial support to Gwynedd secondary schools for two years via the Supporting Language Use Project as part of the grant across the north Wales region.

As you will be aware, in December 2017 the Welsh in Education Action Plan was published for 2017-21, which sets out the national direction for developing Welsh and Welsh-medium education over

the next four years, in accordance with the vision of *Cymraeg 2050: A Million Welsh-speakers and Education in Wales: Our National Vision, Action Plan 2017-21*.

The plan outlines the intention to build on the Welsh language Charter and the secondary Language Use Support Pack to develop a national framework for every school location to provide a whole-school basis for planning and offering opportunities to increase the wider use of Welsh by learners and embed language use practices.

Work is already underway to put that framework in place from September 2018 onwards, and every school, regardless of their language category, will work within the same framework in order to achieve the aim of ensuring that children and young people:

- are confident in using the Welsh language skills;
- nurture positive attitudes towards the language, and
- increase the use of the language within and outside the school.

Welsh Government has set up a national working group of representatives from the four regions to steer the development of the national framework. We appreciate the input of Gwynedd Council officers to those discussions, and the work that Gwynedd Council does representing the north Wales region in its role as the chair of the Welsh language network within the GwE region. Welsh Government officials regularly discuss the developments with Gwynedd Council officers, and are very happy to meet with you to discuss any aspect of the work.

As you mention in your letter, the structure of financing the Language Charter and the work within secondary schools has now moved to a regional system, and is channelled through the four education consortium. Our structure for awarding funding in this field will continue through the regional consortia over the coming period, and how funding is allocated to local authority level to implement the Language Charter and other schemes to support the development of Welsh in education, will be a matter for the GwE region Welsh network to decide.

I look forward to seeing work in this field going from strength to strength, as we work on a national, regional and local level to move this field forward and to give the best possible opportunities for our children and young people to embed their language practices and be confident in using the language in their everyday lives.

Your sincerely

Eluned Morgan AC/AM

Gweinidog y Gymraeg a Dysgu Gydol Oes
Minister for Welsh Language and Lifelong Learning

GWYNEDD COUNCIL CABINET



Report to a meeting of Gwynedd Council Cabinet

Date of meeting: 27 November 2018
Cabinet Member: Councillor Dafydd Meurig
Contact Officer: Gareth Jones, Senior Planning and Public Protection Service Manager
Contact Telephone Number: 34092
Title of Item: Local impact statement in light of the development of the new nuclear power station, Wylfa Newydd, Anglesey.

1. THE DECISION SOUGHT

- 1.1. That the Cabinet approves the draft statement of local impact in Appendix 1.
- 1.2. That the Cabinet delegates powers to the Head of Environment Department, to undertake minor amendments and corrections as necessary to the draft statement and to add relevant evidence to support the direction of the draft statement, prior to submitting the document to the Planning Inspectorate by 4 December 2018.

2. THE REASON FOR THE NEED FOR A DECISION

- 2.1. On 1 June 2018, the Horizon Nuclear Power (HNP) company submitted an application for a Development Consent Order (DCO) to the Secretary of State (via the Planning Inspectorate), for a new nuclear power station to develop the Wylfa Newydd project.
- 2.2. In accordance with statutory arrangements, the Planning Inspectorate was given 28 days to verify the application to ensure that submitted information met relevant requirements, and it was formally confirmed on 28 June 2018 that the application had been accepted. Following the receipt of the application, it is noted that the timetable for the process from here on in is entirely in the hands of the Planning Inspectorate.
- 2.3. Although Wylfa Newydd is not located in Gwynedd, the development on the one hand will be an opportunity for the local economy, however on the other hand it will create challenges for Gwynedd in terms of matters such as infrastructure and transport, housing supply, the labour market, public services and the Welsh language.

- 2.4 Therefore, a decision is needed as the (Draft) Statement of Local Impact in Appendix 1, will convey the Council's opinion on the local impact on Gwynedd, in light of the Wylfa Newydd scheme, and will be submitted as evidence to the Planning Inspectorate as part of the examination process.

3. INTRODUCTION AND RELEVANT CONSIDERATIONS

3.1. Background

- 3.1.1 The principle of locating a new nuclear station in the north of Anglesey was established in the UK Government's Overarching National Policy Statement for Energy in 2011 and a new enterprise, namely Horizon Nuclear Power, announced their intention to develop the site. More recently and prior to the submission of the DCO, the UK Government made a statement that supported contributing towards funding the project.

What does the DCO application include?

- 3.1.2 It is noted that the DCO application includes:
- i. The power station which includes two reactors and other on-site developments such as drains, accesses and parking, temporary structures, landscaping etc.
 - ii. Temporary and permanent marine work including unloading facilities, water cooling system and temporary structures
 - iii. Alternative facilities such as an emergency control centre
 - iv. Associated developments which include employees' accommodation, temporary park and ride facilities, temporary logistics centre, highway alterations and habitat creation work
- 3.1.3 After the nuclear station becomes operational, it will be in operation for 60 years before it is decommissioned. There is not much change in terms of the nature of the development since the consultations that were held prior to submission of the DCO, although the cost has increased to approximately £15 billion. Up to 9,000 people will work on site at the peak of the construction period and 850 will work there when the Station becomes operational. The application also includes the provision of temporary fit-for-purpose accommodation in campus form on the site, for approximately 4000 employees specifically for the station construction phase.

What is the process and timetable for dealing with the application?

- 3.1.4 Since the DCO application was received, the Planning Inspectorate has confirmed the timetable for dealing with the application and details are included in a letter in the following link:

<https://infrastructure.planninginspectorate.gov.uk/document/EN010007-002070>

- 3.1.5 The letter outlines a timetable for examining the DCO application and it is noted that there is a statutory period of six months to examine the application. Here are some dates that are likely to be more relevant to the Council in terms of the examination:

- 23 October 2018: Preliminary Meeting (which has been held and attended by the Council)
- 24 October 2018: First day of the examination with a hearing on the draft DCO has been held which was attended by the Council
- 4 December 2018: Need to submit the **statement of local impact** and statement of common ground
- January 2019 to March 2019 - attend relevant hearings using the **statement of local impact** as the evidence base
- 23 April 2019: Examination closes

3.1.6 It is noted that the examination will include hearings on various fields of work that will be based on the 11 main matters that have been identified in the Inspectorate's recent letter. The Council will attend some of the hearings that will be held in the examination, and also respond to questions raised by the Inspectorate throughout the process.

3.1.7 The statement of local impact that will be submitted to the Planning Inspectorate will include the evidence base used by the Council to respond to matters that will be raised at relevant hearings, and to respond to questions by the Planning Inspectorate during the Examination.

These will be the next steps after the examination is closed:

- Recommendation and decision by the UK Government (six-month period) before the end of October 2019

Following the decision, these are the anticipated steps and timetable:

- Submit information to correspond with DCO requirements (this is similar to applications to correspond with the requirements of planning conditions) – six-month period
- Construction work commencing in late 2020 until 2027

3.2. The Council's response to the submitted DCO application

3.2.1 Since the DCO application submission period, the Council has established a Major Developments Group, which is a cross-departmental internal group, to respond to applications such as Wylfa Newydd. Through the group's input, the Council has responded to three formal consultations and the informal consultation held on the draft DCO.

3.2.2 Since the DCO application was submitted and received, the Council, through the Major Developments Group, had to provide relevant observations on the application to the Planning Inspectorate by 13 August 2018, with observations expected to be a summary of no more than 500 words. The Council's viewpoint as a result of the DCO review that was submitted, is consistent with the viewpoint provided when responding to various consultations prior to submitting the application. Relevant observations that were submitted to the Planning Inspectorate are attached in Appendix 2, which outlines the Council's high level response and sets the framework for the (draft) statement of local impact in

Appendix 1. It is noted that the response in Appendix 1 and matters raised in the statement of local impact, are consistent with the Council's responses to consultations prior to submission of the DCO application.

3.2.3 It is noted that it is not a statutory requirement for the Council to submit a statement of local impact but having considered the substantial scale of the Wylfa Newydd project, and its potential impacts on Gwynedd, it is believed that it is important for the Council to do this. It can be seen that the draft statement notes the positive, neutral and negative local impacts in light of the development and reference is made to the logic and evidence (where relevant) to support this. The draft statement includes the following main parts:

- i. A profile of Gwynedd and the location of the development in relation to Gwynedd
- ii. Overview and evaluation of planning policies and relevant documents
- iii. Potential local impacts in terms of:
 - Highways and transport
 - Economy matters, such as the labour market and tourism
 - Impact on the Welsh language
 - Housing matters
 - Public services

3.2.4 The main concern still held by the Council is that insufficient consideration is given by HNP to the potential side effects on Gwynedd (more specifically the Arfon area), nor any consideration to what will happen if their presumptions are inaccurate in terms of:

- i. where employees will live during the construction work,
- ii. what the side effects will be in terms of transport matters (traffic and transport),
- iii. what the impact will be on the Welsh language and communities
- iv. what the impact will be on the labour market and the economy, and
- v. what the impact will be on public services?

3.2.5 Concerns raised by the Council about impacts that are different from the ones that are anticipated, are seen to be substantiated with the development of the Hinkley Point Nuclear Power Station in Somerset, which is currently in its construction process. An important point to note here is that approximately 5600 employees are expected in Hinkley at its peak compared to up to 9000 with the construction of Wylfa Newydd. The statement in Appendix 1 refers to what is / has happened with the Hinkley development, as a current example of potential impacts of the Wylfa Newydd development. It is also noted that the Council has already referred HNP to examine what is taking place in Hinkley, and to ensure that any lessons are learnt with the DCO application for Wylfa Newydd. The Council has also emphasised the need to ensure that robust mitigation measures are put in place in consultation with the Council and other stakeholders.

3.2.6 The DCO application includes high level information regarding the initial contents for a 106 agreement and a framework for monitoring and responding in good time to any negative impacts. Reference to Gwynedd Council is scarce in these documents, despite the Council's observations when responding to consultations before the DCO application was submitted. It is noted that the statement includes

a wish that the Council expects to have an input in discussions regarding the 106 agreement to try to ensure:

- i. that mitigation measures are provided to address the impact, wherever the impact is caused geographically and that mitigation measures address impacts on Gwynedd in situations where the impact is different / worse than what is anticipated by HNP.
 - ii. reference to Gwynedd where relevant in a 106 agreement, including any monitoring framework, mitigation measures and funding / associated resources and that Gwynedd wishes to be part of discussions involved with preparing and agreeing on these documents.
 - iii. that the Council has representation on the Programme Board / or similar which will be established for the project's construction period to take an overview and to make decisions on releasing funds / resources to mitigate impacts in good time, as well as field groups (e.g. Housing, Language, transport etc.) that will sit under the Programme Board.
- 3.2.7 It must also be noted that there will be positive side effects as a result of the Wylfa Newydd development and that as a Council we would wish to be part of discussions to ensure that interests are disseminated to Gwynedd and the region.
- 3.2.8 With this type of application, the developer and the Council (as well as other stakeholders) are expected to hold discussions to see whether or not there is common ground on aspects of the application. The intention is to try to ensure that discussions in the examination will focus on matters where there is no agreement. The output of this will be a statement of common ground, which is a technical document and is in the process of being prepared, and will be submitted to the Planning Inspectorate at the same time as the Statement of Local Impact.

4. NEXT STEPS AND TIMETABLE

Submit the Statement of Local Impact to the Planning Inspectorate by 4 December 2018

5. ANY CONSULTATIONS UNDERTAKEN PRIOR TO RECOMMENDING THE DECISION

Consultations and input of all of the Council's relevant Departments.

OPINION OF THE STATUTORY OFFICERS

Chief Finance Officer:

Providing a comprehensive declaration of local impact on behalf of Gwynedd Council is essential. I am satisfied that the contents of the response does not place financial obligations on the Council, therefore I have no comments on the contents from a financial perspective".

Monitoring Officer:

The timetable for lodging the Statement of Local impact has been introduced by the Planning Inspectorate as part of the wider Development Consent Order process. The Council must present the statement by the 4th December 2018 so that the impact of the development on Gwynedd may be considered within the process, and specifically so that the Council may contribute within the scheduled hearings. It is noted that considerable work has been undertaken on a cross department basis in order to assess the impact on Gwynedd, and I am satisfied that the statement addresses the legal requirements on the Council within the process."

Appendices

Appendix 1: (Draft) statement of local impact

Appendix 2: The Council's relevant observations

Statement of Local Impact Report by Gwynedd Council

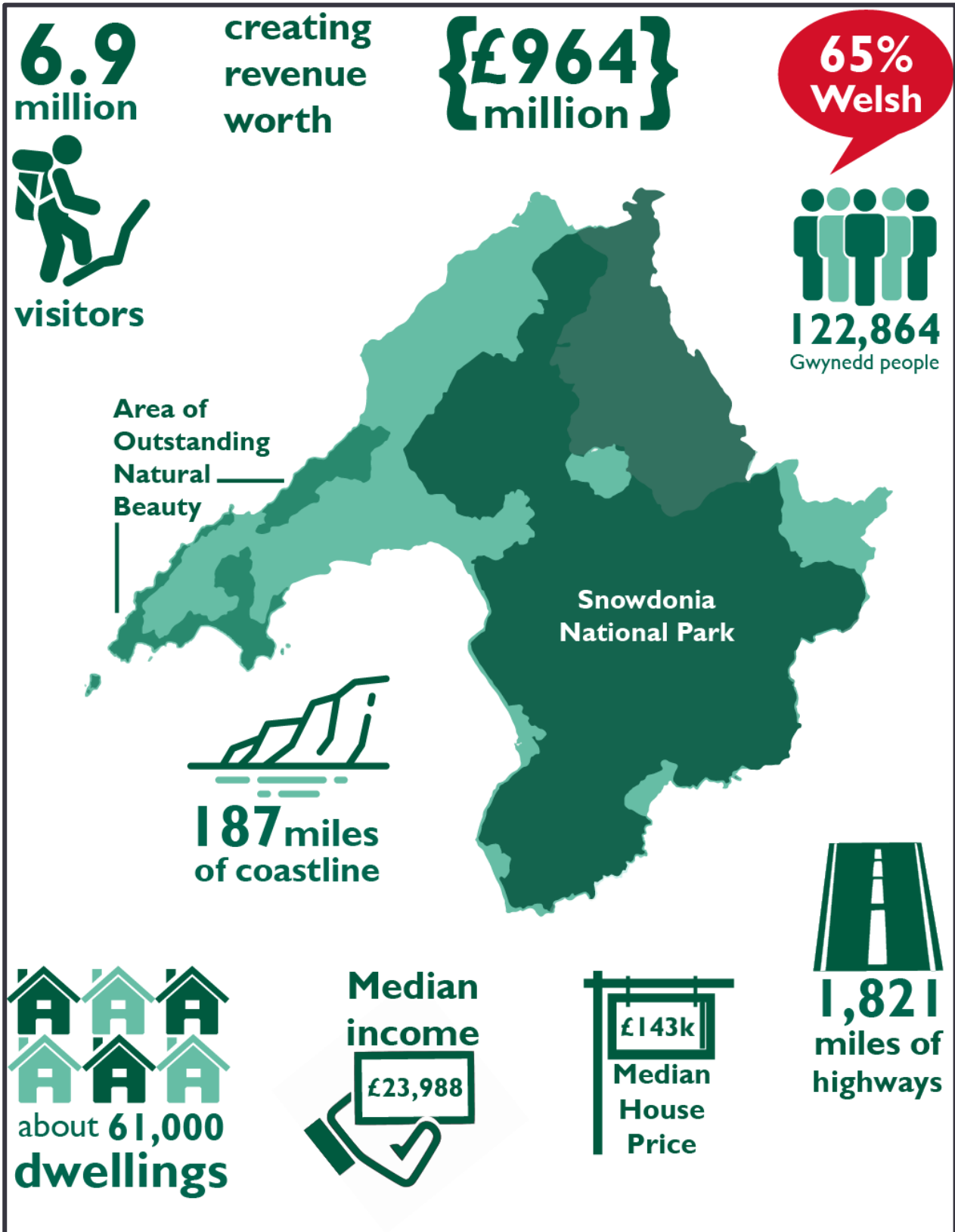
1. Introduction

- 1.1 On 28 June 2018 The Planning Inspectorate confirmed that Application ref. EN010007 by Horizon Nuclear Power (Horizon) for Wylfa Newydd Nuclear Power Station had been accepted for examination.
- 1.2 Gwynedd Council (GC) has also been notified that as a local authority it does not fall within the categories of S102(6&7) of the Planning Act 2008 given that the application site is not within its boundary nor, in the opinion of the Planning Inspectorate, is Gwynedd considered to have part of a boundary with the host authority.
- 1.3 Irrespective of its status under S102 (6&7) GC, based on its local knowledge and the information contained in the Development Consent Order Application, has considered the local impacts of the application upon the county, which are set out within this Statement of Impact Report dated 4 December 2018.
- 1.4 At the outset, GC would like to state support for the principle of the Power Station as it and its construction has the potential to bring positive economic and social benefits to Anglesey, Gwynedd and the wider area. However, GC has consistently identified areas of concern over certain aspects of the development, which will require mitigation and/or a precautionary approach requiring further discussion and agreement with relevant bodies reflected in the final proposals. In discussion with our partners, we are not confident that significant issues related to accommodation, transport, skills and employment, the Welsh language and public services have been adequately examined and addressed.

2. Gwynedd

A profile of Gwynedd

- 2.2 Taken from the Council's 2017 – 2018 Strategic Plan, the diagram on the next page provides an 'at a glance' statistical profile of the County.



A snapshot of resident's views

The following table provides a taste of what Gwynedd's residents stated during recent public consultation workshops undertaken to prepare the Gwynedd and Anglesey Well-being Plan 2018:

| | |
|---|---|
| What makes the area a good place to live: | What's not so good: |
| <ul style="list-style-type: none"> • The natural environment around us • The views • Welsh area and being able to use the language • A good feeling of community spirit • Feel that the area is safe | <ul style="list-style-type: none"> • Lack of good quality jobs • Public transport • Distance from services and facilities • High cost of local housing • The appearance of the streets |
| What improves well-being in your area and contributes towards your quality of life: | What would you change about your area to make it a better place to live: |
| <ul style="list-style-type: none"> • Opportunities to do activities in the open air • The community spirit of the area • Family / Friends / Neighbours • Natural environment • Local facilities | <ul style="list-style-type: none"> • More jobs with higher salaries • Better public transport • More local activities • Improve local facilities • Improve the appearance of the streets |

GC's well-being objectives as set out in its Well-being Statement (2018) are to ensure that Gwynedd residents can –

- i. Enjoy happy, healthy and safe lives
- ii. Live in quality homes within their communities
- iii. Earn a sufficient salary to be able to support themselves and their families
- iv. Receive education of the highest quality which will enable them to do what they want to do
- v. Live with dignity and independently for as long as possible
- vi. Live in a natural Welsh society
- vii. Take advantage of the beauty of the County's natural environment.

3. Project Proposals

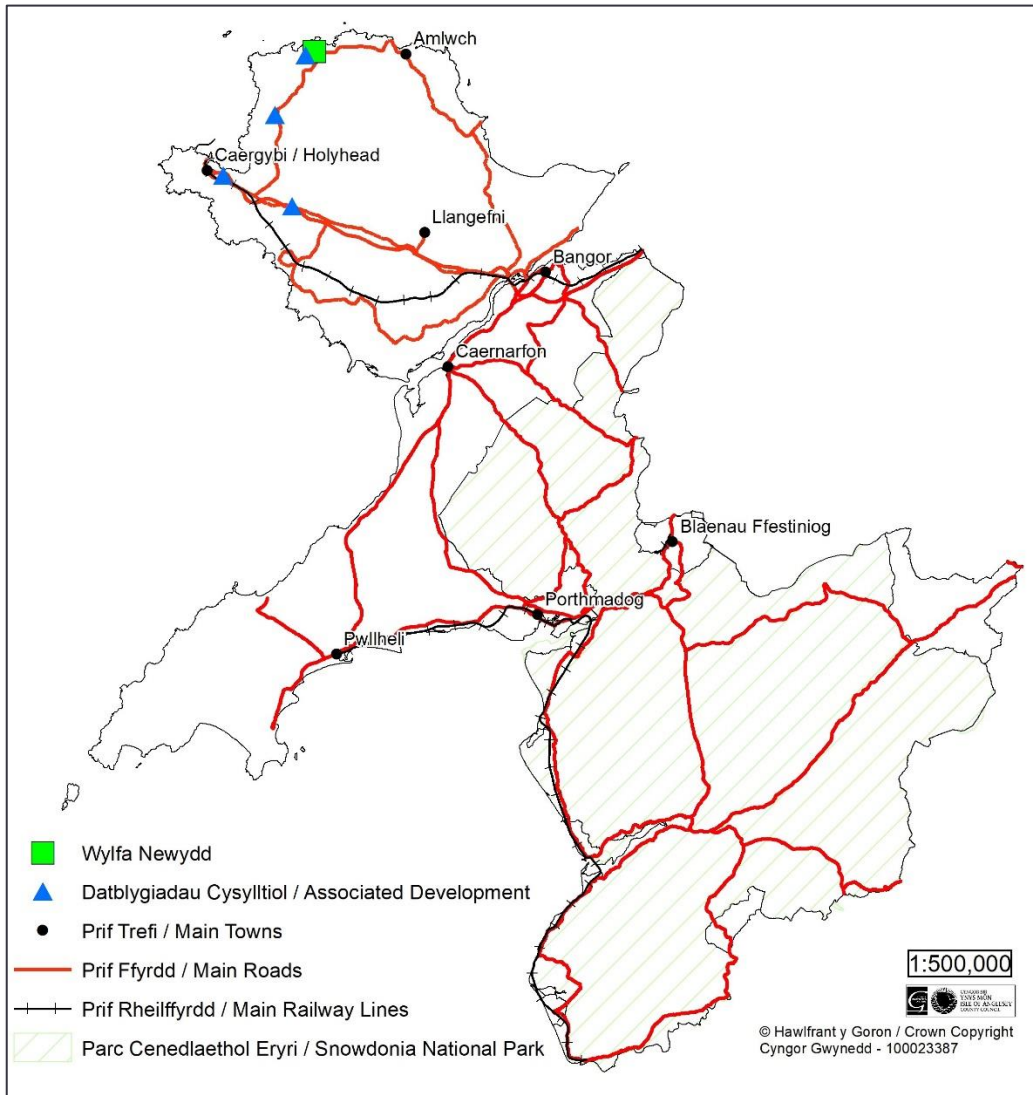
3.1 The Applicant seeks a DCO to authorise the construction and operation of Wylfa Newydd, a new nuclear power station on Anglesey with a capacity of up to 3100 megawatts, and associated development ('Wylfa Newydd DCO Project'). The principal components of the Wylfa Newydd DCO Project are:

- a. The Power Station which includes two UK Advanced Boiling Water Reactors, the Cooling Water System, supporting facilities, buildings, plant and structures, radioactive waste and spent fuel storage buildings and a connection to the national grid.
- b. Other on-site development including landscape works and planting, drainage, surface water management systems, public access works including temporary and permanent closures and diversions of public rights of way, new Power Station Access Road and internal site roads, car parking, construction works and activities including construction compounds and temporary parking areas, laydown areas, working areas and temporary works and structures, temporary construction viewing area, diversion of utilities, perimeter and construction fencing, and electricity connections.
- c. Marine Works comprising:

- Permanent Marine Works including the Cooling Water System, the Marine Off-loading Facility, breakwater structures, shore protection works, surface water drainage outfalls, waste water effluent outfall (and associated drainage of surface water and waste water effluent to the sea), fish recovery and return system, fish deterrent system, navigation aids and dredging.
 - Temporary Marine Works including temporary cofferdams, a temporary access ramp, temporary navigation aids, temporary outfalls and a temporary barge berth.
- d. Off-site Power Station Facilities: comprising the Alternative Emergency Control Centre, Environmental Survey Laboratory and a Mobile Emergency Equipment Garage.
- e. Associated Development comprising:
- the Site Campus for worker accommodation within the Wylfa Newydd Development Area;
 - temporary Park and Ride facility at Dalar Hir for construction workers;
 - temporary Logistics Centre at Parc Cybi;
 - the A5025 Off-line Highway Improvements;
 - Wetland habitat creation and enhancement works at Tŷ Du, Cors Gwawr and Cae Canol-dydd.
- 3.2 The DCO application also seeks various other powers including provisions permitting the compulsory acquisition of interests and rights in land, the temporary use of land, interference with rights and the closure or diversion of streets and other public rights of way including the permanent closure of Cemlyn Road.

4. Power Station location in relation to Gwynedd

- 4.1 The Wylfa Newydd Power Station site and its associated development sites (described in 3 above) are located in the adjacent administrative area of the Isle of Anglesey County Council. The Power Station site is on land on the northern coast of the Island and is within the control of Horizon. The associated development sites are located at various locations on the Island.
- 4.2 The Menai Straits forms the boundary between the north- eastern boundary of the administrative area covered by Gwynedd Council and the southern boundary of the administrative area covered by the Isle of Anglesey County Council. The Power Station site is about 51km from Bangor, which is Gwynedd's main Service Centre and located on the Menai Strait. Currently, vehicular access between the Counties is provided by Britannia Bridge and the Menai Suspension Bridge, with the former also providing a rail link. Map 1 below shows the spatial relationship between the Power Station Site, its associated development and Gwynedd.
- 4.3 The development area and its associated development will not directly impact upon Gwynedd although it is considered that there could be positive, neutral or negative indirect effects upon the County in respect of:
- Impacts upon the general economy with particular reference to the tourist economy;
 - Social and community impacts including upon the Welsh language;
 - Impacts upon the demand for housing for the workforce associated with the construction and operation of the power station; and
 - Transport and traffic impacts upon the highway network
 - Impacts on public services



5. Appraisal of planning policies and documents applicable to Power Station proposals

5.1 GC acknowledges the nationally important role that low carbon energy generation plays as outlined in NPS EN-1, and that no part of the proposed Power Station or its associated development would be physically located inside the administrative area of Gwynedd. It therefore also acknowledges that the

impacts of the scheme fall entirely on the local communities of Anglesey, provided that the assumptions made by Horizon and their suggested mitigation and compensation measures are correct. EN-1 states that consent shouldn't be granted unless the Examining Authority is satisfied that the project will avoid significant adverse impacts on, for example, health and quality of life of communities. Based on concerns around matters highlighted in 4 above it is considered by GC that the adopted development plan as well as other documents and strategies produced by GC and partners should be included as material considerations when considering this application.

National Planning Policy

Planning Policy Wales

- 5.2 It sets out the land use planning policies of the Welsh Government. It translates the Government's commitment to sustainable development into the planning system so that it can play an appropriate role in moving towards sustainability. PPW, the TANs, circulars and policy clarification letters comprise national planning policy. National planning policy should be taken into account in the preparation of development plans. It may be material to decisions on individual planning applications and will be taken into account by the Welsh Ministers and Planning Inspectors in the determination of called-in planning applications and appeals.
- 5.3 Of particular relevance, PPW, underpinned by the Well-being goals, confirms the presumption in favour of sustainable development. It promotes places that promote economic, social, environmental and cultural well-being by:
- providing well-connected employment and economic development in pleasant surroundings. These places are designed and sited to promote healthy lifestyles and tackle climate change by making them easy to walk and cycle to and around, access by public transport, minimising the use of non-renewable resources and using renewable and low carbon energy sources;
 - providing well-connected cohesive communities for all sectors of society, allowing everyone to have a good quality of life by living in strong and safe communities, improving access to services, cultural opportunities and recreation facilities to support people to adopt healthy lifestyles, securing socially inclusive development and more cohesive communities; and
 - valuing the quality of landscapes and historic environment, future proof economic assets both in response to the challenges presented by climate change and in promote low carbon solutions, protecting landscapes and habitats, enabling opportunities for connecting with the natural environment and encouraging healthier lifestyles with the benefit of improving physical and mental well-being.

Technical Advice Notes

- 5.4 As described above, TANs form part of national planning policy, and therefore may be material to decisions on planning applications. From GC's perspective, of particular relevance are: TAN 2: Planning and affordable housing; TAN 18: Transport; TAN 20: Planning and the Welsh language; TAN 23: Economic development

The adopted Joint Local Development Plan:

- 5.5 The following policies of the Anglesey and Gwynedd Joint Local Development Plan 2017 are considered to be of relevance to Horizon's proposal from the perspective of the Council. The full wording of the policies referred to below are in Appendix A.

Strategic Policy PS 1: Welsh Language and Culture

- 5.6 Of particular relevance here is criterion 2, (which is linked to criterion 4 of Strategic Policy PS 5), *'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 is on an unexpected windfall site for a large scale housing development or large scale employment development that would lead to a significant workforce flow'*

Strategic Policy PS 2: Infrastructure and Developer Contributions

- 5.7 Of particular relevance here is *'The Councils will expect new development to ensure sufficient provision of essential infrastructure (either on-site or to service the site) is either already available or provided in a timely manner to make the proposal acceptable, by means of a planning condition or obligation'... and...*

'Where the essential, enabling and necessary infrastructure is required as a consequence of a scheme and cannot be provided on site, financial contributions will be requested, within limits allowed by legislation, to get essential investment off site'.

Policy ISA 1: Infrastructure Provision

- 5.8 Of relevance here is *'Proposals will only be granted where adequate infrastructure capacity exists or where it is delivered in a timely manner. Where proposals generate a directly related need for new or improved infrastructure and this is not provided by a service or infrastructure company, this must be funded by the proposal. A financial contribution may be sought to secure improvements in infrastructure, facilities, services and related works, where they are necessary to make proposals acceptable. Where appropriate, contributions may be sought for a range of purposes, including: 1. Affordable housing...4. Employment and training facilities..6. Transport infrastructure including public transport'..12 Welsh language measures.*

Strategic Policy PS 4: Sustainable Transport, Development and Accessibility

- 5.9 Of particular relevance here is Part 2 in relation to Transfer between Transport Modes. Part 2 ii. states *'Strategically located permanent park and ride facilities within or adjacent to Centres or in other locations close to the main highway network when it can be demonstrated that no alternative sites closer to the Centres are suitable, where customers are supported by frequent bus services between the facility and the destination'...and...*

Part 2 v. states *'Facilities for park and share in appropriate locations within or adjacent settlements on the strategic highway network'.*

Policy TRA 4: Managing Transport Impacts

- 5.10 This policy seeks where appropriate that *'proposals should be planned and designed in a manner that promotes the most sustainable modes of transport having regard to a hierarchy of users'* and that...

'Proposals that would cause unacceptable harm to the safe and efficient operation of the highway, public transport and other movement networks including pedestrian and cycle routes, public rights of way and bridle routes, will be refused. The degree of unacceptable harm will be determined by the local authority on a case by case basis'.

Strategic Policy PS 5: Sustainable Development

- 5.11 Of relevance here is *'Development will be supported where it is demonstrated that they are consistent with the principles of sustainable development. All proposals should...4 'Protect, support and promote the use of the Welsh language in accordance with Strategic Policy PS 1' ...6. 'Protect and improve the*

quality of the natural environment, its landscapes and biodiversity assets, including understanding and appreciating them for the social and economic contribution they make’...and

‘Proposals should also where appropriate: 9. Meet the needs of the local population throughout their lifetime in terms of their quality, types of tenure and affordability of housing units...11. Support the local economy and businesses by providing opportunities for lifelong learning and skills development in accordance with Strategic Policy PS 13... 12. Reduce the need to travel by private transport and encourage the opportunities for all users to travel when required as often as possible by means of alternative modes, placing particular emphasis on walking, cycling and using public transport’.

Strategic Policy PS 9: Wylfa Newydd and Related Development

- 5.12 This policy is particularly relevant in GC in that it states that it will take a number of matters included in this Policy into consideration in preparing their Statement of Local Impact. The relevant considerations include criteria 3, 5, 7, 9, 12 and 16:

‘3. Highways and transport proposals for the Wylfa Newydd Project form part of the integrated traffic and transport strategy that has regard to Strategic Policy PS 4 and any relevant detailed Policies in the Plan and minimises adverse transport impacts to an acceptable level, including those arising during the construction, operation and decommissioning stages, and any restoration stages... ..

5. The accommodation requirements of construction workers should be met in a way that minimises impact on the local housing market, including the ability of those on low incomes to access the private rented sector, affordable housing and other housing services (taking account of the published Local Housing Market Assessment), and not result in unacceptable adverse economic (including the tourism sector), social, linguistic or environmental impacts... ..

7. Proposals for campus style temporary workers accommodation, logistics centres and park and ride facilities will also be assessed against the criteria set out in Policies PS 10 - 12;

9. Early engagement by the promoter with the Council in respect of the promoter’s procurement, employment, education, training and recruitment strategies, with an objective to maximise employment, business and training opportunities for the local communities both in the short and longer term is required... ..

12. All proposals shall be appropriately serviced by transport infrastructure including public transport and shall not have adverse impacts on local communities and tourism and this shall be demonstrated in a transport assessment. Where there is insufficient transport linkage or the road network does not have sufficient capacity to accommodate the level of traffic which will result from any development or an adverse impact is predicted, appropriate improvements to the transport network and the provision of sustainable transport options shall be provided to mitigate the impacts;

16. It is possible that as the project develops, due to unforeseen consequences resulting from the construction and operation of the Wylfa Newydd Project, the Councils may require additional information from, or works to be carried out by the developer in order to off-set any additional impacts or burdens borne by the community affected. The developer should build in review mechanisms in order to monitor the full range of impacts, to review the adequacy of mitigation or compensation measures and to make adjustments as necessary.

Strategic Policy PS 10: Wylfa Newydd – Campus Style Temporary Accommodation for Construction Workers

- 5.13 This policy is concerned with the adequacy of proposed temporary accommodation and is particularly relevant to GC in respect of the criteria 1, 2, 3 and 5 and will require that:

1. the developer can firstly demonstrate that the proposal satisfies a demonstrable need for temporary accommodation for construction workers that cannot be met through either existing residential

accommodation, or the re-use of existing buildings, or the provision of new permanent buildings capable of being adapted for permanent use following their use by construction workers; and

2. the proposal is located on the Wylfa Newydd Project site or a site located adjacent to or well related to the development boundary of Holyhead, Amlwch, Llangefni, Gaerwen or Valley and is close to the main highway network where adequate access can be provided without significantly harming landscape characteristics and features, and also takes account of policy preference for use of previously developed land

3. the proposal must include appropriate mechanisms to mitigate any adverse impacts of the proposed development on the Welsh language and culture or a contribution is made towards mitigating those impacts

Strategic Policy PS 12: Wylfa Newydd - Park and Ride and Park and Share Facilities

5.14 Of particular relevance in minimising travel by private car through a location:

- i. within or adjacent to development boundaries of Centres located along or close to the A5/ A55; or*
- ii. in other locations along the A5/A55 where the site is part of a comprehensive approach to mitigating the transport effects of the Project, takes account of the Councils' preference to consider sites closer to Centres*

Strategic Policy PS 14: The Visitor Economy

5.15 Particularly relevant is part 5: *'Preventing development that would have an unacceptable adverse impact on tourist facilities, including accommodation.....'*

Policy TAI 14: Residential Use of Caravans, Mobile Homes or Other Forms of Non-Permanent Accommodation

5.16 Of particular relevance here are criteria 1, 4 and 6. *'1. The siting is for a limited period of time, and is required to accommodate temporary workers during construction.....or ii. the site is located so as to minimise the need to travel and promotes the use of sustainable transport modes.....*

4. The site is located so as to minimise the need to travel and promotes the use of sustainable transport modes

6. It can be demonstrated that the proposal would not have a significant detrimental impact on the tourism industry;

Other material documents and strategies

5.17 **Gwynedd Council Plan 2018 – 2023**, which sets out the GC's vision and priorities for the period between April 2018 and the end of March 2023. There are several elements to the Plan:

- **Improvement Plan**, which outlines GC's Improvement Priorities and 7 Well-being Aims
- **Departmental Plans**, which describes all GC's day to day work; and lastly GC's
- **Well-being Statement**, which expands on GC's Well-being Aims in accordance with Well-being of Future Generations Act 2015.

Of particular relevance:

- i. Gwynedd faces several challenges in the housing field including an ageing population and changes in benefits, but opportunities also exist, and therefore intends to target areas where different types of houses need to be developed particularly for older people and young people;
- ii. There is a high number of HMOs in Bangor, which negatively affect the appearance of the city, higher number of empty homes outside term time, and reduction in housing stock available for local residents;
- iii. One of the priorities in the associated Improvement Plan is to improve conditions to create a viable and prosperous economy, whilst aiming to secure more jobs offering good salaries;
- iv. Another of the priorities is to ensure that GC encourages and promotes the ability of the people of Gwynedd to live their lives through the medium of Welsh.

5.19 **Gwynedd Well- being Assessment**, which is sub- divided into sub- areas, including Bangor and Caernarfon that lie within the KSA. Having considered the data and the views of local people, the Gwynedd and Anglesey Public Services Board concluded that the key messages of the assessment were as follows:

- 1. The need to maintain a healthy community spirit
- 2. The importance of protecting the natural environment
- 3. Understanding the effect of demographic changes
- 4. Protecting and promoting the Welsh language
- 5. Promoting the use of natural resources to improve health and well-being in the long-term
- 6. Improving transport links to enable access to services and facilities
- 7. The need for good quality jobs and affordable homes for local people
- 8. The effect of poverty on well-being
- 9. Ensuring an opportunity for every child to succeed

5.20 **Gwynedd and Anglesey Well- being Plan 2018**, see section for the Plan’s objectives.

5.21 **Emerging Gwynedd Local Housing Market Assessment 2018**, describes socio- economic conditions prevalent in the County, provides information about the cost and affordability of housing, provides recommendations about measures to improve housing market balance in the long – term, specifies the housing need in the County, etc.

5.22 **Welsh Language Promotion Plan 2018** has been developed in response to the statutory obligation to publish a language strategy that explains how the Council intends to promote and encourage the use of the Welsh language in the county. It sets out the current opportunities available to promote and increase use of the Welsh language as a natural part of everyday life in the county, and also reflects the Council’s wider commitments in relation to the Welsh language, in areas such as education, planning and care and social services, and complements the priorities noted in the **Gwynedd Council Plan** and the **Gwynedd and Anglesey Well-being Plan**. Of particular relevance are the factors that have been identified that need to be counteracted to increase the opportunities available to people in all parts of the county to use and feel a connection with the language. These factors are: Geographical challenges; Mobility and migration; Transferring the language within the family; Losing Welsh-speakers after 16 years of age; The status of the Welsh language as a language of business; Opportunities and support for learners; Technological influences; People’s confidence in their own ability and skills.

6. Potential Local Impacts

6.1. Highways and Transport

Context

- 6.1.2 The Wylfa Newydd Project is located on the Isle of Anglesey and, as such, a proportion of vehicular traffic will have to travel through Gwynedd Council's (GCs) area of the highway network to access the site. This vehicular traffic will comprise:
- ▶ A proportion of the anticipated worker traffic during construction;
 - ▶ Heavy Goods Vehicles (HGVs) and Abnormal Indivisible Loads (AILs), during construction; and
 - ▶ A proportion of the anticipated operational traffic.
- 6.1.3 Of particular concern to GC are the flows of traffic during the construction period travelling through the area and associated, related effects.
- 6.1.4 The main areas of the highway network of concern to GC are:
- ▶ The A55 is a trunk road linking Holyhead with the North Wales coast via the Menai Straits Bridges. The A55 has two lanes in each direction except at the Britannia Bridge which has a single lane in each direction;
 - ▶ The two Menai Strait Bridges. The Britannia Bridge has existing periods of congestion, the Menai Bridge is unsuitable for HGVs and both close due to bad weather on occasion; and
 - ▶ Local Highways in the County and roads in towns, such as Bangor and Caernarfon. The A487 through Caernarfon can suffer congestion in summer periods with tourism traffic. Some areas of the local highway network suffer from fly-parking.
- 6.1.5 There are two road bridges that link Anglesey to the mainland. The Britannia Bridge provides the strategic route onto the island carrying the A55. The Menai Bridge provides an alternative link to the island carrying the A487 and is located to the north-east of the Britannia Bridge. Both bridges can suffer from traffic delays during peak periods, which include the main holiday season as well as typical commuting peaks. The Britannia Bridge is a double-deck structure, providing a single carriageway with one lane in each direction on the upper deck and a single-track railway line on the lower deck. The dual carriageway approaches of the A55 on either side of the bridge have two lanes in each direction, which reduce to a single lane in each direction for the crossing. This leads to reduced capacity over this short section of the A55.
- 6.1.6 Traffic delays can occur in the morning and evening peak periods across the Britannia Bridge. These delays are generally tidal in nature; towards the mainland in the morning and towards Anglesey in the afternoon. Delays increase during summer holiday periods and when ferries from Ireland dock at Holyhead and large numbers of vehicles disembark and travel eastwards towards the mainland.
- 6.1.7 Morning peak queuing near the Britannia Bridge commences eastbound around 08:00 and continues until after 09:00. At its peak, eastbound queuing reaches midway between Junction 8a and Junction 8. In the evening peak, westbound queuing commences around 17:15 (with short period queuing after 16:30) and continues until 18:00. At their maximum, these queues can extend back to Junction 9 on the A55, with further queuing on the A487 on-slip back towards and occasionally onto the roundabout at the bottom of Faenol Hill (A487/A4087/B4547).
- 6.1.8 The A487 via the Menai Bridge provides an alternative route between the mainland and Anglesey. It is a single carriageway road with one lane in each direction and is not appropriate for use by HGVs given the limited overhead clearance between the carriageway and the bridge structure.

- 6.1.9 Both bridges can be closed in bad weather conditions, both to all vehicles or just high-sided vehicles
- 6.1.10 GC is also concerned that because of workers gaining access to the site and the proposals to encourage use of shuttle buses and car-share, there could be an increase in fly-parking adjacent to the main routes through the County and in the main towns of Bangor and Caernarfon. Fly-parking is already a concern on the county highway network in locations such as the A4244, Llys y Gwynt; the Class 3 Road off Junction 12 on the A55; Ty Mawr roundabout A4244/B4547/B4366; the A4086, Caernarfon Road, Bangor and the A4244, Felin Hen. Because of its concerns, GC has applied for, and has been successful in gaining, planning approval for Park and Share facilities in both the Bangor and Caernarfon areas.
- 6.1.11 An analysis of existing accident data was undertaken based upon the average of the last five years of available STATS19 data (i.e. 1 January 2011 to 31 December 2015 inclusive). Accident clusters were identified on the following assessed road sections, relevant to GC:
- ▶ A55 Junction 12 to Britannia Bridge;
 - ▶ Britannia Bridge to A55 Junction 6;
 - ▶ A5 Rhostrehwfa to A5 Menai Bridge; and
 - ▶ A55 Junction 9 to A487 Y Felinheli Bypass (two clusters).
- 6.1.12 The increase in traffic flows associated with the Wylfa Newydd Project could change the risk of accidents occurring on the road network and impact upon the safety road users.

Positive Local Impacts

- 6.1.13 GC appreciates the mitigation proposed to reduce traffic flows at source. It is considered that the following measures, if implemented and managed properly, may have positive benefits in reducing the potential traffic flows through the Gwynedd Council area generated by the construction of the Wylfa Newydd facility:
- ▶ The Marine Off Loading Facility (MOLF), to reduce HGV traffic during construction;
 - ▶ Shuttle Bus services for workers to / from Bangor and Caernarfon, to reduce construction worker traffic. Operational from start of construction;
 - ▶ On-site workers campus, for 4,000 workers (at peak of construction when 9,000 workers forecast in total); and
 - ▶ Car sharing through a programme of incentivising and management.
- 6.1.14 However, whilst the above measures will potentially reduce the development-generated traffic, they will not remove additional traffic completely. Therefore, there should be DCO obligations set out in the Code of Construction Practice, or other appropriate documentation, to ensure the traffic flows modelled in the TA and set out in the ES are not in excess of those modelled or last for a longer period of time than that set out in the construction programme and therefore cause prolonged/higher impacts than those forecast.
- 6.1.15 There should be further detail set out in any phasing of the development, to ensure that the facilities, such as the MOLF are built to the modelled programme timescales and, if not in place when set out, mitigation measures introduced to ensure that any early years impacts from the lack of the MOLF or any extensions to any construction programme are addressed and traffic flows limited.

Neutral Local Impacts

- 6.1.16 GC considers that the following elements of the scheme does not affect the County either positively or negatively and therefore could be considered as neutral:

- ▶ the implementation of the P&R will not result in any benefits in reducing traffic flows on the GC highway network. There could be negative impacts for GC whilst the facility is being built, due to construction traffic accessing the site, the effects of which have not been assessed. The actual operation of the P&R site does not affect the GC highway network;
- ▶ the A5025 off-line improvements will not affect the GC highway network. There could be negative impacts for GC whilst the off-line works are being built, due to construction traffic accessing the site, the effects of which have not been assessed.

Negative Local Impacts

6.1.17 Horizon have made assumptions around the following items, which underpin the transport assessment work:

- ▶ Workers accommodation locations, and hence route(s) they take to / from the Wylfa Newydd site;
- ▶ The split of workers that will be mainland based or Isle of Anglesey based, therefore providing a traffic flow volume from the mainland crossing the Britannia bridge;
- ▶ Level of car share assumed;
- ▶ Level of workers utilising the shuttle buses (Horizon have stipulated that workers have to live within 600 metres of a shuttle bus stop to qualify), and general shuttle bus strategy unclear;
- ▶ Shift patterns and hence travel times;
- ▶ Lack of park & ride and park & share on the mainland;
- ▶ Trip distribution; and
- ▶ Stock Piling at the Wylfa Newydd site, as the only contingency for delays to deliveries.

GC has concerns related to the above assumptions, which include:

- ▶ Fly-parking, of workers vehicles and HGVs;
- ▶ Shuttle buses. Frequencies, routes and management strategy and potential associated fly-parking;
- ▶ Migration of workers, therefore changing the assumptions in the modelling work;
- ▶ Congestion exacerbated on sections / junctions on A55;
- ▶ Congestion exacerbated on Britannia Bridge; and
- ▶ Early years assessment and late delivery of these measures.

Fly Parking

6.1.18 GC is concerned that fly-parking will occur because of the development, whilst the proposed steps to reduce single-occupancy car trips are welcomed, the resulting potential fly-parking will be an unacceptable consequence. GC is concerned that workers car-sharing or catching shuttle buses will park cars on local roads, thus causing severance and stress to local communities and may impinge upon free-flow of traffic in some instances.

6.1.19 Transport issues arising during Hinkley Point C (managed by EDF Energy) have been reviewed given the similarities between this project and Wylfa Newydd, i.e. the use of park and ride shuttle buses to

transport construction workers to site, the use of a freight management facility to manage road freight entering the road network and a marine facility to bring in large quantities of bulk materials by sea.

- 6.1.20 With regard to fly parking, EDF have a similar policy to that proposed by Horizon in which employees are required to sign a code of conduct acknowledging that fly-parking will not be tolerated, with those found not observing this facing disciplinary action. Workers are also required to travel only by their allocated route.
- 6.1.21 During the Hinkley enabling works period, it was noted during a Transport Forum Meeting that fly-parking was being observed in local areas where workers board the buses. EDF acknowledged that only one of their planned park and ride facilities was open at this time ('J24') and that there were limited parking options available to workers, which they anticipated would improve with the opening of the other park and ride sites later in the year. Further to this, EDF started monitoring the fly-parking, with a three-strike policy to those observed fly-parking resulting in contact with the employee's line manager. To reinforce this, additional bus controllers have been strategically placed at key bus boarding locations to challenge employees who may not be boarding at their allocated stop.
- 6.1.22 In a later Transport Forum, it was stated that targeting fly parking had been a key priority of the Site Director with the appointment of a new parking manager and with trials for a new mobile vehicle registration number scanning system to allow a quicker response and removing the need for physical ticketing.
- 6.1.23 During a Community Forum when the issue of fly-parking was raised, attendees were asked to report any inappropriately parked vehicles to EDF and it was noted that the police team had been monitoring the problem. A local police member did however comment that, if a car is taxed and insured, workers could legally park on a public highway.
- 6.1.24 At a later Community Forum update, it was reported that people were reporting fly-parking incidents which were being investigated by the Hinckley Point C team whilst continued regular checks were also being made. In addition to this, an internal campaign to promote key messages was stated to be taking place.
- 6.1.25 A further Community Forum added that a fly parking notice was being circulated to all Hinkley Point C workers to reinforce the message that fly-parking would not be tolerated and was against the code of conduct to which all employees are signatories. It was also noted that the reports of fly-parking were reducing but the awareness campaign would continue.
- 6.1.26 There are no records beyond November 2017 to indicate whether the introduction of these measures have stopped the fly-parking, but what is clear is that for the Wylfa Newydd development, measures and monitoring need to be in from day one to stop fly-parking early and before it becomes an issue.
- 6.1.27 Park and Ride facilities would alleviate this at shuttle bus stop locations.

Shuttle Buses

- 6.1.28 It should be a DCO obligation, set out in the Code of Construction Practice or other appropriate documentation, that the shuttle buses should be operational at the start of any construction activity, including the construction of the mitigation measures in the early years, such as the logistics centre, P&R, A5025 off-line improvements and the MOLF.
- 6.1.29 More detail is required of the duration of the services, the number and location of stops, the exact routes and how the catchment areas for bus stops intend to be set out.
- 6.1.30 It is stated in the Horizon TA that "*The shuttle bus service is expected to commence, subject to worker demand, from the start of construction activities.*" The Council is of the opinion that the provision should not be subject to worker demand; it should be enforced to ensure good practice is inherent from the start.

- 6.1.31 The shuttle buses should be established from the start, with fixed routes and stops that are regularly reviewed to capture as many workers as possible. There are concerns that the restriction of only workers allowed to get the buses if they live within 600 metres of a shuttle bus stop could cause issues such as fly parking to occur adjacent to these bus stops as a result of workers not within the 600m radius wanting to utilise this form of transport to access the site.
- 6.1.32 It is recommended that there is a mixture of direct express services to/from the mainland and to/from Wylfa Newydd. However, there should also be some limited stop services to ensure that as many workers as possible live within the expressed catchments of 600 metres of a shuttle bus stop.
- 6.1.33 It is recommended that the shuttle bus services need to be regularly reviewed and the approach amended if the uptake is not as high as assumed in the transport assessment.
- 6.1.34 GC has concerns that local bus operators will be attracted to provide these shuttle bus services and it will result in shortages to other services that are required for services, such as school transport.

Worker Locations

- 6.1.35 There are concerns that workers will not be able to find accommodation within the areas assumed within the Transport Assessment analysis work. Consequently, the assumptions on mainland / island split, and mode of travel will not be consistent with the modelling undertaken. GC recognises that a sensitivity test has been run in the model which doubled the amount of construction worker traffic from the mainland. However, the Council still has concerns about the baseline assumptions made by Horizon and potential changes to this resulting in negative impacts in the area that do not have a management nor mitigation strategy agreed and set out in the DCO obligations.

Britannia Bridge

- 6.1.36 Much of additional traffic flows on the Britannia Bridge are forecast to avoid the most congested times of day due to the scheduling of shift start and end times. Some additional delays are forecast, albeit these are forecast to be relatively small. There should be vehicular limits and the hours of travel dictated in a DCO control document to ensure that unacceptable travel scenarios do not occur.

“The principal road routes which are likely to be used to access the main Wylfa Newydd site are the A5, A55 and A5025. The main existing road congestion issues relate to the two bridges which provide access to the Island across the Menai Straits (A55 Britannia Bridge and A5 Menai Bridge) both of which are single carriageway, operate at close to existing capacity in the peak hours and experience the highest traffic volumes during the summer holiday season.”

- 6.1.37 Whilst traffic movements are anticipated to be outside of the “normal” peak hours for the construction traffic, there is concern that due to the nature of the traffic flows there will be peak spreading. The construction traffic flows are anticipated to be at the Britannia Bridge very close to these peaks and the traffic flow totals become very similar, therefore not giving much spare capacity or contingency should there be events that cause delays on here and elsewhere on the road network.
- 6.1.38 A DCO application for the National Grid North Wales Connection is expected in 2018 and construction works are expected to begin in 2020 and last for four to five years. The construction of the National Grid North Wales Connection will generate construction vehicle movements, including over the Britannia Bridge. Therefore, adding additional pressure to this highway link.

Early Years Assessment

- 6.1.39 GC is concerned that the local traffic impacts from the construction of the MOLF, P&R, Logistics Centre, On-Site Campus and A5025 off-line improvements could have local effects on highways that have not been assessed and therefore any impact that may arise are unknown and have no mitigation measures proposed should unacceptable impacts occur as a result of the works. Whilst it is accepted

that the overall impacts may not be of as great a magnitude as the peak of the peak construction for the main Wylfa Newydd development, locally they could be perceived to be negative.

- 6.1.40 If the above measures are not delivered and operational when they are programmed to be, there needs to be measures to address this, for example if the MOLF is late, then this will not remove 60% of HGV delivery traffic from the network. Consequently, the implications of this need to be set out, understood and addressed.

Bad Weather

- 6.1.41 The bridges across the Menai are subject to closure when there is bad weather. It is also likely that the weather will not always allow use of the MOLF for deliveries. Whilst GC accepts that Horizon have indicated they will have a contingency stockpile of materials on-site to last for two weeks, there needs to be further emergency contingency plans set out should the conditions result in bad weather (or other circumstances) that stops deliveries via the bridges or the MOLF for more than this two weeks. It would not be acceptable to GC if HGVs or workers were loitering on mainland highway routes or remaining in towns awaiting the bad weather to pass.

Measures

- 6.1.42 Although GC accepts that a sensitivity test has now been undertaken to assess the impacts of doubling the construction worker traffic from the mainland, it is considered that there should be:
- ▶ limits of traffic flows, both for HGVs and worker vehicles (set out in the DCO control documents);
 - ▶ agreements on the roads that Wylfa related traffic can travel on, with traffic flow limits on these roads;
 - ▶ agreements on the time when vehicles can travel that are associated with the Wylfa Newydd project;
 - ▶ monitoring should be undertaken at key sensitive locations, such as the Britannia Bridge, in both directions to ensure that vehicle flows are not exceeding the limits that should be set out within the DCO control documents such as the CoCP.

Adequacy of the DCO, including requirements and obligations

- 6.1.43 GC requests that the following elements are set out and are committed to in the DCO control documents, e.g. the CoCP, as follows:
- ▶ limits on all vehicular traffic in terms of volumes, timings, restricted hours and duration of movements;
 - ▶ detailed Phasing Strategy of the project;
 - ▶ traffic monitoring and management details, with penalties and mitigation set out for exceeding limits;
 - ▶ travel planning details to manage traffic and set out measures of control.
- 6.1.44 The CoCP is currently lacking in a lot of detail that would be expected for a project of this type.
- 6.1.45 HGV traffic volumes have a limit overall set out in the CoCP to date, but there should be limits on all vehicular traffic movements and measures to adhere to these.
- 6.1.46 It is also requested that more detail is provided of construction phasing linked with a construction traffic management strategy setting out in full a detailed construction traffic management plan (CTMP), including, but not limited to, traffic flows limits, duration limits, time periods limits, route

limits to ensure that all reasonable efforts are made to adhere to the parameters assumed in all the assessment work undertaken, which indicates moderate to minimal impacts.

- 6.1.47 Travel Plans should be detailed and completed prior to any work being undertaken to ensure the enforcement action and limits of traffic are set out clearly ahead of any start on any site associated with the Wylfa Newydd development. These, for example, should clearly set out how the car share of 2 people per car, or workers utilising the shuttle buses, is going to be achieved throughout the duration of construction of the development, which are fundamental parameters underpinning the transport assessment work.
- 6.1.48 Traffic monitoring should be undertaken at key points, such as the Britannia Bridge, to ensure that HGVs and workers traffic are not arriving outside of the specified modelled hours and that they are not exceeding the maximum number of vehicles as set out in the CoCP.

Planning policy observations

- 6.1.49 Criterion 3 of Strategic Policy PS 9 advises that the scheme should minimise adverse transport impacts to an acceptable level, include multi modal solutions and investment that encourages travel by public transport, walking and cycling and other sustainable forms of transport. When assessments demonstrate insufficient transport linkage or the road network does not have sufficient capacity or an adverse impact is predicted, Criterion 12 of Strategic Policy PS 9 advises that appropriate improvements to the transport network and the provision of sustainable transport options should be provided to mitigate the impacts. Criterion 6 of Strategic Policy PS 9 acknowledges that unforeseen consequences may arise as the project develops, and therefore it would be reasonable to provide the affected Councils with additional information from or works to be carried out by the developer. Based on this premise, review mechanisms should be set up in order to monitor the full range of impacts, to review the adequacy of mitigation or compensation measures and to make adjustments as necessary.
- 6.1.50 The local positive, neutral and negative potential impacts described in the above sections trigger the need to consider the above- mentioned criteria in Strategic Policy PS 9.

6.2 Economic development including tourism

Context

- 6.2.1 The promotion of well-being, including the promotion or improvement of the economic well-being of their area (Local Government Act 2000)¹, is a key part of a Local Authority's work, as underlined by the Well-being of Future Generations (Wales) Act 2015².
- 6.2.2 Gwynedd Council's commitment to increase the prosperity of its citizens is articulated in the 'Gwynedd Council Plan 2018 – 2023'³, where the first Improvement Priority is to 'improve conditions to create a viable and prosperous economy, aiming to secure more jobs which offer good salaries'.
- 6.2.3 Economically, the picture in Gwynedd is mixed; historically the county has average levels of unemployment and economic inactivity (excluding students) as a result of its constrained labour market, but productivity and wages are among the lowest in the UK due to the prevalence of part time and seasonal work, high levels of self-employment and dependence on lower value sectors; especially in the less developed southern and western parts of the county:

- Population aged 16 to 64 was 60.6% in 2017 2.3% below the proportion for Great Britain (Nomis)⁴;
- Inactivity (excluding students) in the year ending 30 June 2018 was 19.3% compared to 20.1% in Wales and 17.8% in the UK (StatsWales)⁵;
- The ILO unemployment rate in the year ending 30 June 2018 was 4.1% compared to 4.8% in Wales and 4.2% in the UK (StatsWales)⁶;
- The part-time employment rate in the year ending 30 June 2018 was 32.8% compared to 4.6% higher than across Wales and 6.2% higher than in the UK as a whole (StatsWales)⁷
- 13,100 workers commute daily into Gwynedd including 7,000 from Anglesey (StatsWales)⁸;
- Average gross weekly pay in Gwynedd is among the lowest in Great Britain at £478.40, 84% of the GB average (Nomis)⁹;
- Gross Value Added (GVA) per filled job in Gwynedd is only 70% of the UK average one of the lowest in the United Kingdom (ONS)¹⁰

6.2.4 Although Wylfa Newydd and its associated developments are located on the Isle of Anglesey; given the scale of the investment and employment to be generated and the integrated nature of the Gwynedd and Anglesey economy and labour market; Gwynedd Council has, from the outset, welcomed the opportunities for economic development which may arise and expressed a desire to engage with Horizon Nuclear Power to maximise the positive impacts.

6.2.5 The Council has also been mindful of and highlighted the potential for some negative consequences and has asked to work with Horizon Nuclear Power to minimise any negative impacts¹¹.

6.2.6 The relevance of Gwynedd to Wylfa Newydd's development is reflected in the inclusion of the vast majority of the county within the Socio-economic Key Study Area (KSA) and Daily Construction Commuting Zone (DCCZ).

6.2.7 Gwynedd Council is also a proactive member of the North Wales Economic Ambition Board and is mindful that the development of Wylfa Newydd may occur in parallel with a number of other major projects as part of the Growth Deal for North Wales¹² which may enhance the positive impact of Wylfa Newydd or compound any negative impacts; in particular the Council believes opportunities may arise as the development of the Trawsfynydd Nuclear Decommissioning Site as a location for a Small Modular Reactor progresses.

Positive Local Impacts

- 6.2.8 Gwynedd Council has consistently held the view that the development of Wylfa Newydd has the potential to achieve significant positive local impacts and, as noted previously, wishes to work proactively with Horizon Nuclear Power and other partners to ensure these are fully realised.

Labour market

- 6.2.9 There are clear opportunities for the residents of Gwynedd to benefit directly from the job opportunities generated by Wylfa Newydd during its construction and subsequent operation.
- 6.2.10 Gwynedd Council welcomes Horizon Nuclear Power's target that 85% of the operational workforce of Wylfa Newydd should be recruited from the local area including Gwynedd and would seek to work with Horizon to ensure that this target is reflected in all roles, including in managerial, technical and scientific posts. The Council seeks to work with Horizon and partners to ensure long term investment in engaging children and young people in Science, Technology, Engineering and Mathematics (STEM) and providing a clear learning and career path into the nuclear industry (including Wylfa Newydd and other relevant developments such as nuclear decommissioning at Trawsfynydd and Wylfa and a potential SMR in Trawsfynydd), and would like to see a clear commitment to this by Horizon as part of the consenting process and an increase in the scale and intensity of activity as soon as possible to progress the agenda.
- 6.2.11 In relation to the construction of Wylfa Newydd, Gwynedd Council welcomes Horizon Nuclear Power's forecast that 2,000 direct posts should be taken up by home based workers with a further 1,800 generated indirectly (subject to the comments below on the potential risks). The Council notes that this is a worst case (i.e. minimum) forecast; this may be an appropriate approach for the purpose of anticipating demand for accommodation etc., but is not helpful in anticipating and planning the demands of the construction phase on the local labour market. Gwynedd Council would like to work with Horizon Nuclear Power and partners such as the Welsh Government, the Isle of Anglesey County Council and the North Wales Economic Ambition Board to determine an optimal target for local employment – with a focus on higher value posts - which maximises local benefit and minimises any potential risks.

Supply chains

- 6.2.12 There are also clear opportunities for local companies to benefit directly from Wylfa Newydd by supplying goods and services. Given the volume and range of materials required to support the construction of Wylfa Newydd Gwynedd Council accept that there will be limits in the ability of the local economy (Gwynedd and Anglesey) and regional (North Wales) to meet the need. However, the Council wishes to see far greater engagement from Horizon Nuclear Power to define the opportunities for local suppliers, particularly in relation to higher value goods and services, set ambitious targets for local procurement for Horizon and its contractors and support local businesses to take advantage of the opportunities.

- 6.2.13 Again, Gwynedd Council would wish to see the development of local supply chains for Wylfa Newydd considered in the context of other developments in North Wales, which may make the provision of support to develop local suppliers of more specialist requirements viable.

Neutral Local Impacts

- 6.2.14 With the exception of potential job and supply chain opportunities associated with their construction and operation (as noted above), the potential indirect economic opportunities generated by the off-site power station facilities /developments such as Dalar Hir Park & Ride, the Logistics Centre and A5025 off line improvements will not impact upon Gwynedd.

Negative Local Impacts

- 6.2.15 As noted, Gwynedd Council has from the outset been of the view that the development of Wylfa Newydd has the potential to generate significant positive local impacts for the locality and the wider region.
- 6.2.16 The Council has also been mindful that a development of this scale has the potential to generate some negative impacts upon the local economy. Gwynedd Council would like to work proactively with Horizon Nuclear Power and partners such as the Welsh Government, the Isle of Anglesey County Council and the North Wales Economic Ambition Board to identify, monitor and minimise / mitigate the risk of negative local impacts.

Labour market

- 6.2.17 The potential direct benefit of the local employment to be generated by the construction and operation of Wylfa Newydd have been noted above.
- 6.2.18 The large number of posts to be created in the local labour market, particularly during the construction phase (a minimum of 2,000 directly and a further 1,800 indirectly), does pose a risk to the local economy should there be an insufficient supply of available labour to meet the demand.
- 6.2.19 An insufficient labour supply will lead to the displacement of posts from local businesses to Horizon Nuclear Power and its contractors and / or a degree of upward pressure on wages which may undermine the sustainability of local enterprises. Both these impacts would have a negative consequence on the local economy.
- 6.2.20 Horizon Nuclear Power's Jobs & Skills Strategy (Application reference number: 8.3) suggests that sufficient labour supply exists within the KSA / DCCZ to meet the anticipated demand. However the 'Assessment of the Risk of Displacement' commissioned by the Welsh Government from Hardisty Jones Associates (see Annex X) suggest that there is a significant shortfall in the number of available workers to meet Wylfa Newydd's requirements, particularly in relation to the more highly skilled posts, which could lead to workers in these fields leaving local companies to work at Wylfa Newydd. Given its proximity to Wylfa Newydd, the Gwynedd is particularly vulnerable to these impacts.
- 6.2.21 In the Council's judgement, the risk of displacement may compounded by the relatively low numbers of unemployed in the local labour market which suggests that a high proportion of those currently out of work require significant support if they are to enter employment; the high standards and particular

requirements of the nuclear industry (vetting etc.) may preclude many of these individuals from gaining employment at Wylfa Newydd. It should also be noted that a lack of workers has already been cited by sectors such as tourism as a concern, particularly post-Brexit; the demand for workers generated by Wylfa Newydd will increase the challenge employers face in recruiting suitably qualified staff.

- 6.2.22 In light of the significant risks noted above, Gwynedd Council would wish to see efforts to minimise and mitigate the risks to the local labour market prioritised with sufficient resources allocated to monitor the impact of Wylfa Newydd and respond appropriately, including support for local businesses to ‘backfill’ posts where staff have been lost.
- 6.2.23 The Council supports proposals for the establishment of the Wylfa Newydd Employment and Skills Service (WNESS), provided the scope of its activities and geographical coverage is sufficient. Gwynedd Council wishes to be fully involved in the development and delivery of WNESS.

Tourism

- 6.2.24 Tourism is a major sector in Gwynedd and across the Wylfa Newydd DCCZ. Research by the Welsh Government (see Annex X) estimates that the total value of Tourism across DCCZ is £2.2Bn and that the sector supports over 31 thousand jobs. A minor negative effect upon the sector by Wylfa Newydd will therefore have a major economic impact.
- 6.2.25 The potential risks to tourism from Wylfa Newydd relate to a potential adverse effect on the perceptions of the area as a destination and a potential impact on the availability of visitor accommodation if bed spaces are occupied by workers during the construction phase.
- 6.2.26 Research by Horizon Nuclear Power has already suggested that some tourists may reconsider visiting Anglesey as a result of the project and there is risk that Gwynedd will be impacted to a lesser degree. Horizon should ensure that sufficient resources are made available to mitigate these risks including upfront investment to market the area to tourists.
- 6.2.27 The Council considers that the availability of visitor accommodation to house temporary workers from Wylfa Newydd has been overstated and is based on dated information (Gwynedd Council is currently undertaking research to quantify the accommodation currently available). Furthermore, the Council considers that the utilisation of this accommodation by temporary workers is incompatible with maintaining their use for tourists due to the differing needs of both groups. Gwynedd Council would ask that Horizon Nuclear Power ensure the availability of alternative accommodation and discourage the use of visitor accommodation.
- 6.2.28 Gwynedd Council requests that the authority is fully involved in the development and delivery of monitoring and mitigation measures relating to tourism.

Supply chains

- 6.2.29 As noted previously, Gwynedd Council believes that the opportunities for local businesses to supply goods and services to Wylfa Newydd should be encouraged and supported.

6.2.30 However, the Council also recognises that that there is potential for a negative impact if the costs of goods and services in the region increase due to the additional demand generated, however due to the lack of information currently available on the requirements, the potential impact cannot be quantified.

6.2.31 Again the Council would request that it is fully involved in the structures to be developed to monitor and mitigate any impacts.

Adequacy of the DCO

6.2.32 The DCO documentation is currently lacking in a lot of detail that would be required to allow Gwynedd Council to be satisfied that its concerns have / will be addressed. Notably, key documents such as the Supply Chain Action Plan are yet to be received.

6.2.33 Gwynedd Council requests that the following elements are set out and committed to in the DCO control documents e.g. the CoCP, as follows:

- That Gwynedd Council be fully involved in all relevant Monitoring and Engagement Sub Groups
- That monitoring is undertaken early and is ongoing throughout the construction period
- That mitigation should be undertaken proactively where appropriate
- That mitigation should follow impact and consider direct, indirect and induced impacts.
- Ongoing monitoring of the cumulative effects of Wylfa Newydd in view of the large volume of major projects potentially being implemented in North Wales as a result of the North Wales Growth Bid

1. http://www.legislation.gov.uk/ukpga/2000/22/pdfs/ukpga_20000022_en.pdf
2. http://www.legislation.gov.uk/anaw/2015/2/pdfs/anaw_20150002_en.pdf
3. <https://www.gwynedd.llyw.cymru/en/Council/Documents---Council/Strategies-and-policies/Gwynedd-Plan-17-18/Gwynedd-Council-Plan-2018-2023.pdf>
4. <https://www.nomisweb.co.uk/reports/lmp/la/1946157384/report.aspx?town=gwynedd>
5. <https://statswales.gov.wales/v/EhAl>
6. <https://statswales.gov.wales/v/EhAm>
7. <https://statswales.gov.wales/v/EhJX>
8. <https://statswales.gov.wales/v/EhJV>
9. <https://www.nomisweb.co.uk/reports/lmp/la/1946157384/report.aspx?town=gwynedd>
10. <https://bit.ly/2eNL4B2>
11. Gwynedd Council response to PAC1 (xxxx); PAC2 (xxxx) and PAC3 (xxxx)
12. <https://bit.ly/2PquKNr>

Planning Policy Observations

6.2.34 Criterion 9 of Policy PS 9 requires a pro- active approach to procurement, employment, education, training and recruitment in order to maximise employment, business and training opportunities for local communities. Issues raised above in relation to the impacts on the labour market, supply chain and the wider economy suggest that additional information and measures are required in order to better align with the expectations set out in criterion 9.

6.2.35 Failure to maximise opportunities locally would not align with Gwynedd Council's Plan (2018 – 2023) and would have a negative impact on the Joint Local Development Plan's strategy, which supports an anticipated transformational economic change linked to Wylfa Newydd and other development in the Plan area as a means to enable local households to look after themselves and to begin to reverse past trends by retaining and attracting working age households into the Plan area, to maintain and create more sustainable communities.

6.3 Community Impact / Welsh Language

Context

- 6.3.1 According to the 2011 Census, 65.4% of Gwynedd's population are Welsh speakers, and 40 of its 71 wards still have over 70% Welsh speakers. GC has a longstanding commitment to safeguard and promote the Welsh language Gwynedd but it is, however, a county of extreme diversity that produces some challenges in trying to fulfil this commitment. The main challenges are in those 11 wards where there are less than 50% Welsh speakers. Bangor, which is an area of particular concern to GC in regards to this development, has two of the wards with the lowest percentage of Welsh speakers in Gwynedd. On average, Bangor has only 39.3% Welsh speakers, and this stark contrast to neighbouring areas of Gwynedd can be attributed in part to the large number of students and two major employers in the form of the university and Ysbyty Gwynedd, which means it is an area that is already in a sensitive position linguistically. CG has reacted to the challenge seen there by opening a Language Promotion Centre and employing a Development Officer to work specifically on promoting more use of the language in the city, there is a concern that the Horizon development will add further to the general population as well as to the number of non-Welsh speakers in the area, and so put a strain on resources and capacity in the area.
- 6.3.2 Gwynedd in general has seen a steady increase in the population over the last couple of decades, with the population rising from 54,501 in 2001 to 58,427 in 2011, but it has also seen a decline in the percentage of Welsh speakers across the county. This decline is due to many complex factors, but it is widely agreed that the two main factors are the outward migration of the younger generation - moving out of the county to go to university and to seek job opportunities - and an inward migration of the older generation from outside of the county. As a result, a particularly steep decline can be seen in the number of Welsh speakers when they reach the 16-24 age group. Again, CG has recognised the need to work proactively to steady the decline in this age group, as seen in its strategic document - The Welsh Language Promotion Plan for Gwynedd 2018-2023 – but any large scale development that brings an unknown number of people to the county poses a threat to the efforts of GC and other partners in this area, and to the linguistic balance in the area.
- 6.3.3 Gwynedd produces a large number of Welsh speakers through its education system, with 90% of school age children noted as being Welsh speakers. All of Gwynedd's primary schools are Welsh medium, and as a result, all children attending would be expected to speak and participate in school life through the medium of Welsh. An effective immersion service is implemented by the Education Department, and the academic achievements of schools testify this, but the effectiveness of the service does not mean there is no linguistic effect when a pupil from a non-Welsh speaking family comes into a Welsh medium school. Evidence collected through the Welsh Language Charter (Siarter Iaith) scheme shows that the arrival of even one non-Welsh speaking pupil into a school can have a negative impact on the overall social language of the school. The Siarter Iaith scheme was established in Gwynedd some years ago to try and counteract the worrying and ever increasing use of the English language in social settings and as a language of play amongst children.
- 6.3.4 Even though the Wylfa Newydd Project is based on the isle of Anglesey, there will certainly be an impact on the mainland, and in particular the North of Gwynedd, as a result of the development. GC has particular concerns about the community and linguistic effects on Gwynedd, and in particular on the north of Arfon and the area surrounding Bangor.

Positive Local Impacts

- 6.3.5 Considering that the main reason for the outward migration of young people from rural areas is due to the lack of economic opportunities, GC cannot ignore the fact that the proposed development could bring many job opportunities to the area and could have a positive impact on the community and Welsh language as a result by allowing people to stay in their local areas, and continuing to contribute to their local communities. There is a great need for local, quality jobs, and so although it is unclear how many

jobs will be available to local people and companies, it is a possible positive impact if chances are given and the commitment to develop skills of young people in preparation for the development is implemented in full.

- 6.3.6 Mitigation proposed to reduce impact on the locality, like the on-site accommodation for workers, could also be considered a positive impact for Gwynedd, but this is regarded with caution. GC believes it is near to impossible to predict where the 9,000 peak number will live and reside, and therefore the effects they will have is very hard to assess.
- 6.3.7 Our professional experience shows us that the prosperity of a language is dependent on many complex factors and elements and that it is often a case of personal choice or circumstance. We cannot predict personal choices and therefore cannot say for certain where workers will live and reside.
- 6.3.8 Effective monitoring of worker data and sharing of information with key partners will therefore be essential in order to take proactive measures to counteract possible effects wherever the workers might settle.

Neutral Local Impacts

- 6.3.9 Many aspects of the development, mainly relating to infrastructure – changes to A5025, and the site itself – are not likely to have any direct effects, negative or positive, on the community and language of Gwynedd.

Negative Local Impacts

- 6.3.10 GC is of the opinion that there will be a significant impact on Welsh culture and language across the KSA, and in particular on the area of Bangor in Gwynedd. In this respect, CG is worried about the lack of attention given to the possible impact on Gwynedd in the WLIA and mitigation strategy.
- 6.3.11 The main area of concern to GC when looking at possible negative impacts is the effects that the inward migration of workers will have on the area beyond the island of Anglesey, and especially the community and educational impact in Bangor and the surrounding area.
- 6.3.12 Horizon have in the WLIA identified a negative impact on community and the Welsh language as a direct result of the possible placement of workers. However concern remain that the possible impact has been considered for too small a geographical area and that Horizon have not fully considered the possible impact on the mainland, and as a result the current mitigations proposed fail to deal with this negative impact effectively.
- 6.3.13 As mentioned above, GC has some provisions in place to try and safeguard the language, but there is a worry that the extra impact from the development will stretch those services beyond their capacity.
- 6.3.14 GC is concerned that many of the mitigations proposed, like Measure 16, which refers to the funding of peripatetic teachers, have thus far only referred to implementation in Gwynedd “potentially” and “if needed”, and would therefore suggest a reactive mitigation action if assessment of the collected workforce data would show a need rather than proactive action to try and reduce any possible effect.
- 6.3.15 GC would like to see a stronger assurance that the negative social and linguistic impact on the mainland would be limited by Horizon.

Possible negative impact on the communities of Bangor and the mainland

- 6.3.16 The mitigation proposed by Horizon to place most of the workforce in on-site accommodation is welcomed, but will not eliminate the wider impact completely. The baseline assumes to some degree that the rest of the workforce will be residing on the island, but GC is aware that there are concerns that workers will not be able to find accommodation within the areas assumed within the analysis work

and therefore, the assumptions on mainland / island split will not be consistent with the modelling undertaken.

- 6.3.17 Bangor is the regional centre and will therefore be an appealing area for residing, as well as being an attraction for retail and leisure and access to public services like health. The possible impact of any transport arrangements, and park and ride facilities, could also mean more workers living and travelling from the mainland. All this means a negative impact on community and language.
- 6.3.18 Furthermore, GC believes there is likely to be some degree of displacement within the county, and that this could have a negative impact on the linguistic demography of many wards and communities. The possible impact of workers moving from one area of the county to another could leave communities beyond the Menai Mainland assessment area vulnerable.
- 6.3.19 Even if Horizon implemented all the proposed mitigation measures regarding workforce accommodation and data collection, there is still a great element of the unknown. This is impacted by the fact that they cannot ensure accurate and full data on all the workforce, as data regarding dependants and family members moving with the workers will be provided voluntarily (Measure 12-13 WLIA). The sharing of information, and the ability of Horizon to respond to data collected by key partners, as well as by themselves, will be essential. So far, not enough information has been provided about how the data will be assess and shared, and who will assess and determine the negative impacts to determine where and when to target mitigation measures.

Impact on schools and pupils

- 6.3.20 The main worry by far by CG is the possible impact of the development on schools, and as a result the influence on the language use of other children in the community. The baseline used in the socio-linguistic assessment (Environmental Assessment) to assess the effect on local schools is based on the number of empty places in said schools. While this is an adequate way of assessing the effect on the school as a spatial resource, it does not serve as well in trying to assess the effects on the community and language of the school and on the other users of the service and the community. Increasing or decreasing the immersion service in response to demand cannot work as we need the service to be ready to respond to the potential impact, rather than be reactive.
- 6.3.21 GC believes that there will be a particular impact on schools in the Bangor area, and is concerned about the lack of attention given to this threat so far by Horizon.
- 6.3.22 GC has evidence that shows many pupils travel from a wide geographical are, including parts of Anglesey, to Bangor schools, and that even a small number of pupils can have a negative effect on the language use of the pupils and school (and as a wider effect, the community). Data collected by the Siarter Iaith scheme often shows a dip in the language use and tendencies of pupils when a new, non-Welsh speaking pupil has arrived at the school mid-term.
- 6.3.23 A Language and Community Impact Assessment was recently conducted by GC on the school community in Bangor in response to reorganisation proposals for the primary education provision March 2018:
- <https://democratiaeth.cyngor.gwynedd.gov.uk/documents/s500004201/Eitem%206%20-%20Atodiad%204%20-%20Ad-drefnu%20Darpariaeth%20Addysg%20Gynradd%20Bangor.pdf?LLL=1>
- 6.3.24 This assessment shows that many of Bangor’s primary schools are already beyond their capacity (based on pupil numbers in September 2017) and that the social use of the Welsh language amongst pupils is already in a delicate situation. The possible addition of pupil numbers as a direct result of the Horizon development is certain to have a negative impact.

- 6.3.25 As mentioned, language immersion services are currently provided by GC, but there is a question as to how those services will cope with the possible extra pupil numbers in the Bangor area, and how the extra demand in that area of the county will impact the service provided in other areas of the county due to prioritising. GC recently secured funding to establish a new language immersion centre in Bangor. Welsh Government approved the funding in part because they recognize the increased demand and negative impact posed by the Horizon development. There is however concern about the funding available to staff the proposed centre.
- 6.3.26 There is no evidence thus far that Horizon have discussed the current situation with GC Education (as they have with IACC) , and therefore GC is concerned that the possible cumulative effects of the Horizon development, alongside current reorganisation proposals and the general increase in demand on the education service will not be mitigated.

Adequacy of the DCO

- 6.3.27 Given the issues raised in respect of the potential impacts on Communities and the Welsh language, the following points are made in relation to the adequacy of the DCO:
- Insufficient information with regards to the impact of the proposed development on Gwynedd and in particular the Bangor area in terms of impacts on the Welsh language, local education service and communities.
 - The mitigation proposed therefore fails to deal with the negative impacts on the Welsh language, education services and therefore communities in Gwynedd
 - Gwynedd wishes to have an input into the provision and management of a robust monitoring framework as well as input into ensuring appropriate mitigation measures through section 106 agreement to ensure that mitigation is provided where there is negative impact.

Planning Policy Observations

- 6.3.28 Based on the local issues highlighted above and in the sections dealing specifically with workers' accommodation and local employment, skills, and supply chain, particularly the concerns about the assumptions made with regard as to how and where the large temporary workforce will be accommodated, criterion 5 of Policy PS 9 is of particular relevance. This criterion expects that the accommodation requirements of construction workers, a projected 75% of which will come from outside the area (i.e. 7,000 workers), will not result in unacceptable adverse economic....., social, linguistic impacts.
- 6.3.29 From a Welsh language and culture perspective, criterion 10 of Policy PS 9 is also of particular relevance. This criterion is relevant in that it requires consideration of the capacity of local community facilities, which, although not included as an example in the Policy wording, includes the capacity of local schools, Welsh language immersion centres and local facilities that provide Welsh language courses for adults. In line with Policy PS 2 and Policy ISA 1, should the development result in additional impacts or demands on existing community facilities, provided that statutory tests are satisfied, it is expected that contributions will be made to upgrade existing facilities in order to mitigate impacts. This approach aligns with criterion 4 of Policy PS 5 and expectations set out in Policy PS 1.
- 6.3.30 Additionally, criterion 16 of Policy PS 9 is also of particular relevant in that it would expect robust thresholds for reporting and monitoring the spatial distribution of workers in order to minimise the potential effects of a large temporary workforce on the use of the Welsh language within local communities in Gwynedd.

6.4 Housing

Context

- 6.4.1 The level of impact which Wylfa Newydd will have on the demand for housing in Gwynedd will be dependent upon the ability to absorb demand on Anglesey and or the containment of demand in close proximity to the site especially within the Temporary Workers Accommodation (TWA).
- 6.4.2 Wylfa Newydd is located close to the most Northerly point on Anglesey and Wales and has a significant exposure to the Irish Sea. The rurality and low population density may influence the distances people have to travel to reach their place of work and journey times. There is also a need to take account of local nuances and patterns of delivery. The level of existing latent housing capacity in the North West quarter of the island is insufficient to meet demand and will result in the distribution of demand to other communities. Given North Gwynedd's proximity to the A55 and thereby connection to the main park and ride facility in Dalar Hir then Bangor as a regional service centre with its good connections to other centres of population may be viewed as an attractive proposition to some worker groups .
- 6.4.3 The scale and length of the construction period of Wylfa Newydd and the level of preparatory works are unprecedented and there are no meaningful comparators, which leads some nervousness and uncertainty. Experience at Hinckley may help highlight demand patterns and identify good practice. Preliminary analysis suggests that people have initially favoured locations in close proximity to the build site however; patterns may evolve when demand becomes saturated. We are conscious that Hinckley is located much closer to Bridgewater and Taunton, which are able to offer support services. In light of this it is important there is sufficient contingency within existing arrangements to help respond to need and we will require reassurance that mitigation should follow demand. It is also necessary to ensure there is additional support or penalty if there is any deviation from the central business case presented by Horizon to ameliorate any negative housing impacts upon the residents of Gwynedd.
- 6.4.4 Even with a maximum provision of 4000 TWA there will be significant demand on local provision. North West Wales is predominantly a rural area with a sparse population and demand is focused on a very limited area. The business case presented by Horizon claims that it will be possible to meet demand and that it will be possible to minimise local impact. Challenges will arise if they are unable to adhere to the central business case and any the degree of variance from that case. It is unclear as to the level of influence and control that Horizon will be able to exert on large number of sub-contractors and how behaviours can be controlled modified or influenced via inducement. There is greater scope to monitor on site workers however, some support and contractor's roles may be more difficult to manage.
- 6.4.5 Our analysis of demand has been informed by the Gwynedd Local Housing Market Impact Assessment and the Homeless Strategy these highlight existing pinch points, challenges and opportunities within the housing markets.

Positive Local Impacts

- 6.4.6 **MITIGATION** – The level and extent of mitigation available may have a positive influence on housing and could help improve the availability and standard of housing supply and stock thereby providing a positive legacy for the future. However, it is difficult to reach a firm conclusion about the extent of benefit until the scale, or targeting of mitigation is clarified and we expect there will be a need for contingency to cover the construction period in full. There has been some mention of focus on particular mitigation measures, which we would endorse, however the level and scale is a concern and, it is important that mitigation is sufficient to span the duration of the construction period and mitigation needs to be able to respond quickly to change. The workforce profile projects very high numbers of staffing levels of in excess of 6,500 for 3.5 years and high demand over 7 years.

Attention has focused on addressing the peak demand; however, from a housing perspective increased levels of occupation over an extended period may have a more adverse impact due to the stranglehold on supply.

- 6.4.7 **LEGACY** - The extent and nature of the housing legacy, which could be available, is yet unconfirmed and it is difficult to judge what contribution could be made locally however any additional investment which helps improve the quality, range or supply could have a lasting positive impact. Local Authorities in North West Wales have been working with Welsh Government to identify the level of mitigation and contingency, which we believe, is required to prepare and manage demand.
- 6.4.8 **EMPLOYMENT** – The level and breadth of quality employment opportunities, can provide sustainable employment for local families. This will help support local communities and ensure young local people are able remain locally and compete in the housing market. The emphasis on recycling opportunities locally is particularly as it can extend employment opportunities however it would be useful to confirm the definition of a local worker and to distinguish between visitor and worker. Maximising home based workers can reduce the need to identify accommodation option conversely challenges in securing a local workers will lead to increased number of non-home based workers and pressure on accommodation.
- 6.4.9 **MITIGATION AND CONTINGENCY FUNDING** - The fund needs to have flexibility and needs to focus on areas which are impacted. Gwynedd is likely to experience increased demand and displacement if supply is delayed or does not materialise in the expected manner. This could arise from workers being unable to source suitable accommodation on the island and local people facing higher accommodation costs and who are unable to compete. Given the timeframe to deliver housing supply early confirmation of funding will maximise impact and benefit.

Neutral Local Impacts

- 6.4.10 **WORKFORCE MANAGEMENT AND ACCOMMODATION** - A lot of emphasis is placed on establishing a system to actively manage the workforce. Such an approach is welcomed as it allows an opportunity to respond adjust and guide workers to certain types of accommodation or to different communities. The opportunity to participate is supported and it is hoped that Gwynedd can influence in a positive manner. The unknown element is whether it will be possible to identify and variances in demand patterns early and adapt quickly based on agreed triggers- ahead of an adverse community or market impacts. The proposed model will be constrained if there is insufficient or limited capacity within the housing market, given that housing capacity has to be developed and planned well in advance and ramped up over time. There may be potential to deploy some tourist provision to assist at certain points however supply may be limited to certain months.
- 6.4.11 **LATENT CAPACITY** – Analysis suggest there is some latent capacity within the housing market however we are not convinced that it is available at the levels set out by Horizon and we are unsure whether all of the latent capacity is suitable (of sufficient quality) and available. Whilst some new opportunities may materialise prior and during construction it does not follow that the latent capacity identified will be released, and it is likely that significant investment will be required to upgrade some of the capacity to a required standard. Work undertaken by ARC4 on behalf of the 3 local authorities and Welsh Government questions the extent of local supply.
- 6.4.12 **BANGOR** - The impact upon Bangor, being the regional service centre needs to be considered. Given the demography of the projected workforce, the availability of certain support facilities, proximity to educational, shopping and entertainment offerings and transport networks the city and its neighbouring communities is likely to be perceived as an attractive and convenient location. Although there may be challenges due to pressures from a large student population Bangor it does have a higher proportion

of rental properties and HMO and subsequently more capacity to absorb and it may also be possible to deliver accommodation options at a beneficial cost.

- 6.4.13 **BASELINE** - The lack of recent comparators to establish a baseline to model demand creates challenges. It is unknown whether the length and scale of the development will impact on behaviours therefore additional contingencies or safeguards may be required. Will the workforce given the length of the build be more likely to bring dependents or settle locally as relationships form and impact on relocation decisions? Is there a correlation between the length of stay and resettlement? As a popular tourist destination there is also possibility that families may be inclined to visit on an extended basis which could influence the choice of accommodation considered by construction staff. Will the remoteness of the location and the fact that property prices are generally lower than other parts of the UK influence decisions about the type and location of accommodation. As behavioural factors cannot be predicted at the onset, it will be important to monitor experiences in Hinckley and to ensure that sufficient contingency to cover the duration of the project.

Negative Local Impacts

- 6.4.14 **CAMPUS** – The development of an onsite campus is intended to contain and limit the impact of workers but is an acknowledgement there is insufficient capacity locally to meet demand. Whilst the development of the TWA is viewed as an essential mitigation measure there are questions about the ability to deliver 4000 units of Temporary Workers Accommodation (TWA) on site and that these units will be available in advance of demand. Failure or a delay in secure such a supply could result in patterns of behaviour, which once established may be difficult to reverse. The delivery timeframe presented for the (TWA) is extremely tight and provides a minimal margin for adjustment and should be bought forward to ensure capacity is ready in advance of need. It appears that the first tranche of TWA will not be available for occupation until Q1 2021, when workforce numbers will have exceed 5,000 and at a level which may potentially have significant local impacts. Whilst the campus accommodation as proposed is likely to appeal and be favoured by certain groups of workers, especially those resident for short periods, it is important to confirm how workers will be attracted and encouraged to use the facility and whether the level of occupancy can be maintained for the duration of the build. Consolidation on site will make it easier to manage certain elements, however there are questions as to the amount of units which will or can be delivered and that it will not be possible to constrain workers in one location. The type of accommodation also reduces the potential legacy to the region.
- 6.4.15 **DISPLACEMENT** - Gwynedd Council has over 1900 individuals/families waiting on the social housing register and the homelessness service are already experiencing problems identifying affordable private accommodation. The affordability is more acute in the Bangor area where the Homeless Service are already unable to source properties within the Local Housing Authority rates. Even a minimal increase in demand is likely to exacerbate the problem and areas outside Bangor are likely to witness an uplift in rental values which will make it more challenging to identify and safeguard accommodation for vulnerable groups. There are also concerns that vulnerable families and individuals resident on the island could be displaced which would result in increased demand in Gwynedd there could also be an internal drift within Gwynedd. The Gwynedd Homelessness Strategy highlights key pressure points within the existing market and the type and level of accommodation required to address the balance. Further competition and a reduced supply will exacerbate the challenge.
- 6.4.16 **HOUSING AFFORDABILITY** - The documents reference that workers will be able to claim a disturbance allowance of approx. £38 per night (at current rates) which would equate to around £266 a week. The existing Local Housing Allowance for Ynys Mon and North Gwynedd (Key Study Area) is £110 per week for a 3 bed family house which would mean that local people would find it impossible to compete as individual workers would be able to claim 241% more per week. There is

a danger that this could significantly inflate the market and impact the availability of rented accommodation for local people. Information has been forthcoming as to the level of rents payable at the Campus accommodation (will the TWA be provided below the daily allowance) nor have we seen unit cost of building the units to help compare with other alternatives which could potentially be delivered at a more economical cost or provide a long term legacy.

Adequacy of the DCO

- 6.4.17 **ADHERANCE** – The central business case indicates that local impacts can be managed, however minor variances from that case, arising from a range of factor e.g. an increase in staff numbers, delays in delivery or inability to employ locally can have disproportionate negative impacts and will need require for contingencies. It is essential that Horizon affirm the commitment to ensure that building work on site is conditional on securing an adequate supply of housing, in readiness and in advance of need.
- 6.4.18 **TURNOVER** – Information presented suggest that there will be around 30,000 different roles during construction this will involve significant churn of individuals within the housing markets and level of turnover needs to be factored into the housing assumptions.
- 6.4.19 **LEVEL OF LATENT CAPACITY** – There are questions as to whether the latent capacity exists at the levels highlighted by Horizon which would impact on gravity models. Consideration needs to be given as to what triggers will be used to identify change in demand patterns and how additional supply will be delivered quickly.
- 6.4.20 **STAFF NUMBERS** - Alongside the construction staff it is expected that there will be additional roles associated with, or required to serve the workforce , these roles may be involved in building the TWA or off site roles e.g. in service industries and could have a bearing on the demand for housing
- 6.4.21 **Cumulative Demand** – Information provided by Horizon suggest that an additional 500 people will be seeking accommodation options in Gwynedd. There is a need to monitor demand levels and consideration could be given to the distribution of existing Wylfa staff. Given that, other developments are expected to run concurrently with Wylfa Newydd it will also be necessary to consider the cumulative impact of National Grid upgrade, the key infrastructure projects associated with Wylfa Newydd also needs to be taken into consideration.

Planning Policy Observations

- 6.4.22 Criterion 5 of Strategic Policy PS 9 expects that the accommodation requirements of construction workers be met in a way that minimises impact on the local housing market and does not result in an unacceptable adverse economic or environmental impacts. Individually or cumulatively, these adverse impacts could have a negative impact on the linguistic character of communities.
- 6.4.23 Criterion 7 links Policy PS 9 with the requirements of Policy PS 10. Of particular relevance are criteria 1 and 2 of Policy PS 10. The Policy supports the provision of campus style temporary accommodation, but applies a sequential approach, in that this type of accommodation should be provided when existing properties or new properties that could be adapted for permanent use cannot satisfy the identified need.
- 6.4.24 Issues described above and by some other parties who have submitted representations suggest that the potential for the provision of new buildings in sustainable locations on the Island occupied by construction workers before an alternative legacy use may not have been sufficiently explored by Horizon.
- 6.4.25 Notwithstanding the previous comment, issues raised regarding difficulties in delivering the temporary accommodation at Wylfa Newydd on time and in advance, or to respond to variations within the

pattern and distribution of the workforce trigger concerns whether criteria 5 and 16 of Policy PS 9 is satisfied from Gwynedd Council's perspective. The latter criterion recognises that pre- construction assumptions made during the scheme's development may not be realised and therefore more information will be required to identify additional or alternative mitigation measures.

- 6.4.26 A DCO requirement to commit Horizon to construct all 4,000 bed-spaces is required. This needs to be linked to either phases in construction programme and/ or number of workers employed, with clear enforceable triggers.
- 6.4.27 Failure to satisfy criterion 5 of Policy PS 5 could result in development that may not align with Criterion 5 of Policy PS 4 and Policy TAI 14, which seek to safeguard tourist accommodation and manage the use of static caravans, chalets, etc for temporary residential use by construction workers. Additionally, failure to monitor and respond to changing circumstances as required by criterion 16 of Policy PS 9 could have a detrimental impact on the Joint Local Development Plan's Settlement Strategy (Policy PS 17) as the market is left to react to the demand. A DCO requirement to construct all 4,000 bed- spaces in a timely manner and monitoring and review measures would ensure better alignment with criterion 16 of Policy PS 16.

6.5 Service provision

Context

- 6.5.1 Gwynedd Council is statutorily responsible for the provision of certain community services within its area. In addition, residents of Gwynedd rely upon the services of other public providers which include the local health board and the emergency services. Gwynedd's role and interests as local housing authority has been addressed in section xx.
- 6.5.2 Evidence gathered to inform the preparation of the Joint Local Development Plan (Topic Paper 13: Infrastructure 2015) has been used to inform this section.

Education

- 6.5.3 There are 97 primary schools, 14 secondary schools and 2 special needs schools in Gwynedd. In 2015 the Council was experiencing high levels of surplus capacity in its primary schools with 21 schools significantly below and 10 schools above capacity levels. A number of the Council's school buildings are in a poor condition.
- 6.5.4 To address capacity issues Gwynedd has implemented school reorganisation programmes in the Gader (Dolgellau) and Berwyn (Bala) catchments. Proposals are also being developed for the Towyn catchment. The three catchments lie outside of Horizon's KSA.

Health

- 6.5.5 There are 29 GP practices, 16 dental practices 30 pharmacies and 12 opticians¹³ in Gwynedd. Ysbyty Gwynedd in Bangor is a large hospital covering a geographical area which extends from Amlwch

¹³Health in Wales: <http://www.wales.nhs.uk/ourservices/directory>. Accessed November 2018

(Anglesey) to Towyn in the south, Pwllheli in the west and Llandudno in the east. Community hospitals in Gwynedd can be found in Toywn, Blaeneau Ffestiniog, Dolgellau and Tremadog.

Community Centres, Cultural and Sports Facilities

- 6.5.6 There are 17 libraries in Gwynedd as well as a mobile library in addition to 3 museums which are located in Bangor, Llanystumdwy and Dolgellau. Gwynedd has a good provision of purpose-built sports facilities yet whilst the Council is satisfied with the current level and framework of provision it does not mean that all of the area's recreational needs are satisfied. At present the Council operates 14 leisure centres on 16 sites which includes 3 swimming pools, 5 leisure centres with pools and 8 other leisure centres. It also operates the Treborth Athletics Track and full-size and five-a-side synthetic football pitches in some settlements.

Emergency Services

- 6.5.7 Gwynedd is covered by the North Wales Police Western Division whose headquarters are in Caernarfon. There are two custody centres in Gwynedd at Caernarfon and Dolgellau with 18 police stations/offices. Four police stations were identified for review in the 2013-2016 Estates Strategy.
- 6.5.8 There are 14 fire stations and two area safety offices. They are located at Bangor, [Type text] 78 Topic Paper 13: Infrastructure Caernarfon, Dolgellau, Aberdyfi, Abersoch, Bala, Blaenau Ffestiniog, Barmouth, Harlech, Llanberis, Nefyn, Porthmadog, Pwllheli and Tywyn.

Positive Local Impacts

- 6.5.9 The Council does not consider that there will be any significant, positive impacts upon local services within Gwynedd.

Neutral Local Impacts

Education

- 6.5.10 Horizon's project-wide socio-economic assessment suggests that at peak, construction workers would bring 285 partners and 220 dependants (paragraph 1.5.50 Chapter C1 Socio-economics). Horizon estimates a worst case whereby there would be a 2% increase in demand across the KSA leaving 12% surplus capacity. Horizon has recognised that there might be areas where demand could result in capacity constraints and consequently have distributed the assumed number of dependants across the KSA Sub-areas in line with gravity modelling. Reference is made to potential effects upon Anglesey schools (primary and secondary), but no explicit reference is made to Gwynedd. The council would wish to receive confirmation that the mitigation measures which are referenced, such as language support and immersion will extend to the council area.

Emergency Services

- 6.5.11 Horizon estimates that 93% of the 7,500 additional workers required at peak construction will be resident on Anglesey. This breakdown is under-written by a number of assumptions. Gwynedd

Council wishes to see a recognition that should greater number of workers seek accommodation within its area, or should the effects upon emergency services be greater than those which have been reference from Horizon's Project-wide Socio-economic chapter below, that mechanisms are in place to address any impacts that may arise.

Policing

- 6.5.12 Horizon suggests that the effects upon policing in Gwynedd would be negligible (Horizon estimates 20 incidents per year) with the majority of any incidents likely to occur on Anglesey. The council is concerned that the additional demand for policing on Anglesey may reduce provision within its area as both council areas are covered by the same police force. Horizon needs to reach agreement with North Wales Police to ensure that it has sufficient resources to police both council areas.

Ambulance

- 6.5.13 Horizon estimates that there might be a 10% increase in ambulance calls on Anglesey during construction of the project and recognises (paragraph 1.5.69) that the services is already currently under pressure. The effects upon Gwynedd are considered to be negligible – and in the HIA. Whilst the council accepts that demand for ambulance provision in its area may not be significant it is concerned that increased demand on Anglesey may have a knock-on effect in its area. The council would support the North Wales Ambulance Service in ensuring that it has sufficient resources to accommodate the proposed workforce whilst at the same time maintaining (and perhaps improving) the service it provides to all resident in the KSA.

Fire

- 6.5.14 Impacts upon the North Wales Fire Service are considered by Horizon to be negligible. Horizon notes however (paragraph 1.5.77) that stakeholders have raised concern over potentially greater demand for fire service inspections of PRS and the potential fire risks arising from the greater use of latent accommodation. The focus of Horizon's assessment is upon Anglesey and whilst Gwynedd accepts that impacts will be greatest on the island it does require assurance that the fire service across the KSA will be sufficiently resourced.

Leisure and Community Services

- 6.5.15 Horizon recognises (paragraph 1.5.80) that current usage of facilities is higher in Gwynedd than Anglesey and that some increased demand may be realised from non-home-based workers. Additional mitigation in the form of the Community Impact Fund is proposed to address potential impacts. Paragraph 7.4.67 of the Planning Statement (8.1) states that *'The fund will be managed by a committee consisting of representatives from Horizon, IACC, Welsh Government and the emergency services'*. Gwynedd would wish to be party to this committee.

Health

- 6.5.16 The project-wide socio-economic assessment does not address the potential impacts upon existing health services as a result of the construction and operation phases. This is found within the Health

Impact Assessment. The Impact Assessment (8.19) identifies the location of health services provision across the KSA (including Menai Mainland) at figures L6 and L7. An assessment of potential effects is reported in section C.6. The council is supportive of the mitigation measures proposed which suggest close working with PHW and BCUHB whose remit will cover the whole of the KSA.

Negative Local Impacts

- 6.5.17 Gwynedd Council agrees that there are unlikely to be any significant local impacts based upon the assumptions developed by Horizon but remains concerned for the reasons stated above that should these assumptions prove unrealistic that local impacts upon public services may arise. It would therefore wish to see explicit reference to Gwynedd Council as a Community Impact Fund committee member. The need for a developer to address the infrastructure requirements arising from its development proposal is set out within JLDP Policy PS2 Infrastructure and Developer Contributions and Policy ISA 1 Infrastructure Provision (see Appendix XX for detailed policy wording). Additionally, PS 9 Wylfa Newydd and related development requires at criteria 10 that:

Where there would be additional impacts or demands on existing community facilities the Council will seek either appropriate contributions for off-site facilities or upgrading existing facilities. Legacy use of any additional facilities provided should be considered where that is appropriate.

Adequacy of the DCO

Obligation

- 6.5.18 Gwynedd Council has not had sight of the proposed Development Consent Obligation. It has however read the heads of terms presented within section 7.4 of the Planning Statement and would wish to make the following observations¹⁴.
- Community Impact – The HoTs reference a management committee consisting of HNP, IACC, WG and the emergency services. GCC would also wish to be party.
 - Health and wellbeing – Reference is made to a sub-group and the implications made further on suggest this would include health bodies and emergency services. Gwynedd would wish to be represented on this group given our responsibilities under wellbeing and wider community health. The text also refers to housing market pressures which would be of concern to the Council.
- 6.5.19 In conclusion, the Heads of Terms to the S106 would benefit from an over-arching comment that the measures contained within the obligations would follow the impacts and in principle, be available throughout the KSA. As currently drafted, there is almost no reference to Gwynedd despite it forming a significant element of the study area. The Council will await sight of the draft S106 agreement at deadline 3.

²These observations mirror the Council's response to the ExA 'Action points raised from the draft DCO hearing held on Tuesday 24 October 2018'

Planning Policy Observations

- 6.5.20 The issues set out above mean that criteria 5, 10 and 11 of Policy PS 9 are of particular relevance, as well as criterion 4 of Policy PS 10.
- 6.5.21 Criterion 5 expects that the accommodation requirements of construction workers, a projected 75% of which will come from outside the area (i.e. 7,000 workers), will not result in unacceptable adverse social impacts.
- 6.5.22 Criterion 4 of Policy PS 10 seeks to ensure that campus style temporary accommodation (e.g. the Wylfa Newydd Temporary Construction Workers Accommodation) provide facilities, such as healthcare facilities, where there is insufficient capacity within off- site facilities to address the demands from construction workers.
- 6.5.23 When any provision provided by Horizon cannot satisfy demand and therefore causes additional impacts and demands on local communities, criterion 10 expects Horizon to provide appropriate contributions or upgrading existing facilities.
- 6.5.24 Linked to these criteria, criterion 11 of Policy PS 9 sets out an expectation that there are appropriate measures for promoting social cohesion and community safety.
- 6.5.25 Similar to other local impacts set out in this Statement, the expectation that a review mechanism is set up in order to monitor the full range of impacts (criterion 16 of Policy PS 9) is critical.
- 6.5.26 When impacts are identified Policy PS 2 and Policy ISA 1 are of particular relevance. Subject to meeting the statutory tests, these Policies allow for contributions to secure sufficient infrastructure required to accommodate new development.

7. Conclusions

Overview of planning policy observations

- 7.1 GC acknowledges that construction and operation of Wylfa Newydd have the potential to bring positive economic and social benefits to Anglesey, Gwynedd and the wider area. GC broadly agrees that there are unlikely to be any significant local negative impacts based upon the assumptions developed by Horizon. However, GC has highlighted its concerns about these assumptions in Section 6 above, which relate to the following topic areas: construction workers' accommodation, transport, skills and employment (including the tourism sector), the Welsh language and public services. These topics are inter- related, i.e. a potential impact (positive and negative) in one topic area is likely to have an impact on other topic area. Given its location in Northern Gwynedd and as a bridgehead settlement plus its role as an important Service Centre, there are particular concerns about the Bangor area if the assumptions prove incorrect.
- 7.2 GC's concerns are broadly based on potential/ probable gaps in information to inform Horizon's assumptions and a weak monitoring framework to identify and address circumstances that do not align with the original assumptions. Horizon seems to be of the view that local impacts can be managed. However, GC (and its partners) consider that minor variances from that case, arising from a range of factors, e.g. an increase in worker numbers, variation in origin of workers, delays in delivery of infrastructure, or inability to employ locally can have disproportionate negative impacts and will need require for contingencies. Failure or a delay in the supply of, for example, accommodation or park and ride facilities, could result in patterns of behaviour, which once established may be difficult to reverse. GC is concerned that Gwynedd is likely to experience increased demand and displacement if supply is delayed or does not materialise in the expected manner.

7.3 The adopted Anglesey and Gwynedd Joint Local Development Plan 2011 – 2026 is particularly relevant to this Statement of Local Impact, having had the benefit of formal Public Examination (2016 – 2017) and having been found sound following modifications stipulated by the Planning Inspectors. The Plan’s vision and strategic objectives (Chapter 4), the Nationally Significant Infrastructure Projects and related development section (para 6.3.1 – 6.3.10) and the Wylfa Newydd and related development section (para 6.3.12 – 6.3.24) in chapter 6 of the Plan seek to ensure that local impacts are fully addressed. The latter section includes four Strategic Policies that deal specifically with Wylfa Newydd and its related development. These sections and Policies include identifying the Council’s vision and objective that proposals should, where possible, contribute positively to the implementation of the spatial strategy and meet the underlying strategic objectives of the Plan. They also identify an expectation of a commitment from Horizon to adopt initiatives to mitigate and compensate for impacts. The expectation for Horizon to address the infrastructure requirements arising from its development proposal is clearly set out in policy tests within Policy PS 9 through to Policy PS 12, which are supplemented by various generic Policies in the Plan (see Appendix 1). In order to meet the Policy expectations described in Section 6 of this Statement and address its concerns, GC considers that the DCO and its related documents should ensure that:

- monitoring is undertaken early and is ongoing throughout the construction period;
- mitigation should be undertaken proactively where appropriate;
- mitigation should follow impact and consider direct, indirect and induced impacts.

Avoiding negative impacts and facilitating positive impact

7.4 The Council considers that there are aspects of the proposed development that justify a precautionary approach requiring further discussion and agreement between the developer and relevant bodies. The Council wishes to have an input into discussions and arrangements in relation to mitigation measures to avoid adverse impacts, as well as discussions and arrangements to facilitate positive impacts for Gwynedd and the North Wales Region.

7.5 With regards to mitigation measures, the Council considers that these could be provided through amendments to the key DCO control documents such as the CoCP and through a section 106 agreement.

7.6 Gwynedd Council (GC) has only had sight of the S106 Heads of Terms (HoTs) which are set out within document 8.1 Planning Statement (paragraphs 7.4.8 to 7.4.86). Within these HoTs, Gwynedd Council is mentioned once, under the topic of Welsh Language. This is despite a substantial part of Gwynedd lying with the Key Study Area as defined by Horizon. Whilst Gwynedd Council recognises that the majority of impacts are likely to be experienced on Anglesey the scale of the project is such that it anticipates impacts and hence mitigations will also be required within its Council area. Gwynedd Council would therefore wish to see a mechanism within the S106 that allows for its involvement in the following areas, in addition to the Welsh Language:

- Accommodation – The HoTs provide little detail on what will be included within the S106, in contrast to some of the other topics. The section makes no reference to any of the organisations that would be party to the fund and makes no reference to the establishment of an agreed framework for monitoring.
- Community Impact – The HoTs reference a management committee consisting of HNP, IACC, WG and the emergency services. GCC would also wish to be party.
- Health and wellbeing – Reference is made to a sub-group and the implications made further on suggest this would include health bodies and emergency services. Gwynedd (and no doubt IACC) would wish to be represented on this group given our responsibilities under wellbeing and wider community health. The text also refers to housing market pressures which would be of concern to the Council.
- Education and skills – Specific reference is made to IACC and to other organisations with regard to labour churn in the health sector. GC operates 13 residential care homes and has social care responsibilities. It would wish to be party to this.

- Tourism – The HoTs do not mention any organisations and may therefore benefit from a reference to funding being available across the KSA.
- Supply Chain Charter – Reference is made to IACC, Welsh Government, NWEAB and Menter Newydd. GC would wish to be included.
- Service Level Agreement and scale of contributions– Gwynedd would also wish to be able to call upon funding, particularly with regard to monitoring and for officer time spent in relation to the above.

7.7 In addition to the above areas the Council also has concerns regarding highways and transportation issues as referred to in part 6.1 of this statement and therefore there needs to be appropriate measures in place to mitigate any negative impacts.

7.8 In conclusion, the Heads of Terms to the S106 would benefit from an over-arching comment that the measures contained within the obligations would follow the impacts and in principle, be available throughout the KSA. As currently drafted, there is almost no reference to Gwynedd despite it forming a significant element of the study area. The Council will await sight of the draft S106 agreement at deadline 3.

Appendix A Relevant Policies in the Anglesey and Gwynedd Joint Local Plan

Strategic Policy PS 1: 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 provision set out for the settlement in Policies TAI 1 – TAI 6; or
 - c. Residential development of 5 or more housing units on allocated or windfall sites within development boundaries that doesn't address evidence of need and demand for housing recorded in a Housing Market Assessments and other relevant local sources of evidence.
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 is on an unexpected windfall site for a large scale housing development or large scale employment development that would lead to a significant workforce flow;
3. Refusing proposals which would cause significant harm to the character and language balance of a community that cannot be avoided or suitably mitigated by appropriate planning mechanisms;
4. Requiring a bilingual Signage Scheme to deal with all operational signage in the public domain that are proposed in a planning application by public bodies and by commercial and business companies;
5. Expect that Welsh names are used for new developments, house and street names.

Strategic Policy PS 2: Infrastructure and Developer Contributions

The Councils will expect new development to ensure sufficient provision of essential infrastructure (either on-site or to service the site) is either already available or provided in a timely manner to make the proposal acceptable, by means of a planning condition or obligation. Subject to meeting the statutory tests, maintenance payments may be required pursuant to section 106 agreements in order to meet the initial costs of running services and facilities and to compensate communities for loss or damage caused by development. Where the essential, enabling and necessary infrastructure is required as a consequence of a scheme and cannot be provided on site, financial contributions will be requested, within limits allowed by legislation, to get essential investment off site. If the effect of the development is cumulative, the financial contributions may be accumulated, within legislative constraints, in order to alleviate the cumulative effect.

Policy ISA 1: Infrastructure Provision

Proposals will only be granted where adequate infrastructure capacity exists or where it is delivered in a timely manner. Where proposals generate a directly related need for new or improved infrastructure and this is not provided by a service or infrastructure company, this must be funded by the proposal. A financial contribution may be sought to secure improvements in infrastructure,

facilities, services and related works, where they are necessary to make proposals acceptable. Where appropriate, contributions may be sought for a range of purposes, including:

1. Affordable housing
2. Sports and leisure facilities
3. Education facilities
4. Employment and training facilities
5. Recreation and open space
6. Transport infrastructure including public transport
7. Healthcare facilities
8. Nature conservation
9. Recycling and waste facilities
10. Renewable and low carbon infrastructure
11. Cultural and community facilities
12. Welsh language measures
13. Broadband infrastructure
14. Public Realm
15. Flood risk management measures
16. Service and utilities infrastructure, including water supply, drainage, sewers, gas and electricity
17. Archaeological and historic assets Proposals for utility services to improve infrastructure provision will be granted subject to detailed planning considerations.

Policy ISA 2: Community Facilities

The Plan will help sustain and enhance community facilities by:

1. Granting the development of new community facilities, provided that:
 - i. they are located within or adjoining development boundaries or they are located outside development boundaries but within clusters where the proposal will provide an essential facility to support the local community;
 - ii. in the case of new buildings, that the local community's needs cannot be satisfied through the dual use of existing facilities or the conversion of existing buildings;
 - iii. where the proposal is for a facility being relocated, it can be demonstrated that the existing site is no longer suitable for that use;
 - iv. the proposal is of an appropriate scale and type compared to the size, character and function of the settlement;
 - v. the proposal is easily accessible by foot, cycle and public transport. The provision of new or enhanced multiuse community facilities, including the co-location of healthcare, school, library and leisure facilities in accessible locations will be encouraged.
2. Resisting the loss or change of use of an existing community facility unless:

- i. a suitable replacement facility can be provided by the developer either on or off site, and within easy and convenient access by means other than the car, or
- ii. it can be demonstrated that the facility is inappropriate or surplus to requirements, or
- iii. in the case of a commercially operated facility:
 - there is evidence that the current use has ceased to be financially viable, and
 - that it could not reasonably be expected to become financially viable and • no other suitable community use can be established, and
 - there is evidence of genuine attempts to market the facility, which have been unsuccessful.

Strategic Policy PS 4: Sustainable Transport, Development and Accessibility

Development will be located so as to minimise the need to travel. The Councils will support improvements that maximise accessibility for all modes of transport, but particularly by foot, cycle and public transport. This will be achieved by securing convenient access via footways, cycle infrastructure and public transport where appropriate, thereby encouraging the use of these modes of travel for local journeys and reducing the need to travel by private car. The Council will endeavour to improve accessibility and seek to change travel behaviour. This will be achieved by working with our partners to:

1. Maintain an appropriate public transport service, recognising alternative ways of maintaining travel opportunities;
2. Maintain and improve stations, infrastructure and services on the main Railway Lines including access to disabled people and other rail-related improvements;
3. Where possible safeguard, improve, enhance and promote and public rights of way (including footpaths, bridleways and byways) and cycleway networks to improve safety, accessibility (including disabled people) by these modes of travel and to increase health, leisure, well-being and tourism benefits for both local residents and visitors;
4. Support schemes that will improve park and ride / share facilities for areas of employment, new development and freight transfer facilities;
5. Allocating or safeguarding land where appropriate to facilitate the key strategic transport schemes. The Councils will also require appropriate transport infrastructure elements to be delivered as part of major infrastructure development schemes either in kind or through section 106 obligations.

Policy TRA 1: Transport Network Developments

1. Improvements to Existing Infrastructure

Improvements to the existing transport network will be granted provided they conform to the following criteria:

- i. The choice of route and/or site minimises the impact on the built and natural environment, landscapes and property; and
- ii. Permanent land-take is kept to the minimum that is consistent with good design and high quality landscaping; and
- iii. In the case of cycle ways, park and ride schemes, roads and roadside service areas, the scheme will help to improve road safety; and

- iv. In the case of new roads a full range of practicable solutions to the transport problem has been considered and road enhancement provides the optimum solution; and
 - v. In the case of roadside service areas, the scheme must adjoin the strategic road network, focus primarily on serving the needs of motorists, not impede the movement of strategic traffic and in line with Strategic Policy PS 15 not undermine retail provision in the Sub- Regional Centre, Urban and Local Service Centres or Villages.
2. Transfer Between Transport Modes
- In order to facilitate the transfer between transport modes and help to minimise travel demand and reduce car dependency, provided they conform to relevant policies in the Plan the following proposals will be granted:
- i. Improvements to existing rail and bus interchanges, including measures to facilitate access by active travel modes and disabled people with particular access needs;
 - ii. Strategically located permanent park and ride facilities within or adjacent to Centres or in other locations close to the main highway network when it can be demonstrated that no alternative sites closer to the Centres are suitable, where customers are supported by frequent bus services between the facility and the destination;
 - iii. Strategically located facilities within or adjacent to Centres for overnight lorry parking and freight transfer;
 - iv. High quality driver and passenger facilities including but not limited to, seating, information, toilet facilities;
 - v. Facilities for park and share in appropriate locations within or adjacent settlements on the strategic highway network;
 - vi. Facilities within settlements for coach parking, taxis and passenger drop off; vii. Facilities for interchange with water-based transport.
3. Transport Assessments Proposals for large-scale development or developments in sensitive areas that substantially increase the number of journeys made by private vehicles will be refused unless they include measures as part of a Transport Assessment and/or a Travel Plan. Where the Transport Assessment reveals the need for a Transport Implementation Strategy this will need to be secured through a planning obligation.
4. Transport Schemes Improvements to the strategic transportation network in the Plan area shown on the Proposals Maps will be secured through safeguarding and provision of land. Schemes include:
- i. A487 Caernarfon to Bontnewydd
 - ii. Llangefni Link-Road
 - iii. A5025 Valley to Wylfa and other transport infrastructure improvements associated with the new nuclear development at Wylfa Newydd, including improvements from Amlwch to Wylfa Newydd where need for improvement on that section is demonstrated following a highway impact assessment of the Wylfa newydd Project on the A5025.

Policy TRA 4: Managing Transport Impacts

Where appropriate, proposals should be planned and designed in a manner that promotes the most sustainable modes of transport having regard to a hierarchy of users:

- 1. Pedestrians, including people with prams and/or young children;

2. Disabled people with mobility impairments and particular access needs;
3. Cyclists;
4. Powered two-wheelers;
5. Public transport;
6. Vehicular access and traffic management within the site and its vicinity;
7. Car parking and servicing;
8. Coach parking; and
9. Horse-riders.

Proposals that would cause unacceptable harm to the safe and efficient operation of the highway, public transport and other movement networks including pedestrian and cycle routes, public rights of way and bridle routes, will be refused. The degree of unacceptable harm will be determined by the local authority on a case by case basis.

Strategic Policy PS 5: Sustainable Development

Development will be supported where it is demonstrated that they are consistent with the principles of sustainable development. All proposals should:

1. Alleviate the causes of climate change and adapting to those impacts that are unavoidable in accordance with Strategic Policy PS 6;
2. Give priority to effective use of land and infrastructure, prioritizing wherever possible the reuse of previously developed land and buildings within the development boundaries of Sub Regional Centre, Urban and Local Service Centres, Villages or in the most appropriate places outside them in accordance with Strategic Policy PS 17, PS 13 and PS 14;
3. Promote greater self-containment of Centres and Villages by contributing to balanced communities that are supported by sufficient services; cultural, arts, sporting and entertainment activities; a varied range of employment opportunities; physical and social infrastructure; and a choice of modes of travel;
4. Protect, support and promote the use of the Welsh language in accordance with Strategic Policy PS 1;
5. Preserve and enhance the quality of the built and historic environment assets (including their setting), improving the understanding, appreciation of their social and economic contribution and sustainable use of them in accordance with Strategic Policy PS 20;
6. Protect and improve the quality of the natural environment, its landscapes and biodiversity assets, including understanding and appreciating them for the social and economic contribution they make in accordance with Strategic Policy PS 19;
7. Reduce the effect on local resources, avoiding pollution and incorporating sustainable building principles in order to contribute to energy conservation and efficiency; using renewable energy; reducing / recycling waste; using materials from sustainable sources; and protecting soil quality;
8. Reduce the amount of water used and wasted; reducing the effect on water resources and quality; managing flood risk and maximizing use of sustainable drainage schemes; and progressing the objectives of the Western Wales River Basin Water Management Plan. Proposals should also where appropriate:

9. Meet the needs of the local population throughout their lifetime in terms of their quality, types of tenure and affordability of housing units in accordance with Strategic Policy PS 16;
10. Promote a varied and responsive local economy that encourages investment and that will support Centres, Villages and rural areas in accordance with Strategic Policy PS 13;
11. Support the local economy and businesses by providing opportunities for lifelong learning and skills development in accordance with Strategic Policy PS 13;
12. Reduce the need to travel by private transport and encourage the opportunities for all users to travel when required as often as possible by means of alternative modes, placing particular emphasis on walking, cycling and using public transport in accordance with Strategic Policy PS 4;
13. Promote high standards of design that make a positive contribution to the local area, accessible places, that can respond to future requirements and that reduce crime, antisocial behaviour and the fear of crime in accordance with Policy PCYFF 3.

Strategic Policy PS 9: Wylfa Newydd and Related Development

In their role as determining authorities for related development for Wylfa Newydd the Councils will require compliance, where appropriate, with the criteria set out in this Policy and Policies PS 10 - 12, where applicable.

In responding to proposals forming part of a Development Consent Order application to the Secretary of State the Councils will take the same considerations into account in the preparation of a Local Impact Report.

1. Any relevant policies included in the Plan, and any relevant supplementary planning guidance should shape the approach to the development of the nuclear power station and proposals for related development;
2. In order to minimise impact and maximise re-use of existing facilities and materials, opportunities have been taken where feasible to integrate the requirements of the Wylfa Newydd Project with the proposed decommissioning of the existing power station;
3. Highways and transport proposals for the Wylfa Newydd Project form part of the integrated traffic and transport strategy that has regard to Strategic Policy PS 4 and any relevant detailed Policies in the Plan and minimises adverse transport impacts to an acceptable level, including those arising during the construction, operation and decommissioning stages, and any restoration stages. Proposals should where feasible make a positive contribution to transportation policy objectives in the locality, and should include multi-modal solutions and investment that encourages travel by public transport, walking and cycling and other sustainable forms of transport;
4. Early or preparatory works for the development of the nuclear power station shall demonstrate that they are necessary to ensure the timely delivery of the Wylfa Newydd Project or are designed to provide mitigation for the effects of the construction or operation of the Wylfa Newydd Project. Any early or preparatory works must be accompanied by a strategy to enable the sites to be restored to an acceptable standard should the Project not be consented or constructed and demonstrate how the costs of undertaking such restoration will be secured, including through bonding;
5. The accommodation requirements of construction workers should be met in a way that minimises impact on the local housing market, including the ability of those on low incomes to access the private rented sector, affordable housing and other housing services (taking account of the published Local Housing Market Assessment), and not result in unacceptable adverse economic (including the tourism sector), social, linguistic or environmental impacts.

Proposals should form part of a robust construction workers accommodation strategy that has regard to the Plan's Spatial Strategy and any relevant policies in the Plan, including Policy PS 10;

6. Where proposals are for a temporary period both the site selection and the proposal detail shall be informed by a consideration of legacy uses, so that investment in elements such as infrastructure, buildings, ecological and landscape works brings long term benefits. Where a legacy use is proposed, delivery plans for legacy uses will be required with planning applications to demonstrate how legacy use has informed the approach to the design and layout of the related development sites, as well to contribute to the framing of a S106 and/or other agreements and CIL payments (if applicable);
7. Proposals for campus style temporary workers accommodation, logistics centres and park and ride facilities will also be assessed against the criteria set out in Policies PS 10 - 12;
8. The scheme layout and design and the scale of open spaces, landscaping, planting (including hedging and tree belts), waterways and similar features proposed should avoid, minimize, mitigate or compensate for visual, landscape and ecological impacts on the local and wider area, as well as on cultural and historic aspects of the landscape, both in the short and longer term. Proposals will be expected to be commensurate with the scale of the development, and the extent of its impact;
9. Early engagement by the promoter with the Council in respect of the promoter's procurement, employment, education, training and recruitment strategies, with an objective to maximise employment, business and training opportunities for the local communities both in the short and longer term is required. The promoter's procurement, employment, education, training and recruitment strategies and delivery plans will require to be submitted to the Council as part of any planning application so far as it is relevant to the application;
10. Community infrastructure facilities will be provided for construction workers, for example, park and ride or park and share facilities, shops, healthcare and sports and leisure facilities. Where feasible, provision of these community infrastructure facilities on sites other than the Wylfa Newydd Development Area should be sited and designed so that it can be made available for community use during the construction phase and ultimately, where appropriate, serve a community legacy use. Where there would be additional impacts or demands on existing community facilities the Council will seek either appropriate contributions for off-site facilities or upgrading existing facilities. Legacy use of any additional facilities provided should be considered where that is appropriate;
11. Proposals should include appropriate measures for promoting social cohesion and community safety;
12. All proposals shall be appropriately serviced by transport infrastructure including public transport and shall not have adverse impacts on local communities and tourism and this shall be demonstrated in a transport assessment. Where there is insufficient transport linkage or the road network does not have sufficient capacity to accommodate the level of traffic which will result from any development or an adverse impact is predicted, appropriate improvements to the transport network and the provision of sustainable transport options shall be provided to mitigate the impacts;
13. The burden and disturbance borne by the community in hosting a major national or regional nuclear related infrastructure project should be recognised; and appropriate packages of community benefits provided by the developer will be sought to offset and compensate the community for the burden and disturbance imposed by hosting the project;
14. Any proposal on the Wylfa Newydd site (outside a DCO) to treat, store or dispose of Very Low level, Low Level or Intermediate Level Radioactive Waste or to treat or to store spent fuel arising from the existing nuclear power station or any future nuclear development within

or outside the Plan area, in an existing or proposed facility on or off the nuclear site would need to i. demonstrate that the environmental, social and economic benefits outweigh any negative impacts.

15. If a future or legacy use for any temporary development is not feasible the Council shall require that temporary buildings are removed; and
 - i. that the serviced land is left in a suitable condition following the removal of the structures in accordance with a scheme of work submitted and approved by the Local Planning Authority; or
 - ii. all waste disposal facilities, roads, parking areas and drainage facilities are permanently removed from the site and the land is reverted to its original state in accordance with a scheme of work submitted to and approved by the Local Planning Authority.
16. It is possible that as the project develops, due to unforeseen consequences resulting from the construction and operation of the Wylfa Newydd Project, the Councils may require additional information from, or works to be carried out by the developer in order to off-set any additional impacts or burdens borne by the community affected. The developer should build in review mechanisms in order to monitor the full range of impacts, to review the adequacy of mitigation or compensation measures and to make adjustments as necessary.

Strategic Policy PS 10: Wylfa Newydd – Campus Style Temporary Accommodation for Construction Workers

In their role as determining authorities for campus style temporary accommodation for construction workers for Wylfa Newydd, the Councils will require compliance, where appropriate, with the criteria set out in Policy PS 9 and with this Policy. In responding to proposals forming part of a Development Consent Order application to the Secretary of State the Councils will take the same considerations into account in the preparation of a Local Impact Report.

1. the developer can firstly demonstrate that the proposal satisfies a demonstrable need for temporary accommodation for construction workers that cannot be met through either existing residential accommodation, or the re-use of existing buildings, or the provision of new permanent buildings capable of being adapted for permanent use following their use by construction workers; and
2. the proposal is located on the Wylfa Newydd Project site or a site located adjacent to or well related to the development boundary of Holyhead, Amlwch, Llangefni, Gaerwen or Valley and is close to the main highway network where adequate access can be provided without significantly harming landscape characteristics and features, and also takes account of policy preference for use of previously developed land; and
3. the proposal must include appropriate mechanisms to mitigate any adverse impacts of the proposed development on the Welsh language and culture or a contribution is made towards mitigating those impacts in accordance with Policy PS 1 and Policy ISA 1; and
4. Where there is insufficient capacity within existing off-site leisure, recreational, retail and healthcare facilities to meet the needs of occupiers of the site or such facilities are not available within an acceptable distance which facilitates pedestrian or cycle access to them, the proposal must include appropriate mechanisms to mitigate negative impacts which may include onsite provision of ancillary facilities for the use of the occupiers; and
5. Operators will be required to maintain occupancy information to facilitate the monitoring of the impacts of the development, including the number of construction workers accommodated, the duration of occupancy and keep a record of anonymised data of workers (having regard to the requirements of data protection legislation) and make this information immediately available, on request, to the Council.

Strategic Policy PS 12: Wylfa Newydd - Park and Ride and Park and Share Facilities.

In their role as determining authorities for park and ride and park and share facilities for Wylfa Newydd, the Councils will require compliance, where appropriate, with the criteria set out in Policy PS 9 and with this Policy. In responding to proposals forming part of a Development Consent application to the Secretary of State the Councils will take the same considerations into account in the preparation of a Local Impact Report.

1. In order to minimise the need for construction workers and workers that service the facility to travel by private car, the site is located: i. within or adjacent to development boundaries of Centres located along or close to the A5/ A55; or ii. in other locations along the A5/A55 where the site is part of a comprehensive approach to mitigating the transport effects of the Project, takes account of the Councils' preference to consider sites closer to Centres, has due regard to landscaping and environmental considerations, and where provision for travel to the site by sustainable means, including public transport and cycling, can be provided.
2. Proposals should make provision for new and enhancement of existing pedestrian and cycle paths and improvement to public transport services; 3. The siting of buildings and activities, means of access and egress and appropriate mechanisms are used to mitigate negative impacts of the proposed development on the amenity of local communities.

Strategic Policy PS 14: The Visitor Economy

Whilst ensuring compatibility with the local economy and communities and ensuring the protection of the natural, built and historic environment the Councils will support the development of a year-round local tourism industry by:

1. Focusing larger scale, active and sustainable tourism, cultural, the arts and leisure development in the sub-regional centre, urban service centres, and, where appropriate, local service centres;
2. Protecting and enhancing existing serviced accommodation and supporting the provision of new high quality serviced accommodation in the sub-regional, urban and local service centres and villages;
3. Managing and enhancing the provision of high quality un-serviced tourism accommodation in the form of self-catering cottages and apartments, camping, alternative luxury camping, static or touring caravan or chalet parks;
4. Supporting appropriately scaled new tourist provision and initiatives in sustainable locations in the countryside through the reuse of existing buildings, where appropriate, or as part of farm diversification, particularly where these would also benefit local communities and support the local economy and where they are in accordance with sustainable development objectives;
5. Preventing development that would have an unacceptable adverse impact on tourist facilities, including accommodation and areas of visitor interest or their setting, and maximise opportunities to restore previous landscape damage.

Policy TWR 2: Holiday Accommodation

Proposals for:

1. The development of new permanent serviced or self-serviced holiday accommodation, or
2. The conversion of existing buildings into such accommodation, or

3. Extending existing holiday accommodation establishments, will be permitted, provided they are of a high quality in terms of design, layout and appearance and that all the following criteria can be met:
 - i. In the case of new build accommodation, that the development is located within a development boundary, or makes use of a suitable previously developed site;
 - ii. That the proposed development is appropriate in scale considering the site, location and/or settlement in question;
 - iii. That the proposal will not result in a loss of permanent housing stock;
 - iv. That the development is not sited within a primarily residential area or does not significantly harm the residential character of an area;
 - v. That the development does not lead to an over-concentration of such accommodation within the area.

Policy TWR 3: Static Caravan and Chalet Sites and Permanent Alternative Camping Accommodation

1. Proposals for the development of new static caravan (i.e. single or twin caravan), holiday chalet sites or permanent alternative camping accommodation will be refused within the Anglesey Coast Area of Outstanding Natural Beauty, Llŷn Area of Outstanding Natural Beauty and the Special Landscape Areas. In other locations proposals for new static caravan or holiday chalet sites and permanent alternative camping accommodation will only be granted where:
 - i. It can be demonstrated that it doesn't lead to a significant intensification in the provision of static caravan or chalet or permanent alternative camping sites in the locality; and
 - ii. That the proposed development is of a high quality in terms of design, layout and appearance, and is sited in an unobtrusive location which is well screened by existing landscape features and/or where the units can be readily assimilated into the landscape in a way which does not significantly harm the visual quality of the landscape; and
 - iii. That the site is close to the main highway network and that adequate access can be provided without significantly harming landscape characteristics and features.
2. In exceptional circumstances, proposals involving the relocation of an existing static or chalet site already located in the Anglesey Coast Area of Outstanding Natural Beauty, Llŷn Area of Outstanding Natural Beauty and the Special Landscape Areas that forms part of the Coastal Change Management Area to another site will only be permitted providing that criteria 1. i – iii are met and the new site is located outside the Coastal Change Management Area.
3. Within the Anglesey Coast Area of Outstanding Natural Beauty, Llŷn Area of Outstanding Natural Beauty and the Special Landscape Areas proposals to improve existing static and chalet sites by:
 - i. minor extensions to the site area, and/or
 - ii. the relocation of units from prominent settings to less prominent locations, will be permitted providing all of the following criteria can be met:
 - iii. the improvements does not increase the number of static caravan or chalet units on the site unless, in exceptional circumstances, proposals involve the relocation of existing static and chalet parks that fall within the Coastal Change Management Area;

- iv. that the proposed development is part of a scheme to improve the range and quality of tourist accommodation and facilities on the site; v. in the case of a site located within the Coastal Change Management Area, that the proposed development is also part of a scheme to improve the safety of occupiers or occupiers of caravans or chalets;
- vi. that the proposed development offers significant and permanent improvements to the design, layout and appearance of the site and its setting in the surrounding landscape;
- vii. is appropriate when considered against other policies in the Plan 4. Outside the Anglesey Coast Area of Outstanding Natural Beauty, Llŷn Area of Outstanding Natural Beauty and the Special Landscape Areas proposals to improve existing static caravan and chalet sites by:
 - i. minor extensions to the site area, and/or
 - ii. the relocation of units from prominent settings to less prominent locations, and/or,
 - iii. a minor increase in the number of units on site, will be permitted providing all of the following criteria can be met:
 - iv. That the proposed development is part of a scheme to improve the range and quality of tourist accommodation and facilities on the site;
 - v. That the proposed development offers significant and permanent improvements to the design, layout and appearance of the site and its setting in the surrounding landscape;
 - vi. In the case of a site located within the Coastal Change Management Area, that the proposed development is part of a scheme to improve the safety of occupiers of occupiers of caravans or chalets;
 - vii. That any increase in the number of static holiday caravan or holiday chalet units is minor and is commensurate with the scale of any improvements to the site;
 - viii. Is appropriate when considered against other policies in the Plan.

1. The housing market

The site campus is proposed to mitigate significant effects upon the local housing market. Phasing must be flexible to meet demand or to respond to variations in the make-up of the workforce. Measures are required monitor effects upon Gwynedd and to implement mitigation.

Current rental prices are unaffordable to some. Increases will affect vulnerable residents. A displaced population could exacerbate social problems. The Council has had no specific discussion on the Housing Fund.

2. Transportation and road infrastructure

Vehicle movements must be managed and arrangements will be required when Menai Bridge is closed.

County highways currently suffer illegal parking. This situation may be exacerbated particularly at peak construction. HNP proposes one park and ride site. This would not reduce vehicle movements nor address illegal parking across Gwynedd.

Appropriate phasing of the site campus could address some effects upon the housing market and reduce traffic. The Phasing Plan (ref 8.24) provides for its completion by Year 5 when there will be approximately 5,000 workers. There may already be highway effects. The WAS (ref. 8.4) states that there will be a DCO requirement for campus delivery. There is no reference within DCO requirements (WN17-25). The WMS (ref. 8.5) provides a commitment to high levels of campus occupancy. How can this commitment be enforced?

Commitments are needed to monitor where workers are living and how they are travelling.

3. Welsh language and culture

Measures contained within the WLIA (Ref. 8.21) have been reduced and are now less clear and definitive. Horizon's amendments appear to disregard the views of stakeholders.

A commitment to monitor and implement measures in Gwynedd is required. A potential mid-way review could too late to address effects already be occurring.

4. Public services and social characteristics

The documents provides little information on how needs will be met. For example HIA (ref 8.19) states that care provision is a matter for detailed planning. Whilst the HIA refers to the provision of on-site health facilities there is an absence of a DCO requirement to secure delivery.

5. The labour market

The use of local employment targets are supported and all parties must work together to ensure that local labour is maximised.

Local labour market activities should be extended and escalated as soon as possible.

Discussions should be held with the NDA and the Snowdonia EZB to consider how the project could contribute to maintaining the nuclear workforce of the Meirionnydd area.

6. The supply chain

The Supply Chain Charter is welcome. The Council wishes to see additional activity to develop the regional supply chain. Targets for local and Welsh produce and services are required.

7. The wider economy

Whilst there will be positive effects, some local businesses and organisations may not benefit and there is the potential long-term effect on the tourism industry.

HNP is aware of potential effects upon tourism but there remains a lack of consideration of the indirect and secondary effects of the development on other elements of the wider economy of North West Wales.

Agenda Item 8

GWYNEDD COUNCIL CABINET



Report to

a meeting of Gwynedd Council Cabinet

Date of meeting: 27 November 2018
Cabinet Member: Councillor Gareth Roberts
Contact Officer: Aled Davies
Contact Telephone Number: 01286 679003
Title of Item: Gwynedd Council Plan 2018-2023 - Bid for permanent resources to staff the new Dementia Units at Llys Cadfan, Plas Hafan, Plas Hedd and Bryn Blodau to support the implementation of the 'Redesigning Care Services' priority within the Council Plan.

1 THE DECISION SOUGHT

1.1 To allocate £808,000 to support the implementation of the Redesigning Care Services priority within the Gwynedd Council Plan 2018-2023 and to meet the requirements of Care Inspectorate Wales in terms of residential homes' staffing rotas.

2 THE REASON FOR THE NEED FOR A DECISION

2.1 The Gwynedd Council Plan 2018-2023 adopted on 8 March this year notes the intention to develop Dementia Units in the following homes:

- Llys Cadfan, Tywyn (development of an additional unit)
- Plas Hafan, Nefyn
- Plas Hedd, Bangor
- Bryn Blodau, Llan Ffestiniog (development of an additional unit)

With the work of investing in the buildings of Llys Cadfan, Plas Hafan and Plas Hedd already completed and the internal work at Bryn Blodau to be completed before the end of the year. Planning permission was recently granted for external works at Bryn Blodau and we are confident that this work will be completed before the end of June 2019.

2.2 This capital investment has been made with the resources of the Welsh Government's ICF fund. The Council succeeded in attracting the investment on the basis of evolving the services offered by the Council to respond to more severe needs and as a foundation to develop and strengthen our close cooperation with the Health Board and on a local level especially in terms of how our community teams operate. It is acknowledged that an element of risk arises from implementing parts of the plans before a final decision is made on resources and staffing capacity, but with the aim of developing services as a core part of the Council Plan preparations, the decision was taken to move forward and make use of the opportunities available through the ICF fund. The plans to develop the dementia unit services was a priority within the programme of plans that were prepared and agreed between the Health Board and the

Council.

2.3 There is now a need to decide whether or not the Council will allocate permanent revenue resources for the developmental programme. If we are to realise the aim of the developmental programme and make use of the new space as intended for the dementia units in the four locations, then this investment is crucial. Without the investment, the contribution of the four homes to the Council Plan aim of offering dementia care and end-of-life care / more intensive care nearer to home will be limited. Rather, the services will remain in their current less intensive form albeit operating in better and more suitable buildings.

2.4 Approximately £31,000 of the bid total relates to the need to respond to the requirements of Care Inspectorate Wales to strengthen rotas across the Council's Residential Homes.

3 INTRODUCTION

3.1 Each of the dementia units in question will be a home for 7 or 8 individuals. For each one, a 2:2:1 staffing arrangement will be needed, namely two members of staff on the morning shift, two for the afternoon / evening and one overnight. In establishing a new unit this briefly equates to an increase of 40 hours a day in more specialist care capacity in a home and the requirement is slightly less for homes where a Unit already exists. Additional support will be available at all times by the remaining staff of the residential home.

3.2 The bid is submitted for permanent resources to develop this service.

3.3 The care needs of individuals in our residential homes are already more intensive than they were years ago. With the effort to assist people to remain in their homes for as long as possible on the one hand and the lack of nursing beds on the other, the nature of the care needed in our residential homes is getting more intensive. Although the plans in question involve increasing the number of beds in our homes (there will be a small reduction in the total), the investment would support the movement towards more intensive care and specifically dementia care closer to home.

4 THE REASONING AND JUSTIFICATION FOR RECOMMENDING THE DECISION

4.1 The need to invest in changing the balance and nature of care in the Council's residential homes has been highlighted again this year with the closure of two private homes. The Llwyn residential home in Dolgellau closed in May and the Penisarwaun nursing residential home closed at the end of July. Whilst collaboration between the Health Board and Gwynedd Council has succeeded to secure local placements for those residents who were affected, it has also highlighted that the number of more intensive care beds and nursing beds in Gwynedd is not sufficient to meet future needs especially if we are to ensure that care can be offered close to the homes of the majority of the county's residents.

4.2 With private investment in more nursing homes in the area unlikely and increasing risks that other providers will disappear from the market, the Department's work programme has identified a series of homes where a relatively low level of capital

investment alongside revenue investment can offer opportunities to strengthen the provision offered in Gwynedd. This need for the four locations, namely Llys Cadfan, Plas Hedd, Plas Hafan and Bryn Blodau is recognised and prioritised in the Gwynedd Council Plan 2018-2023.

- 4.3 The Department has been very successful in attracting ICF funding to finance these capital improvements, with investment already having taken place in Llys Cadfan, Plas Hafan and Plas Hedd. The Department is working closely with the Property Service on the next investment at Bryn Blodau and it is hoped that this work will be completed by the end of June 2019.
- 4.4 Continuing to change the balance of care within the Council's residential homes over a period of time will involve investing in other locations over coming years. Although no resources have been allocated, the work of securing the plans and the permissions is now in place for the four sites. Implementing these plans will be the subject of further reports to Cabinet if and when the opportunities arise to realise them.
- 4.5 The Department will make every effort to attract external capital investment for these improvements and introduce plans to be considered through the Assets Plan process. The revenue implications of implementing this will be made apparent at the beginning of the process and the accompanying revenue bids to staff the units appropriately in order to provide the dementia services will be submitted through the usual bids procedure.
- 4.6 This bid is submitted for revenue resources based on 2018/19 costs. It is hoped to begin providing the new services in some of the homes early in 2019. The Department has been successful in attracting £174,000 in one-off funding to fund the service at Llys Cadfan, Plas Hedd and Plas Hafan during 2018-19. On this basis, it is not anticipated that there will be a funding gap in the service during 2018-19 however, as this money is available on a one-off basis, there will be a need to secure the full amount for every subsequent year. There will be a need to fund Bryn Blodau in full from July 2019. The nature of the service provision means that long-term funding must be secured before the service can be provided. If this cannot be secured then the services will continue at current levels and the one-off money from the ICF will be diverted to other schemes. It cannot be guaranteed that those schemes would be within Gwynedd.
- 4.7 Over recent months, a further increase has been seen in the number of individuals who cannot be discharged from hospital as a result of a lack of suitable care provision. There is a strong probability that these numbers will increase further over the coming years as people live longer. This is not beneficial to the individual or in terms of maintaining effective and sustainable health services.
- 4.8 Failing to strengthen the provision for dementia care is likely to have an impact on the lives of the county's service users. They would be more likely to have to move from their local community to get care and this could mean an impact on families visiting them and possibility care by non-Welsh-speaking staff in an unfamiliar culture. Without this revenue investment to coincide with the capital investment that has already been made, it will not be possible to make full use of the new resources or respect the wishes of the people of Gwynedd to remain in their area and maintain

contact with their families and local community.

- 4.9 Also, without the investment, it will not be possible to maximise the benefit of collaboration with the Health Board to provide more intensive care within the Council's residential homes.

5 NEXT STEPS AND TIMETABLE

- 5.1 With the approval this bid for resources, the Adults, Health and Well-being Department will advertise the new jobs with the aim of appointing, inducting and training staff to provide services early in 2019.

6 ANY CONSULTATIONS UNDERTAKEN PRIOR TO RECOMMENDING THE DECISION

6.1 Views of the statutory officers:

i. The Monitoring Officer:

The report highlights the journey of this matter leading to the request for revenue resource. The capital investment was through the ICF grant arrangements and we need to be alert to any undertakings or conditions consequent on the implementation of this financing. The recommendation and the observations of the Chief Finance Officer sets the decision and its implications in the Council's budgeting framework. It is appropriate therefore that the expenditure is identified as a priority bid to go forward for consideration when setting the Budget

ii. The Head of Finance Department:

Further to capital investment in order to convert the property, a developmental bid is submitted here for additional revenue resources for the Council's homes.

In terms of general future procedures, I note that such bids should be submitted when consideration is given to the original capital investment.

In this specific case, despite the fact that funding this would mean that the Council would need to realise further financial savings in other fields by 2019/20, I understand how the development will address unavoidable needs as the population of Gwynedd ages in the future. Therefore, appropriate consideration must be given to this bid for £808k of permanent revenue funds.

Effectively, a decision on this now will prejudice bids for resources in the 2019/20 budget, and if the Cabinet confirms the priority, we will plan accordingly.

REPORT TO THE CABINET

{26/11/2018}

Cabinet Member: Gareth Griffith

Subject: Establishing a regime to deal with the Council's duties as a Sustainable Drainage Systems (SuDS) Approval Body (SAB), under the Flood and Water Management Act, 2010.

Officer contact: Emlyn Jones, Senior Manager, YGC

The decision sought

1. That implementing the statutory duties of the SuDS Approval Body (SAB) is attributed to the Consultancy Service.
 2. To delegate the powers of the SAB under Schedule 3 of the Flood and Water Management Act 2010 to the head of the Consultancy Service, with the right for further delegation as necessary.
 3. To delegate the right to the Head of the Consultancy Service to establish a regime which decides on applications in line with statutory legislation and guidance.
 4. To delegate the right for the Monitoring Officer to amend the Delegation Plan within the Constitution to reflect this decision.
-

Opinion of the local member

It is not a local member matter.

Introduction

Schedule 3 of the Flood and Water Management Act (FWMA) 2010 dictates that surface water drainage systems for new developments should conform with National Standards for sustainable drainage systems (SuDS). Schedule 3 FWMA 2010 also places a duty on local authorities acting as SuDS Approval Bodies (SAB's), to approve, adopt and maintain systems which are in accordance with Section 17 of the Schedule. Welsh Government have announced that Schedule 3 will become operational in Wales on the 7th of January 2019.

Therefore, from this date, there will be a need for sustainable drainage systems for all new developments of more than one dwelling, or where the construction area is 100m² or more. Drainage systems must be designed and built in accordance with the required standards for sustainable drainage published by the Welsh Ministers. A flow chart which further describes the process has been included in Attachment 1.

The systems must be approved by the local authority acting in its role as the SuDS Approval Body (SAB) before construction works starts. The SAB will have the right to charge a fee for the approval of applications, with the fee being set dependant on the size of the development. Fees will be consistent throughout Wales as they have been included with the Legislation. The SAB will also offer a pre-application service, with the fee for this service set by each individual authority, which reflects the current Planning procedures.

It is important to note that the Planning and SAB procedures are separate, with individual legislation. Having said this, the requirements of one can influence the other, and vice versa. Meaning that developers will need to consider the drainage requirements of the site at an earlier stage in project development. This message will be reiterated by the Council through the pre-application procedure.

The process of approving a SAB application is a technical one which needs specialization in that field. All applications will need to show that they meet the criteria set out in the National Standards before being approved. The SAB will have a duty to consult with relevant statutory consultees. In Gwynedd these will be Natural Resources Wales and Welsh Water.

Applications will be approved subject to conditions. While the conditions will be dependent on the nature and size of the development, they are likely to include the need for a series of inspections during and on completion of the work, as well as construction bonds which will be held by the SAB until the work is completed to the required standard. An appeals and enforcement procedure has also been established, which is very similar to current Planning arrangements.

There is a duty for the SAB to adopt systems which serve more than one property, as long as they have been built and are operating in line with the approved proposals, including any conditions approved by the SAB. As part of approving an application there will be a need to ensure that funded maintenance arrangements are in place and secured through a legal agreement. The most likely way of securing maintenance funds for

adopted systems will be through charging a cumulative sum to the developer, similar to what is currently used in highway adoption.

The Government Guidance was approved by the Assembly on the 13th of November and confirms that it is the expectation that developers finance the repair and Maintenance of the systems following adoption by the local authorities. Although the Guidance identifies possible arrangements for securing these contributions it is fair to say that further work is needed to identify the precise and appropriate framework for this element. The Council has raised the matter with the Welsh Government. With Legal Services we will continue discussions with Welsh Government on this aspect

The responsibility over flood and water matters in Gwynedd sits within the Consultancy Service. The responsibility with regards to the SAB currently sits with the Cabinet, however the intention is that the SAB responsibilities will be implemented by the Consultancy Service. Specified officers within Gwynedd Consultancy will have delegated rights to implement the regime on behalf of the Council.

It should be noted that the responsibility for lack of compliance is also the responsibility of the SAB.

Forming the SAB is a new statutory duty for local authorities, but no additional funding will be available from Welsh Government. Welsh Government assessments have noted that the SAB should be self-funding in the long term, with the application fees covering the running costs, a copy of the assessment is included as Attachment 2. Through looking at historic Planning applications we predict that approximately 300 applications will be received by the SAB on a yearly basis, and that 3 full time members of staff will be required.

A significant investment of staff is needed to establish the SAB, developing new processes and regimes to ensure that the Authority is in place to receive applications from January onwards.

We estimate that the 300 applications will create an income of £181,771 against the SAB implementation cost of £179,197. The intention is to recruit one full time staff member, employ a temporary member and re-structure the duties of one existing staff to meet the need. This re-structure defers a proposed cut to existing budget till as such a time when the financial model has been tested (possibly after year 1).

We have agreed a proposal with the Management Team to borrow (around £ 87,000) for the cost of the temporary resource (and will be repaying that amount from any income the new body will create). The third appointment will be made based on existing YGC workloads.

Reasons for recommending the decision

Assessing applications of this nature is a specialised field which needs experience and relevant technical training. The Council currently operates a similar regime for the assessment of building regulations applications and ordinary watercourse consents. We expect a significant number of highly technical applications and it is considered that the recommendations meet the statutory needs with regards to the decision making process.

Relevant Considerations

Giving the right to officers to make decisions would facilitate ability to meet the statutory requirement of reaching a decision on standard applications within 7 weeks, and applications which need an Environmental Impact Assessment within 11 weeks. These arrangements are consistent with those currently being established within other Local Authorities throughout Wales.

Next steps and timetable

The new requirements will be operational from the 7th of January 2019, therefore the statutory regime needs to be in place by this date.

Opinion of the statutory officers

The Chief Executive:

The Monitoring Officer:

It is noted that Schedule 3 of the Flood and Water Management Act 2010 comes into force in Wales on the 7th of January 2019. From this date the Council will have statutory responsibility to deal with applications for sustainable drainage. The statutory guidance for the arrangements was recently approved by the Assembly. Reference is made in the report to the repair and maintenance arrangements and we will be working with the Service in order to establish an appropriate mechanism in relation to these matters. I note that the report recommends that the system is delegated for administration through Consultancy Services to work as the SuDS Approving Body. This is considered to be appropriate in order to meet the technical statutory requirements referred to above and will be operated in accordance with the Council's scheme of delegation.

The Head of Finance:

There is a legal requirement for the Council to establish a SuDS Approving Body by 7 January 2019, which means that there is a need to make a decision sooner rather than later on the delegation scheme that will be adopted within the Council to establish such a body. I have no objection to the arrangements set out in the decision sought.

The Welsh Government's Regulatory Impact Assessment (which appears in the appendix) shows an expectation that local authorities will attract net income when the new Regulations come into force (whilst recognising that there will be start-up costs), and Regulations for setting fees will also come into force on 7 January 2019. Therefore, although income and expenditure flows will be unstable at the beginning, the Approving Body is expected to be self-financial in the longer term. In this regard, I note from both the report and from the comments of the Monitoring Officer that further discussion with the Welsh Government is necessary in relation to certain aspects. I will keep close contact with relevant officers so that Finance is aware of any changes in the forecasts for income and expenditure of the Approving Body and will take appropriate action to respond to that

Attachments

Attachment 1 – Flow Chart of the SuDS approval process.

Attachment 2 – Explanatory Memorandum and assessment of regulatory impact.