

From: [PMO](#)
To: [Wylfa Newydd](#)
Subject: RE: IACC Deadline 2 Submission : Local Impact Report - Welsh Language and Culture (email 17)
Date: 04 December 2018 19:50:49
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[Annex 9C-9G \(Batch 4 of 4\).zip](#)

Please note, a number of emails will follow in relation to the LIR – we will confirm the final e-mail.

Pnawn Da/ *Good afternoon,*

Gweler ynghlwm cynrychiolaeth CSYM mewn perthynas â'r uchod / *Please see IACC's representation in respect of the above.*

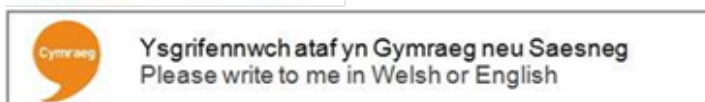
Bydd fersiwn Gymraeg yn cael ei ddarparu cyn gynted a phosib / *A Welsh version of the submission will be provided in due course.*

Cofion/ *Regards,*
Manon

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Mae'r neges e-bost hon a'r ffeiliau a drosglwyddyd ynghlwm gyda hi yn gyfrinachol ac efallai bod breintiau cyfreithiol ynghlwm wrthynt. Yr unig berson sydd 'r hawl i'w darllen, eu copio a'u defnyddio yw'r person y bwriadwyd eu gyrru nhw ato. Petaech wedi derbyn y neges e-bost hon mewn camgymeriad yna, os gwelwch yn dda, rhowch wybod i'r Rheolwr Systemau yn syth gan ddefnyddio'r manylion isod, a pheidiwch datgelu na chopio'r cynnwys i neb arall.

Mae cynnwys y neges e-bost hon yn cynrychioli sylwadau'r gyrrwr yn unig ac nid o angenrheidrwydd yn cynrychioli sylwadau Cyngor Sir Ynys Môn. Mae Cyngor Sir Ynys Môn yn cadw a diogelu ei hawliau i fonitro yr holl negeseuon e-bost trwy ei rwydweithiau mewnol ac allanol.

Croeso i chi ddelio gyda'r Cyngor yn Gymraeg neu'n Saesneg. Cewch yr un safon o wasanaeth yn y ddwy iaith.

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Sent by Email

Dear Roger,

Draft DCO Documentation Review and Associated Workshop (Llandudno, 21st and 22nd November 2017)

I write following a very informative workshop between representatives from Horizon, the Isle of Anglesey County Council (IACC) and Welsh Government to formally comment and feedback on the draft DCO Documentation which we received. We appreciate this opportunity to engage and comment. We remain committed to collaborate, and where possible, inform and influence the draft DCO documentation (prior to its formal submission to the Planning Inspectorate). We confirm that we will also be attending a separate Environmental Workshop on the 5th December where representatives from Natural Resources Wales will also be in attendance.

The basis for the IACC's contributions during the workshop were the comments received from thematic Topic Leads, following consideration and review of the draft DCO Documents Horizon have issued to date. In light of the guidance issued by Horizon at the onset of the process, it was agreed that the IACC's DCO review process would focus upon:

- a. Does the information provide sufficient detail/clarity on Horizon's proposals/position?
- b. Is the detail submitted adequate (i.e. in order to make an assessment)?
- c. Is there anything missing? This should be notable omissions only with a particular focus on mitigations.
- d. Are there any gaps in the information provided?
- e. Are there any changes or inconsistencies in the project detail following on from PAC2& PAC3?

The outcomes of the review process, as discussed during the workshop, can be summarised as:

- a. The documentation received does not currently provide sufficient detail/ clarity on Horizon's proposals/ position. As well as a lack of detail on the physical elements and timing of delivery of key components (such as the workers' accommodation blocks), many of the proposals are to be controlled by plans or strategies which have not been provided and therefore cannot be assessed. For example, the Workforce Management Strategy (WMS) which sets out how the workers living in the onsite campus will be managed is a key document in assessing whether the impacts predicted on neighbour communities are robust. The draft WMS does not currently provide the detail needed to allow impacts to be considered. However, if these plans and strategies are shared by Horizon as a matter of urgency, this would enable the IACC to make meaningful assessment as to whether the documentation provides sufficient detail and clarity; and if not highlight proposed changes for Horizon to include in their final DCO submission.
- b. The level of detail currently provided in the draft DCO documentation is not adequate to allow meaningful assessment of the proposed development. Some important baseline surveys and project design and implementation details are missing and many of the mitigation plans which are being used by Horizon to underpin their conclusions that impacts are acceptable are missing or incomplete and considerations do not always take into account that up to 4,000 people could be living temporarily on the site. Further, some impacts are noted but not fully explained in the appropriate places as in the potential noise and vibration impacts on schools in Cemaes and Llanfechell which are not properly addressed in the education section of the socio-economic considerations. It is critical that Horizon share this information with the IACC in a timely manner, for the reasons stated above.
- c. Some of the baseline data currently used is out of date or not robust and cannot be relied upon as an acceptable, robust, evidence base. As an example of this Horizon have used an out of date schools figure in their consideration of the potential impact of inward migration on school places. They have also used a travel to work area which is larger than that which would be created using the average travel to work commuting time. Horizon have also based a number of conclusions on assumptions (which are stated to be such). The IACC does not agree with all of these assumptions and the evidence base to address these points is being developed. The IACC are committed to working with Horizon to ensure that the baseline data is up to date and robust prior to the freezing of the DCO documentation.
- d. There remains a number of documents yet to be received (IACC have highlighted this with Horizon) and a number which are skeletal in nature and require to be developed further. For example in the Community Impact Report, which should be a key document to assist the local communities in understanding the potential effects on them, critical information is missing. Horizon's commitment during the workshop to share these additional materials (which are deemed important by the IACC) is welcomed. The DCO schedules which set out the application and scope of the powers sought in the draft DCO have not yet been provided, without these the Council cannot consider the acceptability in principle of the powers sought and, in particular, cannot agree to the inclusion of powers removing the need to

seek consents from the Council (such as the ability to make road traffic regulation orders).

- e. The linkages between effects and mitigation are currently not clearly mapped within the documents. There is no overall cumulative mitigation chapter in the Environmental Statement and the mitigation route map listed as a document to be provided by Horizon has not been received. It is not clear which documents take precedence in terms of setting out the mitigation proposals. As a result it is not possible for IACC to confirm whether the proposed mitigation is appropriate and fit-for-purpose, the overall package cannot be cohesively assessed and the IACC has no certainty that secure delivery mechanisms are being proposed. This issue is compounded by the dilution of commitments previously discussed with the IACC and other stakeholders which are expressed only as considerations in the documents giving no certainty of any mitigation being provided. The sharing of the key strategies and plans (detailed above) would enable the IACC to assess whether what is being proposed by Horizon is appropriate and fit for purpose and if not highlight proposed changes for Horizon to include in their final DCO submission.

Also as confirmed at the Workshop, the IACC has the following concerns regarding the draft DCO Documentation.

- Much of the currently proposed mitigation has no suitable trigger points or is proposed to be provided too late. Horizon's preference is to monitor impacts and then respond where they exceed the anticipated level - this will be far too late in many cases. For example, to ensure that the predicted level of local employment is reached, jobs and skills strategies need to start in advance of the project (i.e. during the Site Preparation and Clearance works), to create the pool of suitably qualified local people to take up jobs as they become available. Responding to over-subscription of school places once families have moved into the area is not practical as the lead times for providing additional capacity mean reactionary responses will not be sufficient. The impact on housing of workers seeking accommodation would have already exceeded the acceptable level causing harm to the communities before the proposed mitigation in the form of the next phase of on-site campus accommodation would be available. These examples show why the IACC needs to have clear and appropriate timings and triggers for the delivery of the project and its mitigation; reactionary provision will not provide the level of protection from impacts which is required.
- Based on the documentation received there is insufficient evidence of progress post PAC 2 and 3 consultations. Many of the issues previously raised in PAC2 and PAC 3 remain in relation to:
 - i. Jobs and Skills
 - ii. Economy and Supply Chain
 - iii. Worker Accommodation Housing and Management
 - iv. Highways and Transport
 - v. Welsh Language and Culture
 - vi. Certain environmental topics notably terrestrial ecology

Given the above the IACC remain concerned about the ability of the IACC to continue meaningful engagement with Horizon on the Statement of Common Ground without the necessary detailed information.

Further detail is provided in the attached Annex, to complement the above comments (which was used as the basis for our contribution during the workshop).

Despite this position, I emphasise again our belief that good, positive, progress was made during the workshop. The commitment to share and collaborate was evident. However, to provide the necessary clarity, understanding, confidence and reassurance (that Horizon understand local concerns and expectations and are working to establish workable solutions), a change in approach is required, with greater engagement and sharing of the important, meaningful written materials. This is critical, with the limited time and scope for making changes to the DCO documentation (given its confirmed submission date of the end of March 2018).

I also believe that sharing information at the pre-application stage will allow the Authority to start our own evaluation of the local impacts of the proposal, as encouraged in PINS Advice note one: Local Impact Reports.

With this timescale in mind, including the need to engage and brief Elected Members on progress since PAC3, our shared focus going forward should (as agreed during the Workshop) fall into two categories:

- a. Matters on which more understanding and detail is required to be included in the DCO submission, and
- b. Matters which need to be progressed and accelerated in parallel, recognising that they will require further development post DCO submission.

As soon as the IACC has had the opportunity to assess the additional documentation you have undertaken to provide we will assess which categories described above fall into one or other of the above two categories.

In addition to the points noted to date, the importance of the Horizon “Control Documentation” (as illustrated in slide 7 of the Workshop power point presentation), and associated material is also seen as critical. As was agreed, the IACC looks forward to receiving these draft documents at the earliest possible opportunity. We recognise that these are working documents, which are subject to review and further development.

“Control Documents”, such as the Worker Management Strategy are pivotal in assessing the impacts of the project on North Anglesey. For example, the WAMS is a key document due to its interactions with:

- Other temporary worker accommodation
- On-site parking and park and ride / share facilities on Anglesey and the mainland
- Impacts on the strategic and local highway networks
- Demand for local services and facilities
- Impacts on the Welsh Language and culture

It is hoped that the sharing of these 'Control Documents', and addressing the additional points noted, will be the key to improving our understanding of how the potential benefits will be secured and delivered, whilst in the same manner, managing and mitigating predicted negative impacts.

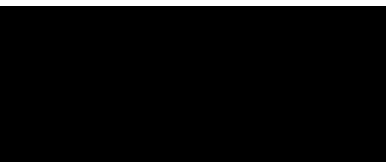
Other related priorities, which were also consistently highlighted during the Workshop, are the need for clarity on how the ambitions and commitments for jobs and growth will be achieved. It is hoped that this be outlined in the Education, Jobs & Skills Action Plan and Supply Chain Action Plan. It was pleasing to hear that Horizon has been progressing these matters internally and that latest draft documents will be shared. We discussed developing the structures and terms of reference for the Employment & Skills Service (that is soon to be piloted), and adding impetus to meetings to work up detailed and complementary Action Plans. These exercises will not be completed by the date of your DCO submission and will continue thereafter. However, as stated above, this will need to be highlighted in the Control Documents and DCO submission.

We also highlighted the importance of 'non-statutory' means of helping deliver these key outcomes of the Wylfa Newydd Projects. In particular, I refer to the commercial/procurement arrangements through principles to be followed in Charters and Terms and Conditions of contracts through the supply chain at all levels of the project. I again emphasise the importance of ensuring principles, commitments and agreements reached through the statutory planning process are embedded and delivered through the projects commercial activity (which has already commenced through both Horizon and Menter Newydd). This is hopefully happening now, with both Horizon and Menter Newydd creating the foundations for local success in ongoing commercial dialogue and processes (to establish the necessary supply chain to deliver the construction project).

What I have sought to outline above are the key priorities which we are eager to progress during the pre and post-DCO submission period. Other issues will be recorded in the notes and agreed actions from the workshop. I would be grateful if Horizon could consider and respond positively to the issues and requests outlined in the attached Annex (ahead of the DCO submission date).

I look forward to continued engagement, dialogue, and collaboration to further influence the DCO submission. This focus and effort will hopefully contribute towards creating the foundations and reassurance to enable the project to proceed, and to succeed commercially and in providing a positive impact to the host community of Anglesey (and beyond).

Yours sincerely,



DYLAN J. WILLIAMS

Pennaeth Gwasanaeth – Rheoleiddio a Datblygu Economaidd
Head of Service - Regulation and Economic Development

APPENDIX A – RESPONSE TO DRAFT DCO DOCUMENTATION

1. Project Control Documents

- 1.1 IACC confirms that we have not seen the following information which forms part of the projects 'Control Documents'. IACC sees the suite of 'Control Documents' as being of critical importance to inform the DCO process as they are a means of securing all proposed methods of mitigation.
- *DCO Schedules (under exception of the outline requirements schedule)*
 - *Landscape and Habitat Management Strategy*
 - *Phasing Plans*
 - *DCO Plans*
 - *Sub CoCPs*
 - *Design and Access Statement: Power Station and off-site facilities*
 - *Design and Access Statement: Associated Development*
 - *Parameter Plans and Tables*
- 1.2 Horizon needs to share the above referred to information with the IACC and relevant key stakeholders sooner rather than later to allow time for review and feedback.
- 1.3 A draft of the DCO requirements schedule was received however this was substantially incomplete. The sections which had been completed are in some places still drafted with contradictory alternatives included. The Council cannot therefore make meaningful comment on these. Given the importance of the requirements in controlling the impacts of the development, and that the Council will be the enforcing authority for these, it is advised that these are progressed as a priority and a fuller version provided to the Council for review ahead of the DCO application being submitted.
- 1.4 As a general point, there is a lack of informative illustrative figures included in documents to aid in explaining matters. These could assist in providing the necessary understanding of what will happen, where it will happen and when the relevant works will occur. IACC would expect for example, that during the key site preparation work phase, illustrative figures would be presented reflecting at least a 3 month cycle (quarterly) change in excavation/stripping footprints and the progressive formation of temporary/permanent soil/rock mounding. These details are important as potential disturbance to local residents with respect to plant movement, haul road locations and trafficking, soil and rock placement and potential noise, vibration and dust arising's will be highly dependent on mounding footprints, early attenuation bund formation and interim restoration details such as temporary seeding and vegetation establishment.

Mitigation Route Map

- 1.5 IACC acknowledges that Horizon confirmed at the Workshop that they are preparing a Mitigation Route Map which maps out all of the project's proposed mitigation. As previously advised, the IACC would appreciate sight of this map as soon as practicable (even in draft if necessary) in order to gain a full understanding of all of the mitigation proposed and confirmation of the triggers that will result in the mitigation requiring implementation during different stages of the project.

Limits of Deviation and Parameter Approach

- 1.6 IACC has previously confirmed that it is important for us to have a clear understanding of the extent of the development against which the extent of impacts and adequacy of mitigation can be assessed.
- 1.7 The DCO documentation attempts definition by the provision of parameter dimensions and limits of deviation. Without the accompanying plans showing the works areas and zones these parameters do not create readily comprehensible definitions. The DCO provides a number of works and powers which are defined by reference to plans and schedules which have not been included; without this detail it is not possible to come to a clear picture on the scope of works, powers and impacts.
- 1.8 IACC requires that the DCO schedules and plans setting out the geographical extent of works and the application of the powers sought are forwarded to us to allow us to relate the development extent to receptors such as highways, rights of way and habitations. At this stage, without these documents we cannot provide meaningful comment on the Parameter Approach. It would also be beneficial if these could be provided as 3D representation of the Work. Until these plans have been provided it is not clear to IACC how Horizon are defining the 'zones' and the 'works' on these plans and what difference between these two terms may be.
- 1.9 Similarly, without the Development Plans and Land Plans, it is not possible for the IACC to comment meaningfully on the proposed horizontal limits of deviation.
- 1.10 The maximum heights of elements in AOD are set out in the ES but not in the parameters plans. This should be clarified and confirmed as taken together with the unlimited vertical limit of deviation sought in the draft DCO this has potential to create uncertainty as well as give rise to wider potential range of other impacts.
- 1.11 Similarly it would be helpful if there was an attempt to provide a visual summary of the main areas outside of the Work package parameters impacted directly or

which are subject to other powers (including road traffic and street works powers). This would help visualise proximity of activities to receptors.

Documents that have not been reviewed and do not form part of this response

- 1.12 Horizon should note that several documents as listed below were received by IACC separately to the receipt of the 'Draft DCO Documents' submission. In the given timescale we have not been able to review these documents and they do not form part of this response. These documents include the following;
- *Cumulative Effects Assessment (including inter and intra effects)*
 - *Power Station Off-site Facilities: Alternative Design Evolution*
 - *Dalar Hir: Alternative Design Evolution*
 - *A5025 Offline Highways: Alternative Design Evolution*
 - *Assessment of Combined Heat and Power Opportunities at Wylfa Newydd Power Station*
- 1.13 We will be responding to the above documents separately once we have had the opportunity to review.
- 1.14 We also confirm that we have not received the following documentation which are listed on Horizons DCO Documents list;
- Logistics Centre: Alternative and Design Evolution
 - Power Station Main Site: Alternative and Design Evolution
 - Energy and Carbon Report
 - DCO Sustainability Statement
- 1.15 Again we would appreciate if Horizon forwards copies of these documents to IACC and any other key stakeholders once available.

Codes of Construction Practice (CoCP)

- 1.16 As the CoCP and sub CoCPs will provide the main mitigation and monitoring framework for the project, IACC expects these documents to provide full details of the construction related activities in order to be able to adequately assess the environmental effects of the proposal and confirm if mitigation proposals are satisfactory.
- 1.17 Further detail and clarification is required to ensure that the submission addresses the physical works in relation to the project and that the documents confirm the relevant controls that are proposed to avoid or minimise environmental effects. Where detail is available elsewhere in the ES, cross-referencing should be made, in particular to detail included in the Construction Method Statement (CMS).

- 1.18 For many topics, the CoCP is generic and not project specific. The CoCP cannot not just reproduce standard best practice, professional guidance and compliance requirements that should be applied to any large scale development. It is essential that Horizon recognises the unique character and environmental sensitivities and constraints that apply within the entire zone of influence of the project.
- 1.19 The full complement of sub CoCPs should be provided at the earliest convenience.

Construction Method Statement

- 1.20 The Construction Method Statement as currently presented does not give the IACC the level of clarity and detail that is required to understand the methods, phasing and practical implementation of the construction phase of the project to allow an assessment of the environmental effects of the proposal.
- 1.21 This document appears to have been given a very significant status with respect to informing the EIA input details that are required for specific topic assessments. Notably paragraph 1.3.2 strongly infers that the CMS has been used as the basis of the EIA. This paragraph also indicates that minor variations to the construction methods presented in the CMS document could occur but IACC's review of this document indicates that many aspects relating to construction details (e.g. footprints and methods of implementation) remain to be determined and that very little detail provided in the CMS as currently provided can be assumed to be secure with respect to the key issues that underpin robust EIA e.g. what will physically happen where, when and for how long.
- 1.22 As a result, the outcome of the assessments for specific topic areas for the EIA may be flawed in terms of significance and therefore not of material value with respect to identifying mitigation. As the EIA is one of the key mechanisms for determining DCO requirements this is unacceptable. Of particular concern are the uncertainties with respect to overall materials balancing, and the potential need to import significant volumes of material, the lack of spatial detail, and uncertainty concerning key elements of the marine works, which required to be rectified if the conclusions are to be accepted.
- 1.23 The phasing details are provided at a very high level and do not give the clarity required for IACC to understand the scale, duration and scope of the physical works that will occur at key stages of the project. Early screening mounding footprints and earthworks phasing are required in greater detail as these are key issues with respect to gaining an understanding of potential effects on landscape and visual amenity and also effects related to air quality and noise and vibration that may be experienced by residential receptors in particular. Having sight of the Phasing Plans would prove to be beneficial in order to have

a full understanding of the timing of the different components that form the proposed development.

- 1.24 With reference to the above we note under para 2.1.1 that phasing details will be subject to a Requirement under Schedule 3 of the DCO. IACC welcomes this commitment but is unable to respond to this requirement without the provision of more precise details regarding the construction programme and related works (Draft DCO requirement MS3 refers to the CMS and states that the phasing set out within the document should be adhered to unless otherwise agreed).

2. Construction Workers Accommodation and On-site Facilities

Comment on Workforce Accommodation Strategy (WAS)

- 2.1 The purpose of this document is to set out how Horizon will plan, monitor and manage its approach to accommodating workers. IACC considers that there is insufficient detail within the strategy on how this will be realised.
- 2.2 In principle the development of some on-site campus accommodation for key or essential workers is supported by JLDP policy when located within the Wylfa Newydd development area provided that the proposed development aligns with Policy PS 9, Policy PS 9A and a range of Policies that consider impacts on areas of local, national and international value to landscape (e.g. views into and out of AONB), biodiversity (e.g. SSSI) (Policy PS 16) and heritage (Policy PS 17) as well as impacts, for example, on the safe and free flow of traffic, e.g. onto and along the A5025 (Policy TRA 1). Compliance is also required with Wylfa Newydd SPG Policy GP 10.
- 2.3 The Strategy relies on additional accommodation which is anticipated in the JLDP, to be delivered in advance of the peak of construction, both within the Private Rented Sector and the owner occupied market. The Strategy makes no provision for this to be actually delivered.
- 2.4 The IACC welcomes the commitment to provide a Housing Fund. However the strategy lacks detail in relation to the role, purpose and size of the Housing Fund in order to ensure the timely delivery of bed space provision (in the right locations) that the WAS relies upon to accommodate the workforce. There is also limited reference to funding officer time to deal with increase homelessness only. As previously confirmed, the Fund needs to be in place in advance of construction to support the provision of new accommodation including affordable and social homes for rent, prior to the arrival of construction workers on the island. Timescales should be agreed with the IACC which should include a phased delivery of new accommodation ahead of and throughout the construction period.
- 2.5 The WAS identifies that policy requires purpose built worker accommodation but does not assess or consider alternatives to an on-site TWA when there are other forms of permanent accommodation which could be provided.
- 2.6 The WAS ignores the stated objective of delivering legacy accommodation and skips straight to the provision of an on-site campus to deliver TWA. IACC expects the strategy to provide commitment with regards to delivering legacy in order to manage expectations and to provide an indication of the possible legacy.
- 2.7 The WAS makes no assessment of the potential displacement of local people from existing accommodation, noting that the gravity model predicts that the workforce will be predominantly located in the north of the island. There is

concern that local people will be displaced in favour of workers, especially in the north of the Island.

- 2.8 The Strategy assumes an average of 2.9 bed spaces per property in the Private Rented Sector. It would be more reasonable for the number of available bed spaces to be linked directly to the number of bedrooms within individual properties. Workers are very unlikely to share a bedroom in the same way that a family would.
- 2.9 IACC does not agree with the suggestion that there is considerable 'spare' capacity in the existing housing sector. Assessment utilising this data could be misleading. The private rented sector in particular is already under significant stress. The supply figures for tourism and caravans vastly exaggerates the actual level of realistic supply available to accommodate construction workers. Only 40% of tourism accommodation is included due to pricing (due to workers overnight allowance pricing them out of the higher-end offer). This may therefore create price pressure at the lower end of the market and this requires further assessment.
- 2.10 As confirmed at the Workshop, an Anglesey Bed Stock survey has recently been commissioned. We anticipate that the survey results will be available post DCO submission and will require consideration in terms of the available capacity to accommodate workers.
- 2.11 The Strategy makes assumptions regarding the use of self-catering tourist accommodation but makes no assessment of whether or not this accommodation is available, can legitimately be used in the context of existing planning and licensing conditions, or whether the accommodation providers are willing to accommodate Wylfa Newydd workers.
- 2.12 We have previously highlighted in our response to PAC3 that many of the existing caravan sites are restricted in their ability to accommodate non-tourists, or are unable to operate for 12 months of the year. Additionally, the Council has identified concerns, (including health concerns), that some caravan accommodation offers a standard of accommodation which may not be suitable for winter occupancy.
- 2.13 The WAS seeks to set out a comprehensive assessment of the baseline position, but it does not examine the location or suitability or the allegedly available accommodation, particularly in the private rented sector and tourism sector. There is a need to undertake spatial analysis and agree suitable thresholds for each area.
- 2.14 The WAS relies too heavily on a series of assumptions regarding the availability of existing accommodation and tourism accommodation. Critically it assumes the timely supply of new stock at a rate well above the historical rate of delivery without any intervention. The WAS needs to take account of the Gravity Model when making assumptions about the availability of existing accommodation and tourism accommodation in particular geographies.

- 2.15 The WAS needs to map available accommodation against delivery of the TWA as the workforce grows to ensure that the construction of the TWA does not cause unanticipated impacts on the housing market and tourism sector.
- 2.16 The IACC also requires confirmation as to whether the site campus is to be developed in phases, the criteria for initiating further phases, and the lead time for construction. This information is required to ensure that there is suitable mitigation in place for each phase and for restoration.

Worker Accommodation Management Service (WAMS)

- 2.17 JLDP Policy PS 9 requires that the accommodation requirements of construction workers should be met in a way that minimises impact on the local housing market and does not result in unacceptable adverse economic, social, linguistic or environmental impacts. The WAMS' success and effectiveness as a tool to manage worker accommodation impacts depends on whether or not construction workers will be required to use it. Its value would be diluted if use is optional and not mandatory.
- 2.18 As previously confirmed, the WAMS needs to be established and operational before the start of construction of the Wylfa Newydd Project.
- 2.19 IACC welcomes the commitment to the WAMS as previously confirmed, however there is insufficient detail on how the WAMS will be managed and how the role of the Oversight Board will be effective in managing demand and mitigation measures. The Board must have access to data about the whole workforce and have the necessary powers to intervene. This is not currently guaranteed in the strategy for the WAMS.

Workforce Management Strategy

- 2.20 IACC expects the Strategy to confirm how the workforce will be expected to behave, what measures Horizon will be put in place to enforce behaviours and how the measures will be reported on and enforced. This will provide the local community with reassurance as to what they should expect during the construction and operational phase of the development.
- 2.21 IACC requires confirmation as to whether the Strategy is applicable to the whole workforce or only to those which Horizon will directly employ. IACC requires the Strategy to be developed for the whole workforce.
- 2.22 The principles read as a broad collection of intentions rather than a clear strategy for how the workforce will be expected to behave, what measures Horizon will put in place, how those measures will be reported on and enforced. The Strategy needs to give confidence about the behaviour of workers and the standards which Horizon are offering to the host communities. The Strategy needs to include confirmation of how measures will be put in place and how reported on and enforced.

- 2.23 The Strategy needs to describe a holistic approach that is applicable to the entire workforce and needs to refer to promoting community cohesion.
- 2.24 IACC wish for the submission to confirm that the Principles of the Code of Conduct will be included in the supplementary project agreement which will be project specific and will be over and above the need to comply with the NAECI agreement.

Infrastructure and facilities on -site

- 2.25 The IACC welcomes the intention to provide on-site facilities as part of any accommodation provision, however the submission lacks confirmation as to the extent and scale of common facilities such restaurant, lounges, gym and outdoor pitches to be provided in the initial phase and whether these are to be scaled up with the triggering of further phases of the site campus. This information is required so that IACC can assess whether the on-site facilities will meet the need of the workforce without adversely affecting existing local facilities including local leisure centres as set out in Policy PS 9 and Policy PA 2 of the JLDP.
- 2.26 Clarification is required as to the location and scope of medical services that will be provided on-site and confirmation whether construction/operational workers at other sites will be able to access these services.

3. Economy and Supply Chain

- 3.1 The IACC requires that local companies are given the opportunity to participate fully in the supply chain during the construction and operational phase of the project. Although we recognise the commitment in the submission to Supply Chain opportunities and the confirmation that local businesses opportunities will be maximised, further details are required in relation to the detailed, funded and monitored delivery plan.
- 3.2 IACC wish to see a draft of the Supply Chain Action Plan to identify how opportunities can be maximised and to confirm if benefits can be achieved. The Plan needs to be commercially driven and it is essential that it is developed alongside the Employment and Skills Action Plan. We welcome the opportunity to work collaboratively with Horizon on the development of this Plan.
- 3.3 IACC recommends that such a plan is developed from the Nuclear Sector Strategy and for it to be regionalised for North Wales. Menter Newydd's engagement and early contract activity alongside Hitachi's work with UK partners is fully encouraged by the IACC.
- 3.4 IACC also needs to have a clear understanding of how much capital projects and general supply chain spending will be available for local companies to bid for. Linked to this, it is currently unclear what type of supply chain spending opportunities would be available, their size and timings.
- 3.5 We understand that a trial of the Wylfa Newydd Employment and Skills Service will commence in early 2018 with the aim of centrally locating all Project job vacancies. This is welcomed as a positive step forward and should be aligned to the site preparation works to provide a trial phase.
- 3.6 The submission notes that within the Local Area of Influence, a 5km radius from the boundary of the development area, there could be an increase in customer base and consumer spending from construction workers. However there is no attempt to quantify the likely scale of such benefits. Likewise it is noted that some tourism-related businesses may lose traditional tourism related revenue, but that this could be offset through construction workers accommodation spend and general consumer spending, however the submission elsewhere confirms that on-site services provision will remove the requirement for workers to utilise local services off-site. Again however there is no quantification of the likely impact. The opportunity to secure contracts for retail services on site is mentioned but no detail provided. These omissions and contradictions need to be addressed.
- 3.7 As previously noted the submission should cross-reference to other parts of the submission where further relevant information is available i.e. the Socio-economics chapter refers to other documents such as the CoCPs where information relating to worker transportation is available.

4. Tourism

- 4.1 Tourism is a key economic sector for the Island both currently and in the long term. The IACC welcomes Horizon's recognition of the importance of the tourism sector to the Anglesey economy. Tourism must be given careful and thorough consideration.
- 4.2 The proposed mitigation, including the creation of a Tourism Fund, is a critical element in ensuring that the various impacts on the sector do not adversely affect the wider economy. The proposal of a tourism fund is welcomed in principle. However for the Fund only to be valid for 2 years after construction is wholly inadequate, considering the importance of the sector to the Island. An agreed tourism fund needs to be in place to focus on branding and perception pre-construction and to continue for 5 years after the power station becomes operational as minimum. Further clarity is also required regarding the scope of activity of the Fund as previously requested in our PAC3 response.
- 4.3 The Fund will also need appropriate governance and decision making arrangements to ensure sound and objective decision making we would be keen to discuss this level of detail pre-submission.
- 4.4 The IACC remains concerned that the level of additional demand from Wylfa Newydd is likely to cause labour shortages and displacement in existing sectors and businesses, including in the tourism sector. This presents the opportunity for Horizon and its supply chain to invest in training in specific areas to ensure there is an adequate supply of labour for the demand created by Wylfa Newydd. This would also help mitigate displacement impacts and provide a sustainable legacy from the project to support key sectors of the economy including tourism.
- 4.5 We note that the submission confirms that it is anticipated that the Visitor and Media Centre would be open at the start of operations on-site and it would be a permanent facility, with no planned decommissioning strategy.
- 4.6 The submission then refers to the planned provision of the Visitor and Media Reception Centre that would add to the overall tourist appeal of the area during the operation period. We note the commitment to deliver a permanent Visitor and Media Reception Centre on site within 5 years of the end of construction which would be consented outside of the Wylfa Newydd DCO Project by planning permission through the Town and Country Planning Act regime. We welcome the confirmation that the design and facilities contained within the centre will be subject to discussion with key stakeholders in advance of planning permission being submitted and also welcome the acknowledgment that there is an opportunity for this centre to provide facilities for tourists and local visitors to gain a greater understanding of the Wylfa Newydd DCO Project and the Energy Island Programme, and for the centre to act as a community resource with a café and children's play area. The centre could also be used to showcase local produce (e.g. food and crafts) and boost the associated brand for this produce.

- 4.7 The IACC wish confirmation that a visitor centre will be available throughout the construction and operation phase and that the facility during the construction phase will be designed to be a wet weather visitor attraction and not just a viewing platform.

5. Highways, Transport and Infrastructure

Traffic and Transport Strategy

- 5.1 Whilst the Traffic and Transport Strategy is useful in setting out broad intentions, IACC would have expected to be in a position to comment on a comprehensive Travel Management Strategy that would provide details in relation to traffic movement predictions (across all relevant modes) and controls in relation to freight, workers, import and export of primary bulk construction materials, bulk earthworks and excavation materials and make-up materials and ancillary site support requirements. The Strategy should also provide detail of monitoring performance against targets and the mechanisms that are to be implemented if performance is not met. Consideration of movements during outage is also required. Travel Plans need to be prepared and agreed.
- 5.2 As already advised, details of the on-site facilities that will be available to employee/contractors should be provided as these will impact on traffic movements.
- 5.3 IACC acknowledges that Horizon has a car-sharing target of 2.0 workers per car for the project. There is lack of evidence to demonstrate that a car share of 2.0 project wide is achievable or realistic and detail is required of the initiatives Horizon will offer its workers to encourage car sharing.
- 5.4 There is a lack of evidence to demonstrate that a car-sharing database that records daily shift patterns for each worker together with home location that then matches workers who could car share has been previously utilised successfully, especially on a similar NSIP. Detail is required as to how Horizon will enforce workers to register on the database. Mitigation should be provided as a contingency should the database underachieve its car-sharing targets. Mitigation could be in the form of strategically located park and share sites which could allow workers to make informal arrangements to car share the onwards journey to Dalar Hir or the main project site.
- 5.5 Confirmation is required on the number of parking spaces provided at the main project site along with confirmation on how Horizon will manage to split the users of car parking spaces at the main site and Dalar Hir. Details is required of the number of car parking spaces that will be provided and if they will be scaled over time to meet changing demand. If detail is provided elsewhere in the submission, cross-referencing should be added.
- 5.6 Further information is required in relation to the car parking provision at the campus and details on how workers will travel to site.
- 5.7 The Planning Statement confirms that a total of 400 spaces will be provided for workers i.e. one for every ten workers. We require further clarification as to how this number of spaces has been derived, if the parking is to be phased, and if the parking is temporary/permanent.

- 5.8 The potential for HGV deliveries outside of normal working hours requires to be agreed. IACC expect to see further information provided on the number and management of vehicles accessing the site in advance of the provision of the MOLF, A5025 improvements and the Park and Ride.
- 5.9 Clarity is required as to the frequency, timetabling, routing and capacity of bus provision.
- 5.10 Horizon have used information from National Grid's North Wales Connection project website to obtain National Grid's estimated construction traffic volumes. This is unacceptable as the IACC have concerns with the accuracy of the traffic data available on the website. The IACC recommends that Horizon formally agrees the traffic data that is to be used for the traffic modelling with National Grid and that the Assessment supporting the submission is updated accordingly.

Timing of infrastructure and Early Years Strategy

- 5.11 IACC requires assessment of the likely impacts of the development on the highway network during the early years of the project i.e. prior to the operation of the MOLF and A5025 bypass. The IACC requests forecasted construction traffic volumes for each quarter from the commencement of the project construction programme through to the opening of the A5025 bypasses and the MOLF being available. This will identify where the significant effects is greatest, which can subsequently be assessed as part of the Early Years Strategy. This will identify the environmental effects as well as aid the identification of an acceptable volumetric threshold of construction traffic routed along the A5025 prior to opening of the bypasses.
- 5.12 Horizon should demonstrate how they intend to future proof the existing A5025 during the early stages of the construction programme, particularly the section of highway between Section 8 of the on-line improvements and the existing Wylfa access road to provide resilience to the network and to avoid the potential significant disruption to its construction programme. .
- 5.13 The IACC are concerned that without details of a comprehensive Travel Management Strategy being made available for comment, there is potential of the A5205 along, Pentraeth, Benllech, Amlwch to Cemaes and sub rat runs being utilised by construction workers. IACC require confirmation that monitoring will take place of traffic on minor roads to avoid rat runs.
- 5.14 IACC are concerned regarding the certainty on the timely availability and operation of the MOLF and require confirmation on the estimated frequency of use of MOLF. IACC agrees in principle for the MOLF to receive 80% of materials with a worst case scenario of 60% being assessed. This should be met throughout the whole construction programme.
- 5.15 Confirmation is required as to how materials will be delivered during construction of the MOLF this could be through the provision of a 'pre-MOLF' Transportation

Plan (which would include details of management and control). A 'post- MOLF' Transportation Plan should also be provided.

- 5.16 Clarification is required as to what the contingency plan is should the construction of the MOLF, A5025 improvements or Dalar Hir be delayed. Details are required also of the contingency measures that will be in place in the event that the Britannia Bridge is closed.

6. Welsh Language and Culture

Draft Welsh Language and Culture Mitigation and Enhancement Strategy for Wylfa Newydd (WLCMES) August 2017

- 6.1 During all discussions, the IACC has set out its expectations for the Welsh Language and Culture to be treated as an all-encompassing theme and golden thread, underpinning consideration of impacts and mitigation of all aspects of the Wylfa Newydd project. In addition, Welsh language and Culture is also one of the seven Wellbeing goals required to be taken into account (together with the principles of sustainable development) in the decision-making for the project. The public bodies, including IACC, require the necessary information to enable them to discharge these duties in relation to Wylfa newydd.
- 6.2 We remind Horizon that we have previously recommended that a section is included in each chapter of the DCO submission documentation which gives consideration of the Welsh language implications of that particular ES theme.
- 6.3 The IACC appreciate Horizon's acceptance that the in-migration of non-Welsh speaking construction workers will reduce the proportion of Welsh Speakers. However, the impact and therefore the appropriate mitigation, of this in-migration will be dependent upon the number of workers migrating, their dependent, their location, school places required, and degree of interaction with the communities in which they are residing and the duration of their stay.
- 6.4 IACC has significant concerns with the contents of the revised version of the WLCMES as some mitigation proposals that we welcomed in the March 2017 version of the WLCMES have been amended/diluted and some omitted without the provision of an evidence base underpinning these changes.
- 6.5 Since March 2017 the programme has intensified in the North of the island and now includes a total of 4000 workers being accommodated at the site campus. The IACC has already expressed concern about the decline of Welsh speakers in this area, which could be compounded by these proposals which would see an influx of workers and their families to the North of the Island. It is crucial that Horizon provides more information on Worker Management proposals.
- 6.6 The IACC is also concerned that the wording in this document in many instances has moved from commitment to consideration.
- 6.7 Example of omissions of commitments that were included in the March 2017 version of the WLCMES include;
 - a. a commitment to include a linguistic target for relevant jobs;
 - b. a commitment to include a linguistic courtesy for all Wylfa Newydd construction and operation staff;
 - c. a commitment to being proactive in encouraging staff to develop Welsh Language skills through training courses; and

- d. a commitment to use employee appraisals to establish skills requirements for specific roles.
- 6.8 Example of omissions of actions that were included in the March 2017 version of the WLCMES include;
 - a. Ensure that Menter Newydd and suppliers in Tiers 2 and below provide information on their Welsh language capacity and how they will adhere to Horizon's Welsh language policy;
 - b. Ensure Menter Newydd and suppliers in all tiers are encouraged to offer a bilingual service in public facing roles;
 - c. Training module for encouraging community leadership and linguistic integration skills; and
 - d. Funding of community projects.
- 6.9 The dilution and condensing process undermines the transparency and legitimacy of the revised strategy as it was undertaken without reference to the Steering Group which was established by Horizon to engage with key stakeholders.
- 6.10 Detail is required on how exactly the Welsh Language Impact Assessment Steering Group will evolve to monitor and assess all progress on an independent basis.
- 6.11 It is disappointing to note that whilst Horizon commits to data collection on families moving into the area, no such commitment is made to collect data on the language skills of its workforce and to update this data periodically. This baseline information is vital to establish a baseline for Language Skills Strategy. This approach would assist Horizon to measure the language skills progression of its workforce.
- 6.12 The nature and complexity of the project highlights a need for a specific fund to cover unforeseen circumstances. The mitigation response must have sufficient flexibility to respond urgently when the need arises.
- 6.13 Intensification of the project in North Anglesey needs consideration from a Welsh Language perspective in order to work closely with families to promote integration and decrease community tension. A rolling programme is required to fund a Community Bilingual Activities Officer in each secondary school catchment area (5 posts). The programme should thereafter progress to the rest of the Island.
- 6.14 IACC is concerned regarding the lack of commitment and focus to upgrade STEM facilities in schools. This is essential from a Welsh language perspective to ensure that local pupils who study these subjects bilingually are provided with first class facilities to progress successfully to further and higher education and ultimately be in a position to compete for employment opportunities at Wylfa Newydd.

- 6.15 The IACC is supportive of commitment in the WLCMES to appoint a Welsh Language and Culture Co-ordinator to assist in the further development, implementation and monitoring of an agreed programme of actions but is very disappointed that the recruitment process has not commenced. The IACC has previously confirmed in our response to PAC3 that we would be happy to provide any support or input in relation to the recruitment process and requested the opportunity to review and comment on the job description prior to advertisement of this role. IACC considers that for the role to have an influencing capacity the post holder needs to be at a senior level.
- 6.16 There is a need for a commitment to commence some mitigation early to allow for adequate lead in time e.g. peripatetic language immersion provision.
- 6.17 Immediate investment and intervention is required in order to plan mitigation effectively, with particular focus on the North of the island.

7. Education and Skills

Jobs and Skills Strategy

- 7.1 The IACC recognises that the project can offer significant opportunities for the local economy. Employment creation will have an immediate positive impact, whilst investment in skills and training could boost the supply side of the economy through encouraging an enlarged labour pool with higher levels of productivity. In addition, the ability for firms and individuals to gain nuclear construction related experience should provide longer term opportunities to secure contracts for the maintenance of Wylfa Newydd once operational, and work on future nuclear new builds in the UK and elsewhere. Consequently, the IACC are eager that all stakeholders work together to maximise the benefits for the local labour force and local businesses to help transport the local and regional economy.
- 7.2 The development of the Jobs and Skills Strategy is welcomed, as is Horizon's commitment to work with local education providers and other stakeholders in delivering training. The development of the WNESS and its role in helping companies to backfill roles should be particularly useful.
- 7.3 However, the information in the Strategy has not progressed significantly from PAC3 and therefore Key Issues raised remain. IACC therefore remains concerned regarding the lack of detail in the Strategy to fully explain and specify Horizon's approach in dealing with issues raised. There have been no obvious changes in projections from PAC3 and the construction and operational workforce numbers seem to be unchanged for total jobs, type of jobs and share likely to be filled by 'local' labour.
- 7.4 In particular we are concerned that this strategy mainly deals with the construction phase of the project and not the operational phase.
- 7.5 IACC requires confirmation as to when a detailed breakdown of the estimated number of jobs during the construction period will be made available. The phasing for workforce demand is key to understanding when which skills will be in demand
- 7.6 IACC recognise as do Horizon that there are uncertainties and challenges in projecting, planning and delivering employment and skills training opportunities that will be created by the project. However there are still areas including the supply and demand for skills and training allied with an assessment of capacity within the existing training system that would help firm up the required mitigation and better demonstrate Horizon's commitment to a positive economic legacy from the project.
- 7.7 Given the uncertainty referenced in the document, there is a need to provide adequate mitigation in the form of financial and staff resource to ensure that positive opportunities to upskill and increase the proportion of local labour are maximised.

- 7.8 Additional information should be provided in relation to the training places to be provided by year, course and skill level. Further detail on how large the problem of backfilling positions will be, how Horizon will monitor requirements for backfilling and the frequency of this monitoring. Further details should be provided in relation to the Service Hubs/Management Board as these are considered to be the mechanism for monitoring. There is also a need to understand how the monitoring will trickle down to the supply chain. IACC also wish confirmation as to what Horizon's expectations of the role of the Employment & Skills Service are.
- 7.9 IACC and North Wales would benefit from a wider view of the demand and supply of skills in Anglesey which takes account of projections for sectoral growth, replacement demand and the stock and flow of skills. This would help determine if sufficient training is being offered, if displacement is likely and if FE colleges and Higher Education should shift focus. This information would also be useful for school children deciding on future careers and education.
- 7.10 There is a need to recognise that displacement is going to be an issue during the construction phase. Although the IACC recognises that displacement can be positive, in certain spatial areas and skill groups this will be identified locally as poaching. IACC requires confirmation that the strategy pushes displacement/poaching as deep and late into the construction phase as possible. The Strategy should make an explicit estimate of the likely displacement in the local economy. Clarity on wages rates is required to understand the potential displacement effects. As wages on Anglesey are already low, the issue of displacement is genuine, and remains of concern to the Council and local businesses.
- 7.11 From a supply chain perspective, the document has not progressed sufficiently from PAC3 to provide confidence that any concerns have been addressed. Horizon's 'Supply Chain Action Plan' should be shared.
- 7.12 IACC requests further clarification in relation to local labour participation. The documents set out that the construction phase local labour participation in Anglesey will be below that for Hinkley Point C (34%). The 22% local participation is estimated by type of job available. It is not clear why the previous estimate of 25% local labour is not feasible, particularly given the large number of 'site services, security and clerical staff' jobs available and the opportunity to train additional locals through the Jobs and Skills Strategy. Preparatory work by HNP, reviews of previous evidence from other major infrastructure projects and differences in labour market dynamics all suggest a higher target should be used.
- 7.13 Further detail is required on how the further 1,000 additional roles available during refuelling and maintenance outages will be filled; will these be open for local workers or filled by supply chain contracts. This detail is required as the regular influxes of 1000 temporary workers will create significant impacts on their own, while temporary jobs for locals creates different impacts, particularly in the local labour market.

- 7.14 Assessment of local operational labour is set at 45% though, with mitigation, this is expected to reach 85%. The evidence base should reflect this level of ambition and this level should be included as a commitment with appropriate delivery mechanisms.

Education Strategy

- 7.15 IACC wish confirmation as to when an updated Education Strategy will be made available.
- 7.16 Horizon assesses the impact on primary schools to be insignificant, with no mitigation beyond the Community Impact Fund which would allocate funding if monitoring showed demand exceeding capacity (arguing that housing developers would include mitigation as a result of new developments). IACC again advises that there is existing primary school oversubscription across the Island. The predicted increased demand on school places until 2025 requires implementation of proposals to mitigate against the project's related employment led increased demand on the Education Authority's resources.

8. Health and Wellbeing

- 8.1 As previously advised, the IACC is of the view that detailed information on the project must be provided in order to enable the Council and other listed bodies to make informed decisions, having full regard to the Wellbeing statutory duties (particularly the Sustainable Development Principle) and the 7 National Wellbeing goals. Horizon must provide the Council, Welsh Government and Secretary of State with the information necessary to allow them to comply with the statutory requirement.
- 8.2 IACC considers that the requirements of the Wellbeing of Future Generations (Wales) Act 2015 applies to the whole application and we continue to strongly advise that the development is considered through the lens of the wellbeing legislative framework. This means that well-being is treated as an all-encompassing theme underpinning consideration of impacts and mitigation of all aspects of the project.
- 8.3 The IACC considers that the assessment of wellbeing needs to be two-fold, which would include consideration of the construction and operation phases of the project.

Health Impact Assessment

- 8.4 IACC is satisfied that this Assessment contains all the required elements of a comprehensive Health Impact Assessment. It clearly identifies the various policy frameworks, the project itself and specific vulnerable groups. Health effects are considered in terms of the 'Wider Determinants of Health' which include issues relating to wellbeing. The HIA builds upon the HIA Interim Report which contained the public health profile of the Area and moves on to provide a description of the health effects and proposed mitigation.
- 8.5 We welcome that this specific field of work will continue to develop going forward, primarily through the establishment of a Health and Wellbeing Monitoring Group that will consider monitoring data relevant to the project and when a set of key topics and indicators will be agreed.
- 8.6 We welcome the commitment by Horizon to facilitate bespoke analysis of routinely collected public health data relevant to the project. This information would inform discussion by the Health and Wellbeing Monitoring Group. If required the group will discuss the need for additional mitigation or follow-up investigation. This builds on the work of the Steering Group which is currently independently chaired by Public Health Wales. IACC considers that the chair of this Group should be nominated by the Group.
- 8.7 IACC recommends that Horizon uses the Public Service Board's Wellbeing Assessments as a baseline going forward along with the North Wales Population Needs Assessment.

- 8.8 IACC needs a clear understanding of what will be the demands on primary and local Health care services as well as a full understanding of what will be the requirements of the Emergency Services?
- 8.9 Subject to agreement with partners, IACC agree in principle to the suggestion that Horizon should require construction workers to register with, and, prioritise the use of the on-site medical and healthcare services rather than using the community NHS services.

Community Cohesion Report

- 8.10 Community Cohesion should fall under the remit of the Health and Wellbeing Monitoring Group
- 8.11 The IACC have reviewed the Community Cohesion Report. Confirmation is required as to whether the workers at the site campus would have access to their vehicles. If they do, the workers would be mobile and more likely to interact with the local community and its residents. This raises safeguarding issues which would not necessarily be addressed by the Code of Conduct.
- 8.12 Greater understanding is required as to the measures that need to be put in place to minimise and mitigate impacts and IACC would recommend that further work is commissioned with the help of Bangor University.
- 8.13 IACC promotes the development of a Community Hub in Cemaes. The Hub should be a focus for daytime activities for residents, particularly those with protected characteristics. The Hub should also be a base for Community Liaison Workers appointed by Horizon as well as a temporary base for IACC and other partner agency workers.
- 8.14 A dedicated Community Support Officer should be employed to facilitate programmed events. Transport should be offered for those with difficulty traveling to the hub.

Community Impact Report

- 8.15 IACC welcomes the Community Impact Report. However in its current form it signposts rather than states the issues, impacts and mitigation proposals in the various thematic assessments. In drawing them together in this one document they can be considered spatially.
- 8.16 The Community Impact Report is an explicit acknowledgement by Horizon that their latest project proposals have intensified development in North Anglesey and that an assessment of impacts on these communities and the rest of Anglesey is required.
- 8.17 A full assessment of the Community Impact Report cannot be made until the IACC has a full understanding of how the workforce are to be managed.

- 8.18 Adoption of Baseline evidence is cited but includes no analysis of the current state of Anglesey and of individual Study Areas has been carried out. This is essential to understand the 'current state of play' in localities before their capacity/capability to accommodate/handle the impacts of the project and other planned projects.
- 8.19 The fact that the Wylfa project straddles two study areas is highlighted but not reflected in consideration of localised effects and their specific mitigation.

9. Environment

Tre Gof Site of Special Scientific Interest (SSSI)

- 9.1 There is currently a significant disconnect between the ecology and hydrology assessments and the overall conclusions. There appears to be a likelihood that the Tre Gof SSSI will be lost or permanently damaged as a result of the development, which has not been adequately explored, nor the details of the intended compensation provided. Details need to be provided regarding how changes to the site will be monitored and the timing of the delivery of the compensation that will create and enrich fen habitats to offset potential adverse effects on Tre Gof SSSI.
- 9.2 With regards to site campus, there is no substantial consideration of the potential effects of visitor pressure on local ecological receptors from having 4000+ workers living in proximity, including possible effects on breeding chough and their use of the proposed compensatory foraging areas at Wylfa Head.

Noise

- 9.3 The submission recognises that the temporary workers accommodation is a noise sensitive receptor. Therefore, any proposed mitigation measures for the site campus must be extremely robust to ensure that workers' health and safety is not compromised due to inadequate building design resulting in unacceptable internal noise levels.
- 9.4 The submission refers to additional noise mitigation measures that may be required as a result of noise monitoring results. IACC requires clarification as to when the need for the additional measures would be triggered, how quickly they would be installed and how this would be monitored.
- 9.5 Clarification is required as to how can the relevant mitigation measures bring benefit to receptors when the noise intrusion may well have ceased before they can be physically implemented.

Air Quality

- 9.6 IACC recommends that Horizon incorporate the significant policy changes brought about by the Local Air Quality Management in Wales Policy Guidance (June 2017). These which includes the WHO guideline value of 10µg/m³. The new policy has a strong emphasis on meeting the objectives of the Wellbeing of Future Generations Act.
- 9.7 IACC continues to seek for Horizon to commit to the adoption of WHO Annual Objective for PM_{2.5}, particularly given the UK Governments commitment to reducing concentrations of this pollutant. Current exposures on Anglesey falls well below the WHO limit and any increase in PM_{2.5} could give rise to health effects.

- 9.8 IACC considers that the workers accommodation will be a relevant exposure for both long terms and short term averages. The site campus needs to be recognised as a relevant receptor and a clearer reference needs to be made to the potential dust and health effects at the site campus.
- 9.9 IACC wish to agree an appropriate threshold for dust soiling. This will need to be based on a specified increment above the existing background concentrations.

Cemaes Bathing Waters

- 9.10 The IACC has, throughout its consultation responses, raised the issue of the need to assess the possible impacts of the project on Cemaes Bathing Waters. Mitigation measures need to be in place to prevent sedimentation entering the bay to maintain and if possible enhance the water quality of the bay. Such measures need to be designed to cope with high rainfall events.
- 9.11 The FCA has identified moderate risk of fluvial flooding (from watercourses) to properties in Cemaes and a high risk of pluvial flooding (surface water flooding) to properties upstream of Cemaes during construction. This would add to the combined effects already identified in this area.
- 9.12 IACC presumed that this confirmed increased flood risk, along with increased shipping movements would result in increased turbidity in the Bay at Cemaes and therefore we are surprised that the assessment has not considered impacts on the EU Bathing Water which was designated as Poor in 2017. This is of particular concern given that high sediment run off could occur following rainfall onto the exposed bare earth surfaces (topsoil strip, bulk earthworks, storage and mounds). Together with the increased steepness of land surfaces, this could increase run-off into Traeth Bach stream running into Cemaes Bay.
- 9.13 The Health Impact Assessment (HIA) needs to make reference to Cemaes Bay EU Bathing Water. IACC is aware that both NRW and PINS in their scoping reply have raised this as a concern. It is imperative that the HIA ensures that its proposed development does not have a negative impact on Cemaes Bay EU Bathing Waters (a consequence of increased shipping movements and turbidity etc.).
- 9.14 No mitigation is proposed to monitor and maintain the EU Bathing Water at Cemaes.

10. Site Selection Report

Dalar Hir

- 10.1 The site selection methodology is broadly logical although IACC have a number of concerns regarding the site selection process. As confirmed in our response to PAC3, the IACC maintains its objection to Dalar Hir as the justification and mitigation for this site has still not been adequately assessed.
- 10.2 There is a need for Horizon to look at more than one Park and Ride site, and in particular a park and share site/sites to supplement the proposed Dalar Hir facility. The IACC still envisage that workers will make informal arrangements to meet each other near the A55 corridor, most likely at junctions 6, 7 and 8 and on the mainland to car share the onward journey to either the main site or Dalar Hir. A secondary park and ride or park and share site on the mainland could also prove to be a useful back up site in the event of road/bridge closure.
- 10.3 In light of Hinkley, we are concerned that Horizon is under-estimating the parking demand and the impacts that may arise therefrom. Anglesey is unique as an island and additional parking facilities of a smaller scale in or adjacent to population centres should also be considered.

Wylfa Newydd Site Layout

- 10.4 The Report confirms that the location of the main plant seeks to avoid the Tre Gof SSSI, Wylfa Head and pre-existing Dame Sylvia Crowe landscaping mounds. However it is to be noted that the Ecology Chapters confirm that significant adverse effects are predicted on these features.

11. Landscape, Visual and Cultural Heritage

- 11.1 IACC requests that we are provided with a copy of the Landscape and Habitat Management Strategy (LHMS) as soon as possible in order to allow comment on the adequacy of the mitigation proposals. The LHMS should be applicable to both the construction and operational phase of the development and all the proposed development included as part of the DCO should be included in the assessment of effects of the development on the features and special qualities of the AONB including A5025 off-line works, site campus etc.
- 11.2 This Strategy is required to understand the overall coherence of the mitigation proposals, particularly regarding total losses and gains of habitat and the timescale for impacts, whether the proposals are supported by the data provided, and where the combination of mitigation proposals and survey data support the assessment conclusions.
- 11.3 The significant weight to be given to the AONB Management Plan in determining planning applications should be acknowledged (please refer to Policy AMG 1 of the JLDP).
- 11.4 All features of the AONB should be included in the assessment as confirmed in the AONB Management Plan.
- 11.5 IACC expects the LHMS to include details of the mitigation proposals to protect and enhance the Dame Sylvia Crowe's designated landscape.

Assessment of Effects on Heritage Assets

- 11.6 The Assessment of Effects on Heritage Assets is seen as a screening exercise rather than a full assessment of possible impacts. By including so many undesignated assets as well as designated assets it is considered that those assets of particular concern are rather lost in the list. We are satisfied that all assets of concern have been included in the assessment.
- 11.7 It would also be beneficial to separate construction, operation and decommissioning assessments into separate tables for each asset type.
- 11.8 Further detail regarding mitigation proposals requires to be included in the assessment document. Mitigation proposals should include a photographic survey in spring, summer, autumn and winter, a full survey of Cestyll Garden to identify the plants that are present and their condition, and a mapped record/register of field names where the removal of field boundaries is proposed.

Coastal Path

- 11.9 The Coastal Path is very important to the leisure, recreation and tourism offer on Anglesey (being part of the wider Wales Coastal Path) and it's important that the integrity of this Coastal Path offer is protected, if not enhanced as a result of this project.
- 11.10 Although proposals relating to PRow have generally been consistent from PAC2 and PAC3 to this draft submission, it is disappointing that Horizon has in the submission failed to address the Council's response and suggestions in respect of both PAC2 and PAC3. It is also disappointing that no meeting between HNP and IACC to discuss PRow and Access has taken place since March 2016.
- 11.11 IACC has on several occasions stressed the importance of having the route of the Coastal Path, during the operational phase, positioned as close to the sea as possible offering users the best coastal route option with enhanced sea views. The IACC are keen to discuss alternative paths or engineering solutions to that proposed.
- 11.12 The IACC is seeking that the Coastal Path be reinstated on the coast following completion of the main construction.
- 11.13 A Footpath Implementation Plan is required to be agreed with IACC prior to DCO submission.

12. Cumulative Effects

- 12.1 It is noted that Horizon has provided the IACC with the Cumulative Impact Assessment which includes consideration of Intra and Inter Project Effects. This Assessment was received towards the end of our internal Draft DCO documentation review and therefore we are not in a position to comment on this Assessment as part of this submission.
- 12.2 We note that the proposals for the Third Crossing has been scoped out of the Assessment. We understand that WG will be consulting on their preferred proposals in early 2018 and therefore it is considered that the information available as part of this consultation should inform the project's assessment of cumulative effects.
- 12.3 We are also aware that the Welsh Government are proposing to replace the A55 Junction 15 (Llanfairfechan) & Junction 16 (Penmaenmawr) roundabouts with height separated junctions. These proposals should be part of the projects cumulative assessment as they are within the 90-minute drive time. The timescales provided on the Welsh Government website are that the statutory process and public enquiry will take place between summer 2019 to autumn 2020 with detailed design and construction will take place between autumn 2020 to autumn 2022.
- 12.4 IACC advises that a group may be required to be set up during 2018 to meet quarterly to understand the timescale/progress of the projects scoped into the assessment. It is considered that when the proposed projects will happen is crucial for an adequate cumulative assessment to take place to inform the decision making process.