

From: [PMO](#)
To: [Wylfa Newydd](#)
Subject: RE: IACC Deadline 2 Submission : Local Impact Report - Introduction (email 3)
Date: 04 December 2018 20:37:35
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[Annex 1D-1O \(Batch 2 of 2\).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.*

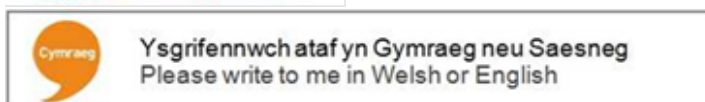
Bydd fersiwn Gymraeg yn cael ei ddarparu cyn gynted a phosib / *A Welsh version of the submission will be provided in due course.*

Cofion/ Regards,
Manon

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Mae 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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Kieran Somers
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Sent by email

Dear Kieran,

OFFICIAL SENSITIVE

Review of Horizon's DCO Application (Housing)

- 1.0 Following the submission of the Isle of Anglesey County Council's (IACC) Relevant Representations to the Planning Inspectorate and the SOCG workshop held on the 24th July 2018, the purpose of this letter is to provide you with further detail and clarity on the IACC's position in relation to housing and construction worker accommodation impacts and to seek agreement on mitigation measures. The IACC is committed to discussing and agreeing as many issues as possible prior to the DCO Examination to ensure that the proposed development is acceptable and that the Examination hearings can be as focused and productive as possible.
- 1.1 Horizon's approach to mitigation based on monitoring and then dealing with impacts as and when they occur is wholly unacceptable. The IACC's stance is that adverse impacts should be avoided and where that is not possible mitigated through proactive and pre-emptive measures. This principle equally applies to all thematic issues. This includes agreeing a suite of preventative measures, including up-front investment to build housing, DCO requirements, DCO obligations and changes to phasing / delivery to avoid or minimise impacts on the housing market and supply where possible. Where adverse impacts cannot be avoided, appropriate mitigation should be implemented to offset the identified adverse impacts. Compensation will be required in respect of residual impacts that cannot be mitigated. In addition, a community resilience fund will be required to address impacts which exceed or are additional to those assessed and/or unquantifiable impacts. The aim of this letter is to outline these issues and to define the mitigation measures required to make the development's impacts acceptable in planning terms.
- 1.2 The matters raised below represent part of IACC's ongoing engagement with you on the DCO application as regards issues related to housing and are made in response to the application documents as submitted. The IACC reserves the right to add to or amend these issues (and to raise new issues) as necessary in its Written Representations and Local Impact Report.

2.0 Summary of Main Issues

2.1 Following the submission of the DCO application, the IACC commissioned Cambridge Centre for Housing & Planning Research (Cambridge University) to independently review Horizon's Construction Worker Accommodation Strategy and the previous work commissioned by the IACC (Amec Foster Wheeler Housing Review January 2017) [and to undertake further assessment and analysis to inform the Council's position on what effective impact reduction and mitigation measures would comprise of]. Following this review by Cambridge University, there are a number of fundamental issues that the IACC wish to raise with Horizon. These are outlined in detail below.

2.2 *Horizon's Demand for Accommodation*

- 2.2.1 A weakness of the Horizon Strategy is that the model does not make any explicit assumptions to accommodate different 'tastes' in the housing choices of the workforce. The gravity model assumes that all members of the workforce have similar preferences, and are constrained by the same trade-off between the time and cost of travel and the cost and availability of accommodation. Horizon have produced revised estimates based on an assumed workforce of 8,500, with a potential maximum of 9,000. The composition of the workforce has also changed, with fewer 'professional, managerial and supervisory' staff but more M&E workers.
- 2.2.3 The current Horizon planning assumption is that professional, supervisory and managerial staff will total 2,000 out of the 9,000 total, or 22%. Only 12% (237 workers) of the [2,000] home based workers are predicted to be professional, supervisory or managerial staff. It would appear to be quite possible that the 1,750 non-home based professional, supervisory or managerial staff are likely to prefer their own, independent, accommodation rather than to live in the TWA campus on site, and judged likely to prefer permanent accommodation rather than caravans.
- 2.2.4 If the judgements made on accommodation preference are correct (or probable), then nearly 60% of the 3,000 non-home based workforce ([] people) seeking accommodation in the private market are likely to prefer individual (rather than shared) accommodation, in permanent accommodation rather than caravans. Not all these would necessarily be looking for self-contained accommodation: rooms offering B&B style accommodation (including latent accommodation), or rooms in hotels and guesthouses would probably be attractive to white collar staff who are only on site for short periods. This type of accommodation is termed 'serviced accommodation' in the table below, which compares the IACC January 2017 estimate of the possible accommodation/tenure split of the white collar' staff (prepared by Wood and shared with Horizon) with an alternative estimate of tenure preference prepared by Cambridge University¹.
- 2.2.5 The numbers of professional staff have been adjusted pro rata to the current Horizon planning assumption of a total professional staff number of 1,998, of whom 1,761 would be non-home based. The proportions by length of stay, and the proportions of staff by year of construction, have been kept the same as those estimated in the IACC January 2017 paper². The estimates of staff numbers in each year of construction result in significantly more professional staff on site in the final two years of construction than has been allowed for in the current Horizon workforce estimates. The IACC require detail on the composition of the workforce by function to resolve these discrepancies.

¹ The Cambridge University paper commissioned by IACC is being prepared for publication and will be shared with Horizon when available; it will also be included as a technical paper to the Local Impact Report.

² AMEC Foster Wheeler Housing Report 2017

Professional, managerial & supervisory staff: tenure estimates (%)									
	IACC/Wood estimates					Alternative estimate (Cambridge University)			
	TWA	Owner occupation	Private rented	Tourist accommodation	Latent accommodation	TWA	Owner accommodation	Private rented	Serviced accommodation
Up to 6 months	60	0	0	15	25	75	0	0	25
7 to 42 months	42.5	10	30	7.5	10	0	25	50	25
Over 43 months	27.5	30	38	7.5	5	0	66	33	0

Note: 'Serviced' accommodation might be in Hotels, Guesthouses, B&B or latent accommodation.

2.2.6 The alternative estimate presented by Cambridge University assumes that professional staff on-site for more than seven months at a time will prefer not to use TWA, and that a higher proportion of staff who are on site for longer periods will prefer to buy rather than rent (this is probably particularly the case for those staff who are likely to continue working at Wylfa Newydd in ongoing operational roles). It is unlikely that these roles will be for less than 6 months, however it assumed that 75% of professional staff on-site for less than 6 months will stay at the TWA or will be in serviced accommodation. They will not purchase or rent a property for such a short period of time.

2.2.7 The estimated numbers of professional staff, by type of accommodation and tenure that result from the two estimating approaches are set out in the table below.

Professional etc staff group: tenure estimates compared												
	Y1	Y2	Y3	Y4	Y5	Y6	Y7	Y8	Y9	Y10	Y11	Peak
IACC/Wood estimates												
TWA	2	2	8	7	100	332	585	642	590	359	182	642
OO	1	1	4	4	109	277	328	334	323	283	198	334
PRS	2	1	5	5	109	323	478	494	463	342	198	494
Tourist	0	0	2	2	27	81	128	141	131	86	50	141
Latent	0	0	2	2	18	66	132	151	137	72	33	151
Total	5	4	21	19	362	1079	1650	1761	1645	1142	662	1761
Housing Review estimates												
TWA	1	0	6	4	0	36	171	236	206	46	1	236
OO	2	1	10	10	272	668	746	754	738	678	495	754
PRS	2	1	4	4	91	293	473	491	456	315	165	491
Serviced	1	1	1	1	0	81	261	280	245	103	0	280
Tourist	0	0	0	0	0	0	0	0	0	0	0	0
Total	5	4	21	19	362	1079	1650	1761	1645	1142	662	1761

2.2.8 The table shows that a change in the assumptions on accommodation type and tenure would result in a shift between tenures. The altered assumptions in the 'alternative' estimate would result in less use of TWA by professional staff, an almost identical use of the PRS and of tourist/latent accommodation, but a significant increase in owner occupation. A shift towards owner occupation would result in a greater number of properties being occupied, if it is assumed that professional staff would prefer not to share accommodation. This is considered to be more probable as professional staff (i.e. managers and supervisors) will not want to share with workers they are potentially managing and they will be able to afford virtually any property on Anglesey (see section 2.5 below on Affordability).

2.2.9 These results do not imply that there would be any reduction in the number of bedspaces required in TWA: the 400 bedspaces in TWA not occupied by professional staff would become available for other workers.

2.2.10 The possible split between tenures is compared in the tables below, which include the Horizon proposed tenure split for the 3,000 non-home based workers.

Summary of estimates for different tenures			
	Horizon estimate for 3,000 workers	IACC/Wood estimate for 1,761 professional staff	Alternative estimate for 1,761 professional staff
Caravan	650	141	0
Hotel and B&B	450		280
Serviced accommodation			
Latent	400	151	754
Owner occupied	600	334	
PRS	900	494	491
TWA	n/a	642	236
Total	3000	1762	1761

2.3 Owner Occupation / New Build Housing

2.3.1 The Joint Local Development Plan (JLDP) identifies a total provision of new housing in Anglesey over the plan period from the beginning of 2015/16 to 2026 of 3,186 dwellings, representing an average output of approximately 320 per annum. The construction of Wylfa Newydd is programmed to take eleven years: assuming a start on site at the beginning of 2020, completion would not be until 2030/31, five years beyond the current JLDP.

2.3.2 The JLDP identifies six sites totalling 225 dwellings under Tai 5, and a further 105 dwellings in rural clusters under Tai 6, to be developed with 100% affordable housing. A further 354 affordable dwellings are planned to be provided on mixed sites using S106 agreements, or 11.6% of the remaining 3,029 dwellings.

2.3.3 In the urban service centres, most of the local service centres (with the exception of Beaumaris and Rhosneigr), and in the service villages, affordable housing does not have any local connection requirement, providing 345 dwellings. The remaining 340 affordable dwellings all have a local connection requirement.

2.3.4 The underlying population trends in Anglesey imply a falling population to 2026, with the

number of dwellings required increasing by around 50 per annum as the number of households increases slightly faster than the fall in the population.

- 2.3.5 The JLDP 'jobs led' scenario would require an annual increase in dwelling numbers of 270 per annum in addition to the 'natural' growth in household numbers. However, the 'jobs led' scenario would have the effect of increasing the number of people commuting out of Anglesey to work in Gwynedd, Conwy and elsewhere: the number of dwellings required to meet any growth in the workforce on Anglesey itself would be less than 270 per annum.
- 2.3.6 Although an increase in the housing stock could provide a theoretical balance between existing supply and the increased demand created by Wylfa Newydd, IACC considers it likely that either the owner occupied or private rented markets will be affected by other factors. For example, a change in prices resulting from the increased demand and spending power of non-home based workers may give an incentive to existing owners to sell, or for existing landlords to obtain possession and relet at higher rents. In both cases, this may result in supply being sold or let to workers at Wylfa Newydd, but might equally lead to sales or lettings to people relocating to work on the project, leaving existing residents unable to compete in the market.
- 2.3.7 At present, the achievement of the new build housing targets in the JLDP are mainly dependent upon private sector activity, by housing developers or landowners. The delivery of new affordable housing is in turn largely dependent upon this developer activity via Section 106 agreements. There is therefore no guarantee that developer activity will occur at a sufficient rate, both in numbers and timing of delivery, to balance the increased demand from non-home based workers for accommodation. In contrast, the IACC's forecast is that it is more likely that developer activity will lag behind increased demand, reacting to the signals given by increasing prices to stimulate developer interest and investment.
- 2.3.8 Based on the estimated demand as outlined in section 2.2 above, the IACC have assessed depending on the private sector to build housing to meet the demand from Wylfa Newydd as an unacceptable level of risk to the Island's housing needs. By the time developers deliver new stock, the impact on the local housing market would have already occurred. This is unacceptable as the risk to local people wanting to buy or rent, the adverse impact on vulnerable tenants, the Welsh language and culture, homelessness and the risk of displacement is significant and could have a lasting and irreversible impact on Anglesey and its communities. The IACC require an interventionist approach through the Housing Fund to invest in new build housing to boost existing supply ahead of demand increasing and before impacts are experienced. In accordance with the proximity principle and drawing on evidence from Hinkley Point C, IACC considers that Anglesey North and Anglesey West will be most impacted as this is where demand will be greatest. Mitigation measures in the form of increased supply (comprising of new build and bringing back empty homes, for example) need to be targeted in these areas in the first instance.
- 2.3.9 Horizon's current proposal for the Housing Fund (c. £10M) is not adequate to mitigate against the impacts of Wylfa Newydd. The IACC's provisional assessment shows that in order to mitigate the impact of Wylfa Newydd on the local housing market, a Housing Fund of **£25M** is required. This figure is being refined through the work being undertaken by Cambridge University and a copy of that will be shared once it is completed.
- 2.3.10 The level of funding requested for the Housing Fund will not only allow the IACC to boost the supply of housing through new build, but will also fund other initiatives such as bringing empty homes back into active use, increasing supply in the PRS through minor improvement grants, rent deposit schemes and other support measures.

2.3.11 There is a short window (in house building terms) from the date of Horizon's Final Investment Decision (FID) to end of Year 3 for the IACC to increase the supply of housing in time for the growth in non-home based workers in Year 4 (1,755 non-home based workers), Year 5 (3,618) and leading to a peak in Year 7 (6,643). Investment will be required upfront (pre-FID) to ensure that the IACC have housing sites that are 'shovel ready' and available to be developed immediately.

2.4 Turnover in the Private Rented Sector (PRS)

2.4.1 In estimating the potential of the private rented sector to accommodate non-home based workers, there is a fundamental difference in approach between Horizon and the IACC in assessing the potential capacity of the sector. The difference in the estimates results from different interpretations of the limited data available on turnover within the private rented sector.

2.4.2 Horizon interpret the available data, indicating a turnover rate around 35% per annum, combined with a vacancy rate at any one time of over 10%, as indicating that there is some spare headroom within the sector. The IACC have assessed the existing data on void periods and turnover rates in the PRS, and the likelihood of spare capacity within the sector as indicating that there is no excess capacity in the sector to accommodate the increase in demand.

2.4.3 A survey in 2010 by ARLA³ (previously known as the Association of Residential Letting Agents) suggested that the average void period for landlords in Wales/Scotland/Northern Ireland was 3.7 weeks, with 23% of landlords outside London and the South East experiencing void periods of 5-6 weeks or more.

2.4.4 A 2015 survey⁴ by the insurance company Direct Line found that while void periods averaged 20 days in London, the average for northern cities such as Liverpool or Sheffield was 31-33 working days. No figures were given for more rural and peripheral areas such as Anglesey or Gwynedd, but it would not be unreasonable to assume that PRS properties outside the student market of Bangor will experience longer void periods before re-letting.

2.4.5 Horizon quote the 2011 Census finding that 35% of PRS properties in Anglesey, and 42% in Gwynedd had a different tenant one year previously. This would imply that the average tenancy length in the PRS in Anglesey is just under three years ($1/0.35 = 2.86$ years).

2.4.6 In practice, it is unlikely that all PRS properties turn over at the same average rate: it is in landlords' interest to minimise void periods, because of the cost of rent loss, cleaning and repairs between tenancies, and in the interest of the tenant to remain in the same property. The correct interpretation of the data is therefore based on a smaller percentage of the PRS stock turning over at a faster rate than the average.

If the 35% of the PRS stock that has a new tenant compared to twelve months previously turns over twice a year, rather than once a year, taking advantage of the minimum six month period for an Assured Shorthold letting (in Wales, since 1 April 2017, these are known as Periodic Standard Contracts), then the average void period will be 7.4 weeks, and 10% of the stock will be void at any one time.

³ ARLA Members Survey of the Private Rented Sector, Second quarter 2011 <http://www.arla.co.uk/media/56549/arla-members-survey-private-rented-sector-2011-q2.pdf#search=>

⁴ <http://www.dailymail.co.uk/property/article-3584584/Tenancy-voids-landlords-losing-500-18-months-renters-on.html>

- 2.4.7 As an illustrative example, if a landlord has 20 properties, and 7 of them (35%) are re-let twice a year, then the average void period would need to be 7.5 weeks if 10% of the 20 properties are to be vacant at any one time. An average void period of 7.5 weeks would not seem unreasonable in a rural, sparsely populated area like Anglesey. (The report by Arc4⁵ suggests that the average time to re-let property in the KSA was around 7 weeks over the three years 2014-17.) In practice, the actual operation of the PRS market is likely to be somewhere in between the two extremes.
- 2.4.8 Therefore, the normal operation of the market means that a turnover rate of 35% per annum, with 10% of the PRS stock vacant at any one time, is compatible with the normal voiding and reletting process. Therefore, for every PRS property rented by incoming workers at Wylfa Newydd, there will be one less property available for the local market.
- 2.4.9 Cambridge University conclude that there is no 'spare headroom' in the private rented sector: every property that becomes void is re-let in the normal way. Property let to non-home based workers will interrupt the normal workings of the private rental sector throughout the construction period, and across the whole island. This position differs significantly from Horizon's position, where it is submitted that there is sufficient headroom capacity in the PRS to absorb workers into this sector without impact adversely on existing tenants or people wishing to enter the PRS.

2.5 Affordability

- 2.5.1 Most of the non-home based workforce at Wylfa Newydd will be eligible for the standard accommodation allowances agreed by the National Joint Council for the Engineering Construction Industry. The allowances for 2018 are £39.37 per night, or £275.59 per week.
- 2.5.2 The table below shows that the accommodation allowances give Wylfa Newydd workers very significant spending power within the housing market. 'Affordable' rents are currently considered to be no more than 30% of net income (after tax and National Insurance), and the NJC allowances give workers around £1,194 to spend per month on accommodation. This would amount to 30% of a net monthly income of £3,981, which is a gross annual income of £68,545. (Workers at Wylfa Newydd will not be paid £68,545, but will have the spending power in the housing market equivalent that of someone with an annual income of £68,545. The average income by residence on Anglesey by contrast is £498.30 per week or 25,912 per annum.)
- 2.5.3 Even if it assumed that workers will seek to spend no more than £25 per night from the allowance on accommodation, they will be able to spend £758 per month: the spending power of someone with an annual income of nearly £40,000.

NJC accommodation allowances and spending power				
Daily accommodation allowance	Weekly (7 days) equivalent	Monthly equivalent	Equivalent to 30% of net monthly income	Implied gross annual income
£39.37	£275.59	£1,194.22	£3,981	£68,545
£25.00	£175.00	£758.33	£2,528	£39,639

⁵ Review of the Private Rented Sector in North Wales, Arc4, June 2017

- 2.5.4 If two workers share accommodation such as a 2 bedroom house, then they will be able to afford to pay between £2,388 per month (at £39.37 per night) or £1,517 per month (at £25 per night), as shown in the table below.

Affordable rents for 2 sharers		
Daily accommodation allowance	Weekly spending power for 2 sharers	Monthly spending power for 2 sharers
£39.37	£551	£2,388
£25.00	£350	£1,517

- 2.5.5 Spending power at these levels would clearly enable Wylfa Newydd workers to afford to rent virtually any property on the island: As at 10th September 2018, there are only 38 properties advertised for rent on Anglesey on Rightmove.com, and only two of these are priced at more than £1,300 per month.
- 2.5.6 Given the limited number of properties available at any one time, this implies a very strong likelihood of a significant rise in rents across the PRS due to increased demand and the higher spending power of incoming workers over the average income of residents.

Private rented sector: average rents by bedsize	
	Average monthly rents in 2016
1 bedroom flat	£446
2 bedroom house	£498
3 bedroom house	£550
4+ bedroom house	£799

Source: Review of the Private Rented Sector in North West Wales, Arc4, 2017

- 2.5.7 In the tourist sector, any Wylfa Newydd worker would be able to rent any caravan (average maximum price per night £39.28), and any two Wylfa Newydd workers would be able to share in much of the self-catering market (average minimum price per night £76.07), as shown in the table below.
- 2.5.8 Given average occupancy levels in the self-catering market (particularly off-season (Nov – March) with average occupancy of approximately 46%) , many owners may find an all year let to Wylfa Newydd workers an attractive proposition (two Wylfa Newydd workers, using the midpoint of their spending power, could afford an annual rent of £23,430 for a 2 bedroom let).

	Serviced, rooms and hostel	Caravan and Camping	Self Catering and alternative
Average minimum price per night	£60.80	£23.48	£76.07
Average maximum price	£102.40	£39.28	£145.91
Range for minimum price	£12 - £110	£8 - £80	£7 - £948
Range for maximum price	£20 - £350	£10 - £172	£10.50 -£993
Base / Average	80	73	113

Source: Accommodation Bedstock Survey, p14, Strategic Research and Insight, 2018

- 2.5.9 What this demonstrates is that Wylfa Newydd workers can afford to buy or rent the majority of properties on Anglesey and could afford much of the tourism accommodation. as The adverse impact of Wylfa Newydd workers outspending local people, will result in higher rents, house prices and displacement if there is not a commensurate increase in supply of housing to meet the demand is unacceptable and requires to be mitigated.

2.6 Phasing & Delivery of On-Site Campus

- 2.6.1 The phasing and delivery of the on-site campus will have a significant impact on the local housing market and the availability of tourism accommodation. Horizon's proposed phasing and delivery for the on-site campus is unacceptable as it will place significant stress on the local housing market, particularly during the early years of the project. To minimise the pressure on the private market the IACC requires the TWA to be in use from the beginning of the build-up of non-home based workers on site, from Year 3 Q2, rising to the planned peak of 4,000 by Year 5 Q4. This would mean that only minimal use of the private market by non-home based workers would be required until Year 6 Q1.
- 2.6.2 Horizon's current proposal of having 1,000 bedspaces available by Q4 Year 4 building gradually up to a peak of 4,000 by Q2 Year 7 is not acceptable. This places significant and unjustified stress on the local housing market and tourism sectors, particularly in the early to mid stages of the project (Years 4, 5 and 6). Horizon must mitigate the impacts of its project by ensuring that the on-site campus is ready and available earlier in the construction programme to meet this significant demand for accommodation.
- 2.6.3 The IACC also require the on-site campus to be available for longer, declining more gradually from Year 8 Q4 to Year 10 Q1. This will reduce the pressure on the private housing market during Year 9 and the first two quarters of Year 10 as the non-home based workers would otherwise have to be accommodated in the PRS or in tourism accommodation.
- 2.6.4 For clarity, bringing forward the phasing / delivery of the on-site campus does not replace the need for the Housing Fund to increase supply of housing. Both measures are required in order to reduce the impacts on the local housing market and tourism sector.

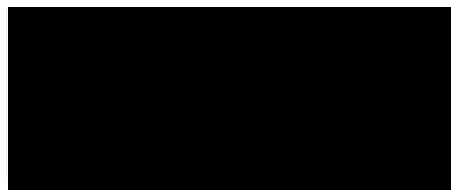
3.0 Conclusion

3.1 Following the IACC's review of Horizon's DCO application, there remain fundamental differences between the IACC and Horizon. These include:

- i. Demand for Accommodation – Given the number of professional staff (managerial and supervisory) the IACC's evidence concludes there will be much more demand for individual accommodation outside the Site Campus. This will place even greater demand on owner occupied accommodation and serviced accommodation.
- ii. Affordability – The workers' allowance and spending power means that they will effectively be able to rent any property on Anglesey (either alone or sharing). This will place significant stress on the PRS and may displace local people (particularly vulnerable and low-income tenants) and may prevent local people from being able to afford to rent in their community. Workers will also be able to afford any caravan accommodation and most self-catering accommodation, which again raises significant concerns not only for the tourism sector, but also for the IACC in terms of enforcement and management of restrictions on the use of such accommodation.
- iii. PRS Capacity and Turnover – IACC's evidence shows that there is no spare headroom in the private rented sector: every property that becomes void is re-let in the normal way. Property let to non-home based workers will interrupt the normal workings of the private rental sector throughout the construction period, and across the whole island. Without increasing the supply in the PRS, there will be significant and unacceptable impacts on the PRS on Anglesey.
- iv. Phasing and Delivery of On-Site Campus – The on-site campus must be delivered earlier in the construction programme to minimise impacts on the housing market and tourism accommodation. The first phase of on-site campus (1,000 bedspaces) as a minimum should be ready and available by Q4 Y3 and must continue to be delivered by Y5 Q4 (4,000).
- v. Housing Fund – The IACC's assessment shows that Horizon's proposed mitigation package (currently £10M) is inadequate to deal with the impacts of Wylfa Newydd on the local housing market. The IACC's evidence shows that **£25M** would be sufficient, provided that the on-site campus is delivered earlier in the construction programme as outlined in section 2.6 above.

3.2 The IACC is eager to discuss these impacts with Horizon and to agree as many issues as possible prior to the DCO Examination. I would welcome your response to the issues raised above and for this to be the basis for a workshop within the next few weeks.

Yn gywir / Yours sincerely,



DYLAN J. WILLIAMS

Pennaeth Gwasanaeth – Rheoleiddio a Datblygu Economaidd
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