

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](#)
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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 ynglwm 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 Mon. Mae Cyngor Sir Ynys Mon 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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Dear Kieran,

OFFICIAL SENSITIVE

Review of Horizon's DCO Application (Education, Skills and Training)

- 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 education, skills and training 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 impacts should be avoided and where that is not possible mitigated through proactive and pre-emptive measures to protect and enhance the education, skills and opportunities of local people. This principle equally applies to all thematic issues. This includes agreeing a suite of preventative measures, DCO requirements, DCO obligations and changes to phasing/ timing to avoid or minimise impacts wherever 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. The aim of this letter is to outline these issues/ impacts 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 to issues related to education, skills and training, are made in response to the application documents as submitted. The IACC reserves the right to add to or amend these issues (and raise new issues) as necessary in its Written Representations and Local Impact Report.

2.0 Education, Skills and Training Context

2.1 Although it is in a remote location, Anglesey offers a beautiful environment and a high quality of life to those who live on the island. With short journey times reducing health problems¹ and lower environmental impact, existing residents do not require additional accommodation, place no additional burden on services, or have no disruptive impact on the community. The island's industrial base also offers synergies to Wylfa Newydd, with the past experience of the existing Wylfa Magnox power station, the presence of the Energy Island Programme and many other energy and engineering related businesses. Maximising the number of local people working on the Wylfa Newydd project is a key priority.

2.2 Recent evidence shows that Welsh businesses are struggling to fill vacancies, and that the level at which Wales businesses are spending as a result of the skills shortage is more per business than other parts of the UK². The impact of the Fourth Industrial Revolution and Brexit is widely expected to worsen skills shortages³. Anglesey's population is around 70,000 of which approximately 12,000 are between the ages of 0-15yrs, 6,100 are between 14-19yrs, and 4,200 are between 16-24yrs. Welsh is widely spoken and used, for example with the 2011 census identifying 71.3% of 16-19yrs olds as Welsh speakers.

2.3 IACC's vision is for Anglesey to become a well-known location for its world class and bespoke educational infrastructure particularly but not exclusively in STEM subjects, and to have an appropriately skilled workforce to meet the demands of its partners in the energy and related sectors. Anglesey already has a higher proportion of the working age population working in a skilled trade or with an NVQ Level 4+ qualification and a lower proportion of residents with no formal qualifications than the Welsh average.

2.4 Economic inactivity represents a significant segment of the working age population and in 2016 there was over 4,000 working age inactive people who could potentially have joined the labour market⁴. Anglesey also has a higher proportion of retirees; with people living longer, older people are choosing to move to part time work prior to retirement and more retirees are seeking part-time self-employment⁵.

2.5 Anglesey has five bilingual secondary schools. Each secondary school has between 8-11 primary schools in its catchment, most of which are Welsh medium community schools and cater for pupils aged 3-11years. Many of the primary schools are small, 23 have less than 100 pupils and 8 have less than 50 pupils.

2.6 Most of this school stock is in need of modernisation. Some funding for renewal and refurbishment is available from Welsh Government under its 21st Century schools scheme, and this scheme will be entering phase B during the construction phase. IACC is also under statutory obligations and financial pressures to rationalise capacity, and a complex process involving consideration of both modernisation and rationalisation is on-going.

2.7 There are currently national shortages of teachers in certain subject areas important to this project including Welsh medium and STEM subjects⁶ and this is a long standing and challenging problem particularly since research suggests that, of all education factors,

¹ Being sick of the daily commute could be affecting your health. Royal Society for Public Health (2016)

² An Open University Business Barometer (2018)

³ Skills Shortages in the UK Economy The Edge Foundation (2018)

⁴ Demand for Skills and Supply of Local People, Oxford Economics study (2018)

⁵ ONS Trends in self-employment in the UK: 2001 to 2015 (2016)

⁶ Stats Wales (2017), KS3 and KS4 science report, Estyn (2017), National Audit Office report: Training New Teachers (2016)

classroom teaching has the greatest influence on pupils' learning⁷. Coincidentally, a progressive increase in secondary school rolls driven by earlier trends in birth rates will occur during the construction phase, exacerbating these difficulties. Wales is currently undertaking a major reform of school education for 4-16 year olds which is not scheduled to be complete until 2026, resulting in uncertainty over how the teaching workforce will react to new pressures and demands.

- 2.8 Some 2000 Anglesey residents are typically enrolled at HE institutions with one third going to England for their studies. At further education level Coleg Menai operates the Llangefni campus which includes an Energy Centre and a new Engineering Centre under construction. Courses and apprenticeships are also available at other Grŵp Llandrillo Menai sites in Bangor and further afield although these can be difficult to access from many parts of the island and this can be a strong deterrent especially to those with limited means or other barriers to education. Horizon's support for these has been appreciated.
- 2.9 The closest Higher Education institution is Bangor University with around 11,000 students. Bangor University works jointly with Aberystwyth University on the provision of science courses. Grŵp Llandrillo Menai also provides degree level courses.
- 2.10 Welsh-medium immersion education is the principal method for ensuring that incoming children can develop their Welsh language skills from 3 years upwards, and it is a priority for the IACC to further strengthen and safeguard the Welsh language and bilingual education. For learners of primary school age there are currently two centres on the Island, both at capacity and with a waiting list. For those at secondary school age current practice is to provide immersion education within each school. These arrangements will need to be strengthened to comply with the 'Welsh language continuum', part of the Welsh Government's Cymraeg 2050 strategy.

3.0 Summary of Main Issues

- 3.1 Following the IACC's initial review of the DCO submission the following points are raised:

3.2 Capacity for dependents of workers

- 3.2.1 Horizon provides an estimate of 220 dependents of migrant workers at the point of 'peak' construction, acknowledging that the actual figure will depend on the recruiting practices of contractors and subcontractors over which it does not have full control. It does not provide an estimate of the numbers at other points during the construction phase, or of the actual number of individual children involved throughout the period which will be higher due to natural churn in the employment of their parents/ carers. As confirmed in our letter to Horizon dated 24th August 2018⁸, the IACC has serious reservations about the methodology of how HNP have calculated the number of dependents that the migrant workers will bring to Anglesey which equates to only 3% bringing their families with them. The Council therefore does not accept the figures used are a reasonable case, requests sight of the details of this methodology in order to understand how these assumptions were derived and reserves the right to submit its own figures for dependents.
- 3.2.2 Horizon accepts responsibility in principle for providing capacity for these children to be educated and identifies the Community Impact Fund as the relevant funding source should support be needed, but the proposals in other respects are unsatisfactory. The proposals

⁷ Improving Teaching. Estyn (2018)

⁸ Letter from IACC to Horizon on Non-Home Based Workforce Household Composition dated 24th August 2018

contain projections that conclude that there will be no capacity problem even if all incoming child dependents are at primary school age, or all are at secondary school age⁹. They also do not set out a clear and timely approach to putting mitigations in place if they are needed and suggest what appear to be narrow and unworkable conditions¹⁰ for providing funding in this situation. The requirement to demonstrate the cause of a shortage of school places by linking directly to an individual child of an incoming family is unrealistic since there are many factors affecting supply and demand at the level of individual places and identifying a 1:1 relationship between a worker at Wylfa Newydd and the need for a specific additional school place will often not be possible. To illustrate this, a child of an incoming worker may be accommodated in a primary school with the result that the school reaches capacity for that year group; the following term a local resident may move within the catchment of the same school and their child of the same year group would no longer be able to be accommodated. The proposals do not address the challenge of providing the necessary teaching capacity in any way.

- 3.2.3 Any lack of capacity for school places causes serious problems for the schools concerned, for the local authority and particularly for the children and their parents/ carers. These could include prolonged decision-making, additional travel, overcrowding, disruption to timetables, increased administrative costs, stress for teachers, and potential appeals by parents/ carers. Workloads for teaching staff and those involved in the management of capacity will also be increased, particularly if poor preparation leads to rushed measures being needed.
- 3.2.4 There are well-established links between attainment in education and insufficient teachers, trainers or support staff in permanent positions¹¹. The excessive use of supply teachers or teachers on short-term contracts has also been shown to cause disruption to children's education leading to lower educational attainment at all levels¹². In the longer term, lower educational attainment would lead to weaker skills in the labour market and cause disruption to businesses, increased recruitment problems and increased local unemployment.

Facilities

- 3.2.5 To determine appropriate levels of contribution to mitigate both facility and staffing issues, it will be necessary for Horizon to provide more information about how it has calculated the range of possible extra places and the factors affecting this. Since there are long lead times in mitigating problems of educational capacity a more robust precautionary plan for the construction phase and the initial operating phase is needed. The assessment of the necessary mitigation should take into account relevant external factors such as demographic trends and modernisation needs. It should also recognise the wider obligations and responsibilities on local authorities to take a planned approach to rationalising capacity, managing school budgets and maintaining capacity for short term local variation in demand. The IACC would be pleased to work with Horizon to do this. At present there is spare capacity in the facilities at some Anglesey schools but investment from Horizon will be needed to ensure sufficient capacity for the increased demand created by workers bringing their families to the Island. Any projected capacity shortfalls for individual schools must be addressed by extending the facilities in ways that take account of the school's particular circumstances and may include alterations, extensions or new build, with Horizon meeting these costs in full.
- 3.2.6 Current provision for nursery education is at capacity and Horizon's overall estimate of 220 dependents at the point of 'peak' construction (which is not accepted) suggests approximately

⁹ Document 6.3.1 C1-Socio-economics (Rev 1.0) 1.5.61, 1.5.127-1.5.129

¹⁰ Document 8.1 Planning Statement, 7.4..56

¹¹ Improving science teacher retention – Wellcome Trust/Education Datalab (2017), Smithers and Robinson 2000, Mocetti (2012); Fredriksson et al (2013); Schanzenbach (2006).

¹² A teacher who knows me: The academic benefits of repeat student-teacher matches. Institute for Effective Education (2018), Ronfeldt et al (2012); Atteberry et al (2016)

20 of these children could be at nursery age. The potential to extend capacity at existing sites require examination with those concerned to establish potential costs.

3.2.7 Some 2-3% of learners have statemented special needs, equating to approximately 4-6 children at the point of peak employment based on Horizon's estimate (which is not accepted) and to approximately 12-15 individuals in total due to normal churn in their parents/carers jobs. The existing special school is presently at capacity and further analysis is needed to identify the scale of provision required to meet these learners' needs, both in the special school and in mainstream schools.

Teachers and support staff

3.2.8 To meet additional staffing needs and to mitigate the disruption caused by non-Welsh and potentially non-English speaking children to the education of others, the teaching workforce needs to be strengthened. As referred to above, the recruitment and retention of teachers, especially in shortage areas, is a major challenge and early action is needed due to the long lead times involved. Without the appropriate mitigation, Horizon's proposals will add to the difficulty of ensuring a full complement of appropriately qualified teachers on Anglesey, worsening an existing problem and considerably increasing the pressure on teachers.

3.2.9 Should the IACC accept Horizon's clarification of the methodology used for confirming the household composition of workforce, using Horizon's estimate of 220 dependants at peak as a reasonable figure for planning purposes, we provisionally estimate that the equivalent of 12 additional qualified teachers will be required at this point, and numbers in proportion to this before and after this. Training costs for 12 staff are approximately £240k (assuming no staff turnover) and salary costs approximately £425k pa at present rates. Other staff may also be needed. However, since recruitment and retention of teachers is so challenging it will also be necessary to strengthen teaching on Anglesey more generally, to ensure that the necessary staffing levels can be achieved. This will require:

- improved retention of teachers and school staff in shortage areas,
- increased supply of new teachers and school staff in shortage areas, and
- improved training and support for existing teachers and staff.

3.2.10 During the operational phase, Horizon estimate 31 additional pupils will need education, equating to training costs of approximately £20k per teacher and salary costs of approximately £70k pa at current rates. As above, a higher figure may be appropriate for contingency purposes, and measures to support teacher recruitment and retention as a whole are also needed.

3.2.11 Action must be taken in good time, beginning not less than 3 years before the anticipated arrival of workers and it is essential that incentives and other measures such as sponsorship or bursaries supported by Horizon are tested in advance and that they are effective within the wider context of teacher recruitment and retention in Wales¹³.

Welsh Language and Immersion

3.2.12 The dependents of migrant workers will require immersion procedures unless they already speak Welsh. Any lack of capacity to provide good quality immersion services would cause a range of negative impacts including limiting the integration of new pupils, disruption to their learning and to the learning of other pupils sharing their classes leading to lower attainment, as well as impacts beyond the classroom, for example disrupting wider strategies to normalise the use of the Welsh language. Horizon acknowledges that current immersion capacity is likely to be insufficient and its proposal to support a peripatetic teacher service is helpful but far from

¹³ OECD (2017) Getting Skills Right: United Kingdom, OECD Publishing, Paris.

adequate.

3.2.13 Following agreement of the household composition of workforce, it will be necessary to identify and agree the maximum likely number of dependant children requiring immersion services.

3.2.14 As Immersion Centres are currently at capacity, it is likely that there will be a need to increase the existing provision. This will include other costs associated with the service provision such as management and administration, training, curriculum resources, transport, facilities and insurances.

3.2.15 It is likely that some of the dependents of migrant workers will not have English or Welsh as their first language. Further additional suitably trained staff would be required, as well as costs for developing or adapting specialist teaching resources. There may also be a need to strengthen immersion facilities for pre-school children.

3.2.16 Overall coordination of these services should be guided by an advisory group of education professionals.

3.2.17 Since immersion techniques can only partly mitigate the pressures on the education system of introducing large numbers of non-Welsh speakers and potentially non English speakers, again it is essential that wider steps are also taken to strengthen school level education throughout the project.

3.3 Local Labour participation during the construction phase

3.3.1 The aim to maximise labour participation by Anglesey residents during the construction phase requires investment in world class bilingual education and training that is fully accessible to a wide range of Anglesey residents. During this phase, a large number of workers will be required for Wylfa Newydd itself and to backfill where displacement occurs; strengthening basic education and providing locally accessible training pathways is key to achieving this aim.

3.3.2 While many of the jobs during construction involve construction trades which will not be needed in the operating phase, there are many similarities between the other skills needed across both phases. Most of the measures relating to these, such as supporting excellent school education, further education and STEM specialist training apply to both, albeit with some adjustments in scale and timing.

3.3.3 IACC seeks clear, long-term commitments from Horizon to a reasonable contribution to ensuring world class school education, post-16 training, apprenticeships and work experience opportunities that are fully accessible to residents, and to supporting individual residents to improve their knowledge and skills where necessary. The level and extent of mitigation measures needed and the costs will be informed by the number and types of Anglesey jobs to be targeted.

Local Employment Targets

3.3.4 It is welcome that Horizon has acknowledged the link between local employment and community benefit, particularly for young people, and that education and training are central to this. It also accepts it has a role in maximising the economic opportunities available to Anglesey residents, however there are substantial problems with Horizon's approach:

- it states that "Planning new or additional training solely against original forecasts is a risky approach" proposing monitoring and working with contractors as a response to uncertainty, however IACC believes that arrangements to provide support with suitable flexibility can and should be set up at the outset,

- statements concerning maximising local employment refer to the wider DCCZ area making it difficult to determine how its proposals affect Anglesey,
- the strategy for maximising local employment mainly appears to focus on the activities of the proposed WNESS and actions it has taken to date. This is unclear and wholly inadequate, and
- It states that “much of” the employment will be “via the supply chain” but there is little detail on how Horizon will control its procurement and management processes and any commitments are vague.

3.3.5 Horizon provides one figure for the level of employment of Anglesey residents during the construction phase: a figure of 1,256 workers at the point of ‘peak’ construction (14% of the total). This is too low, is not compatible with the aim of maximising local employment, and would disadvantage the islands economy and the wellbeing of its people. At Sizewell B, the equivalent actual number was approximately 20%¹⁴. IACC believes that more reasonable and ambitious targets should be agreed for the employment of Anglesey residents throughout the project.

3.3.6 In addition to appropriate funding contributions from Horizon, clear and robust arrangements to pass on obligations to the supply chain are essential.

3.3.7 Horizon states that it will invest in the skills of the people of Anglesey required for displacement jobs, which is helpful, however no clear proposals are included and it takes the position that it is “impossible to know the likely scale” of displacement effects. This is not acceptable (as noted in the letter on Local Employment and Displacement dated 27th of September 2018) and there is concern that disruption to businesses and recruitment problems could occur across a wide range of activities leading to potential problems for individuals and to a loss of business and a lack of growth and investment^{15,16}. The proposed strengthening of school and post-16 education and training discussed below will contribute to mitigating these effects.

School Education

3.3.8 Horizon’s proposals to contribute to education of under 16 are largely restricted to support for careers advice and information provided through the WNESS. It states that the Skills Fund “could include capital spending to support the curriculum”, however no details are given of what form this could take or of the amount identified for this purpose. Horizon’s proposal to appoint one member of staff to “take responsibility for working with teachers” and two education officers (term time only) are wholly inadequate. The proposal documents also do not address the critical importance of ensuring adequate numbers of well qualified teachers or trainers.

3.3.9 Failure to strengthen formal school education in terms of facilities, educational materials, and support staff will restrict the quality of teaching¹⁷ and educational attainment of school leavers with long-term effects, weakening the flow of local people ready to take up employment connected with Wylfa Newydd, whether direct, indirect or resulting from displacement. This missed opportunity would extend to attitudes and aspirations of young people, limiting science ‘capital’, weakening efforts to overcome stereotypes, and a range of other negative consequences.

3.3.10 Although it is acknowledged that strengthening school education will not directly affect employment in the first few years, it will be a key factor throughout the rest of the project. Many

¹⁴ Auditing the Socio-economic Impacts of a Major Construction Project: The Case of Sizewell B Nuclear Power Station (1999)

¹⁵ Miller Research, Beaufort Research, Cogent and Oxford Economics (2014)

¹⁶ Adalet McGowan and Andrews (2015).

¹⁷ The quality of new build in Further Education and its impact on learners, Estyn (2010)

of those currently in secondary level education will enter the employment market early in the construction phase, and those in primary education will begin to do so well before the construction phase reaches peak employment. Failure to take early steps to raise attainment in schools rapidly will lead to a lower share of local workers in a wide range of roles, including high value STEM Level 4+ jobs.

3.3.11 The detailed nature of measures needed to strengthen school education may change over time and it is proposed that overarching agreements are made concerning Horizon's long-term level of financial contribution, with arrangements for specialist organisations to be contracted to deliver these services cost effectively. The support fall into a number of categories:

- resources for teachers (aligned to the new curriculum),
- access to equipment, kits, workshops and live programmes for all learners,
- funding for projects to develop creative learning and pupil agency,
- targeted mentoring and support for those at risk of becoming NEETS and for more able and talented pupils, and
- reduction of administrative burdens.

3.3.12 In each case resources should be bilingual, and follow best practice, for example in terms of local relevance, community links, promoting wellbeing and use of digital media. They should also build on strengths of existing schools.

3.3.13 As referred to above, there are challenges to maintaining a full complement of teachers. To mitigate these potentially serious adverse impacts on the quality of education¹⁸ IACC proposes that Horizon's financial contribution includes a reasonable proportion of costs of on-going support for:

- improving retention of teachers and school staff in shortage areas,
- increasing the supply of new teachers and school staff in shortage areas, and
- improving training and support for existing teachers and staff¹⁹.

Careers Advice and Support

3.3.14 The proposals for WNESS are welcomed and many of the activities referred to are of the kind that could help at least partially mitigate some of the impacts if carried out fully. However, there are substantial gaps and uncertainties concerning issues such as: activity levels, displacement and backfilling, working with the supply chain, raising science capital²⁰, and more action will be needed. There is also no clear statement of Horizon's role and responsibility in connection with WNESS or the extent of its support.

3.3.15 The numbers of Anglesey school leavers going on to higher education are falling²¹ and failure by Horizon to invest adequately in careers advice, awareness raising and engagement activities will exacerbate existing problems such as poorly informed subject choices by school pupils, fewer girls pursuing STEM careers, and fewer applicants for training and apprenticeships resulting in low uptake by local young people of the skilled roles which will become available.

3.3.16 All education and training choices of the people of Anglesey should be made in the full knowledge of the potential employment opportunities associated with Wylfa Newydd, its suppliers or vacancies arising from displacement. Clear information concerning this strategy must also be provided to potential workers and employers from the outset to provide a greater

¹⁸ Examining the effect of class size on classroom engagement and teacher pupil interaction: Differences in relation to pupil prior attainment and primary vs. secondary schools Peter Blatchford*, Paul Bassett, Penelope Brown (2011).

¹⁹ Harlen, Holroyd and Byrne, (1995)

²⁰ Kings College London, ASPIRES research

²¹ <https://www.careerswales.com/en/professionals/pupil-destinations/>

sense of confidence and shared goals.

3.3.17 The majority of activities should continue throughout the construction and operational phases, but some are particularly important at key stages. For example, at the outset measures are needed to encourage supply chain companies on the island to engage with and participate in education and training opportunities. This includes helping them understand the process for applying for work, to begin to train their personnel and to offer work placements to others. Failure to do so could reduce the supply of suitably qualified local candidates from the early stages of construction.

3.3.18 Good support from Horizon will ensure that communication and engagement techniques use multiple channels to reach each audience group to avoid gaps and reinforce messages, are evidence-based and employ best practice. For example, careers education should begin early, additional funding should be provided for the recruitment of non-traditional candidates, employers and apprentices should visit local schools to encourage participation, and online presence should be increased²². Support for work experience programmes for students in years 10-13 is also important. Steps should be taken to incentivise residents studying off the island to return on completion of their studies. For businesses, marketing and information through business networks and press advertising is needed guided by evidence-based recommendations²³.

3.3.19 For NEETS, unemployed, underemployed and other economically inactive groups including those with barriers to employment, well designed²⁴ engagement is needed to initially promote interest and then to provide encouragement, mentoring and tailored support in accessible locations such as help with interview techniques, job search and CV writing skills.

3.3.20 To help address the problems of teacher shortages engagement activity should include measures to encourage Anglesey residents to undertake teacher training, re-enter the profession or to attract qualified teachers from other areas. Mitigation could include financial contributions to targeting marketing, incentives and other initiatives that are shown to be effective²⁵.

Post-16 Education

3.3.21 Horizon's proposals acknowledge its responsibility to support training and to incorporate measures to address worklessness, disadvantage and gender imbalances. It is also accepts the need to work closely with existing bodies and providers, to be guided by them and to provide its financial support through them^{26,27}.

3.3.22 This is welcomed, however commitments to post-16 education are mainly given in outline only; and insufficient information is given to assess what actual contribution is being made and whether this would be adequate to maximise employment opportunities for Anglesey residents – this is unsatisfactory. The challenges are substantial, for example the number of applicants from Wales for physical science courses in 2018 was down around 7% from 2017, continuing a five-year downward trend²⁸.

3.3.23 If employment for Anglesey residents is to be maximised, Horizon should contribute more

²² Becci Newton and Joy Williams, Institute for Employment Studies (2013)

²³ Identifying and Utilising Existing Staff Skills. RHD Consultancy (2017)

²⁴ Office for Students: National Collaborative Outreach Programme report (2018)

²⁵ Diagnostic Analysis of the Effect of Retention and Turnover on the Teaching Workforce. National Foundation for Educational Research (2017), Improving Schools in Wales: An OECD Perspective (2014)

²⁶ Ref 8.3 Jobs and skills Strategy section 6.3.4

²⁷ Ref 8.17 Sustainability Statement: Table 7-4.6 pp254

²⁸ UCAS data (2018)

comprehensively and clearly to investment in high quality post-16 education, training and work experience and to providing funding to encourage and support access to them. This includes basic training, training for specific semi-skilled and skilled jobs during both construction and operational phases, and training for specialist higher level nuclear relevant STEM jobs that have long training periods. This funding could contribute to developing new courses, adapting courses (e.g. for part-time or distance learning), improving facilities or moving them to more accessible locations. Funds to support learners directly could include bursaries, scholarships, travel and clothing grants and other forms of assistance.

3.3.24 Taken together, post-16 education and training must form joined-up pathways through which individual learners can prepare for each significant employment category. Evidence shows that accessibility is a key factor²⁹, and it is important that training pathways are attractive, locally available, and suitably adapted, particularly for those who are NEET, economically inactive, underemployed or self-employed, or for those who may wish to retrain and re-enter the labour market such as older people. For example, research shows that improved FE facilities can aid progression from school to further education vocational programmes³⁰. Support is also needed to ensure courses are delivered to a high standard through the medium of Welsh.

3.3.25 It is important that training of local residents in the advanced skills that will be required to operate Wylfa Newydd begins during the construction phase due to the long lead times involved. Financial arrangements should include increasing capacity of the relevant pathways and helping Anglesey residents to attend the relevant undergraduate and postgraduate courses and to gain the necessary work experience.

3.3.26 It is also expected that there will be shortages of suitably trained and experienced teachers and trainers able to teach key pathway courses through the medium of Welsh and English particularly for specialist or hard to recruit subjects. Mitigation should include strengthening of training for school teachers and trainers in shortage areas. At post-16 level this may also include upskilling existing FE and HE teachers, increasing the efficient deployment of staff (for example through increased mobility) and supporting the engagement of specialist training providers.

3.4 Local Labour Participation during the Operational Phase

- 3.4.1 During the operational phase, significant numbers of stable and secure jobs will be available and there will be an on-going flow of opportunities due to normal churn and the approximately 5% of the nuclear workforce likely to retire each year³¹.
- 3.4.2 Horizon appears to accept the challenge to support long term employment for Anglesey residents during this phase in principle and acknowledges there may be skills mismatches during the operational phase³², however the form of its commitments to strengthening post-16 training are not clear and measures described relate chiefly to the construction phase. The proposals cite the need for flexibility, however this should not mean a lack of clarity over the scale of commitment that it may offer or how this would be managed in the long term.
- 3.4.3 Failing to provide sufficient FE and workplace training opportunities in accessible locations will restrict residents' ability to fulfil their potential and would result in disadvantage to the island's economy and the wellbeing of its people. Lack of provision of education and training pathways

²⁹ Learning Works Widening Participation in Further Education (1997), Apprenticeships in Wales National Assembly for Wales Economy, Infrastructure and Skills Committee (2018)

³⁰ The quality of new build in Further Education and its impact on learners. Estyn (2010)

³¹ Cogent, Power People: The Civil Nuclear Workforce 2009-2025

³² Document 6.3.8 App C1-1-Socio-economics Baseline Report (Rev 1.0) Section 4.6.5

through the medium of Welsh or English will limit individual school leavers' progress towards appropriate levels of education and therefore their job prospects, as well as for those who are NEET, economically inactive and those who may wish to re-enter the labour market.

3.4.4 The aim of maximising labour participation of Anglesey residents during the operational phase of Wylfa Newydd requires an appropriate contribution to investment in high quality training and apprenticeship pathways that are bilingual and accessible to a wide range of Anglesey residents.

School Education

3.4.5 As in the construction phase, strengthening school level education will provide the necessary foundations for all local employment during the operating phase. This will also ensure continuing resilience and flexibility in the local workforce to meet Horizon's needs throughout the life of Wylfa Newydd. This includes lower level jobs across diverse areas such as clerical, food preparation and security, mid-level jobs such as IT or personnel management, and high level specialist jobs in STEM and management. Because this aspect of mitigation is common to both phases of Wylfa Newydd, please refer to the earlier details on strengthening and supporting schools education as set out above.

Careers Advice

3.4.6 The proposals do not confirm that the WNESS careers service would continue during the operational phase. IACC believes that Horizon should commit to contributing to funding the service during the operational phase at an appropriate level to support the on-going aim of maximising local employment.

Post-16 Education

3.4.7 While the need for construction-related skills will reduce substantially at the end of the construction phase, the majority of measures relating to non-construction jobs during the construction phase should be continued throughout the operational phase, with appropriate adjustments. The financial contribution from Horizon should include provision for making these alterations and to maintaining this world class post-16 education and training provision throughout. To illustrate this, areas of training that should continue include:

- foundation courses and training at NVQ levels 1,2 and 3 for both school leavers and adults for jobs such as retail, food preparation and serving, ICT and business skills
- basic and lower level preparation for nuclear specific jobs such as Nuclear Industry Awareness Awards or Diplomas in Nuclear Power Plant Operations,
- HNCs, HNDs, vocational qualifications and apprenticeships suitable for mid-level jobs such as supervisory, managerial and ICT roles as well as certain skilled technical and professional STEM roles,
- advanced education, training and work experience in nuclear relevant skills including graduate and post graduate qualifications.

3.4.8 Depending on the specific jobs and training pathways involved, adjustments to courses, apprenticeships and work experience may include: increasing or decreasing capacity, reconfiguration and updating of taught content, and general rationalisation or relocation (for example more work experience may be possible at the Wylfa Newydd site itself). In some cases it may be necessary to significantly expand courses or introduce new courses, for example in relation to maintenance jobs where these will be needed in significantly greater numbers. During the change from construction to operation the adjustments to training provision and employment patterns will require careful consideration so that each takes place at the appropriate time, in some cases well before the end of the construction phase.

3.4.9 IACC would also like to see a commitment from Horizon to transitioning professional and

supervisory level jobs from construction into the operational phase – although the number of these jobs may be relatively small, they are likely to be well paid career-long jobs and are therefore of particular benefit.

3.4.10 As for all training provision during the construction phase, training during the operating phase should continue to be available through the medium of Welsh and English and in accessible locations. It should also continue to be targeted towards those who are NEET, economically inactive, or have other barriers to employment, or those who are retired but could work part time. Funding should also be available directly to individuals where this may increase uptake, for example scholarships, bursaries, grants or funding for travel costs or clothing.

3.5 *Lack of clarity over the proposals for Education and Training*

3.5.1 The proposal documentation includes a Jobs and Skills Strategy, but not an education and training strategy. The Jobs and Skills Strategy states: “Horizon’s education strategy focuses on three strands: inspire, engage and equip:

- inspire young people to study STEM subjects,
- engage young people, key stakeholders and the local community about the future recruitment opportunities offered by Horizon, and
- equip young people with key employability skills”.

These aspirations are welcomed, but the strategy referred to appears to be missing.

3.5.2 The following high-level statements concerning education or skills are included in the proposals. They are also welcomed in themselves, but lack supporting information.

Ref 8.3 Jobs and skills Strategy:

- Horizon believes it is particularly important to deliver sustainable careers for local residents, equipping them with skills that will be relevant and useful over the longer-term, beyond the construction phase of the Wylfa Newydd Project [1.1.3]
- Horizon envisages that the Strategy will be delivered in partnership with a range of stakeholders [1.1.6]. It will be backed by a flexible Skills Fund that can be used to deliver any aspect of the Strategy, including the WNESS, work with schools, the operational workforce development strategy, backfilling of vacancies at local employers, new training capacity, outreach and direct funding of training courses. [1.1.7]
- Education support sits comfortably in the centre of Horizon’s broader community benefits plan [7.2.1]
- In order to enhance local employment opportunities Horizon will establish a Skills Fund to support a range of education, training and employment initiatives relating to both the construction and operational phases of the project. [8.1.4]

Ref 8.1 Planning Statement:

- The CIO will also interface in related areas such as: ii. Promotion of education, upskilling, training and local employment opportunities, including support for young people from disadvantaged backgrounds. [7.4.41ii]
- The Guiding Principles in the Wylfa SPG [RD28] are considered relevant to the socio-economic assessment and include the following principle: Local job creation and skills development through the implementation of an Employment and Skills Strategy, which should include the maximisation of local labour provision [6.4.358]

3.5.3 Further examples of lack of information concerning education and skills are set out below.

- Horizon refers to an “education hub” and to “identifying educational touch points” but neither are explained further.

- Any substantive detail around proposals to engage with school education are restricted to information provided by WNESS.
- In statements concerning school capacity for the dependents of migrant workers teaching capacity is not considered.
- It is stated that the Skills Fund “could include capital spending to support the curriculum”, however there are no details given.
- Some outreach to schools is proposed but its main purpose appears to be to “communicate Horizon’s requirements for education and skills” and there is no indication of scope or scale.
- A current primary school outreach service is referred to that operates at a low rate equivalent to less than one engagement during a pupil’s seven years at primary school. No commitment to continue this is given and although an increase is mentioned, it is not quantified.
- There is reference to engagement with schools to “demonstrate commitment to wider issues i.e. community benefits” but there is little information provided.

It is also notable that its Mitigation Route Map lists 1,039 items, of which only two refer to education as ‘issues’ and only 19 contain a reference to education.

3.5.4 Taken together, this is very disappointing and not acceptable. Failure by Horizon to adhere to its obligations to mitigate impacts and to fulfil its stated goal of maximising employment for Anglesey residents by making a reasonable and realistic contribution towards education and training will:

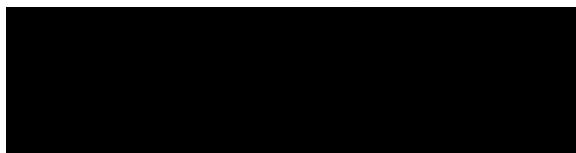
- disadvantage the islands economy and the wellbeing of its people,
- fail to realise the full potential for economic benefit from employment opportunities arising from Wylfa Newydd,
- fail to realise the full potential for employment opportunities in direct and indirect employment at Wylfa Newydd as well as vacancies caused by churn and displacement,
- increase problems of wage inflation and recruitment difficulties for existing businesses whether in the supply chain or not, and
- create a greater need to bring in external labour causing increased costs and disruption.

4.0 Conclusion

4.1 Although the IACC is supportive of the Wylfa Newydd project and the opportunities it brings, this support does not come at any cost. In order for the Wylfa Newydd Project to be acceptable for Anglesey and its residents, the breadth of jobs across various sectors (both high value jobs and support jobs) at both the construction stage and operational phase must be maximised. To enable the local population to access these jobs a series of intervention measures are required to ensure that all possible opportunity is given to the local people to gain employment at Wylfa. Not demonstrating that all efforts have been made to maximise local employment by not transforming the education and training in the region is unacceptable. The IACC is committed to working with Horizon leading up to the DCO Examination to agree amendments to the proposals and mitigation measures that will make the development acceptable.

4.2 Without agreeing a suite of mitigation proposals, which includes up-front capital investment, agreement on phasing and timing, monitoring and resilience funding, the development is not be acceptable to the IACC. The current proposal by Horizon to 'monitor and mitigate' as and when impacts arise is unacceptable and substantial further progress needs to be made if we are to reach common ground before the DCO Examination.

Yn gywir / Yours sincerely,



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