

From: [PMO](#)
To: [Wylfa Newydd](#)
Subject: RE: IACC Deadline 2 Submission : Local Impact Report - Education and Skills (email 9)
Date: 04 December 2018 21:20:52
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[image002.png](#)
[image003.png](#)
[Education and Skills.pdf](#)
[Education and Skills Annex.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.*

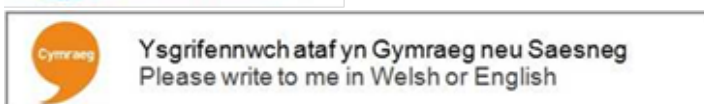
Bydd fersiwn Gymraeg yn cael ei ddarparu cyn gynted a phosib / *A Welsh version of the submission will be provided in due course.*

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 i'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 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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Ynys Môn

THE ISLE OF

Anglesey

Wylfa Newydd

Local Impact Report

Chapter 7: Education and Skills

December 2018

PINS Ref: EN010007



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1.0 Education and Skills

1.1 Overview of Impacts

- 1.1.1 The Isle of Anglesey County Council (IACC) wants to see as many young local people as possible being given the opportunity to work at Wylfa Newydd, directly or indirectly, both during its construction and during its subsequent operation and decommissioning. This will increase their wage levels and career prospects which, in turn, will improve their quality of life, their health, their wellbeing and their prosperity. In addition, providing young people with appropriate education and skills as well as an opportunities to apply these locally, will assist in supporting vibrant local communities and, potentially, the future strength and vitality of the Welsh language. It also assists in stemming the trend towards a disproportionately aging population on the island. The IACC and Anglesey residents support towards the Wylfa Newydd Project is predominantly based on securing and maximising high-value employment opportunities in the short and long-term and for this to be achieved there is a high dependence on ensuring that there are world class education and skills facilities in place for the next generation to thrive.
- 1.1.2 An ample pipeline of appropriately educated and trained local young people entering the jobs market will, therefore, be key for Anglesey to reap the benefits of the proposed Wylfa Newydd Nuclear New Build. The availability and quality of, for example, advice on subject choices and careers is, therefore, critical. Equally as important is the standard of teaching and the need to proactively ensure the availability of modern, fit for purpose teaching environments and learning facilities on the island to encourage and prepare young people to engage successfully with opportunities arising.
- 1.1.3 The IACC has the ambition which is reflected in the objectives of the Isle of Anglesey Plan 2017-2022¹ of *“ensuring that every pupil, every young individual, every learner, wherever they are, whatever their background and circumstances, achieve their full potential and are ready to play a proactive part as the future’s responsible citizens and community champions”*. The IACC also has *“the ambition of ensuring that every pupil, every young individual, every learner, wherever they are, whatever their background and circumstances, achieve their full potential and are ready to play a proactive part as the future’s responsible citizens and community champions”*².
- 1.1.4 The proposed Wylfa Newydd development therefore potentially provides a significant, positive, aspirational opportunity for local young people to be attracted to and securing the education and the skills training needed to engage directly in the construction and / or operation of the new nuclear power station; engage indirectly through local supply chain businesses and support service providers to the project; or engage in other local businesses experiencing the disruptive effects of job displacement, through the loss of staff to the nuclear new build project.
- 1.1.5 Without adequately funded and supported measures, the benefits that Wylfa Newydd can bring to young people on Anglesey will not be fully realised.

¹ Isle of Anglesey Plan 2017-2022 ([Link](#))

² Isle of Anglesey Education Strategy: School Modernisation (2018 Update). ([Link](#))

- 1.1.6 In considering the impact of the proposed Wylfa Newydd development on education and skills, the IACC has differentiated between the skills and training needs of individuals already in the workforce (a matter considered in the Economic Development – Local Employment Chapter), and the educational needs of the pipeline of young people likely to enter the workforce during the period of construction and operation of the proposed power station (considered here in this Chapter).
- 1.1.9 Based upon the evidence and analysis which follows, it is critical that, in respect of 1.1.7(a) above, a suite of funded and agreed mitigations are put in place to deal with impacts relating to:
- a) increase local labour participation in the construction phase;
 - b) increase local labour participation in the operational phase; and
 - c) remediate the potential negative effects of displacement and disruption to schools.
- 1.1.10 In all instances, separate and distinctive packages of measures are needed for Under 16's Education, Post 16 Education and Careers Engagement and Support Services. Mitigations required include, for example, strengthening basic education in schools, supporting sufficient FE and workplace training opportunities, delivery of outreach and enrichment services to motivate and engage young people in STEM related subjects. A suite of funded and agreed mitigations need to be put in place to:
- a) address potential shortages of physical capacity within schools to accommodate the dependants of migrant workers during the construction phase;
 - b) staff capacity to provide high quality education to dependents of migrant workers;
 - c) provision of Welsh Language immersion services for newly arrived dependents of migrant workers; and
 - d) disruption to education of others as a results of dependents of migrant workers.

2.0 Preparation of this Chapter

- 2.1 The IACC has appointed Peter Trevitt Consulting to provide advice on education and skills, assessing the DCO proposals as submitted and to reach the impact conclusions. It has also informed the proposed measures which could reduce negative impacts Further detail and evidence is provided in the accompanying annex (Annex 7A).

3.0 Context

Preparing the Island's young people

- 3.1 Providing inspirational education will help in the retention of young and skilled people on Anglesey, however there are significant challenges, for example:
- a) public spending on education is forecast to reduce and IACC expects that the need to make savings will result in lower expenditure per pupil;
 - b) a recent audit has identified that £6.8million is required to address building improvement issues identified in primary schools and £14m for secondary schools;
 - c) Numbers of entrants for teacher training have missed Welsh Government targets for over five years and recruitment;
 - d) there are continuing national shortages of teachers in certain subject areas including Welsh medium and STEM, and

- e) demographic trends will increase secondary school enrolments year on year during the proposed construction phase.
- 3.2 Public funding supports a wide range of education and training initiatives of direct relevance to Horizon and Wylfa Newydd, for example:
- a) Under the National Employability Plan 2018 Welsh Government is preparing to launch two new employability services in 2019, Working Wales and the Employment Advice Gateway (EAG). These aim to engage with up to 50,000 people a year and to work with approximately 42,000 adults across the first 4 years through the Working Wales programme.
 - b) The Communities for Work programme will provide employability support to over 13,500 participants who are long term unemployed by 2020.
 - c) A new £10 million Skill Development Fund has been launched to boost regional skills provision and target job-specific skills gaps.
 - d) From 2020 the Childcare, Play and Early Years workforce plan will provide funding for early education and childcare for working parents of 3 and 4 year olds for up to 48 weeks per year.
 - e) The Welsh Government introduced³ higher level apprenticeships in 2011. The Welsh Government funds 19 work-based learning providers to deliver apprenticeship programmes across Wales.
- 3.3 Horizon states that its aim is to maximise Anglesey residents' labour participation in the Wylfa Newydd Project and accepts responsibility in principle for supporting the community to achieve this, however it has not provided an Education and Skills strategy and its proposals contain few commitments. IACC's evidence shows that this presents a real risk of losing the opportunities and wider economic benefits for the people of Anglesey.
- 3.4 By its own admission it has drawn from non-European experiences to guide its proposals, acknowledging that "The risk from using non-UK/European projects is that the labour market context is often very different from the UK, which reduces the transferability of lessons learned⁴". The proposals concern the first Advanced Boiling Water Reactor installation in Europe and caution is necessary in all areas concerning jobs and skills.

Capacity and Capability of the Island's schools

- 3.5 IACC has statutory and strategic responsibilities to provide education on the Anglesey, however public spending and budgets are under acute strain and IACC expects that the need to make savings will result in lower expenditure per pupil in the years ahead.
- 3.6 Despite these challenges 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.
- 3.7 Anglesey currently has some capacity within some of its school stock but a number of primary schools, the special educational needs school and nursery provision are currently full. IACC is under statutory obligations and financial pressures to rationalise the excess capacity, and a complex process involving consideration of both

³ Estyn, Higher Apprenticeships in work-based learning September 2018 ([Link](#))

⁴ Examination Library APP-[096] para 2.3.1

modernisation and rationalisation together with public consultation is on-going. Much of the school stock is in need of modernisation, and some funding for renewal and refurbishment is expected to be available from Welsh Government under its 21st Century schools scheme during the proposed construction phase for Wylfa Newydd.

- 3.8 There are continuing national shortages of teachers in certain subject areas including Welsh medium and STEM and this is a particular concern for IACC's vision since evidence shows that of all factors, classroom teaching has the greatest influence on pupils' learning outcomes. Demographic trends will increase secondary school enrolments year on year during the proposed construction phase, increasing the challenge of recruiting and retaining excellent teachers.
- 3.9 Welsh-medium immersion education is the principal method for ensuring that incoming children from 3 years upwards can develop their Welsh language skills and begin the process of integration into Welsh medium education. It is a priority for the Authority to further strengthen and safeguard the Welsh language and bilingual education, goals that are fully aligned with the Welsh Government's Cymraeg 2050 strategy. For learners of primary school age there are currently two immersion centres on the Island, both close to full capacity. For those at secondary school age current practice is to provide immersion education within each school.

4.0 Impacts and evidence base – preparing the Island's young people

4.1 Impact 1: Increasing local labour participation in the construction phase

- 4.1.1 At the peak of the construction phase Horizon estimates that 1,260 Anglesey residents will be employed on the Project. IACC regards this as too low and not compatible with maximising local employment. Failure by Horizon to maximise local employment will result in:
- a) disadvantage to the Island's economy and the wellbeing of its people relative to the opportunity;
 - b) failure to realise the full potential for economic benefit from Wylfa Newydd, and
 - c) failure 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.
- 4.1.2 Horizon proposes monitoring as a response to uncertainty, however there is considerable doubt that there would be time for the necessary actions to be taken given the relatively long timescales involved in education and training. Late or rushed actions within the education and training sector are less likely to be effective and could cause considerable further disruption. The need for flexibility should not mean a lack of clarity over the scale of commitment that it may offer or how this would be managed.
- 4.1.3 It is not clear whether Horizon's estimates for local employment take into account all factors that could affect recruitment. Failure to anticipate these factors correctly could increase the need for local labour for which it is important the local population are prepared. These factors include:
- a) Welsh language requirements;
 - b) long commutes from across the DCCZ favour local workers more than Horizon anticipate (e.g. current average commute is 12miles but many areas of the DCCZ are much further than this); and
 - c) the effects of job displacement.

Under 16s education

- 4.1.4 Children in school represent one of the most important future sources of labour for Wylfa Newydd and to help fill roles caused by displacement. Maximising employment for Anglesey residents requires that these learners receive the best possible school education. Lower attainment by school leavers has a long-term effect, limiting attainment at subsequent levels of education and training. This in turn weakens the flow of those ready to take up opportunities of employment. The negative consequences of weaker school education will apply not just to school leavers at NVQ Level 1 and 2, but also at Levels 3, 4 and 5, including potentially the highest skill STEM jobs. In the longer term, lower educational attainment leads to weakness in the labour market skills and causes disruption to businesses, increased recruitment problems, limited career progression and increased local unemployment.
- 4.1.5 The influx of new residents, including dependent children, to Anglesey will increase the demand for school and education places. Without suitable mitigation Wylfa Newydd will therefore increase the difficulties of ensuring a full complement of appropriately qualified teachers. There is a well-established link between lower attainment in education resulting from a lack of sufficiently qualified and experienced teachers, trainers or support staff in permanent positions. A greater level of 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. Other consequences include large class sizes high workloads, teachers teaching outside their specialist subjects, stress for other teachers, head teachers spending less time fulfilling their main role, increased administrative burden and problems with succession planning. These problems are also linked to retention problems which can also lead to further staff shortages.
- 4.1.6 The Wylfa Newydd Project will increase the need for STEM skills and while STEM learning facilities in Anglesey schools are adequate and safe, local authority budgets are limited leading to fewer potential workers with the appropriate skills than could be achieved with well targeted further investment, particularly where this can also help improve the employment opportunities of those with special learning needs, disabilities, and other challenges, as well as the more able and talented.
- 4.1.7 Failure to strengthen teaching in primary level education could begin to adversely affect the employment market by 2024 (one year before the Construction Workforce projection reaches peak employment assuming the Project starts in 2019). Failure to strengthen teaching in secondary level education could begin to adversely affect the employment market more quickly, well before peak construction is reached.
- 4.1.8 Failure by Horizon to contribute responsibly to investment in education at primary and secondary level will lead to missed opportunities to help schools on Anglesey to reach the highest standards, preparing a younger generation of local people to be competent, well trained and adaptable workers and provide the local labour force which Horizon has used in carrying out its assessments of multiple impacts of the Project. Failure to achieve the predicted rates of local labour will increase impacts across a number of areas including housing, Welsh language and culture, community cohesion and impacts on local services and facilities.

Post 16 education

- 4.1.9 There are projected shortfalls in the supply of Anglesey residents with NVQ level 4+ STEM subjects and NVQ level 3 construction and engineering subjects. Horizon's actions to date in relation to the new Llangefni Engineering Centre and at Grŵp

Llandrillo Menai are welcome, however there appear to be gaps in the availability of courses for certain key skills areas that are reasonably accessible to Anglesey residents.

- 4.1.10 Failure to provide suitable, local training and apprenticeship opportunities will limit the take up of specific NVQ level 1, 2 and 3 courses most relevant to the Wylfa Newydd Project, including by those who are NEET, economically inactive, or otherwise have barriers to education. This will reduce the quality of the workforce, limit the potential for fulfilling and positive careers for these groups and entrench disadvantage and inequity. It will also limit the long term wider individual and community benefits that work can bring.
- 4.1.11 Shortfalls in accessible education and training opportunities and pathways at NVQ Levels 3, 4 and 5 and in skills suitable for the most specialised STEM jobs will limit individuals' attainment of relevant qualifications and they will be less able to take up opportunities of employment as a result of Wylfa Newydd, whether direct, indirect or induced. For example, gaps in provision of a training pathway will have a knock-on effect on each level above, ultimately failing to maximise the numbers of Anglesey residents with skills suitable for higher paid occupations during construction.
- 4.1.12 The numbers and quality of candidates wishing to study at HE level will be restricted if pipeline of those qualified and motivated to reach the required entry level is not adequate. Since the jobs for which this group will be suitable are amongst the most highly paid and potentially stable and long lead times are involved, failure to maximise these opportunities will have a major adverse impact.
- 4.1.13 Many of those who may consider taking up post-16 education or training will not find it easy to travel long distances and time and cost involved in travel will be a significant deterrent to their ability and willingness to do so. This includes those who are NEET or long-term unemployed, but also many other groups who may wish to train or retrain.
- 4.1.14 Failure to support initial teacher training in shortage subjects will worsen the difficulties of ensuring adequate numbers of well trained teachers are in place to meet demand in Anglesey schools. This risks weakening attainment of learners in schools and increasing the difficulties of ensuring sufficient teachers to cater for the dependents of incoming workers.
- 4.1.15 If teachers and trainers are not able to teach courses through the medium of Welsh, this will cause disruption to those who wish to learn in Welsh and will not meet IAAC's aim of ensuring that all education pathways are available in the medium of Welsh for those that want it.

Careers, engagement and support services

- 4.1.16 Failure to adequately raise awareness and provide guidance concerning employment issues through careers advice, awareness-raising and engagement activities for those of school age is likely to lead to weaker motivation and lead to poor education and career choices, restricting learners' ability to fulfil their potential and not providing the appropriately skilled local labour pools the Project needs to meet its local labour targets.
- 4.1.17 Failure to provide a coordinated, well designed and comprehensive range of engagement support services to schools at a significant scale could impact on a range of important factors leading to fewer pupils attaining the skills needed to access opportunities created by the Project. These include:

- a) reduced motivation and self-confidence for pupils and teachers;
- b) reduced awareness of the importance and relevance of STEM;
- c) lower impact on overcoming gender stereotypes and barriers to uptake of science courses by girls, leading to fewer girls in STEM careers;
- d) negative attitudes towards STEM and STEM education held by those who influence learners outside school such as parents and family ('science capital');
- e) reduced awareness of workplaces and workplace culture and of the opportunities that they may offer; and
- f) weaker parental and community involvement in education.

- 4.1.18 Failure to promote apprenticeships and the range of training and work placement opportunities to young people and adults will restrict the number of applicants, reducing the numbers of those qualifying and subsequently entering the workplace or moving on to the next step in their chosen training pathway. This could limit local employment during the construction period.
- 4.1.19 Failure to raise awareness amongst adults and contractors of opportunities for work connected with Wylfa Newydd or potential displacement opportunities is likely to lead to delays in individual companies on the Island taking action to engage with and support education and training opportunities. This will reduce the supply of suitably qualified candidates for roles during the early stages of construction.
- 4.1.20 Awareness raising also has a potential impact at graduate level, and it is notable that the number of Anglesey school leavers going on to higher education is currently declining. Attracting those who choose higher education at distant locations to return to Anglesey after their studies is an IACC priority. Failure to adequately promote Wylfa Newydd as a potential employer offering good sustainable employment to STEM graduates in particular will limit the numbers of those qualified at NVQ Level 4 and above who may return to or take up residence on the Island, reducing the pool of skills relevant to Wylfa Newydd, Energy Island and other initiatives.
- 4.1.21 Failure to raise interest in teaching as a career will hinder efforts to provide additional teaching capacity for the dependents of workers and to raise educational attainment. Teacher recruitment in STEM subjects and Welsh medium roles is important to achieving the goal of maximising employment.
- 4.1.22 Horizon acknowledges its responsibility to work with partners to ensure that local employment is maximised, but this is followed up with very few clear commitments concerning its future role or funding contributions. Its estimated level of local labour participation during the construction phase appears low, lacks supporting information and no target is given. No enforceable target for local labour participation during the operational phase is given. Its strategy for maximising local employment is also unclear and mainly focuses on its WNESS proposals and actions it has taken to date.
- 4.1.23 Horizon clearly recognises the link between local employment and community benefit, particularly for young people, and acknowledges that education and training are central to this. It also accepts it has a role in maximising the economic opportunities available to Anglesey residents, but statements concerning maximising local employment refer to the wider DCCZ making it difficult to determine how its proposals affect Anglesey.
- 4.1.24 Horizon acknowledges that "Labour forecasting is an ongoing activity and not an exact science", stating that "Planning new or additional training solely against original

forecasts is a risky approach but this can be mitigated. Incorporating early joint working with contractors and programme controls will help establish a more likely level of need”⁵. These statements describe work that should already have been undertaken and included in the proposals.

- 4.1.25 Horizon’s approach to the level of local labour participation is based on an aspiration, not a target. Its estimate for employment of Anglesey residents at the point of ‘peak’ overall employment during construction is 1,256 workers.
- 4.1.26 Horizon acknowledges its modelling of local labour participation is based on limited evidence. Document ES Volume C - Project-wide effects App C1-2 - Socio-economic technical appendix Ref 6.3.9 states: “The evidence base on local participation comes from a limited range of studies of power station developments considering the comparatively recent resurgence of Nuclear Power Station proposals”. [2.4.15]
- 4.1.27 Horizon proposes monitoring as a response to uncertainty, however in most cases it is not clear how this would operate and there is considerable doubt that there would be time for the necessary actions to be taken given the relatively long timescales usually involved in matters concerning education, training, recruitment and employment.

Employment practices

- 4.1.28 Horizon acknowledges that “much of” the employment during the construction phase will be via the supply chain and that employment and related practices within the supply chain will impact on the wider goal of maximising employment for Anglesey residents, however there is little detail on how it intends to influence this and any proposals are vague, for example: “Horizon will encourage a positive contribution from its suppliers to the local communities in which they work on our behalf”, this is not a commitment to taking any defined action. Details of how patterns of employment may differ between direct and indirect employment are not provided. References to specific measures state only that they will be considered in future.
- 4.1.29 Horizon does not provide information on how its recruitment practices will differentiate between Anglesey residents and others, if at all. There is an urgent need for further information about recruitment and contracting methods.
- 4.1.30 Horizon clearly commits to including skills required for displacement jobs within its investment in the skills of the people of Anglesey, which is helpful. However, it offers little information on possible displacement effects whether positive or negative and takes the position that it is “impossible to know the likely scale” of these.

HORIZON POSITION

Under-16s education

- 4.1.31 Horizon acknowledges its responsibility to support education and training but identifies very few clear commitments.
- 4.1.32 Document 8.17 Sustainability Statement refers to a capital investment programme for all 5 secondary schools on Anglesey, but no further information is provided in its DCO submission. [5.9.4]
- 4.1.33 Horizon proposes to appoint one member of staff to “take responsibility for working with teachers to further develop primary and secondary resources” and that new

⁵ Examination Library APP-[411]

resources will be available on the “Futures website”. No further detail is provided such as subject areas, age relevance, purpose or timescales. Further information about the resources is needed since this is an important area for support, particularly in light of the anticipated high level of need for new schools’ resources linking to the new curriculum. It is also unclear whether Horizon’s proposal is limited to one member of staff, or whether this staff member would manage a budget for development of resources using external specialists.

- 4.1.34 Horizon states “Proposals are being finalised and include, for early years engagement, existing primary and secondary schools on Anglesey” however this is in the context of “construction and some elements of technical training for the construction and operational workforces for the Project”. Further information is needed, and it is not clear whether the school level engagement is limited to these specific skills, especially at early years and primary school level.
- 4.1.35 Teachers and trainers play a central role in providing high quality education, however the proposal documents do not address the critical importance of ensuring adequate numbers of well qualified teachers or trainers to address increases in demand.
- 4.1.36 It is not clear whether teacher training that Horizon states it is currently providing in relation to its Primary Outreach Programme is intended to continue, or how it relates to other professional learning such as the services provided by GwE Education Consortium
- 4.1.37 Horizon refers to an “education hub” and to “identifying educational touch points”. These are potentially interesting but the terms are not explained further and more information is needed.

Post-16 education

- 4.1.38 The acceptance of responsibility set out by Horizon is relatively strong in this area and it shows commitment in principle to supporting training for its workers and for those needed by the supply chain and through displacement during the construction phase. It shows awareness of its responsibility to incorporate measures to address worklessness, disadvantage and gender imbalances, and appears to accept the “challenge” to focus on supporting long term employment.
- 4.1.39 However, the form of the commitments to support post-16 education are mainly given in outline only, and this is unsatisfactory. Horizon’s statement that the support already in place for apprenticeships is sufficient at this time requires further analysis but it appears that this is only the case if local employment in these skills areas is at the relatively low overall levels estimated by Horizon.
- 4.1.40 The measures described relate chiefly to construction and engineering related training during the construction phase, not to other areas of training that will be needed. It also lists courses that need to be set up that address a number of priority areas where more action is needed, however these are not linked to clear delivery proposals.
- 4.1.41 Insufficient information is given to assess what Horizon’s contribution would be to address potential gaps in courses for relevant skills, courses not available in accessible locations, and it is not clear how tradesmen will gain the necessary site experience to qualify for work (described as a minimum of one year).
- 4.1.42 Horizon recognises its responsibility for inclusion and equity in the provision of post 16 education, and intends to support mitigation, however no firm details are given. For older or unemployed workers Horizon commits to ensuring that “outreach or work

readiness training will be facilitated”. It is unclear what “facilitated” means and whether Horizon will fund this and under what circumstances, for example will work readiness training only be provided to those who have been offered a job?

- 4.1.43 Horizon’s proposals do not refer to teachers and trainers of post 16 courses and there are no proposals concerning support for teacher training.
- 4.1.44 Horizon’s proposals refer to some support and funding for training facilities to date. References to working with partners to deliver training in future are unclear and not specific in terms of roles, financial contributions or the type of training. The locations of training facilities referred to are in the Wylfa Newydd Development Area and at Coleg Menai, which includes locations that are not readily accessible for many Anglesey residents.
- 4.1.45 The proposals do not address the importance of the accessibility of training and of the barriers of travelling distance, especially for young people, those who are economically disadvantaged and those with disabilities.
- 4.1.46 Horizon’s proposal documents describe some current and past support provided to higher education including providing graduate placement opportunities and sponsoring courses. Much of this activity benefits non-residents of Anglesey, although there is a possibility they may become long-term residents in future. No clear forward commitment to provide support is given.

Careers, engagement and support services

- 4.1.47 Horizon’s proposals in relation to careers advice and engagement include many that could help achieve the shared goal of maximising local employment for Anglesey residents. However, in each case they lack information about the role Horizon would play and how it would contribute financially.
- 4.1.48 Statements on funding via a Horizon ‘Skills Fund’ are encouraging and they refer to this funding “supporting” the operation of the WNESS (including outreach, work readiness training etc) and communication routes (including social media platforms) within the local community to enhance awareness of training and employment opportunities. However, the fund is referred to as “flexible” and it is not clear what the extent of this funding is, what the term “supporting” means (e.g. is this part-funding), how it may change with time, or on what basis decisions would be made. The proposals state that a body called the ‘Jobs and Skills Service’ will be responsible for overseeing the WNESS but it is not clear what this refers to.
- 4.1.49 The statements concerning WNESS working with “contractors and stakeholders to maximise opportunities for local residents, unemployed people, young people and groups that traditionally are under-represented in the construction workforce” are welcome, however again they lack detail.
- 4.1.50 The proposals include some references to the WNESS remit also covering indirect employment and to some aspects of education and training, but this is less detailed making it difficult to assess.
- 4.1.51 The schematics in Figs 1.7 and 1.8 in the Ref 6.3.1 C1-Socio-economics (Rev 1.0) suggest that Horizon sees its role as relating to all main stakeholders in providing the services. Fig 1.8 relates to the construction phase and concerns WNESS. The nature of the relationships between the stakeholders and activities shown is unclear, there is no key to the diagrams and it contains references that are not explained anywhere in the proposal documents, for example ‘experiential secondments’, ‘pathfinders’ and a ‘succession plan’.

- 4.1.52 Outreach to schools is proposed but its main purpose appears to be to “communicate Horizon’s requirements for education and skills” rather to enhance the curriculum or support teachers. There is reference to engagement with schools to “demonstrate commitment to wider issues i.e. community benefits” and to “support” wider stakeholder objectives. No clear information is provided on the level of funding involved or what form this may take.
- 4.1.53 In terms of scale, the proposals say that “Horizon...will look to increase [its outreach activity, predominantly aimed at primary-aged children]”. Its report states that currently it is reaching 800 pupils over an approximate 15month period. This represents just one engagement for each individual during their seven years at primary school. The level of increase proposed is not quantified. The level of activity for secondary schools is not explained.
- 4.1.54 Horizon proposes to appoint two education officers (term time only) to “engage, deliver and train teachers to use and embed the [outreach] programme into their curriculum”. Further information is needed.
- 4.1.55 Under the heading “School Engagement” Horizon states it will “target schools in priority geographical areas, engaging with all 5 Secondary Schools and 47 Primary schools on Anglesey” but further information is not provided and it is not clear what form this engagement may take or when it would occur. It seems likely from the context that this primarily concerns careers advice.
- 4.1.56 Reference is made to “informal education” in “facilities that would be constructed in the Wylfa Newydd Development Area”. This is also not explained further and there is no specific commitment.
- 4.1.57 Horizon’s proposals refer to “Continue engagement with schools through the ‘Dyfodol/Futures’ educational engagement programme”, “Big Bang Cymru” and “STEM Ambassadors” however it is not clear what scale and form of support this represents by Horizon, or what timescale is envisaged. It is also not clear how this fits into a strategic approach. The documents state: “This engagement plan is available to all schools on the Isle of Anglesey” which is welcome, however making services available does not equate to them being delivered.

Mitigation required

- 4.1.58 Anglesey residents represent potentially the most stable and committed overall group of employees relating to the Wylfa Newydd Project, whether this is through direct, indirect or induced jobs.
- 4.1.59 Horizon’s estimate of 1,260 workers drawn from Anglesey residents at the point of ‘peak’ construction (Community Impact Report Ref 8.23 page 6) is regarded as unambitious and unacceptable as part of the project plan. This has been analysed in several different ways to investigate the potential for increased local labour participation. Please see Annex 7A (section 1) for further details.
- 4.1.60 IACC proposes a suite of evidence based mitigation measures to strengthen education and training and to improve the capabilities and flexibility of the local workforce. The approach considers measures identified by experts that complement existing education and skills and draw on evidence and best practice to provide education and training with the aim of maximising local employment opportunities arising from Wylfa Newydd. Suitable funding and support from Horizon for the proposed measures will lead to more job opportunities for which Anglesey residents

are appropriately qualified across a range of roles during the construction phase minimising some of the adverse impacts of the Project by maximising local labour.

4.1.61 Investment in education, training and skills would boost the supply side of the economy, creating an enlarged local labour pool with higher levels of productivity. This would improve the embeddedness of the development within the host communities of Anglesey. The proposals are designed to assist:

- a) people currently in work with the necessary skills;
- b) those in work but requiring additional skills to meet the specific requirements of EIP Projects;
- c) people who have been made redundant following recent closures;
- d) people out of work including the long term unemployed;
- e) young people not in education, employment or training (NEETs); and
- f) local people who have moved away from Anglesey to secure work who may wish to return attracted by the new jobs on offer.

4.1.62 Annex 7A (section 2) shows further detail of the proposed mitigations pending dialogue with Horizon.

4.2 Impact 2: Increasing local labour participation in the operations phase

4.2.1 The majority of jobs during the operational phase will be in stable, long term roles and these will be in low, medium and high skill occupations such as operations, maintenance, technical support and nuclear energy specialisms.

4.2.2 Horizon estimates that 850 staff will be employed at Wylfa Newydd during the operational phase. During outages there will be a need for a further 1,000 temporary workers, creating significant opportunities during those periods. It states that, “with the proposed interventions to maximise the local contribution to the workforce, an 85% local contribution is achievable.”

4.2.3 Horizon’s Socio Economic Technical Appendix C1-2 Application Ref 6.3.9 has based its modelling on 85% of construction workers living up to 90 minutes drive away, and 85% of non-construction workers living 60mins drive away.

4.2.4 IACC believes that this position is unambitious given its stated aim of maximising employment by Anglesey residents, and a higher target should be set. Horizon’s proposals contain few interventions that would help achieve this aim. Failure by Horizon to support Anglesey to maximise local employment arising from Wylfa Newydd will result in long-term disadvantage to the Islands economy and the wellbeing of its people. The IACC in its response to PAC2 Horizon stated that “up to 85%” of the operational jobs to be taken by local residents. IACC would like this to be a minimum level with a target for 100%.

4.2.5 IACC wrote to Horizon following the PAC3 consultation stage asking for information concerning roles for the outage periods including whether these are part-time, full-time or temporary employment and how many of these jobs are expected to be taken by locals. No further information or clear proposals have been made.

4.2.6 Failing to take steps to ensure that Anglesey residents with the required skills and experience secure jobs ahead of those from outside Wales, for example through suitable recruitment practices such as advertising vacancies in Anglesey first, risks

posts that could be taken by appropriately qualified local people being taken by non-residents.

Under 16s education

- 4.2.7 Failure to commit appropriate support to strengthen basic education in schools will not provide robust foundations to the skills and attainment of young people on the Island. This will limit their future potential to take jobs connected with Wylfa Newydd and will limit the capabilities of this important labour pool for Horizon.

Post-16 education

- 4.2.8 Failing to support sufficient FE and workplace training or retraining opportunities in suitable locations restricts residents' ability to fulfil their potential and to maximise local employment, both during normal operation and during periodic maintenance and refuelling. Horizon's proposals categorise the effect of jobs for Anglesey residents as highly beneficial, acknowledging that this is a significant impact but identifies no specific support.
- 4.2.9 The term 'local' used throughout HORIZON's documents refers to the whole DCCZ area, however many Anglesey residents who would benefit most from training are likely to be unable to travel longer distances. Training that is available at a greater distance than Bangor, for example, would not be suitable for many. Lack of provision, or barriers to accessible education and training pathways at NVQ Levels 3, 4 and 5 will limit individuals' progress towards appropriate levels of education and therefore less able to take up opportunities for employment arising from Wylfa Newydd.

Careers, engagement and support services

- 4.2.10 The level at which HORIZON will support careers advice and engagement after the construction stage is not clear and it indicates that the WNESS service may cease at that point. In the absence of clear commitments, the impact of insufficient activity will weaken the pathways to employment in good stable jobs for young people and those who may wish to retrain.
- 4.2.11 Failure to provide support to schools through outreach or enrichment services reduce the motivation and engagement of young people towards potential careers in connection with Wylfa Newydd and will not maximise young peoples' interest in STEM. This will limit the attainment of learners and the strength of the pipeline progressing to further and higher education.

HORIZON POSITION

Under 16s education

- 4.2.12 There are no proposals concerning education of under 16s and issues around teaching or teacher recruitment and retention at any stage are absent.

Post-16 education

- 4.2.13 Horizon appears to accept the "challenge" to support long term employment, however the form of its commitments to strengthening post-16 training or retraining are not clear. The need for flexibility should not mean a lack of clarity over the scale of commitment that it may offer or how this would be managed.
- 4.2.14 Proposals concerning accessible training in non-construction related skills are very limited indeed.

4.2.15 Horizon recognises its responsibility for inclusion and equity and intends to support mitigation, however no firm details are given. Measures described relate chiefly to the construction phase, not to the operational phase.

Careers, engagement and support services

4.2.16 Some details concerning a proposed WNESS careers service are provided relating to the operational phase, however it is not clear what Horizon's involvement in this service will be and there is no commitment for this to operate during the operational phase.

4.2.17 There are no commitments to provide informal educational support services to schools.

Mitigation required

4.2.18 The agreed aim is to maximise Anglesey residents' labour participation during the operational phase of Wylfa Newydd. From the start there will be opportunities for a wide range of low, medium and high-level occupations and the effects of retirements, churn and replacement will ensure an on-going need for workers with a range of skills throughout the operational phase. Additional job opportunities will arise during maintenance and refuelling periods.

4.2.19 Education and training pathways relevant to all operational roles at Wylfa Newydd are essential to maximise the opportunities for Anglesey residents' and an appropriate level of support from Horizon to achieve this is needed. Although Horizon has not set a target for local employees for the operational phase, this should be set at 100%.

4.2.20 Unless otherwise specified, the proposed mitigation measures are broadly the same as those detailed for Impact 1 with any differences in the form of delivery of specific measures being due to local circumstances and need. Taken overall, the level of these measures and therefore the level of support that is sought from Horizon would be less than during the construction phase reflecting the lower number of workers involved in Wylfa Newydd during the operating phase.

4.2.21 There will be changes in the sectoral focus of post-16 training to reflect the reduction in need for construction/engineering skills relating to the build (which will begin to occur before the end of the construction phase) however training provision in other skills areas will continue to be needed, including education and training at a foundation level and arrangements for retraining. Adjustments will be needed in good time to focus training on technical and STEM roles needed to operate the Wylfa Newydd site efficiently and safely. Additional training may also be needed in skills relating to outages such as for maintenance and refuelling, and for roles needed in greater numbers than in the construction phase such as supervisory, managerial and ICT roles.

4.2.22 The reduced emphasis on construction skills later in the construction phase could enable some repurposing of the capacity used for construction and engineering training and support for funding to carry out refitting and re-equipping training and apprenticeship facilities to high standards is also proposed which should then be expanded. Funding should also be available to develop courses and make other necessary arrangements to fill gaps in provision appropriate for the operating phase.

4.2.23 Annex 7A shows further detail of the proposed mitigations pending dialogue with Horizon.

4.3 Impact 3: Negative effects of displacement and disruption to schools

- 4.3.1 The level of additional demand for workers in certain sectors by Wylfa Newydd is likely to cause serious labour shortages in those sectors and businesses. Where there is high demand relative to possible supply of labour there is likely to be a significant pull factor created on labour in existing firms with a knock-on effect on the local economy as staff with appropriate skills are required to fill these vacant posts.
- 4.3.2 Impacts include the need to bring in external labour, recruitment delays, lost production associated with vacancies remaining unfilled, increased labour and recruitment costs and the effects of longer commutes and higher accommodation in some cases. In more serious cases they can limit investment and reduce the ability of firms to innovate and adopt new technologies. More information from Horizon is needed but impacts are most likely where significant numbers of workers are needed for relatively short periods (e.g. 1-2 years). Further problems occur when workers finish their contracts and return to the labour market, not only due to potential unemployment but also to their former employers who may wish to reemploy them leading to their replacement becoming unemployed.
- 4.3.3 The problem of vacancies caused by skills shortages are increasing particularly acutely in North Wales, and Brexit is adding to the pressures expected, particularly during the proposed period of construction of Wylfa Newydd.
- 4.3.4 When employment voids occur, this will lead to a need for training and reskilling to provide replacements for these staff.
- 4.3.5 In some areas relating to education and skills Horizon proposes monitoring, however in many cases identification of any problem would arise too late to put in place an effective solution. It also could lead to a failure to make clear provision for resources and arrangement to control and deploy those resources when needed in a timely and robust way.
- 4.3.6 The regular influxes of 1,000 temporary workers is expected to cause some displacement impacts. IACC wrote to Horizon following the PAC3 consultation stage asking for information concerning role for the outage periods including whether these are part-time, full-time or temporary employment and how many of these jobs are expected to be taken by locals.
- 4.3.7 The impacts of noise/dust effects could be highly disruptive to the schools concerned if pre-emptive action is not taken. There could also be safety risks if action is not taken to ensure safe routes for children to school are maintained.

Employment practices

- 4.3.8 Without a clear strategy and a planned approach, chaotic disruption to businesses and recruitment problems could occur across a wide range of activities, with consequent impact on their customers, and staff. These could include loss of business, recruitment difficulties, and lack of growth and investment.
- 4.3.9 Document 6.3.9 ES Volume C - Project-wide effects App C1-2 - Socio-economic technical appendix paragraph 2.4.10 refers to a detailed study on the construction skills implications of an NNB programme, stating that “a nuclear build project would have a larger impact on individual regional construction markets within which they were to take place” This clearly identifies a high level of impact attributable to Wylfa Newydd is likely.

- 4.3.10 During the construction phase there will be stages where the numbers of workers in each occupational category will fall. This may occur at various times depending on the sector but will become a major factor once the point of 'peak' employment on the Project is reached. If those laid off are local residents instead of migrant labour this will not maximise local employment (recognising the need to avoid discriminatory practices).
- 4.3.11 During outages the need for temporary workers may create significant impacts in the local labour market if displacement occurs.

HORIZON POSITION

Under 16s education

- 4.3.12 Failure to support school education on Anglesey will limit the attainment and motivation of young people, exacerbate labour and skills shortages and reduce the resilience and adaptability of the local labour force to meet the needs of employers who may be affected by displacement.

Post-16 education

- 4.3.13 Failure to support post-16 education will limit the attainment and motivation of Anglesey residents exacerbating labour and skills shortages and reducing the resilience and adaptability of the local labour force to meet the needs of employers who may be affected by displacement.

Careers, engagement and support services

- 4.3.14 Failure to support careers, engagement and support services on Anglesey will limit the attainment and motivation of young people, exacerbate labour and skills shortages and reduce the resilience and adaptability of the local labour force to meet the needs of employers who may be affected by displacement.
- 4.3.15 Horizon states "it is impossible to know the likely scale of the potential backfilling needs".
- 4.3.16 Horizon have not proposed an adequate response to this issue and their position is unclear. Their Jobs and Skills Strategy states it is impossible to know the scale of any displacement effects, while the Socio Economic Technical Appendix C1-2 Ref 6.3.9 paragraph 2.4.31 states: "New job opportunities [from Wylfa Newydd] will create a number of different effects. The most obvious effect will be to encourage existing workers to move from an existing job unrelated to the Wylfa Newydd Project to work directly on the Wylfa Newydd Project."

Employment practices

- 4.3.17 The proposals state "WNESS will help workers find new work when they leave Wylfa". This is welcome, but it highlights the absence of a clear strategy concerning succession planning and in particular how Anglesey residents will be treated compared to those from outside the region as the need for each different trades/skills passes its peak during the employment stage.

Under 16s education

- 4.3.18 In Socio Economic Technical Appendix C1-2 Ref 6.3.9 paragraph 2.4.7 Horizon acknowledges the link between school education and displacement effects quoting

from a report⁶ that states: “Attrition due to retirement was expected to limit the mobility of experienced people to where the demand is located. In this way, a large proportion of the predicted skills peak demand would be passed on to the skills pipeline of those currently in education and training as either direct infill of skills gaps or for back-fill for the movement of experienced people across sectors.”

Post-16 education

4.3.19 See also the above points at 0 to 0 which also concern the link between post-16 education and displacement effects.

Careers, engagement and support services

4.3.20 The proposals make reference to WNESS providing support for backfilling but lacks useful detail.

Mitigation required

4.3.21 Increasing the level of skills of Anglesey residents will reduce skills shortages for Wylfa Newydd and for employers affected by displacement, helping to guard against business disruption or recruitment difficulties. Therefore, the measures that are proposed under Impacts 1 and 2 are also proposed in mitigation of these impacts. These measures take an education and skills approach to mitigating the negative effects of displacement but there may be wider social and economic impacts that require other forms of mitigation or compensation.

4.3.22 Suitable pre-emptive action is required for schools where noise and dust effects may occur.

4.3.23 The Annex 7A shows further detail of the proposed mitigations pending dialogue with Horizon.

5.0 Requirements common to all mitigation measures in this chapter

5.1 The details of all mitigation measures should be appropriate to the varying employment patterns that will arise at each stage of the Project, with key factors such as the timing of training pathways and the number and duration of different roles taken into account. For example, while entry into many construction-related jobs will be important in the earlier stages of the construction phase, a wide range of other opportunities will arise during this stage and continue into the operations phase and careful consideration should be given to all. In addition to changing needs, the delivery and form of mitigation measures may require adjustment over time and there will be a need for periodic updating, for example, as digital media creates new opportunities for engagement.

5.2 Wherever possible, it is recommended that the proposed education and training mitigation measures should be delivered by specialist organisations already working in the relevant sector. This may include initial development, delivery and on-going updating and refreshment as needed. In many cases specialist organisations may be able to extend or adapt their activities to provide elements of this support without the need to develop and set up entirely new ways of operating, and this may affect the detailed design of the measures themselves in some cases.

5.3 Mitigations should link with wider priorities, such as those identified by the Welsh Government, the North Wales Economic Ambition Board and by relevant research.

⁶ Cogent. 2010. Renaissance Nuclear Skills Series: 2: Next Generation - Skills for New Build Nuclear [\(Link\)](#)

Detailed plans require discussion between Horizon, IAAC and other stakeholders such as ColegauCymru to establish feasibility and cost implications in more detail.

6.0 Impacts and evidence base – Capacity and Capability of the Island's schools

- 6.1 A potentially large number of dependents of migrant workers are expected during the Wylfa Newydd Project. Horizon has provided a snapshot of the numbers of these dependents it anticipates at the point of 'peak' construction of 220, and during the operational phase it expects 31 at any given time. The basis for these estimates is questioned, but the number cannot be known in advance with any precision. Also unknown is the numbers at other times during the construction phase or the turnover rate – families are unlikely to stay throughout the construction phase, for example, since the jobs requirements are fast changing and most of the workers will be employed by companies in the supply chain for the duration of their contacts only.
- 6.2 Maintaining high quality education while accommodating additional dependents of migrant workers presents challenges for IACC, principally in terms of physical facilities and staff. IACC is under statutory obligations regarding educational provision and must take a planned approach.
- 6.3 Horizon accepts responsibility for mitigating the impacts of dependents of migrant workers. It has assessed the future physical capacity of schools, finding that there will be sufficient capacity with only minor action, however this finding appears to be based on out of date information. HORIZON appears not to have assessed the wider impacts, including the effect on the education of other learners or on teaching capacity.
- 6.4 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. If poor preparation leads to rushed measures being needed, all of these problems are likely to be more acute.
- 6.5 Table 1 below shows how the impacts that have been assessed together with summaries of the obligations and mitigations proposed.

Impact	Brief description	Council Impact rating	Mitigation by obligation		Mitigation requirement	
			Horizon proposed	IACC	Horizon proposed	IACC additional
4	Shortage of physical capacity to accommodate dependents of migrant workers	Negative (major)	Accepts responsibility but projects no mitigation needed.	Statutory responsibility to provide capacity but obligated to seek compensation costs if cause is attributable to a responsible body	Proposes Monitoring	Extension of capacity where shortages are predicted to occur
5	Shortage of staff to provide high quality education to dependents of migrant workers	Negative (major)	Does not recognise this as an issue.	Staffing levels are largely a school level responsibility, however IACC provides school budgets. There are recommendations concerning maximum pupil/teacher ratios	Nil	Additional teaching and support staff needed. Strengthening of overall teaching capacity to offset risk of staff shortages
6	Provision of Welsh language immersion services for newly arrived dependents of migrant workers	Negative (major)	Acknowledges some responsibility.	Services are an established part of IACC's educational arrangements to meet Welsh Government objectives	Proposes a limited degree of help and monitoring	Additional specialist immersion staff needed New centre for primary immersion and additional facilities for secondary schools

Impact	Brief description	Council Impact rating	Mitigation by obligation		Mitigation requirement	
			Horizon proposed	IACC	Horizon proposed	IACC additional
						Additional provision for arrangements for those with weak English language skill
7	Disruption to education as a result of dependents of migrant workers	Negative (major)	Does not recognise this as an issue.	No clear precedent	Nil	Strengthening of overall teaching capacity
8	Impact on special needs provision	Negative (major)	Does not recognise this as an issue.	Statutory responsibility to provide capacity but obligated to seek compensation costs if cause is attributable to a responsible body	Nil	Additional capacity

Table 1: Assessment of impacts and summaries of obligations and mitigations proposed

7.1 Local Impact 4: Physical capacity to accommodate dependents of migrant workers

- 7.1.1 The Local Authority has a statutory duty to provide full-time education to children and young people aged 5-16. Relevant acts include the Education (School Premises) Regulations 1999 and the Children Act 1989.
- 7.1.2 Any lack of physical capacity for school places causes serious problems for the schools concerned, for the local authority and particularly for the parents and the children themselves. This could include decision-making delays, additional travel distance, overcrowding, disruption to the school, administrative workload and cost, stress for teachers, potential appeals by parents/carers, poorer educational outcomes, less efficient use of resources, lack of sustainability, disruption to IACC's modernisation planning.
- 7.1.3 In its letter of 30.11.17 IACC advised Horizon 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. [7.16]
- 7.1.4 Impacts may also include difficulty meeting the Special Educational Needs Code of Practice for Wales⁷. All schools must admit pupils with already identified special educational needs, as well as identifying and providing for pupils not previously identified as having SEN. Admission authorities cannot refuse to admit children on the grounds that they do not have a statement of special educational needs or are currently being assessed. There is a clear expectation within the Education Act 1996 that pupils with statements of special educational needs will be included in mainstream schools. A parents' wish to have their child with a statement educated in the mainstream should only be refused in the small minority of cases where the child's inclusion would be incompatible with the efficient education of other children
- 7.1.5 IACC is under a requirement to provide 10 hours of education from the beginning of the term following the third birthday of children. Current provision for nursery education is at capacity and Horizon's estimate suggests approximately 20 of these children could be at nursery age, creating funding and capacity shortages. In addition to its direct educational value, childcare is as an economic enabler helping parents and carers to access and remain in work and shortages would affect working parents, potentially limiting employment for Anglesey residents.
- 7.1.6 In addition to dependents of migrant workers arriving to take up jobs with Horizon or its supply chain, there are likely to be additional migrant workers coming to the Island to fill vacancies caused by displacement of jobs by the Wylfa Newydd Project. It is also possible that migrant workers in both categories will decide to stay in Anglesey when their jobs at Wylfa Newydd end, and have more children requiring education and possibly immersion services.

Horizon's POSITION

- 7.1.7 Horizon's position is there is no issue and that spare capacity in the physical facilities at some Anglesey schools is likely to be sufficient.

⁷ Special Educational Needs Code of Practice for Wales ([Link](#))

- 7.1.8 Horizon acknowledges the possibility of higher numbers of incoming children and suggests monitoring, but this is not sufficient if new facilities need to be created and additional staff recruited and is not an acceptable as an alternative to a planned approach, the result will be too little too late. It is not acceptable, as Horizon suggest, to allow impact to arise and then try to mitigate them especially where the mitigation may itself take some time to deliver. Education provision is planned on the basis of projections and there is no reason why that should not be done in the instance. Horizon's approach is not a responsible approach with regard to the education of children. It should also be noted that during the construction phase the requirement for potentially large numbers of places are likely to arise at short notice and to occur for differing periods of time.
- 7.1.9 Reference is made in Horizon's proposals to other factors that could affect available capacity in future, such as the economic cycle or government policies and there is a suggestion that if capacity problems arise from "inter-project cumulative effects" then Horizon would expect to "share the burden of any additional mitigation".
- 7.1.10 Horizon provides the following information concerning the numbers of dependents of migrant workers it expects.
- 7.1.11 Document 6.3.1 C1-Socio-economics (Rev 1.0): Table C-14 shows that at peak construction Horizon is projecting 220 dependents of non-home based workers.

Table C1-14 Breakdown of non-home-based workers and dependants during peak construction

Additional population	Number of people
Non-home-based workers	7,000
Estimated partners	285
Estimated dependants	220
Total	7,505

- 7.1.12 Note that no information is provided concerning the periods before and after the peak, or the expected churn rate – affecting the period over which each child may require schooling.
- 7.1.13 Document 6.3.1 C1-Socio-economics (Rev 1.0): 25% of non-home-based professional workers, 4% of operatives (for example civils; and mechanical and electrical workers) and 60% of operational workers (arriving during construction) would bring families into the area [1.5.48].
- 7.1.14 Document 6.3.1 C1-Socio-economics (Rev 1.0): Table C1-18 notes that the operational phase of the Wylfa Newydd Project may result in an increase in the local population of 199 people of whom 31 are estimated as dependents.
- 7.1.15 Horizon provides the following information concerning capacity projections.
- 7.1.16 Document Ref 8.23 Community Impact Report: "In terms of school places, whilst there is capacity in some schools now, that may not be the case in the future. IACC will monitor school enrolment" [2.3.47].
- 7.1.17 Document 6.3.1 C1-Socio-economics (Rev 1.0): Excess capacity for primary schools expected to decrease due to modernisation programme from 11% (630 surplus places) in 2016 to 5% (288 surplus places) in 2021. [1.3.14]

7.1.18 Document 6.3.1 C1-Socio-economics (Rev 1.0): Table C1-15 shows estimates of primary school capacity after accommodating dependents of incoming workers, indicating that over 10% capacity remains in the areas shown.

Table C1-15 Primary school capacity (%) assessment

Area	% of capacity used currently	Spare places currently	Revised % of capacity used -reflecting new demand
Anglesey North	83.2	189	89.8
Anglesey South	86.7	353	88.3
Anglesey West	94.4	152	96.8
Menai Mainland	82.5	966	83.1
KSA	86.1	1,657	88.0

7.1.19 Document 6.3.1 C1-Socio-economics (Rev 1.0): Details of effect of demand for secondary schools – states “no concerns exist” (1.5.61). [1.5.59 – 1.5.62]

7.1.20 Document 6.3.1 C1-Socio-economics (Rev 1.0): Table C-16 shows estimates of secondary school capacity after accommodating dependents of incoming workers, indicating that over 10% capacity remains in the areas shown.

Table C1-16 Secondary school capacity (%) assessment

Area	% of capacity used currently	Spare places currently	Revised % of capacity used - reflecting new demand
Anglesey North	52.5	461	60.1
Anglesey South	84.5	337	86.5
Anglesey West	74.6	514	77.8
Menai Mainland	77.8	1,199	78.4

7.1.21 Document 6.3.1 C1-Socio-economics (Rev 1.0): Demand for education. The effect on Prim/Sec schools from the projections of the increased population is considered not significant. [1.5.127-1.5.129]

7.1.22 Document Ref 8.22: The EqIA Equality report: Concern raised about additional learning needs unit and the response of Horizon. [pp32]

7.1.23 Horizon’s DCO submissions include the following references that may be considered relevant:

7.1.24 Planning Statement Ref 8.1: In order to enhance local employment opportunities, Horizon will establish a fund to support a range of education, training and employment initiatives relating to both the construction and operational phases of the Project... which is covered by the Community Impact Fund. [7.4.57] pp169, 170

7.1.25 Jobs and skills Strategy Ref 8.3: Horizon is committed to investing in a skills infrastructure that provides people from Anglesey and the surrounding counties with the skills they require to be deemed competent to work on the Project - and also in areas where future displacement is likely to occur.” [2.3.3]

- 7.1.26 Document SocioEconomics D3 – 6.4.3: “Community Impact Fund would provide funding for localised issues, such as schools and leisure facilities. Community Impact Fund (secured through planning/Section 106 Obligations). Funding would be released subject to the satisfaction of a number of conditions, yet to be agreed”. [Table 3-6 3.6.4]
- 7.1.27 Document 6.3.1 C1-Socio-economics (Rev 1.0): Monitoring of school enrolment by the IACC. Horizon will provide funding via CIF if issues arise [1.6.16]
- 7.1.28 Document 8.17 Sustainability Statement: The Community Impact Fund could be used to address potential effects on education facilities [5.10.16]
- 7.1.29 Document Ref 8.23 Community Impact Report: “Should localised issues arise where applications are made for places in schools at capacity and IACC can demonstrate the nature of the resulting effect (e.g. temporary short-fall in funding, additional costs for appeals processes etc.) Horizon will provide funding to address this via the Community Impact Fund” [2.3.47]. Repeated at 3.3.46, 4.3.35, and 5.3.33 and Planning Statement at [7.4.56]

Mitigation required

- 7.1.30 At present many schools have spare capacity in their facilities however the IACC is under obligations to reduce this as part of its overall responsibility to update and modernise the school stock within limited budgets.
- 7.1.31 At the level estimated by Horizon it is possible that the total number of places across the school system may be sufficient in general but there are likely to be capacity problems in certain areas. The calculation below assumes that 75% of dependents of migrant workers arriving to work on the Project can be accommodated within the existing school estate however this will depend on where shortfalls occur will depend on where migrant families choose to live, the dependents ages and needs, and other external factors such as demographic trends. It will also be necessary for Horizon to provide more information about how it has calculated the range of possible extra places and the factors affecting this, as well as the possible effects of displacement.
- 7.1.32 A detailed projection of the support required can only be developed through discussion between Horizon and IACC concerning plans for school rationalisation and modernisation taking into account the impact of Wylfa Newydd but also recognising 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. IACC’s plans for the period to 2026 are under consideration. Its aims are to achieve:
- a) learning environments that will enable the successful implementation of strategies for improvement and better educational outcomes;
 - b) greater economy and efficiency for learning environments through better use of resources
 - c) a sustainable education system that meets national building standards and reduces the recurrent costs and carbon footprint of education buildings.
- 7.1.33 Other considerations for IACC’s plans for the period to 2026 include, for example:
- a) Increasing schools’ use for community benefits such as community-use rooms, a stable library or drop-off / pick-up points for mobile libraries and self-help

automated services for council business (to improve community cohesion and maximize the use of the IACC's resource outside school hours and seasons).

- b) Development of single site wrap around provision for all under 11s, including babies and siblings on some sites for example nursery provision for 0-3 year olds on the site of new or adapted schools to enable children to access 5 terms of part-time education before starting full time in the September following their 4th birthday.

7.1.34 The following examples illustrate possible scenarios where additional capacity may be needed:

- a) A primary school may have insufficient capacity for reception classes but sufficient in all other areas. This school may have a space adjacent to existing reception classroom that is under-used and could be converted which may involve altering doorways, decoration, windows, services etc. Building works to convert and make good this space may be needed.
- b) A primary school may require additional classroom space but have a communal area that is larger than necessary. A cost-effective plan may involve building a new communal space or hall, and repurposing the previous communal space as a larger classroom.
- c) A secondary school may have sufficient classroom capacity but insufficient capacity for design and technology or science labs, requiring a new classroom/lab, new equipment and subsequent relocations of equipment between the new space and existing lab or workshop spaces.

7.1.35 There are currently ten nursery schools on Anglesey and it is understood that all are currently at capacity. Using Horizon's estimate of 220 dependent children at the point of 'peak' construction approximately 20 of these could be at nursery age. The potential to extend capacity at existing sites requires examination and mechanisms for the funding requires consideration since the majority of nurseries are privately run.

7.1.36 Horizon has not assessed the level of displacement jobs, and this may be a cause of further inward temporary migration of families with school age dependents needing education. The possibility of migrant workers staying on the Island when their employment on the Project ends has also not been assessed and could increase the mitigation required.

Evidence base

7.1.37 Horizon's figures given in the Socio Economic Technical Appendix Ref 6.3.9 Table 2-8 (page 22) for the overall demand for workers engaged with Wylfa Newydd at the point of 'peak' construction allows an estimate of the 7,000 non-home based workers by occupation during the construction phase, as shown above. Applying these in turn to the percentages that Horizon estimates will bring families under each occupation category produces a figure of 505 dependent children at this point.

	No of workers	...of whom home based	...of whom non-home based	% estimated to bring families	No family households	No of dependent children (DCCZ)	No of dependent children (Anglesey)
Supervisory/managerial	1998	237	1761	25%	440	340	289
Site services, security and clerical staff	902	689	213	60%	128	99	84
Civil engineering ('civils')	3069	675	2394	4%	96	74	63
Mechanical and electrical operatives	2580	208	2372	4%	95	73	62
Operatives	451	191	260	4%	10	8	7
Totals	9000	2000	7000		769	594	505

7.1.38 The above calculation does not include dependents of migrant workers arriving to fill vacancies arising from job displacement caused by the Project, or as a result of migrant workers staying on the Island after their employment on the Project ends which could increase the mitigation required.

7.1.39 The assumptions used by Horizon may be an underestimate for other reasons for example:

- a) The rural nature of the area and its attractive surroundings may encourage more workers to prefer to bring families.
- b) The effects of Brexit on non-UK workers may increase the proportions of domestic labour in comparison to the sources of data used by Horizon.

7.1.40 Changes in birth rates in recent years has led to increased capacity at secondary schools, however this trend is now reversing and rolls are expected to increase, reducing capacity.

7.1.41 An audit of the IACC's portfolio of school buildings indicates that serious defects remain in a number of sites and buildings. In particular, there are maintenance issues and emergency health and safety [e.g. gas supplies, heating systems] that will "raise doubt about the long-term viability of some of our existing schools". Maintenance of school buildings that are aging, and the sustainability of this infrastructure is unsustainable.

7.1.42 Please also see the Annex 7A which sets out a list of further evidence used in the compilation of this report.

7.2 Local Impact 5: Staff capacity to provide high quality education to dependents of migrant workers

7.2.1 IACC's evidence base demonstrates clearly that there are well-established links between educational attainment and the number and quality of teachers, trainers

or support staff. A greater level use of supply teachers or teachers on short-term contracts has also be shown to cause disruption to children's education leading to lower educational attainment at all levels. In the longer term, lower educational attainment would lead to weaker skills the labour market and cause disruption to businesses, increased recruitment problems and increased local unemployment.

- 7.2.2 If sufficient school capacity for the dependents of incoming workers is not provided in a way that is compatible with an excellent education system, the learning of these children and those of other children will be adversely affected. It is important to note that at secondary level an increase in school rolls is expected over the next 5 years and additional recruitment will be needed for approximately 25-30 new teachers by 2023 simply for demographic reasons, placing further background pressure on recruitment and retention during the construction phase.
- 7.2.3 Effects include large class sizes, high workloads, teachers teaching outside their specialist subjects, stress for other teachers, head teachers spending less time fulfilling their main role, increased administrative burden and disrupted succession planning. In the longer term, lower educational attainment leads to weakness in the labour market skills and causing disruption to businesses, increased recruitment problems, limited career progression and increased local unemployment.
- 7.2.4 The pressures on teachers are a particular concern, potentially affecting morale exacerbating recruitment and retention problems leading to further staff losses. Without the appropriate mitigation, pressure on staffing could add to the difficulty of ensuring a full complement of appropriately qualified teachers on Anglesey leading to weaker educational outcomes for large numbers of learners.
- 7.2.5 Evidence shows that impacts are likely to be more acute in smaller schools due to the particular challenges they face, with half of Anglesey primary schools (23) having fewer than 100 pupils.
- 7.2.6 These effects will be magnified if poor preparation leads to short term measures being needed, and further costs could be incurred in connection with appeals and temporary measures.

HORIZON POSITION

- 7.2.7 Horizon's proposals largely don't address this issue.
- 7.2.8 Horizon's DCO submissions include the following references that may be considered relevant:
 - a) 6.3.1 C1-Socio-economics (Rev 1.0): Demand for education. The effect on Prim/Sec schools from the projections of the increased population is considered not significant". [1.5.127-1.5.129]
 - b) 6.3.1 C1-Socio-economics (Rev 1.0): Details of effect of demand for secondary schools – no concerns exist" (1.5.61).

Mitigation required

- 7.2.9 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 evidence shows the teaching workforce needs to be strengthened. 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. An increased use of supply teachers or other measures such as more frequently

moving teachers between different classes has a detrimental effect on learner outcomes and should not form part of the mitigation measures.

7.2.10 The evidence suggests two approaches are needed to mitigate the impacts identified:

- a) Employing the additional staff needed to expand the workforce sufficiently to teach the additional dependents of migrant workers. Further details are set out below.
- b) Strengthening of the overall workforce in ways that enable the above measure and others proposed in this document to have an increased chance of success.

7.2.11 The following list summarises proposed mitigations to strengthen the teaching workforce.

- a) Upgrading staff rooms and staff only areas
- b) Sports/leisure benefits for teachers
- c) Incentives to teach in secondary schools
- d) Strengthen primary school teaching
- e) Contribution to initial teacher training
- f) Enhancing the skills of the existing teaching workforce
- g) Online training and mentoring tools

7.2.12 The same measures are also relevant to Local Impact 4 (see below) and to mitigations in the Education and Skills LIR, and further detail of each of the above is set out in that document.

7.2.13 Data provided by Horizon for the annual size of the overall workforce across the construction phase (Table 2-1, Jobs and Skills Strategy Ref 8.3) combined with IACC's estimate based on that information of 505 dependents of migrant workers at 'peak' has been used to estimate the number of dependents of migrant workers in each year and the approximate numbers of teachers needed – see table 3 below:

	Year (construction phase)										Aver- ages
	1	2	3	4	5	6	7	8	9	10	
Approx number of dependents	8	16	117	272	326	427	505	388	179	54	
Dependents of nursery age	1	2	13	30	36	47	56	43	20	6	25
Dependents of primary school age	3	6	45	106	127	166	196	151	69	21	89
Dependents of secondary school age	3	6	45	106	127	166	196	151	69	21	89
Number of primary teachers	0.2	0.4	2.8	6.5	7.8	10.2	12.0	9.2	4.3	1.3	4.2
Number of secondary teachers	0.2	0.5	3.6	8.5	10.2	13.4	15.8	12.1	5.6	1.7	5.6

Table 3: Estimation of the number of dependents of migrant workers in each year and the approximate numbers of teachers needed

7.2.14 Horizon has also not assessed the level of displacement jobs, and this may be a cause of further inward temporary migration of families with school age dependents needing education.

7.2.15 Specific mitigation measures require dialogue with Horizon. These should include consideration of dependents of nursery, primary and secondary school age and should ensure that all adverse impacts are minimised as far as possible.

Evidence base

7.2.16 There is a well-established link between lower attainment in education resulting from a lack of sufficient qualified teachers, trainers or support staff in permanent positions. 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 levels.

7.2.17 There are currently national shortages of teachers in certain subject areas important to this Project including Welsh medium and STEM subjects and this is a very challenging problem that many agencies are working to address. The challenges can be more acute at secondary level where subject specialism is important; in many parts of the UK there are widespread instances of science teachers teaching Key Stage 3 learners (11-14years) in subjects that are outside their subject specialism and instances of this at GCSE level.

7.2.18 Please also see Annex 7A which sets out a list of further evidence used in the compilation of this report.

7.3 Local Impact 6: Provision of Welsh language immersion services for newly arrived dependents of migrant workers

7.3.1 It is a priority for the Authority to strengthen and safeguard the Welsh language and bilingual education and to adhere to the policies of the Welsh Government including the establishment of a 'Welsh language continuum' as set out in the Cymraeg 2050 strategy.

7.3.2 IACC has adopted the principle that Welsh should not be treated less favorably than English, and that residents of the Island should be able to live their lives through the medium of Welsh if they wish to do so.

7.3.3 The dependents of migrant workers will require immersion preparation 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 as well as impacts beyond the classroom, for example disrupting wider strategies to normalise the use of the Welsh language.

7.3.4 It is necessary to identify the maximum likely numbers requiring immersion services and analysis shows that:

- a) Horizon's overall estimate of 220 dependents of migrant workers at 'peak' equates to approximately 502 individuals requiring immersion services during the construction phase, assuming an average length of stay of two years.

- b) Based on an IACC estimate of 505 dependents of migrant workers at 'peak' equates to approximately 1,158 individuals requiring immersion services during the construction phase, assuming an average length of stay of two years.

	Year										Total
	1	2	3	4	5	6	7	8	9	10	
Approx numbers of dependents of migrant workers present in each year	8	16	117	272	326	427	505	388	179	54	N/A
Immersion 'episodes'	8	8	109	163	163	264	241	148	31	23	1158

- 7.3.5 Failure to provide sufficient specialist trained immersion teachers for the dependents of migrant workers will restrict the quality of immersion. This will place additional burdens on existing staff affecting retention and morale and will degrade the quality of education that they can deliver.
- 7.3.6 It is expected that some dependents of migrant workers will not have good English language skills. Immersion arrangements for this situation are not normally needed and without assistance this will increase workloads for the immersion services, the learners will not be properly prepared for further schooling and the disruptive effects referred to above will be exacerbated.
- 7.3.7 The Nuclear Energy Skills Alliance Nuclear Workforce Assessment (2015) states that with regard to nuclear new build projects: "shortfall is expected to be met by new entrants including apprentices and transfer of skilled staff from other sectors including the wider EU. Across the Engineering Construction Industry as a whole (not just nuclear), the report notes that there is an increasing trend in employment of non-UK workers". Whilst the effects of Brexit may act to reduce the numbers of workers' arriving with dependents without good English skills, this is uncertain and provision should be made in good time.

HORIZON POSITION

- 7.3.8 Horizon acknowledges that immersion capacity is likely to be insufficient. Its proposal to support a peripatetic teacher service is helpful but is not adequate.
- 7.3.9 In 8.1 Planning Statement, Horizon proposes the following:
- Appointing a Welsh Language and Culture Co-ordinator to focus on the development and implementation of Welsh language and culture mitigation and enhancement measures during construction and operation of the Wylfa Newydd DCO Project.
 - Horizon will also provide a peripatetic teacher service to support current immersion education capacity across primary and secondary schools (in Anglesey and Gwynedd if required)". [6.2.28], [6.4.477]
 - Collecting aggregate and anonymised data on...children moving to the KSA with construction and operational workers...include numbers of children, ages and

Welsh language skill levels to provide information for education and early years planners.

7.3.10 Horizon's 8.14 Mitigation Route map states:

- a) Horizon will fund a peripatetic teacher service (pro-rata as detailed below) that would support current immersion education capacity on Anglesey (and potentially Gwynedd if required) across primary and secondary schools. Funding will be available so that two language immersion teachers will be available to work with pupils at the start of the construction. The level of this service will be proportionate to the number of workers that will bring their families and increase or decrease in response to demand. The number of workers bringing families will be carefully monitored through collection of data.
- b) Horizon will engage and facilitate ongoing dialogue with IACC, Gwynedd Council, Mudiad Meithrin (Welsh-medium early years representative body) and Menter Iaith Môn to discuss the inflow of pre-school age children and the impact on local Welsh-medium provision and measures to mitigate this impact.

7.3.11 Horizon's Welsh Language Impact Assessment Ref 8.21 includes the following references that may be considered relevant:

- a) The in-migration in non-home-based workers and their families during construction would lead to an increased demand for education services including schools and language immersion centres. [B.4.374]
- b) Assuming a worst-case scenario that all school-aged children moving into the KSA during construction are non-Welsh speakers, the introduction of 220 school-aged children would adversely alter the balance of Welsh and non-Welsh speakers in primary schools across the KSA [B.4.378]
- c) Horizon fully acknowledges the core role and success of language immersion centres in the KSA and would implement measures to increase capacity within the existing language immersion centres. Mitigation measures are proposed to address this increased demand that would occur during construction. [B4.382]
- d) Horizon acknowledge that measures to mitigate the introduction of non-Welsh speaking children, especially into Ysgol Uwchradd Caergybi and Ysgol Syr Thomas Jones, would be necessary [B.4.386]
- e) The scale and duration of the workforce required for decommissioning is unknown but would be likely to be less than during peak construction. Without the employment requirements and knowledge of the potential for home-based employee numbers, the effects on the provision of education services, health care provision and local and public services cannot be assessed in detail. However, negative effects would be mitigated as part of the Decommissioning EIA.[B.5.18]
- f) All construction workers residing at the Site Campus would be single workers and would not therefore result in a demand for school places or introduce non-Welsh-speaking children into schools closest to the Wylfa Newydd Development Area within the LAI. [C4.128]

7.3.12 Horizon does not provide any estimates of the numbers of dependents of migrant workers who may not have good English or Welsh, this is important because existing immersion services are designed around the needs of English speaking incomers. This is an important issue where further consideration is needed.

Mitigation required

- 7.3.13 All primary schools on Anglesey are bilingual schools that conduct end of Foundation Phase and KS2 assessments through the medium of Welsh. In the two primary schools that are an exception, Welsh is a priority area for both schools. All primary school aged children who move to Anglesey will need immersion support regardless of the school they choose to attend. Children who are new to English as well as Welsh will require additional support in both languages.
- 7.3.14 IACC acknowledges Horizon's recognition of the fact that 'an increase in the number of non-Welsh-speaking school-aged children in areas where Welsh-medium education is provided will increase pressure on Welsh language immersion centres in particular'.⁸ **Ensuring adequate Welsh language immersion provision for incoming children is an essential mitigation step. So too is additional English as an Additional Language (EAL) support for children who are new to English. Given the lack of certainty with regard to the number, age, language background (if they are speakers of languages other than Welsh or English), additional learning needs, location of residence and school enrollment, IACC requires that Horizon provide the funding for adequate worst case scenario preparation in advance of Construction.**
- 7.3.15 IACC acknowledges Horizon have agreed to fund additional immersion teacher capacity in line with demand for the service. Horizon's initial proposal to commit to the funding of two language immersion teaching posts is unlikely to be adequate. Given that the ratio of teachers to pupils in immersion provision should not exceed 8:1 and that pupils should be taught with cohorts of the same age, more than two additional teachers will be required. This should be explicitly acknowledged in WLCMES mitigation Measure 16.
- 7.3.16 Based on current capacity and anticipated growth in need for additional support (see Annex 7A), the IACC has identified **the need for Horizon to fund the employment of:**
- a) an additional 5 Welsh immersion teachers to meet anticipated primary school pupil needs (2.5 equivalent in each of 2 additional language centres)
 - b) 5 specialist Welsh immersion teachers and 5 Welsh immersion (Level 3) classroom assistants (i.e. 1 teacher and 1 classroom assistant in each of Anglesey's 5 secondary schools) to meet anticipated KS3 pupil needs
 - c) An additional 2 English and as Additional Language (EAL) teachers to support children aged 7 and over for whom English is an additional language on arrival in Anglesey schools.
- 7.3.17 **This provision will need to be funded and established well in advance of the arrival of the first Horizon worker children** to ensure that the provision is in place and well-embedded in time for the first arrivals. It is envisioned that the steps that will be necessary to prepare for the first arrivals will **require at least two years** and amongst other actions involve:
- a) Recruiting and training specialist immersion teaching staff
 - b) Recruiting and training staff in the additional language and cultural needs of EAL/WAL pupils

⁸ Examination Library APP-[430] para B.4.382.

- c) Using the specialist staff to train primary sector teachers in all schools on Anglesey and, in particular, those most likely to receiveincomer pupils as a consequence of Wylfa Newydd
- d) Developing and embedding screening strategies such as WELLCOMM in the Foundation Phase and better equipping KS2 and KS3 mainstream teachers in using immersion skills within the classroom
- e) Developing materials and training in the additional languages other than English (e.g. Japanese and other expected / known additional languages).⁹

7.3.18 Provision related to meeting the additional needs of Horizon Wylfa Newydd pre-school, primary and school dependants will be needed during construction, operation and decommissioning phases of the Project. The number of Horizon workforce children in need of support will depend on the additional support needs of each child and will need to be subject to annual review for the duration of the project. Where numbers are unknown, reasonable worst cse scenario funding will be required from Horizon. **This should be explicitly acknowledged in WLCMES mitigation Measure 16.**

Evidence base

7.4.19 Please also see the Annex 7A which sets out a list of further evidence used in the compilation of this report.

7.4.20 Further evidence is provided in the Welsh Language and Culture Chapter and Annex 9A - Anglesey Language Profiling Data Report

7.5 Local Impact 7: Disruption to education of others as a result of dependents of migrant workers

7.5.1 Even with good quality immersion services in operation, they do not fully mitigate the additional pressure on teachers caused by incoming non-Welsh speakers with limited understanding of the language in which education is being conducted and the disruptive effect on day to day teaching and the learning of their classmates, lowering attainment. Until the incoming pupil's language skills have improved sufficiently, teachers may have to repeat instructions, phrase explanations using over simplified terminology, alter lesson plans and give less time and attention to others in the class.

7.5.2 In the longer term, lower educational attainment leads to weakness in the labour market skills and causing disruption to businesses, increased recruitment problems, limited career progression and increased local unemployment.

7.5.3 There are also impacts beyond the classroom, for example, limiting the use of Welsh language socially and disrupting wider strategies to normalise the use of the Welsh language and to increase the confidence of those whose skills are improving. At an administrative level integrating non-Welsh speakers also increases workloads for other school staff including headteachers, and potentially disrupts transition processes, for example where learners move from primary to secondary school.

⁹ Some immersion centres have already developed materials in languages such as Polish to help children and parents/carers who have no knowledge of English to better communicate with teaching and support staff.

- 7.5.4 In the light of the wider pressures on teacher recruitment and retention, and the close relationship between teaching and educational attainment, this additional impact also has the potential to increase the difficulty of ensuring a full complement of appropriately qualified teachers on Anglesey, worsening an existing problem.
- 7.5.5 In the event that incoming children do not speak English as a first language, this would further exacerbate the impact within the schools that they move to. Failure to address this would lead to extra workloads for existing staff, a need for additional staff, additional management and administration, potentially increased time spent in immersion centres, and the creation of learning resources suitable for the languages of incomers.
- 7.5.6 For small schools these impacts are likely to be greater due to the additional challenges for all small schools.

HORIZON POSITION

- 7.5.7 Horizon's proposals do not address the need for strengthening teaching and support staff to provide extra staff resilience to ensure that all classes containing learners who have required immersion preparation can continue to achieve the teaching and learning outcomes expected.
- 7.5.8 Horizon's statements concerning 'expected' capacity of schools appears to focus on the physical facilities only and not to consider teachers and other staff.
- 7.5.9 Horizon's Welsh Language Impact Assessment Ref 8.21 states "As per the assessment on primary schools, whilst no concerns are expected in terms of capacity of secondary schools in the KSA, the introduction of 220 school-aged children into secondary schools in the KSA would significantly alter the balance between first and second language Welsh speakers and non-Welsh speakers in secondary schools". [B.4.384]

Mitigation required

- 7.5.10 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. Wider measures to strengthen teacher recruitment and retention discussed in this and other Impact Assessments are the key measures in providing additional resilience to teaching across the Island.
- 7.5.11 Recruitment and retention of teachers, especially in shortage areas, is a major challenge with long lead-times and the need to provide extra capacity arising from Wylfa Newydd will substantially increase this problem without robust and positive mitigation.
- 7.5.12 The following list summarises proposed mitigations to strengthen the teaching workforce:
- a) Upgrading staff rooms and staff only areas
 - b) Sports/leisure benefits for teachers
 - c) Incentives to teach in secondary schools
 - d) Strengthen primary school teaching
 - e) Contribution to initial teacher training
 - f) Enhancing the skills of the existing teaching workforce

g) Online training and mentoring tools

7.5.13 The same measures are also relevant to Local Impact 2 (see above) and to mitigations in the Education and Skills LIR, and further detail of each of the above is set out in that document.

7.5.14 Discussion with Horizon is necessary to determine and agree how it will fully mitigate these impacts.

Evidence base

7.5.15 Please also see Annex 7A which sets out a list of further evidence used in the compilation of this report.

7.6 Local Impact 8: Special needs provision

7.6.1 Failure to provide appropriate special needs provision fails to meet the needs of learners meaning that they do not receive the support they need to reach their full potential.

7.6.2 It should be noted that much SEN provision provided by local authorities relates to pupils without formally stated needs.

7.6.3 Canolfan Addysg Y Bont is a special school in Llangefni, that is maintained by the Authority for 3-19 year old pupils with severe learning difficulties and complex needs. Pupils placed in the school are usually subject to a statement of SEN. The school provides an outreach support service to the mainstream schools and includes an Early Years assessment unit (ABC Unit) for pupils under 5 with additional needs. Specialist placements are provided for a small number of pupils with ALN whose needs cannot be met in mainstream or local special schools in learning centres, by arrangement with other authorities and training providers.

HORIZON POSITION

7.6.4 No proposals have been provided.

Mitigation required

7.6.5 IACC's policy is to accommodate those with special needs in mainstream schools wherever possible and this will continue. The requirements of the mainstream schools to accommodate additional special needs learners is an important consideration.

7.6.6. Data for Anglesey schools¹⁰ shows some 4% of learners have statemented special needs, 1% require places in a special school, and 21% have needs that are met within mainstream schools. Note that not all children with special needs are statemented. Some numbers may also be higher due to inward temporary migration of families with school age dependents to fill displacement jobs.

7.6.7 The table below shows approximate numbers of learners during each year of construction requiring places in a special school, based on IACC'S provisional assumption of 505 dependents at the point of 'peak' construction. Note that these are not necessarily the same individuals and each individual's needs will be different and cannot readily be predicted.

Year (construction phase)

¹⁰ Pupils with special educational needs by local authority, region and type of provision [\(Link\)](#)

	1	2	3	4	5	6	7	8	9	10
Approximate number of learners requiring places in special schools	0	0	1	3	3	4	5	4	2	1

7.6.8 The facilities required to meet learners' in mainstream schools require examination for potential gaps in physical provision (such as laptops, accessibility alterations or quiet spaces) and for staff such as special educational needs coordinators. To support this, proposals to strengthen overall teaching as set out above are needed. Support for additional resources and special equipment may also be necessary.

7.6.9 For the half who need more specialist provision, the existing special school (Canolfan Addysg y Bont SEN school) is presently at capacity and there are no indications that the underlying need for places will reduce.

7.6.10 IACC will require dialogue with Horizon to agree appropriate mitigation.

Evidence base

7.6.11 Please also see the Annex 7A which sets out a list of further evidence used in the compilation of this report.

7.7 Local Impact 9: Pre-school provision

7.7.1 The impact on pre-school education provision and required mitigation measures are presented in the Welsh Language and Culture Chapter.

8.0 Local Policy Position

8.1 Preparing the Island's young people

8.1.1 One Wales: One Planet. A New Sustainable Development Scheme for Wales ¹¹ (2009). Securing the long-term economic future of Wales is one of the key priorities of the Welsh Government, identifying the energy sector as being important for Wales.

8.1.2 IACC's document New Nuclear Build at Wylfa IACC (2014)¹² states: "The more the Project's employment requirements...can be resourced by the Island's workforce, the greater the economic benefit the Project will be to the Island's economy", and calls for:

- a) "The Wylfa NNB Project promoter to support...maximising the economic opportunities available to the Island's communities".
- b) "Support for education and training".
- c) "Ensuring that employment, supply chain and procurement opportunities are advertised and accessible locally."

¹¹ One Wales: One Planet May 2009 ([Link](#))

¹² IACC SPG 2014 ([Link](#))

- d) “timely support to existing educational institutions and local education provision with an emphasis on the promotion of Science, Technology , Engineering and Mathematics”.
 - e) “support the Island’s disadvantaged communities and local young people including through local training initiatives and outreach programmes so that they are able to benefit from employment opportunities associated with the Wylfa Newydd Project”.
 - f) “Maximise local labour provision through local employment contracts and labour agreements, employment initiatives, procurement of businesses and services that employ local people and advertisement of positions”.
 - g) “Support local businesses where staff are lost to the Wylfa Newydd Project. This should include training in skills areas where there is a recognised shortage, to increase the overall pool of people available”.
- 8.1.3 In its strategic document 'Transforming Education on Anglesey, School Modernization'¹³ (2013) IACC stated it is committed to providing the best possible education for all children and young people on the Island.' As part of that commitment, modernizing education was identified as one of the main priorities.
- 8.1.4 IACC’s vision is to “ensure that every child, every young person, every learner, wherever they are, regardless of their background and circumstances, fulfil their full potential and be prepared to play a proactive role as responsible citizens and future community champions. We need to raise education standards on the Island to realize this, and to contribute to the ambitious Welsh Government's vision for education in Wales.” Its aims are to:
- a) further improve the standards of leadership, management and quality of teaching and learning,
 - b) improve educational outcomes for children and young people and break the link between deprivation and low educational attainment,
 - c) promoting the socio-economic and community improvement program, particularly in the development of a skilled workforce in the STEM field that contributes to the development of the Energy Island, and
 - d) Modernize the stock of schools on the Island by combining 10 smaller schools and building 21st century schools in three areas within Band A, one of which opens in March 2019.
- 8.1.5 Further aims identified recently that also respond to increasing budgetary pressures include:
- a) the need to focus on sustainable and affordable schemes;
 - b) ensure that our strategy contributes to the aims of the Future Generation of Future Act (2015), and contributes to 'Planning a Place'; and
 - c) ensure the best opportunities for our children and young people to flourish by taking advantage of the world of work opportunities that are on the Horizon through the Energy Island program.
- 8.1.6 A key challenge for IACC is acting on challenges faced by smaller schools due to their rural nature. Half of Anglesey primary schools (23) have fewer than 100

¹³ IACC SPG 2014 ([Link](#))

pupils. An Estyn report on School size and educational effectiveness (2013) highlighted the effect of school size on pupils' attainment. This showed that:

- a) On average, schools of less than 100 pupils perform less well in terms of inspection outcomes, pupil standards, wellbeing, curriculum provision and quality of teaching.
- b) On average secondary schools with fewer than 600 pupils tend to perform less well in terms of examination results, wellbeing, quality of teaching and curriculum provision. The difference between the attainment of pupils at small and large secondary schools was found to be approximately 10% in terms of the numbers reaching the expected level at the end of KS4.

8.1.7 Strategic Plan for Welsh in Anglesey Education 2017-2020¹⁴ states that all Anglesey's children and young people should be bilingually proficient and possess the ability to use both languages equally at the end of their educational career. Local authorities have a statutory duty under section 10 of the Learner Travel (Wales) Measure 2008 to promote entry to education and training through the medium of Welsh. Includes the following objectives:

- a) ensuring that proposals for the 21st Century Schools strengthen Welsh medium provision,
- b) increase the ability to take advantage of Welsh language provision through immersion plans and centres for latecomers,
- c) ensuring a higher proportion of Welsh language provision within the IACC's schools. Increase the use of Welsh as a teaching and learning medium,
- d) increase the percentage of students 14-16 who are studying for qualifications through the medium of Welsh,
- e) improve provision and standards, and
- f) that every member of the Authority's education workforce is able to communicate effectively through the medium of Welsh to a level appropriate to the post.

8.1.8 Welsh Language Policy¹⁵ (2016) states the Welsh language should be treated no less favourably than the English language and that persons in Wales should be able to live their lives through the medium of the Welsh language if they choose to do so. If the IACC offers an education course that is open to the public, it will be offered in Welsh.

8.1.9 Isle of Anglesey County Council's Corporate Plan 2013 -17 seeks to raise standards and modernise the schools.

8.1.10 Anglesey Economic Regeneration Strategy (2004 – 2015). The strategy seeks to ensure a thriving and successful economy with quality work opportunities created by innovative employers with effective support services and a skilled and flexible workforce.

8.1.11 Anglesey and Gwynedd Joint Local Development Plan 2011 – 2026¹⁶ (2017) States that: "By 2026, Anglesey and Gwynedd will be [an] area...which boasts an appropriately skilled workforce, where its residents and businesses are able to grasp new transformational economic opportunities in order to thrive and prosper

¹⁴ Strategic Plan for Welsh in Anglesey Education 2017-2020 ([Link](#))

¹⁵ Welsh Language Policy Isle of Anglesey County Council Version 3.0 (12 May 2016) ([Link](#))

¹⁶ Anglesey and Gwynedd Joint Local Development Plan 2011 - 2026 Written Statement 31 July 2017 ([Link](#))

and which promotes economic activity amongst young people.” Strategic objectives include:

- a) Ensure that the appropriate physical or community infrastructure is in place e.g....schools, community facilities, or that it can be provided (e.g. by means of developer contributions) to cope with every kind of development.
- b) Secure opportunities to improve the workforce’s skills and education.
- c) Diversify the Plan area’s rural economy, building on opportunities, offering local employment opportunities with good quality jobs that are suitable for the local community.
- d) Proposals will only be granted where adequate infrastructure capacity exists or where it is delivered in a timely manner. Where proposals generate a directly related need for new or improved infrastructure and this is not provided by a service or infrastructure company, this must be funded by the proposal. A financial contribution may be sought to secure improvements in infrastructure, facilities, services and related works, where they are necessary to make proposals acceptable. Where appropriate, contributions may be sought for a range of purposes, including: education facilities, employment and training facilities and Welsh language measures.
- e) In relation to FE and HE education development, proposals to re-use previously developed land or buildings on existing further / higher education sites will be favoured over proposals for development on greenfield sites. Whilst the principle of adapting buildings for re-use is supported, not all buildings will be suitable for this.
- f) Local economic and community benefits are where feasible maximized, through agreement of strategies for procurement, employment, education, training and recruitment with the IACC at an early stage of project development;
- g) Early engagement by the promoter with the IACC in respect of the promoter’s procurement, employment, education, training and recruitment strategies, with an objective to maximise employment, business and training opportunities for the local communities both in the short and longer term is required. The promoter’s procurement, employment, education, training and recruitment strategies and delivery plans will require to be submitted to the IACC as part of any planning application so far as it is relevant to the application.

8.1.12 Wylfa Newydd: Supplementary Planning Guidance May 2018¹⁷

- a) The IACC will require the Wylfa Newydd Project promoter and any other applicant to support the delivery of the Energy Island Programme and Anglesey Enterprise Zone, maximising the economic opportunities available to the Island’s local communities, including: support for education and training, ensuring that employment, supply chain and procurement opportunities are advertised and accessible locally, a procurement strategy which enables local businesses to access opportunities, contributions to support for training and up-skilling including in local schools and colleges as well as through the provision of mentoring, training and apprenticeship schemes and requiring contractors to participate in such schemes.

¹⁷ Wylfa Newydd: Supplementary Planning Guidance May 2018 [\(Link\)](#)

- b) Local young people must be supported in accessing education and training to enable them to take up new employment opportunities.
- c) The IACC expects the Wylfa Newydd Project promoter to prepare and implement an Employment and Skills Strategy.
- d) Includes a list of thirteen measures of support to encourage the development of STEM qualified teaching staff and the expansion of facilities to capitalise on the benefits associated with the Wylfa Newydd Project and to offset any adverse impacts on existing provision.
- e) All planning applications for associated / related development will be required to demonstrate how the aims of the Employment and Skills Strategy will be delivered by the proposed development.
- f) Monitoring is likely to include, but not be restricted, to the following: the number of local people trained and up-skilled in programmes funded and/or partly funded by the Project promoter, the proportion of the labour-force recruited from (home-based).

8.2 Capacity and Capability of the Island's schools

8.2.1 IACC's vision is to "ensure that every child, every young person, every learner, wherever they are, regardless of their background and circumstances, fulfil their full potential and be prepared to play a proactive role as responsible citizens and future community champions. We need to raise education standards on the Island to realize this, and to contribute to the ambitious Welsh Government's vision for education in Wales." Its aims are to:

- a) further improve the standards of leadership, management and quality of teaching and learning;
- b) improve educational outcomes for children and young people and break the link between deprivation and low educational attainment;
- c) promoting the socio-economic and community improvement program, particularly in the development of a skilled workforce in the STEM field that contributes to the development of the Energy Island;
- d) Modernize the stock of schools on the Island by combining 10 smaller schools and building 21st century schools in three areas within Band A, one of which opens in March 2019.

8.2.2 Further aims identified recently that also respond to increasing budgetary pressures include:

- a) the need to focus on sustainable and affordable schemes;
- b) ensure that our strategy contributes to the aims of the Future Generation of Future Act (2015), and contributes to 'Planning a Place';
- c) ensure the best opportunities for our children and young people to flourish by taking advantage of the world of work opportunities that are on the Horizon.

8.2.3 IACC schools' modernisation policy is aligned to date with the corporate, local and national strategies including the national 21st Century Schools programme. The first phase, Band A is due to be complete on Anglesey in April 2019, at which point some 10% of primary school learners will receive their education in 21st Century buildings. Progress to date has included closing a number of smaller schools and opening new schools. It is anticipated that by mid-2019 Anglesey's primary

schools will have 10% surplus places, a reduction of over 17% in six years. The school modernization program on Anglesey will give due consideration to the following factors:

- a) Potential environmental impact and proposed changes to school infrastructure.
- b) Reducing carbon emissions arising from the direct use of schools from heat, energy and transport.
- c) Opportunities for schools to demonstrate good sustainability practices in energy, water, waste, travel, food and procurement for their pupils, their staff and their communities.
- d) Improve the teaching of sustainable development through the provision of innovative, indoor and outdoor learning environments.

8.2.4 IACC recognises that the funding available under the 21st Century Schools programme is not sufficient to address modernisation issues for all schools, and a prioritised approach is under consideration. A further challenge for IACC is acting on challenges faced by smaller schools due to their rural nature. Half of Anglesey primary schools (23) have fewer than 100 pupils. An Estyn report on School size and educational effectiveness (2013) highlighted the effect of school size on pupils' attainment.

8.2.5 Strategic Plan for Welsh in Anglesey Education 2017-2020¹⁸. All Anglesey's children and young people should be bilingually proficient and possess the ability to use both languages equally at the end of their educational career. Local authorities have a statutory duty under section 10 of the Learner Travel (Wales) Measure 2008 to promote entry to education and training through the medium of Welsh. Includes the following objectives:

- a) Ensuring that proposals for the 21st Century Schools strengthen Welsh medium provision;
- b) Increase the ability to take advantage of Welsh language provision through immersion plans and centres for latecomers;
- c) Ensuring a higher proportion of Welsh language provision within the IACC's schools. Increase the use of Welsh as a teaching and learning medium;
- d) Increase the percentage of students 14-16 who are studying for qualifications through the medium of Welsh;
- e) Improve provision and standards; and
- f) That every member of the Authority's education workforce is able to communicate effectively through the medium of Welsh to a level appropriate to the post.

8.2.6 Welsh Language Policy¹⁹ (2016). The Welsh language should be treated no less favourably than the English language and that persons in Wales should be able to live their lives through the medium of the Welsh language if they choose to do so. If the IACC offers an education course that is open to the public, it will be offered in Welsh.

¹⁸ Strategic Plan for Welsh in Anglesey Education 2017-2020 [\(Link\)](#)

¹⁹ Welsh Language Policy Isle of Anglesey County Council Version 3.0 (12 May 2016) [\(Link\)](#)

- 8.2.7 Isle of Anglesey County Council's Corporate Plan 2013 -17 seeks to raise standards and modernise the schools.
- 8.2.8 Anglesey Economic Regeneration Strategy (2004 – 2015). The strategy seeks to ensure a thriving and successful economy with quality work opportunities created by innovative employers with effective support services and a skilled and flexible workforce.
- 8.2.9 The Anglesey and Gwynedd Joint Local Development Plan 2011 – 2026²⁰ (2017) vision states that: "By 2026, Anglesey and Gwynedd will be [an] area...which boasts an appropriately skilled workforce, where its residents and businesses are able to grasp new transformational economic opportunities in order to thrive and prosper and which promotes economic activity amongst young people." Strategic objectives include:
- a) Ensure that the appropriate physical or community infrastructure is in place e.g....schools, community facilities, or that it can be provided (e.g. by means of developer contributions) to cope with every kind of development.(SO 2)
 - b) Secure opportunities to improve the workforce's skills and education.(SO 11)
 - c) Diversify the Plan area's rural economy, building on opportunities, offering local employment opportunities with good quality jobs that are suitable for the local community. (SO 12)
- 8.2.10 Delivery of the Plan's vision and objective requires implementation of a series of Policies. Based on the issues raised in this Chapter of the Local Impact Report, the following Policies are of particular relevance:
- a) Criterion 5 of Strategic Policy PS 9: Wylfa Newydd and related development, which sets out the expectation that the accommodation requirements of construction workers (a projected 75% of which will come from outside the area (i.e. 7,000 workers)), will not result in an unacceptable adverse ... social, linguistic.... impacts.
 - b) Criterion 9 of Strategic Policy PS 9: Wylfa Newydd and related development, which expects Horizon to maximise employment, business and training opportunities for local communities both in the short and longer terms.
 - c) Criterion 10 of Policy PS 9 Wylfa Newydd and related development, which sets out the expectation that consideration is given by Horizon of the capacity of local community facilities. Although not included as an example in the Policy wording, these facilities include the capacity of local schools, nursery schools, Welsh language immersion centres/ classes.
- 8.2.11 Also of particular relevance in this respect is the Wylfa Newydd: Supplementary Planning Guidance May 2018²¹ which provides detailed advice about the application of relevant Policies in the Anglesey and Gwynedd Joint Local Development Plan on the Island.
- a) The IACC will require the Wylfa Newydd Project promoter and any other applicant to support the delivery of the Energy Island Programme and Anglesey Enterprise Zone, maximising the economic opportunities available to the Island's local communities, including: support for education and training, ensuring that

²⁰ Anglesey and Gwynedd Joint Local Development Plan 2011 - 2026 Written Statement 31 July 2017 ([Link](#))

²¹ Wylfa Newydd:Supplementary Planning Guidance May 2018 ([Link](#))

employment, supply chain and procurement opportunities are advertised and accessible locally, a procurement strategy which enables local businesses to access opportunities, contributions to support for training and up-skilling including in local schools and colleges as well as through the provision of mentoring, training and apprenticeship schemes and requiring contractors to participate in such schemes.

- b) Local young people must be supported in accessing education and training to enable them to take up new employment opportunities.
- c) The IACC expects the Wylfa Newydd Project promoter to prepare and implement an Employment and Skills Strategy.
- d) Includes a list of thirteen measures of support to encourage the development of STEM qualified teaching staff and the expansion of facilities to capitalise on the benefits associated with the Wylfa Newydd Project and to offset any adverse impacts on existing provision.
- e) All planning applications for associated / related development will be required to demonstrate how the aims of the Employment and Skills Strategy will be delivered by the proposed development.
- f) Pro-active measures agreed between the Project promoter and the IACC should be implemented to mitigate potential adverse impacts on, and strengthen, Welsh language and culture. A list of twelve example measures of support is included.
- g) All planning applications for related development will be expected to demonstrate how the Welsh Language Strategy will be delivered by the proposed development.
- h) Monitoring is likely to include, but not be restricted, to the following: the number of local people trained and up-skilled in programmes funded and/or partly funded by the Project promoter, the proportion of the labour-force recruited from (home-based).

8.2.13 The IACC's assessment of potential local impacts described in this Chapter indicates that the Project could result in adverse impacts on schools and other educational facilities, resulting in additional demands on these facilities (in physical and manpower). Unmanaged, a clear potential impact would be on the ability of schools and other related facilities to continue to play their critical role to sustain and strengthen the Welsh language. Schools are recognised as important domains to sustain and enhance the Welsh language and culture on the Island. These concerns are also highlighted in the Chapter on Welsh language and culture. Without robust mitigation and monitoring strategies, the IACC remains concerned that the above Policy tests will not be achieved

8.2.14 On this basis, the requirements of criteria 10 and 13 of Policy PS 9 and the requirements of Policy PS 2 Infrastructure and developer contributions and Policy ISA 1 Infrastructure provision are also of particular relevance. Provided that statutory tests are satisfied, these policy tests expect that contributions will be made to secure improvements in infrastructure, facilities and services (which could include upgrading existing facilities) in order to mitigate impacts.

8.2.15 When an assessment of a development identifies potential impacts (positive or negative) it is expected that an applicant considers whether a positive impact can be improved and whether a negative impact can be managed to an acceptable level. These enhancement or mitigation measures could be embedded in the development or secured via contributions (subject to the statutory tests).

- 8.2.16 As set out in this Chapter, the IACC does not consider that the measures identified by Horizon are sufficiently robust to mitigate the identified impacts.
- 8.2.17 Criterion 16 of Policy PS 9 Wylfa Newydd and related development is also of particular relevance because the IACC would expect robust thresholds for reporting and monitoring the spatial distribution of workers in order to minimise the potential effects of a large temporary workforce on existing facilities on the Island. Thresholds in the monitoring framework need to be sufficiently robust in order to identify trends that could, if allowed to continue, result in patterns of behaviour, which once established may be difficult to reverse. Identification of trends as soon as possible is critical. The requirements of criterion 3 of Policy PS 10 Wylfa Newydd: campus style temporary accommodation for construction workers, is also of particular relevance within the context of monitoring and proactively tackling additional impacts or variances from the assumptions that underpin Horizon's case. From a schools' capacity perspective the variances could arise from an increase in worker dependents, variation in origin of workers (i.e. more non- home workers).
- 8.2.18 As described in this Chapter of the Local Impact Report and in other chapters, the IACC is not convinced that the monitoring framework is sufficiently robust.

9.0 Gaps in information provided

Education and Skills

9.1 List of gaps

- 9.1.1 In document 1.4. General Glossary Horizon defines its Jobs and Skills Strategy as "A strategy which has been developed with stakeholders to identify various measures to support employment for the Wylfa Newydd Power Station." Adding that it is not a certified document. By this definition the strategy is not intended to address wider implications for jobs and skills, mitigate impacts or to maximise employment for Anglesey residents.
- 9.1.2 The Jobs and Skills Strategy states: "Horizon's education strategy focuses on three strands: inspire, engage and equip [listed below] however, no education strategy has been provided and there is very little firm information concerning commitments to support these aims:
- a) inspire young people to study STEM subjects;
 - b) engage young people, key stakeholders and the local community about the future recruitment opportunities offered by Horizon; and
 - c) equip young people with key employability skills.
- 9.1.3 The Mitigation Route Map lists 1,039 items, of which only two refer to education as 'issues' and only 19 contain a reference to education.
- 9.1.4 Horizon refers to its Supply Chain Charter including a "series of measures...commencing in the primary education sector and tracking through to secondary and higher education establishments and partners". Further reference to this concept appears to be missing.
- 9.1.5 Horizon acknowledges that "Labour forecasting is an ongoing activity and not an exact science", stating that "Planning new or additional training solely against

original forecasts is a risky approach but this can be mitigated. Incorporating early joint working with contractors and programme controls will help establish a more likely level of need". These statements describe work that should already have been undertaken and included in the proposals.

- 9.1.6 The majority of documents provided by Horizon concerning local jobs and skills issues concern people living within the DCCZ, a large area of north west Wales with none specific to Anglesey residents as a group. Horizon does not provide information on how it plans recruitment practices on the Project to differentiate between Anglesey residents and others, if at all.
- 9.1.7 Estimates of how many workers are expected to be employed directly, by contractors and by subcontractors at each stage of the Project have not been provided. Horizon states that during construction much of the employment will be via the supply chain, however details of how patterns of employment may differ between direct and indirect employment are not provided.
- 9.1.8 Proposals concerning training in non-construction related skills or school education are very limited indeed, and issues around teaching or teacher recruitment and retention are absent.

9.2 IACC requests and dates

- 9.2.1 In its response to the Stage 3 (PAC3) (letter from Gwynne Jones to Mr Hawthorn) IACC stated: "In summary the demand for skills evidence is unacceptably incomplete and further work is required. This information is required to allow the necessary and appropriate targeting of jobs and training to maximise opportunities and supply the labour Horizon requires ahead of roles arising reducing the need for in-migration where roles could be filled by local labour whilst protecting existing employers and businesses". Further information requested in this letter included:

Information requested	Result
Detailed understanding of future skills gaps	Some information provided
What additional training is required from higher education, and further education to meet future demand by Horizon	Some information provided
Detail of the requirement for additional skills in the immediate supply chain	Some information provided
Detail on the contracts available to local business	Not provided
More detail on the demand and supply for skills and qualifications.	Some information provided

Detail on the level and scope of support for improving facilities at secondary schools	Not provided
How Horizon will run the Technical Apprenticeship Scheme over the lifetime of the construction Project, how many apprenticeship places will be created each year and will the number rise in line with peak demand for labour	Not provided
How Horizon's efforts to add nuclear context to courses at University of Bangor, the £1m investment in the Engineering provision at Grwp Llandrillo Menai from Bangor to Llangefni and engagement with schools to encourage take up of STEM subjects fit in with Horizon's wider skills / training strategy and when these further investments will be made.	Not provided
More information on any programmes or incentives to incorporate or re-train existing Magnox staff (or those recently left who still possess relevant skills). Clear proposals are needed in this respect.	Not provided
The precise remit and role of the [WNESS] brokerage service should be set out in order to give a consistent view on what is to be provided. Similarly how the other routes to employment are to be made operational should also be clearly set out with specific mechanisms, quantified targets, funding and other details including staffing.	Some information provided
Details of how Horizon will work with partners to fund training including the scale of financial commitment to training and mechanisms to deliver.	Not provided

9.2.2 In its letter of 30.11.17 IACC stated that it required:

Information requested	Result
An Education Strategy [7.15]	Not provided
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. [7.5]	Not provided
Information concerning the supply and demand for skills and training [7.6]	Some information provided
An assessment of capacity within the existing training system [7.6]	Some information provided

Information on the training places to be provided by year, course and skill level [7.8]	Not provided
Detail on how large the problem of backfilling positions will be [7.8]	Not provided
How Horizon will monitor requirements for backfilling and the frequency of this monitoring [7.8]	Not provided
Details in relation to the Service Hubs/Management Board [7.8]	Not provided
How the monitoring will trickle down to the supply chain [7.8]	Not provided
Confirmation as to what Horizon's expectations of the role of the Employment & Skills Service are [7.8].	Not provided
IACC requires confirmation that the strategy pushes displacement/poaching as deep and late into the construction phase as possible [7.10]	Not provided
Further clarification in relation to local labour participation. [7.12]	Some information provided
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 IACC and local businesses. [7.11]	Not provided

9.3 Education Capacity

- 9.3.1 The Mitigation Route Map lists 1,039 items, of which only two refer to education as 'issues' and only 19 contain a reference to education.
- 9.3.2 Horizon's statements concerning 'expected' capacity of schools appears to focus on the physical facilities only and not to consider teachers and other staff.
- 9.3.3 It is likely that some of the dependents of migrant workers will not have English or Welsh as their first language and further information from Horizon is required concerning numbers of workers with dependents who may be in this category.
- 9.3.4 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 suggesting conditions for providing funding that are not specified. The proposals do not address the challenge of providing the necessary teaching capacity for these people in any way.
- 9.3.5 Horizon provides an estimate of 220 dependents of migrant workers only 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 that this may represent throughout the period.

- 9.3.6 Horizon has also not assessed the level of displacement jobs, and this may be a cause of further inward temporary migration of families with school age dependents needing education.
- 9.3.7 For the operating phase Horizon provides an on-going figure but no estimate is given for outage periods or for the decommissioning phase. Further information is needed concerning both phases.
- 9.3.8 There is no reference to the possibility of pupils having special needs or of the implications of this for capacity provision although this is likely during the construction phase.
- 9.3.9 There is a general commitment to mitigate the effect on the education system of children of incoming workers and provide funding, but no information is given concerning planning for this (other than monitoring) what form it would take or what level of financial provision would be made.
- 9.3.10 Horizon identifies the Community Impact Fund as covering “spending on boosting school place numbers”, and for funding “localised issues such as schools”. However, no figures are given.

9.4 IACC requests and dates

- 9.4.1 In its letter of 30.11.17 IACC advised Horizon 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. [7.16]
- 9.4.2 In its letter of 30.11.17 IACC advised Horizon that:
 - a) 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. [8.17]
 - b) Analysis of the current state of Anglesey and of individual Study Areas...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. [8.18]
- 9.4.3 In its letter 24.08.18 the IACC sought urgent clarity on the household composition of the non-home based workers, and in particular, the number of workers assumed to bring partners and dependents. The IACC believed it to be essential to understand how the figure was derived and its robustness to fully understand the future demand for school places and (particularly North Anglesey) and demand on immersion services. A response was received from Horizon but the issue was not clarified.

10.0 DCO Obligations and requirements

Mitigation summary

10.1 Impact 1: Increasing local labour participation in the construction phase

- 10.1.1 A suite of evidence based mitigation measures is required to strengthen education and training and to improve the capabilities and flexibility of the local workforce.

Suitable funding and support from Horizon for the proposed measures will lead to more job opportunities for which Anglesey residents are appropriately qualified across a range of roles during the construction phase minimising some of the adverse impacts of the Project by maximising local labour.

10.1.2 The proposals are designed to assist:

- a) people currently in work with the necessary skills;
- b) those in work but requiring additional skills to meet the specific requirements of EIP Projects, people who have been made redundant following recent closures;
- c) people out of work including the long term unemployed;
- d) young people not in education, employment or training (NEETs); and
- e) local people who have moved away from Anglesey to secure work who may wish to return attracted by the new jobs on offer.

10.1.3 Annex 7A (section 2) describes further detail of the proposed mitigations.

10.2 Impact 2: Increasing local labour participation in the operations phase

10.2.1 Education and training pathways relevant to all operational roles at Wylfa Newydd are essential to maximise the opportunities for Anglesey residents' and an appropriate level of support from Horizon to achieve this is needed. The target for local employees for the operational phase, this should be set at 100%.

10.2.2 The proposed mitigation measures are broadly the same as those detailed for Impact 1 with any differences in the form of delivery of specific measures being due to local circumstances and need. The level of these measures and therefore the level of support that is sought from Horizon would be less than during the construction phase reflecting the lower number of workers involved in Wylfa Newydd during the operating phase.

10.2.3 Annex 7A shows the detail of the proposed mitigations.

10.3 Impact 3: Negative effects of displacement and disruption to schools

10.3.1 Increasing the level of skills of Anglesey residents will reduce skills shortages for Wylfa Newydd and for employers affected by displacement, helping to guard against business disruption or recruitment difficulties. Therefore, the measures that are proposed under Impacts 1 and 2 are also proposed in mitigation of these impacts. These measures take an education and skills approach to mitigating the negative effects of displacement but there may be wider social and economic impacts that require other forms of mitigation or compensation.

10.3.2 Suitable pre-emptive action is required for schools where noise and dust effects may occur.

10.3.3 Annex 7A shows further detail of the proposed mitigations pending dialogue with Horizon.

10.4 Requirements common to mitigation measures 1 to 3

10.4.1 The details of all these mitigation measures should be appropriate to the varying employment patterns that will arise at each stage of the Project. The delivery and

form of mitigation measures may require adjustment over time and there will be a need for periodic updating, for example, as digital media creates new opportunities for engagement.

10.4.2 Mitigations should link with wider priorities, such as those identified by the Welsh Government, the North Wales Economic Ambition Board and by relevant research. Detailed plans require discussion between Horizon, IAAC and other stakeholders such as ColegauCymru to establish feasibility and cost implications in more detail.

10.5 Local Impact 4: Physical capacity to accommodate dependents of migrant workers

10.5.1 Present schools spare capacity will be reduced by IACC as part of its overall responsibility to update and modernise the school stock within limited budgets.

10.5.2 There are likely to be capacity problems in certain areas. Detailed projections of the support required can only be developed through discussion between Horizon and IACC concerning plans for school rationalisation and modernisation taking into account the impact of Wylfa Newydd. Proposals should support IACC's aims are to achieve:

- a) learning environments that will enable the successful implementation of strategies for improvement and better educational outcomes;
- b) greater economy and efficiency for learning environments through better use of resources
- c) a sustainable education system that meets national building standards and reduces the recurrent costs and carbon footprint of education buildings.
- d) increasing schools' use for community benefits.
- e) Development of single site wrap around provision for all under 11s.

10.5.3 Scenarios that need to be catered for include:

- a) Primary schools with insufficient capacity for reception classes but sufficient in all other areas. Building works to convert and make good this space may be needed;
- b) Primary schools requiring additional classroom space where repurposing existing communal space could answer that need;
- c) Secondary school requiring design and technology or science labs, requiring a new classroom/lab and equipment.

10.5.4 Nursery school extended capacity at existing sites requires examination and mechanisms for the funding those privately run.

10.5.5 Resilience against the possibility of migrant workers staying on the Island when their employment on the Project ends must be allowed for.

10.6 Local Impact 5: Staff capacity to provide high quality education to dependents of migrant workers

10.6.1 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. Early action is needed due to the

long lead times involved. Increased use of supply teachers or more frequent movement of teachers between different classes should not form part of the mitigation measures.

10.6.2 Mitigation required:

- a) Employing the additional staff needed to expand the workforce sufficiently to teach the additional dependents of migrant workers;
- b) Strengthening of the overall workforce in ways that enable the above measure and others proposed in this document to have an increased chance of success.

10.6.3 Resource is required to support:

- a) Upgrading staff rooms and staff only areas
- b) Sports/leisure benefits for teachers
- c) Incentives to teach in secondary schools
- d) Strengthen primary school teaching
- e) Contribution to initial teacher training
- f) Enhancing the skills of the existing teaching workforce
- g) Online training and mentoring tools

10.7 Local Impact 6: Provision of Welsh language immersion services for newly arrived dependents of migrant workers

10.7.1 Support for Welsh-medium immersion education is the principal method for ensuring that children can develop their Welsh language skills from 3 years upwards, and it is a priority for the Authority to strengthen and safeguard the Welsh language and bilingual education.

10.7.2 Both immersion centres on the Island, both currently very close to capacity. Mitigation should include increasing the capacity of the service and it is proposed that two new centres are set up in new locations so as to provide reasonable access for all parts of the Island, and that the capacity of existing centres is also increased.

10.7.3 Secondary school immersion is required within each school, ensuring a teacher to child ratio of 1:8 and should allow for further strengthening to comply with the 'Welsh language continuum', part of the Welsh Government's Cymraeg 2050 strategy.

10.7.4 Mitigation should include arrangements to train teachers in language immersion techniques, potentially through a team of Language Support Teachers under the supervision of the language centres which may also help monitor and support the process in schools and centres.

10.8 Local Impact 7: Disruption to education of others as a result of dependents of migrant workers

10.8.1 In addition to immersion techniques wider measures to strengthen teacher recruitment and retention are needed to providing additional resilience to teaching across the Island.

10.8.1 Recruitment and retention of teachers must anticipate long lead-times and the need to provide extra capacity arising from Wylfa Newydd which will substantially increase this problem.

10.8.2 Mitigations must be able to support:

- a) Upgrading staff rooms and staff only areas
- b) Sports/leisure benefits for teachers
- c) Incentives to teach in secondary schools
- d) Strengthen primary school teaching
- e) Contribution to initial teacher training
- f) Enhancing the skills of the existing teaching workforce
- g) Online training and mentoring tools

10.9 Local Impact 8: Special needs provision

10.9.1 IACC's policy to accommodate those with special needs in mainstream schools must be supported in the face of additional special needs learners.

10.9.2 Provision must recognise that each individual's needs will be different and cannot readily be predicted.

10.9.3 The facilities required to meet learners' in mainstream schools and physical provision (such as laptops, accessibility alterations or quiet spaces) and for staff such as special educational needs coordinators must be supported..

10.9.4 Mitigation must reflect that the existing special school (Canolfan Addysg y Bont SEN school) is presently at capacity with no indication that the underlying need for places will reduce.

11.0 How proposed mitigations relate to Horizon's proposals

11.1 Horizon accepts responsibility for mitigating the impacts of additional numbers of dependents of workers coming onto the Island and requiring education and identifies the appropriate fund. Horizon's proposals are to monitor the need for additional school places, but its assessment is that none are likely to be needed. In relation to the impact of incoming learners without Welsh language skills, a low level of teaching support is proposed, again with monitoring.

11.2 IACC proposes a more planned and pre-emptive approach, based on ensuring the maximum level of additional provision is provided in good time in a way that is cost effective both for Horizon and in relation to IACC's ongoing planning for school modernisation and improvement. Since these plans are necessarily made in a phased way, the final mitigation will be a mix of definite measures and provisional measures, however because many of the measures cannot be fully defined at the outset, a timetable must be devised for finalising them at the appropriate time to ensure provision is ready for learners.

11.3 In relation to Welsh language immersion services, IACC proposes an approach that is more realistic in terms of need, comprehensive in terms of impacts and

resilient to deal with uncertainties. IACC's position also takes into account relevant external factors such as demographic trends and modernisation.

11.4 Dependency on further detail from Horizon

- 11.5 To determine appropriate levels of contribution to mitigate both facilities 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. It should also recognise the wider obligations and responsibilities local authorities have to take a planned approach to rationalising capacity, managing school budgets and maintaining capacity for short term local variation in demand.
- 11.6 Further information from Horizon will help identify a projection of the expected numbers of dependents of migrant workers arising both from employment Wylfa Newydd and displacement. A planned approach to putting in place the required mitigation for this projected number and their anticipated needs in good time is necessary.

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