

From: [PMO](#)
To: [Wylfa Newydd](#)
Subject: RE: IACC Deadline 2 Submission : Local Impact Report - Welsh Language and Culture (email 14)
Date: 04 December 2018 20:37:49
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
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[Annex 9A - Anglesey Language Profiling Data Report \(Batch 1 of 4\).zip](#)

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

Pnawn Da/ *Good afternoon,*

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

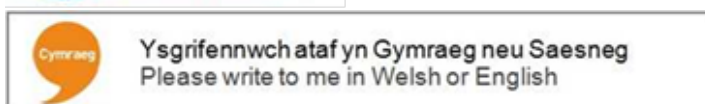
Bydd fersiwn Gymraeg yn cael ei ddarparu cyn gynted a phosib / *A Welsh version of the submission will be provided in due course.*

Cofion/ *Regards,*
Manon

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Mae'r neges e-bost hon a'r ffeiliau a drosglwyddyd ynghlwm gyda hi yn gyfrinachol ac efallai bod breintiau cyfreithiol ynghlwm wrthynt. Yr unig berson sydd 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 9: Welsh Language
and Culture

December 2018

PINS Ref: EN010007



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COUNTY COUNCIL

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1.0 Welsh Language and Culture

1.1 Overview of Impacts

- 1.1.1 Anglesey is a very unique and special place where the Welsh language and culture are integral to Anglesey's island identity. The Welsh language, culture and heritage are of paramount importance here. More than three-quarters of Anglesey children and more than half the adults living on the island can speak Welsh. Anglesey remains one of the strongholds of the Welsh language. The Welsh language is a natural element of everyday life, of social cohesion and of well-being on the Island. The Welsh language and Culture serve as the golden thread, weaving together history and heritage with a strong sense of belonging, community, community cohesion and well-being. Safeguarding and enhancing the language is, therefore, of the highest priority.
- 1.1.2 The Wellbeing of Future Generations (Wales) Act 2015 sets the goal of creating a Wales of vibrant culture and thriving Welsh language where society promotes culture, heritage and the Welsh language. The sustainability of the Welsh language depends on the process of improving Welsh communities by providing ample educational, cultural and social opportunities to use the language on a daily basis. These opportunities are obtained through formal mechanisms such as the education system and language classes for learners and through informal means such as associations, organisations and clubs.¹
- 1.1.3 The importance of sustaining and growing communities with a high density of Welsh speakers is also a priority identified by the Welsh Government's Welsh Language Strategy *Cymraeg 2050: A million Welsh speakers*: *"It is important for several reasons. These communities contain the higher percentages of Welsh speakers who describe themselves as fluent speakers as well as higher percentages of speakers using the language most frequently"*.²
- 1.1.4 The IACC cannot over-emphasise the importance of the Welsh language and culture to Anglesey. The IACC requires that the Welsh Language and Culture to be treated as an all-encompassing theme and golden thread underpinning consideration of impacts and mitigation of all aspects of the Wylfa Newydd project. These include (amongst others) lifelong learning skills, job opportunities, housing, tourism, health and well-being, social inclusion, community and social infrastructure. The impact of the project is far reaching in terms of the Welsh language and culture, and therefore it is crucial that Horizon demonstrates a meaningful, robust and deliverable commitment towards supporting and enhancing the Welsh Language and Culture throughout the project, from its construction to operation and through to decommissioning phases.

¹ Anglesey Welsh Language Strategic Forum: Welsh Language Strategy 2016 – 2021, page 9, (accessed 15 September 2019 ([Link](#)))

² Cymraeg 2050: A million Welsh speakers, page 61. ([Link](#))

1.1.5 The IACC expects, therefore, that the main aim and starting point of the policy and mitigation measures with regard to Wylfa Newydd Project as an employer and workplace should be to ensure:

- a) that the development has a positive effect, rather than an adverse effect, on “opportunities for persons to use the Welsh language” locally; and
- b) that the Welsh language is treated “no less favourably than the English language” within the organisation and its operations.

1.1.6 It is realistic to expect that a high proportion of Welsh speakers be employed across the Horizon workforce. Indeed IACC consider that Horizon can assist IACC to increase the number and proportion of Welsh speakers on Anglesey and contribute to Welsh Government’s target of creating 1 million Welsh-speakers by 2050 if it:

- a) puts robust plans in place to recruit Welsh speaking workers, and
- b) develops the Welsh language skills of all of its workforce.

1.1.7 The positive impacts of the Wylfa Newydd Project on the Welsh language and culture:

- a) Creation of a significant number of local jobs with Welsh language skills requirements at the construction, operational and decommissioning phases could provide work for local Welsh speakers, especially young people, encouraging them to stay living on Anglesey;
- b) Attracting back Welsh speaking people and their families who have moved away to return also attracted by the jobs on offer from Wylfa Newydd and other planned projects could increase the number of Welsh speakers and alter its demographic profile which is critical for the longer term;
- c) There is potential to make Welsh language and culture more sustainable on Anglesey if the fall in working age population of Welsh speakers that has occurred on the Island since 2008 is reversed.

1.1.8 The neutral impacts of the Wylfa Newydd Project on the Welsh language and culture:

- a) The anticipated increases in secondary school pupil number during construction are deemed neutral as there is currently adequate pupil number capacity within the secondary school sector;
- b) However, school space capacity is a separate issue from the capacity to provide the Welsh language immersion and EAL support these pupils may require.

1.1.9 The negative impacts of the Wylfa Newydd Project on the Welsh language and culture:

- a) There are potentially significant negative impacts on the Welsh language and culture should the influx of temporary workers be such that they overwhelm the local communities in which they live and visit with adverse

- effects on the day to use of Welsh as a first language, community cohesion, demands for services and facilities, schools, traffic and transport, etc.;
- b) Hence, the need for the suite of preventative and mitigation measures outlined in this Chapter and the other LIR Chapters, which demonstrates the 'golden thread' nature of the Welsh language referred to in paragraph 1.1.4 above;
 - c) IACC's current Welsh-medium preschool provision and primary and secondary sectors' Welsh language immersion and English as an Additional Language support is already at full capacity and unlikely to be able to cope with additional HNP worker dependent children;
 - d) 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 enrolment, IACC requires that Horizon provide the funding for adequate worst case scenario preparation in advance of Construction;
 - e) There has been insufficient recognition of the potential for labour displacement of Welsh speakers in public service provision roles, which could result in existing public service providers having difficulty in maintaining their current provision of services through the medium of Welsh.
 - f) HNP's weak proposals for the ongoing monitoring of Wylfa Newydd impact on the Welsh language and culture could mean that mitigation and enhancement commitments are not adequate to safeguard the Welsh language and culture;
 - g) In order to avoid this negative impact, procedures to monitor and evaluate annually throughout all three phases of the project will be necessary;
 - h) It will also be necessary to implement the WLCMES and its annual action plans annually throughout the construction, operation and decommissioning periods.

2.0 Context

- 2.1.1 Anglesey is a very unique and special place where the Welsh language and culture are integral to Anglesey's island identity. The Welsh language and Culture serve as the golden thread, weaving together history and heritage with a strong sense of belonging, community, community cohesion and well-being.
- 2.1.2 Within Wales, Anglesey plays a crucial role in maintaining the vitality of the Welsh language. By being the local authority with the second highest percentage of Welsh speakers, Anglesey is counted as one of the strongholds of the Welsh language³. Nevertheless, the vitality of the Welsh language on Anglesey is fragile. 2011 Census figures indicate a decrease in the number of Welsh speakers on the island from 38,893 (60.1%) in 2001 to 38,568 (57.2%) in 2011. Similarly, the joint surveys between the Welsh Government and the Welsh Language Commissioner, '*Welsh language use in Wales*'⁴ indicate that the percentage of Welsh speakers on Anglesey who use the language every day fell by 10% in the period 2004 – 2015 (87% (n=31,500) in 2004-6 to 77%

³ Anglesey Welsh Language Strategic Forum: Welsh Language Strategy 2016 – 2021, page 9. [\(Link\)](#)

⁴ Welsh language use survey [\(Link\)](#)

(n=29, 500) in 2013-15)⁵.

- 2.1.3 Arresting and reversing this decline is a strategic aim of the IACC and its partners. *“Our vision for the 2021 Census is to see an increase in the number of Welsh speakers and that the percentage increases to at least 60.1% as it was in 2001.”*⁶ Specifically, the desired result of the Welsh Language Strategy 2016 – 2021 for Anglesey is to *“maintain the wards where 70% of the population speak Welsh and increase the percentages of the other, remaining wards”*.⁷ Two of the strategy indicators are: *“an increase in wards with over 70% speaking Welsh”* and *“an increase in wards with over 50% speaking Welsh”*⁸.
- 2.1.4 The Wellbeing of Future Generations (Wales) Act 2015 sets the goal of creating a Wales of vibrant culture and thriving Welsh language where society promotes culture, heritage and the Welsh language. The sustainability of the Welsh language depends on the process of improving Welsh communities by providing ample educational, cultural and social opportunities to use the language on a daily basis. These opportunities are obtained through formal mechanisms such as the education system and language classes for learners and through informal means such as associations, organisations and clubs.⁹
- 2.1.5 The importance of sustaining and growing communities with a high density of Welsh speakers is also a priority identified by the Welsh Government’s Welsh Language Strategy *Cymraeg 2050: A million Welsh speakers: “It is important for several reasons. These communities contain the higher percentages of Welsh speakers who describe themselves as fluent speakers as well as higher percentages of speakers using the language most frequently”*.¹⁰
- 2.1.6 The IACC cannot over-emphasise the importance of the Welsh language and culture to Anglesey. The IACC requires that the Welsh Language and Culture to be treated as an all-encompassing theme and golden thread underpinning consideration of impacts and mitigation of all aspects of the Wylfa Newydd project. These include (amongst others) lifelong learning skills, job opportunities, housing, tourism, health and well-being, social inclusion, community and social infrastructure. The impact of the project is far reaching in terms of the Welsh language and culture, and therefore it is crucial that Horizon demonstrates a meaningful, robust and deliverable commitment towards supporting and enhancing the Welsh Language and Culture throughout the project, from its construction to operation and through to decommissioning phases.

⁵ Further details on the Welsh language profile on Anglesey are provided in Annex 9A and 9B : Anglesey Language Profiling Report

⁶ Anglesey Welsh Language Strategic Forum: Welsh Language Strategy 2016 – 2021, page 5. [\(Link\)](#)

⁷ Anglesey Welsh Language Strategic Forum: Welsh Language Strategy 2016 – 2021, page 28. [\(Link\)](#)

⁸ Anglesey Welsh Language Strategic Forum: Welsh Language Strategy 2016 – 2021, page 28. [\(Link\)](#)

⁹ Anglesey Welsh Language Strategic Forum: Welsh Language Strategy 2016 – 2021, page 9. [\(Link\)](#)

¹⁰ Cymraeg 2050: A million Welsh speakers, page 61. [\(Link\)](#)

3.0 A summary of Horizon's Welsh Language Impact Assessment

3.1 This section presents key extracts from Horizon's assessment of the impact of the Wylfa Newydd Project on Welsh language and culture as summarised in pages 6 to 13 of the WLIA¹¹. Table 1 provides an overview of Horizon's impact assessment.

3.2 Project-Wide Effects (Volume B / Component 1)

3.2.1 Population characteristics

3.2.1.1 *"The employment opportunities offered during both construction and operation would be expected to reduce past trends of out-migration of young and working age people resulting in a **moderate beneficial effect** on Welsh language and culture.*

3.2.1.2 *Population increase during construction would have a **major adverse effect** on the balance of Welsh and non-Welsh speakers within the KSA, with the level of effect expected to be greatest in the north of the Isle of Anglesey, in particular the wards of Llanbadrig and Mechell.*

3.2.1.3 *The presence of up to 4,000 construction workers residing at the Site Campus would have potential **major adverse effects** on the use and prominence of the Welsh language within the communities near the Wylfa Newydd Development Area (WNTA).*

3.2.1.4 *The presence of up to 3,000 workers in communities across the KSA would have potential **major adverse effects** on the use and prominence of the Welsh language within a number of communities especially wards located in Anglesey North.*

3.2.1.5 *Non-Welsh-speaking construction workers and their families moving into the area may not fully appreciate or understand the unique Welsh culture and traditions within the KSA (**moderate adverse effect**), which could lead to social tensions and conflict (**negligible adverse effect**).*

3.2.2 Employment, skills and education

3.2.2.1 *The significant employment opportunities offered during the construction phase is expected to reduce out-migration of young people from the KSA, resulting in a **moderate beneficial effect** on Welsh language and culture.*

3.2.2.2 *The Wylfa Newydd Project would generate major opportunities for apprenticeships and given the scale and duration of the Wylfa Newydd Project. The permanent, high-quality job opportunities offered during operation would have a **moderate beneficial effect***

¹¹ Examination Library Reference APP-[432]

3.2.3 Investment and spend in the local economy

- 3.2.3.1 *The Project would generate major benefits to local businesses, including in the tourism sector, especially during construction, and would have an overall **moderate beneficial** effect.*

3.2.4 Local businesses

- 3.2.4.1 *It is expected that the construction phase would generate major benefits to local businesses including the tourist sector, and would have an **overall moderate beneficial effect** on local businesses, including Welsh-speaking businesses.*

3.2.5 Cost of housing

- 3.2.5.1 *Increasing the price of accommodation would affect the ability of the local population including Welsh speakers to remain living locally, leading to an overall **moderate adverse** effect on Welsh language and culture.*

3.2.6 Infrastructure supply and education

- 3.2.6.1 *The introduction of construction workers' children to local Welsh-medium schools would be expected to alter the balance of Welsh and non-Welsh speakers leading to an overall **moderate adverse** effect.*
- 3.2.6.2 *An overall **negligible adverse** effect on the use and prominence of the Welsh language amongst primary and secondary school-aged children in the KSA during operation is identified.*

3.2.7 Community and local services

- 3.2.7.1 *An increased demand for community facilities during both construction and operation would be beneficial in terms of safeguarding the provision of local services and facilities such as post offices, banks and public houses for the local population, albeit this would be a **negligible beneficial** effect. Safeguarding the provision of such services also contributes towards sustainable communities, where Welsh language and culture forms part of the social fabric of communities.*
- 3.2.7.2 *In terms of effects on the provision of health care facilities, a **neutral** effect on the provision of health care services and provision for the population of the KSA (including Welsh speakers) would be expected.*

3.2.8 Social and cultural aspects

- 3.2.8.1 *Employment opportunities offered to the local population during construction, would contribute towards retaining young people. However, the introduction of non Welsh-speaking construction workers and their families to Welsh-medium youth/voluntary/community groups would be expected to dilute the use of the Welsh language within those groups, leading to an overall*

negligible adverse effect during construction.

- 3.2.8.2 *Introducing non-Welsh-speaking construction workers and their families into communities could adversely affect the use and prominence of the Welsh language within the communities, especially during construction. The magnitude of non-home-based construction workers and their families who are expected to relocate to the KSA during the construction period, has the potential to dilute existing Welsh culture and traditions as well as the use of the Welsh language within the community, leading to an overall **moderate adverse** effect.*

3.2.9 Environmental amenity

- 3.2.9.1 *Potential environmental effects at a project-wide level during construction are expected to occur mainly due to noise and vibration. An overall **minor adverse** effect on Welsh language is identified. During operation an overall **negligible** effect is identified.”*

3.3 Wylfa Newydd Development Area (Volume C / Component 2)

3.3.1 Population characteristics

- 3.3.1.1 ***Neutral** effect on Welsh language except for out-migration where a **minor adverse** effect is expected during construction and a **negligible adverse** effect is expected during operation.*

3.3.2 Environmental amenity

- 3.3.2.1 *Should out-migration occur due to the reduction in the quality of the environmental amenity, this would adversely affect the Welsh language in the LAI, especially in the wards of Llanbadrig and Mechell, leading to an overall **minor adverse** effect.*

- 3.3.2.2 *There is not expected to be a significant effect on Welsh language and culture during the operation phase (overall **negligible adverse** effect).*

3.3.3 Infrastructure supply and education

- 3.3.3.1 *An overall **negligible beneficial** effect on Welsh language is therefore identified during both construction and operation.*

3.3.4 Local businesses

- 3.3.4.1 *The presence of the construction workers at the WNDA, including those residing at the Site Campus, is expected to lead to additional spend within local businesses within the LAI, which would be a **negligible beneficial** effect.*

- 3.3.4.2 *However, it is acknowledged that some tourism businesses may experience some adverse effects. The operation of the Power Station is expected to*

*generate additional spend for businesses within the LAI which would be of benefit to these local businesses. (**negligible beneficial** effect).*

3.3.5 Social and cultural aspects

3.3.5.1 *The influx of non-home-based construction workers into the communities within close proximity to the WNDA has the potential to lead to some degree of social tensions/conflict between residents of the WNDA's LAI and non-home-based workers, identified as an overall **negligible adverse** effect.*

3.3.5.2 *A **minor adverse** effect on Welsh traditions and culture during construction is identified.*

3.4 Off-Site Power Station Facilities (ie AECC, ESL and MEEG) (Volume D / Component 3)

3.4.1.1 *An overall **neutral** effect on population during the construction and operation of the Off-Site Power Station facilities as effects on population are assessed under project-wide effects.*

3.4.1.2 *The construction of the Off-Site Power Station Facilities would be expected to lead to **negligible adverse** effects to the environmental amenity of the LAI communities due to changes in air quality, noise and vibration.*

3.2.1.3 *The direct effects on businesses within the LAI from additional spending would be expected to be minimal (**negligible beneficial** effect).*

3.5 Park and Ride (Volume E / Component 4)

3.5.1.1 *An overall **neutral** effect on population during the construction and operation of the Park and Ride as they are assessed under project wide effects.*

3.5.1.2 *The presence of construction and operational workers related directly to the Park and Ride facility would be expected to lead to increased expenditure within local businesses and services such as the shop and post office and the public house/inn. This increased demand for services is not expected to be significant; however, it would result in a **beneficial effect** in terms of contributing towards their safeguarding with the LAI (negligible beneficial effect).*

3.5.1.3 *This would contribute towards sustaining a rural economy for the length of the operational phase of the Park and Ride (six years) and therefore would be **beneficial** for the population of the LAI, including Welsh speakers.*

3.6 A5025 Off-Line Highway Improvements (Volume F / Component 5)

3.6.1.1 *An overall **neutral** effect on population during the construction and operation of the A5025 Off-line Highway Improvements as they are assessed under project wide effects.*

3.6.1.2 When considering the effect of the Off-line Highway Improvements as a whole, an overall **negligible adverse** effect is identified.

3.7 Logistics Centre (Volume G / Component 6)

3.7.1.1 An overall **neutral** effect on population during the construction and operation of the Logistics Centre as they are assessed under project wide effects.

3.7.1.2 Due to the small number of construction workers expected to be associated with the Logistics, the direct effects on businesses within the LAI from additional spending would be expected to be minimal (**negligible beneficial** effect).

3.8 Cumulative Effects (Volume H / Component 7)

3.8.1.1 When considering the overall effect of both construction and operation of the Wylfa Newydd Project in terms of project-wide effects, a **negligible beneficial** effect is identified.

3.8.1.2 When applying the scoring system (see Document 8.21, Table H-3), an overall base index score for each individual development is identified as follows:

- a) Project-wide effects: **negligible beneficial** effect;
- b) Wylfa Newydd Development Area: **negligible adverse** effect;
- c) Off-Site Power Station Facilities: **neutral** effect;
- d) Park and Ride: **neutral** effect;
- e) A5025 Off-line Highway Improvements: **neutral** effect; and
- f) Logistics Centre: **neutral** effect.

Table 1: Summary of Horizon's Welsh Language Impact Assessment of effects ¹²					
COMPONENT 1 - PROJECT-WIDE EFFECTS (VOLUME B)			"negligible beneficial effect"		
	Major beneficial	Minor beneficial	Neutral/Negligible beneficial/adverse effects	Minor adverse	Major adverse
Population Characteristics					
Reduction in out-migration of young and working age people		√			
Impact on KSA of increase in population during construction					√
Impact of Site Campus on WNDA of increase in population during construction					
Impact of nonCampus workers on KSA of increase in population during construction					√

¹² Examination Library Reference APP-[432]

Workers and their families lack of understanding of Welsh culture and tradition				√	
Leading to social tensions and conflict			√		
Employment Skills and education					
Major opportunities for apprenticeships	√				
Investment and spend in local economy					
Impact on local businesses including tourism		√			
Impact on businesses owned by Welsh speakers		√			
Cost of Housing					
Impact on ability of local population including Welsh speakers to remain living locally				√	
Infrastructure Supply and Education					
Introduction of construction worker's children to local Welsh-medium schools				√	
Impact on use and prominence of Welsh language on KSA's school aged children			√		
Community and local Services					
Impact of increased demand during construction and operation phase			√		
Impact on health care facilities			√		
Social and Cultural aspects					
Impact of non Welsh-speaking construction workers on Welsh-medium youth/ voluntary/ community groups			√		
Impact of non Welsh-speaking construction workers and their families on use and prominence of Welsh language communities within KSA				√	
Environmental Amenity					
Impact of noise and vibration on Welsh language			√		

COMPONENT 2 WYLFA NEWYDD DEVELOPMENT AREA (VOLUME C)	“negligible adverse effect”				
Population Characteristics					
Reduction in out-migration of young and working age people			√		

Infrastructure Supply and Education					
Introduction of construction worker's children to local Welsh-medium schools			√		
Investment and spend in local economy					
Impact on local businesses including tourism			√		
Social and Cultural aspects					
Impact of non Welsh-speaking construction workers on Welsh-medium youth/voluntary/community groups / Impact of nonWelsh-speaking construction workers and their families on use and prominence of Welsh language communities within KSA			√		
Enviromental Amenity					
Impact of noice and vibration on Welsh language/ Impact on use and prominence of Welsh language on KSA's school aged children			√		

COMPONENT 3 Off-Site Power Station Facilities (i.e. AECC, ESL and MEEG) VOLUME D			“neutral effect”		
Population Characteristics					
Impact on Population			√		
Investment and spend in local economy					
Impact on local businesses including tourism			√		
Enviromental Amenity					
Impact of noice and vibration on Welsh language/ Impact on use and prominence of Welsh language on KSA’s school aged children			√		

COMPONENT 4 PARK AND RIDE (VOLUME E)		“neutral effect”			
Population Characteristics					
Impact on Population			√		
Investment and spend in local economy					
Impact on local businesses including tourism			√		

COMPONENT 5 A5025 OFF-LINE HIGHWAY IMPROVEMENTS (VOLUME F)			“neutral effect”		
Population Characteristics					
Impact on Population			√		
Overall Impact					
Overall Impact			√		

COMPONENT 6 LOGISTICS CENTRE (VOLUME G)			“neutral effect”		
Overall Impact					
Overall Impact			√		

COMPONENT 7 CUMULATIVE EFFECTS (VOLUME H)		“negligible beneficial effect”			
Overall Impact					
Overall Impact			√		

4.0 IACC's response to Horizon's WLIA

- 4.1 In this section, comments are made on the broad points of principle about Horizon's WLIA, identifying a number of shortcomings. Some comment is made on how these shortcomings could be addressed. In section 6 of this chapter, the steps that should be taken to avoid, reduce, mitigate or compensate for adverse impacts are identified.

4.2 Methodology used for Welsh Language Impact Assessment

- 4.2.1 The methodology used by Horizon for its Welsh Language Impact Assessment of the Wylfa Newydd project is 'Planning and the Welsh Language - The Way Ahead' (2005).¹³ This is the WLIA methodology used by most assessors in the planning field, including local authorities since 2005. This methodology has its limitations – and the assessments of likely impacts - remain relatively subjective. The IACC has concerns that some assessments in the WLIA are not robust enough.
- 4.2.2 The IACC recognises and accepts that the methodology is in accordance with the guidance adopted in IACC's Supplementary Planning Guidance on the Welsh Language (2007).¹⁴
- 4.2.3 However the IACC notes, in its comments on the WLIA undertaken for the JLDPs that *"...the field of language assessments is an area of discussion and a speciality that is still being developed... It should also be noted that the Language Impact Assessment methodology is a subjective process intended to establish the probable impacts stemming from a proposal or policy."*
- 4.2.4 The assignment of values to likely impacts is therefore subjective and can be open to challenge. **Horizon has chosen to assess impact on the Welsh language and culture in relation to the KSA or DCCZ in the main. This approach minimises the impact the project is likely to have on specific communities on Anglesey. In particular, the likelihood of a negative impact on communities of closest proximity to Wylfa Newydd such as Tregele, Llanfechell, Cemaes, Amlwch, Llanfachraeth, Llanfaethlu, Carreglefn and Rhosybol in the wards of Llanbadrig, Mechell, Amlwch Port, Amlwch Ruaral, Llanfethlu is likely to be greater than that identified by Horizon's WLIA.**

4.3 Population Characteristics

- 4.3.1 The largest impact of the Wylfa Newydd Project on the Project area in terms of the Welsh language and culture is likely to be the workforce required to construct, operate and decommission the Wylfa Newydd Project. In particular, it is the likely impact of the magnitude of non-home based construction workers (and their dependants) relocating to the Island, their geographical distribution

¹³ Planning and the Welsh Language the way ahead (2005) ([Link](#))

¹⁴ IACC (2007) Supplementary Planning Guidance Planning and the Welsh Language ([Link](#))

and engagement with the local community that causes concern. This occurs as a result of increasing the concentrations of workers in wards and thus reducing the percentage of Welsh speakers resident in those wards.

- 4.3.2 The IACC accepts Horizon's 'worse-case scenario for assessment purposes' figures that the total number of workers at peak construction will be 9000. Horizon specify that only 1260 jobs will be filled by Anglesey residents and that 6,560 of the 7,000 non-home based construction workforce are expected to reside on Anglesey, particularly in the north and west of the island.¹⁵
- 4.3.3 The WLIA does not state, nor present evidence as to the likely geographic distribution of the non-home based families and, in particular, how many of the 505 partners and dependants relocating to the KSA will reside on Anglesey during the construction phase. A figure nearer the higher end of the scenario represents a level of in-migration from outside the island that will have a far higher significant impact than one where the figure is marginal.
- 4.3.4 Horizon recognise the significance of the thresholds of over 70% and over 50% of Welsh speakers in reflecting key dimensions of linguistic vitality in a geographical area. In 2011 there were 8 wards on Anglesey with over 70% Welsh speakers¹⁶ and 21 wards with over 50% Welsh speakers¹⁷. The Horizon's WLIA predicts that on Anglesey, the percentage of Welsh speakers in the wards of Bryngwran (Anglesey West) and Gwyngyll (Anglesey South) would fall below the 70% threshold as a result of increased in-migration. According to the 2011 Census, 71.2% (n=1311) of the total population of Bryngwran (n=1841) were Welsh speakers and 70.5% (n=1093) of the total Gwyngyll (n=1,550) population spoke Welsh. According to Horizon, Bryngwran would experience a 1.8% increase in population and a 1.3% reduction in the percentage of Welsh speakers. Gwyngyll would experience a 1.3% increase in population and a 0.9% reduction in the percentage of Welsh speakers.¹⁸
- 4.3.5 The four wards where the percentage of Welsh speakers would fall below the 50% threshold are: Llanbadrig (Anglesey North), Llanfair-yn-Neubwll (Anglesey West), Moelfre (Anglesey North) and Parc a'r Mynydd (Anglesey West). According to the 2011 Census 52.4% (n=690) of the total population of Llanbadrig (n=1317) were Welsh speakers; 50.5% (n=1369) of the total population (n=2764) of Llanfair-yn-Neubwll spoke Welsh; 52.3% (n=554) of the population (n=1059) spoke Welsh and in Parc a'r Mynydd 50.4% (n=563) of the total population (n=1117) were Welsh speakers. As a consequence of Wylfa Newydd, Horizon's Welsh Language Impact assessment anticipates that Llanbadrig will experience a 17% increase in population and 7.9% reduction in Welsh speakers; Llanfair-yn-Neubwll a 2.7% increase in population and 1.4% reduction of Welsh speakers; Moelfre a 15.5% increase in population and 7.1% reduction of Welsh speakers and Parc a'r Mynydd a 1.8% increase in population and 0.9% reduction of Welsh speakers.

¹⁵ Examination Library Reference APP-[432], para. B.4.2.1.

¹⁶ Cyngar (80.8%); Tudur (80.7%); Cefni (80.5%); Llanfihangel Ysgeifiog (75.8%); Bodffordd (73.3%) Braint (73.2%); Bryngwran (71.2%) and Gwyngyll (70.5%).

¹⁷ Anglesey Welsh Language Strategic Forum: Welsh Language Strategy 2016 – 2021, page 9. ([Link](#))

¹⁸ Examination Library Reference APP-[432], para. 4.81

- 4.3.6 It is noted that the analysis of the wards affected by in-migration have been identified by the **gravity model** used by Horizon to predict whereincomerworkers and their families are likely to seek accommodation.
- 4.3.7 The IACC note Horizon's assessment that the population increase during construction is likely to have a major adverse effect on the balance of Welsh and non-Welsh speakers within the KSA, with the level of effect expected to be greatest in the north of the Isle of Anglesey.
- 4.3.8 In particular the wards of Llanbadrig (52.4% n=690 of the total population (n=1317) were Welsh speakers in 2011 according to the Census) and Mechell (68.6% n=1030 of the total population (n=1502) were speakers of Welsh).^{19, 20} It is further noted that the 'presence of up to 4,000 construction workers residing at the Site Campus is likely to have potential major adverse effects on the use and prominence of the Welsh language within the communities near the Wylfa Newydd Development Area, including Tregele, Cemaes, Amlwch, Llanfachraeth and Llanfaethlu.²¹ The use and prominence of the Welsh language and culture in the wards of Llanbadrig (as above), Mechell (as above) and Llanfaethlu (64.4% (n=1025) of the ward's total population (n=1592) spoke Welsh in 2011)²² is also likely to be adversely affected by the presence of construction workers who are accommodated at the Site Campus.²³
- 4.3.9 The presence of up to 3,000 workers in communities across the KSA would have potential major adverse effects on the use and prominence of the Welsh language within a number of communities especially wards located in Anglesey North such as Llanbadrig (as above), Llanfaethlu (as above), Mechell (as above) and Moelfre (52.3% n=554 of the total ward population of n=1059 spoke Welsh in 2011)²⁴ as well as the ward of Llanbedrgoch (43.9% n=654 (total population n=1490) speakers of Welsh in 2011)²⁵ located in Anglesey South. These wards would accommodate non-home-based construction workers and their families located within the communities.²⁶
- 4.3.10 It remains possible that additional wards will also be adversely affected by patterns of in-migration not currently identified by the gravity model. The IACC is however particularly concerned about the impact on the wards mentioned above. In line with its Welsh Language Strategy 2016 – 2021, IACC expects that Horizon make every effort to avoid causing any ward on Anglesey to fall below their 2011 census proportions of Welsh speakers. In addition to safeguarding wards above the 70% and 50% thresholds, IACC also expects Horizon to avoid causing any decrease in the proportion of Welsh speakers the wards where there are lower percentages of Welsh speakers and where IACC has invested heavily in maintaining and growing the use of Welsh.

¹⁹ Examination Library Reference APP-[432] page 6.

²⁰ NOMIS: Census 2011: Welsh Language Profile, unitary authorities in Wales (KS208WA). ([Link](#))

²¹ Examination Library Reference APP-[432], page 7.

²² NOMIS: Census 2011: Welsh Language Profile, unitary authorities in Wales (KS208WA). ([Link](#))

²³ Examination Library Reference APP-[432], page 7.

²⁴ NOMIS: Census 2011: Welsh Language Profile, unitary authorities in Wales (KS208WA). ([Link](#))

²⁵ NOMIS: Census 2011: Welsh Language Profile, unitary authorities in Wales (KS208WA). ([Link](#))

²⁶ Examination Library Reference APP-[432] page 7.

4.3.11 Horizon currently calculates that 220 school aged children will be relocating to the KSA during the construction phase of the Wylfa Newydd project. The IACC has expressed serious reservations about the methodology used by Horizon to calculate the number of dependents that the incomer workers will bring to Anglesey. The methodology used forecasts that only 3% of incomer workers will bring their families with them. The IACC does not accept the figures used are a reasonable case IACC's estimates puts this number of child dependents at 500 – 510 during the construction phase.

4.3.12 The Gravity Model used to predict the areas where Horizon workers are likely to reside is a blunt tool. It remains possible that additional wards will also be adversely affected by patterns of in-migration not currently identified by the gravity model. Horizon needs to provide clearer and more robust assumptions as to where non-home based families are likely to reside. If this is not possible, appropriate resilience funding will be required to respond if necessary to the currently unknown impacts.

4.4 Reducing Out Migration

4.4.1 A significantly improved Jobs and Skills scheme is required to encourage and facilitate the appropriate up-skilling of local residents to reduce out-migration of young people, especially in the short-to-medium term. This, alongside attracting local people and their families back to the Island through offering good employment opportunities at Wylfa Newydd, should also be prioritised in order to protect the Welsh Language and Culture. There is also a need to monitor and mitigate the impact of the in-migration of large numbers of non-Welsh speakers to Anglesey on a range of organisations including youth and family activities in the community, across Anglesey and, in particular, in the north of the Island.

4.4.2 Operation Phase

4.4.2.1 During the operation phase, 85% (740) of the operation phase workforce and their 63 partners and dependants are predicted to reside on Anglesey.²⁷ The IACC in its letter to Horizon dated 24th August 2018²⁸ requested 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. This information has not been forthcoming.

4.4.2.2 There is no detail provided of the exact numbers of these additional temporary workers during the operation phase, where they would reside and to what extent these workers would be expected to be drawn from the local population on Anglesey or not and nowhere is there any real clarity as how the workforce is expected to be distributed beyond the 4,000 employees located at the Site Campus.

²⁷ Examination Library Reference APP-[432], para. B.3.28.

²⁸ See Annex 9C IACC letter to Horizon 24 August 2018 'Non-Home Based Workforce Household Composition (Number of Partners and Dependents)'

4.4.3 Decommissioning Phase

4.4.3.1 No analysis of the impact of the decommissioning workforce and their dependants is provided²⁹. This lack of clarity is unacceptable.

4.5 Infrastructure and Education

4.5.1 The impact of the dependents of the Horizon Wylfa Newydd workforce on the linguistic character of schools needs to be more fully recognised. Horizon's estimate of 220 school aged dependent during the construction phase is too conservative. IACC predicts 500 – 510 child dependants during this period. This is addressed under Question 13 of the assessment (sections B.4.359 – B.4.401). As summarised in section B.4.395 the overall effect during **construction** applying the weighting used in the WLIA is identified as having a probable "*overall moderate adverse effect (with a score of -0.7)*". As summarised in section B.4.401 the overall effect during **operation** applying the weighting used in the WLIA is identified as having a probable "*overall negligible adverse effect (with a score of -0.1)*".

4.5.2 The number and age of dependent, school-aged children is currently unknown and their likely geographical distribution also unknown. It is also possible therefore that whilst the probable effect on the overall KSA will be less adverse there are likely to be more significant impacts in some parts, particularly on the isle of Anglesey. Depending which schools are in receipt of additional children and the number of additional children in each school, mitigation and enhancement measures to avoid detrimentally affecting the use of the Welsh language amongst the school population will be needed. There is likely to be a need for greater safeguarding of Welsh culture and tradition to avoid 'dilution' in the use of the Welsh language, Welsh culture and traditions in the KSA and on the Island in particular. The IACC also require measures that will protect and enhance the Welsh language to meet its policy targets to grow the number and percentage of Welsh speakers on the Island.

4.6 Welsh Tradition and Culture

4.6.1 The IACC believes, based on the length of the construction period, that the Wylfa Newydd Project will have an effect and will dilute the Welsh Language, Culture and Traditions in the KSA due to the extensive influx of non-home based workers who are non-Welsh speakers. Horizon's WLIA recognises that this will have an overall moderate effect across the KSA. However, the adverse effect on individual local areas on Anglesey in particular and certain areas in the wider region where the Welsh language is used on a daily basis by a substantial percentage of the population could be much greater.

²⁹ Examination Library Reference APP-[432], in para. B.3.36 that "indications of potential changes in workforce can however be taken from similar projects such as the former Magnox power stations located at Trawsfynydd in Gwynedd, as well as the Existing Power Station at Wylfa Head", this information is not provided.

4.7 Community & Local Services

- 4.7.1 As Horizon conclude, it is likely that the increase in population created by Wylfa Newydd does not impact negatively on the provision of some local services e.g. banks, post offices and libraries. However, the demand on other services such as pre-school child care and education, for example, is likely to create a demand which current provision is unable to meet. The use of Welsh in community classes, organisations, events and other types of community activities could also be negatively impacted in some locations and therefore require specific mitigation strategies to minimise the impact. Mitigations to overcome the effect on local community activities and services would include funding of a robust Community Language Services (to be developed with stakeholders), production of training materials to aid integration of incoming workers, broadening the scope of the Community Translation Service, and supporting the provision of the early years (pre-school) services.

4.8 Welsh Language in the Workplace

- 4.8.1 While recognising that HO is not statutorily subject to the Welsh Language (Wales) Measure 2011, the IACC is nevertheless eager to establish that the Wylfa Newydd Project operates in accordance with the aims and objectives of the current Welsh language legislation³⁰ in line with the best practice adopted by organisations of a similar size and status and in compliance with the Wellbeing Goals.
- 4.8.2 **The IACC expects, therefore, that the main aim and starting point of the policy and mitigation measures with regard to Wylfa Newydd Project as an employer and workplace should be to ensure:**
- a) **that the development has a positive effect, rather than an adverse effect, on “opportunities for persons to use the Welsh language” locally; and**
 - b) **that the Welsh language is treated “no less favourably than the English language” within the organisation and its operations.**
- 4.8.3 The IACC recognise that for nuclear site licence and safety reasons, English will be the primary language for certain aspects of operation. Nevertheless, other aspects of the operation can be expected to give equal status to Welsh and English.
- 4.8.4 “Opportunities for persons to use the Welsh language” in social situations at work and in the communities in which the workforce live will depend on many key factors which will need to be addressed in detail in Horizon’s Corporate Welsh Language Policy and in its WLCMES, including the following:
- a) the linguistic profile of the workforce (currently unknown);
 - b) distribution of the workforce in local communities (currently predicted according to gravity model but not known more precisely at this point);

³⁰ Welsh Language (Wales) Measure 2011. ([Link](#))

- c) impact of the above on the proportion of Welsh speakers to non-Welsh speakers in schools, communities and social group encounters (currently unknown);
- d) managing the expectations of in-migratory workers from a majoritarian (English/ other majority language) cultural background and low awareness levels of the Welsh language and culture (this issue has not been addressed to date in the Horizon WLIA);
- e) a realistic appraisal of the projected Welsh language acquisition rate among in-migratory workers and their families (this has not been addressed to date in the Horizon WLIA);
- f) the extent to which the normative use of Welsh is established and supported by managers in workplace situations (currently unknown and dependent upon Horizon's Corporate Welsh Language Policy and its implementation).

4.8.5 As mentioned above, the Wylfa Newydd Project does not fall within the remit of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards Regulations drawn up under the Measure. Horizon's activities are therefore beyond the statutory regulatory remit of the Welsh Language Commissioner. However, over 600 organisations, charities and businesses have used to the Commissioner's on-line questionnaire to draw up a Welsh Language Promotion Plan³¹ or voluntarily developed a Welsh Language Policy with Welsh Language Commissioner approval. To date, over 40 charities and micro, small, medium and large private sector businesses have finalised and adopted voluntary agreements with the Welsh Language Commissioner. Such arrangements are particularly appropriate for organisations with a high profile such as the Outreach Services Division of the Houses of Parliament, London or whose activities will have major impacts on local communities such as Horizon.

4.8.6 In view of the anticipated impact of the Wylfa Newydd project upon the local vitality of the Welsh language, the IACC are strongly of the opinion that Horizon should follow established best practice in developing a bilingual workplace. The current text of the WLCMES makes little reference to robust monitoring and reporting measures. A voluntary agreement with the Welsh Language Commissioner to adopt annual monitoring and reporting arrangements would be appropriate. A positive initial step would be to seek the Welsh Language Commissioner's comments on and approval of Horizon's Welsh Language Policy and WLCMES measures.

4.8.7 Although Horizon has limited influence over the extent to which its workforce can be encouraged to learn and use Welsh in the community, Horizon can exert a direct influence on workforce attitudes and behaviours with regard to Welsh language and culture in the workplace. Horizon can actively establish the use of Welsh in the workplace and facilitate the learning of Welsh by workers who do not speak the language. In this way Horizon can contribute to the Welsh Government's target to create a million speakers of Welsh by 2050.

³¹ Welsh Language Promotion Plan Welsh Language Commissioner website: [\(Link\)](#)

4.8.8 The IACC requires the Workforce Management Strategy to include comprehensive details of the principles that Horizon and its partners will follow to manage and control the workforce and therefore minimise the potential effects of a large temporary workforce on these local communities.

4.8.9 These principles will then need to be implemented through the Code of Conduct during the construction stage. The IACC would have expected to see a draft Code of Conduct at this stage. Project impacts cannot be fully assessed if the IACC has not got a full understanding of Horizon's approach to the monitoring and management of their workforce.

5.0 IACC's Policy Position with regard to the Welsh Language and Culture

5.1 By ensuring that any relevant new development takes into consideration any possible effect on the ability of the local population to use and use the Welsh language, the land use planning system has an acknowledged contribution to make to the wellbeing of the Welsh language and culture on the Island.

5.2 The following criteria from Policies in the adopted (July 2017) Anglesey and Gwynedd Joint Local Development Plan are of particular relevance:

- a) *Criterion 5 of 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 unacceptable adverse economic, social, linguistic impacts.
- b) *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 includes the capacity of local schools, Welsh language immersion centres and local facilities that provide Welsh language courses for adults to accommodate additional demands arising from Wylfa Newydd.
- c) *Criterion 11 of Policy PS 9 Wylfa Newydd and related development*, which sets out the expectation that the Project will include appropriate measures for promoting social cohesion.

5.3 Also of particular relevance is *GP 14 of the adopted (May 2018) Wylfa Newydd Supplementary Planning Guidance*, which sets out expectations in terms of measures considered suitable to mitigate adverse impacts and strengthen positive impacts.

5.4 The IACC's assessment of potential local impacts indicates that the Project could result in a range of impacts (adverse and positive) on communities and result in additional demands on existing community facilities, which are important domains to sustain and enhance the Welsh language and culture on the Island. These differ from those identified by Horizon. Without robust mitigation and monitoring strategies, from a Welsh language and culture

perspective, the IACC remains concerned that the above Policy tests will not be achieved.

- 5.5 On this basis, the requirements of *criterion 10 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, it is expected that contributions will be made to secure improvements in infrastructure, facilities and services (which could include upgrading existing facilities) in order to mitigate impacts.
- 5.6 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). This approach aligns with *criterion 4 of Policy PS 5 Sustainable development*, and expectations set out in *Policy PS 1 Welsh language and culture*. The former seeks to ensure that development is consistent with sustainable development principles, which includes supporting and promoting the use of the Welsh language. The latter, at criterion 4 sets out the expectation that proposals that would cause significant harm to the character and language balance of a community that cannot be avoided or suitably mitigated by appropriate planning mechanisms should be refused.
- 5.7 IACC does not consider that the measures included in the WLCMES are sufficiently robust to enhance and mitigate the identified impacts.
- a) *Criterion 16 of Policy PS 9 Wylfa Newydd and related development* is also of particular relevance. From a Welsh language and culture perspective, it is of 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 the use of the Welsh language within local communities on the Island. Thresholds in the monitoring framework need to be sufficiently robust in order to sufficiently early enough identify trends that could, if allowed to continue, result in patterns of behaviour, which once established may be difficult to reverse. 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. The variances could arise from a range of factors, e.g. an increase in worker numbers, variation in origin of workers, delays in delivery of infrastructure, or inability to employ locally.
- 5.8 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.

6.0 Gaps in information

6.1 Accommodation

- 6.1.1 The IACC in its letter to Horizon dated 24th August 2018³² requested 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.
- 6.1.2 No analysis of the impact of the decommissioning workforce and their dependants is provided³³.

6.2 School Capacity and Linguistic Character of Schools

- 6.2.1 The IACC appreciates that the precise numbers, timing and location of dependant arrivals are not currently known. However, the IACC will require data concerning the number, age, language backgrounds, place of residence and intended education setting of choice of the dependants that will be relocating to Anglesey with Horizon employees in order to ensure that the education authority and the schools can make adequate plans for the additional school intakes.
- 6.2.2 It is expected that this more detailed assessment of potential impact of dependants upon the linguistic character of schools be comprised of the following three aspects:
- a) analysis of data on primary and secondary school places capacity in Anglesey North, Anglesey South, Anglesey West and the Local Area of Influence during the construction and operation phases;
 - b) modelling of different scenarios of increased school pupil numbers to assist in determining the possible level of impact to specific communities and school clusters within the island;
 - c) qualitative evidence gained from schools on the resource impact of additional non Welsh-speaking pupils, particularly late arrival pupils of different ages and different linguistic and cultural backgrounds.
- 6.2.3 IACC has conducted some initial language profiling of the primary and secondary school populations in each school on Anglesey using PLASC 2018 data. This data indicates the language ability of pupils in each primary school (Appendix 1, Map 11) and each secondary school (Appendix 1, Maps 18 and 19). This data can be used to help identify those schools that will be most impacted by additional Horizon workforce children and help IACC and Horizon to target additional support and monitor the effectiveness of the support that is put in place.

³² See Annex 9C IACC letter to Horizon 24 August 2018 'Non-Home Based Workforce Household Composition (Number of Partners and Dependents)'

³³ Examination Library Reference APP-[432] para. B.3.36 "indications of potential changes in workforce can however be taken from similar projects such as the former Magnox power stations located at Trawsfynydd in Gwynedd, as well as the Existing Power Station at Wylfa Head", this information is not provided.

6.3 Education and Employment linked to the Welsh Language

6.3.1 The data presented in the WLIA and Baseline Report does not adequately assess the impact of the Wylfa Newydd Project on preventing the out-migration of Welsh speakers. As detailed in IACC's letter to Horizon dated 27th September 2018³⁴ further information is required within Horizon's Jobs and Skills strategy. During the construction phase, Horizon only expect 1260 of the possible 9000 jobs at peak to be filled by Anglesey residents, therefore, it is unclear to what extent the project will help reduce out-migration of young people especially in the short to medium term. It is also unclear how it is expected that there would be a 6% increase in employment on Anglesey as a direct result of the construction of the Wylfa Newydd Project.³⁵ No evidence to support this claim is provided in the WLIA or the Welsh Language Impact Assessment Baseline Report. Data is presented on the level of qualifications held by Anglesey Welsh speakers³⁶ though not according to type of subject or field. Similarly, no indication is given of the qualification levels required by the Wylfa Newydd Project. The IACC concludes that the data presented does not provide the means of measuring the impact of the Wylfa Newydd Project on preventing the out-migration of Welsh speakers due to lack of employment opportunities.

6.4 Welsh Tradition and Culture

6.4.1 The WLIA notes that 'the level of effect' will depend mainly on the willingness of the non-home-based worker to integrate culturally and linguistically. No data or comparison studies are provided to show how likely this is to happen when majority language speakers move into minority language speaking areas on a short term basis. Hitherto, the experience in Wales shows that this is highly unlikely.

6.4.2 The baseline data presented in the WLIA and Baseline Report does not provide a detailed, community level profile of the range of the current use of Welsh within key community social networks, community activities and voluntary / community groups.

6.4.3 IACC's initial community language profiling (Appendix 1) of the Welsh language ability of participants and the leaders of community groups together with data on the language of group activities begins to provide a picture at ward level where these groups meet and the extent to which their activities are conducted in Welsh, bilingually or in English. This is essential data, which will need to be added to to form a meaningful baseline of community language use pre-Wylfa Newydd, targeting mitigation and enhancement measures and a means of monitoring impact through the life of the Wylfa Newydd project.

³⁴ See Annex 9D IACC letter to Horizon 30 November 2017 Re Draft DCO Documentation Review (Section 7 – Education and Skills)

³⁵ Examination Library Reference APP-[432], para B.4.101.

³⁶ Examination Library Reference APP-[432], Table D-24 (Appendix A7-1, page 157).

6.5 Children, Young People and Families

6.5.1 The baseline evidence provided by Horizon is restricted to a meagre list of selected community groups located within proximity of each of the Wylfa Newydd project component sites. This is inadequate. The baseline evidence used to inform and monitor impact should not be limited to these sites but rather include, in addition, those communities where incomer workers and families are expected to take up residence. In addition, there is a need for more detailed profiling of the voluntary / activity / community groups to include a wider range of local activities and groups aimed at different age groups; to profile the numbers and ages of young people / families and other individuals who attend community activities and the existing language use profiles of these groups. As mentioned in the previous paragraph, IACC has completed an initial profiling of community groups (see Appendix 1) but there remains a need for a full profile of community groups as described. Following the review of this detailed profile, criteria to define 'robust' and at 'risk' levels of existing use of Welsh within local voluntary / activity / youth groups would need to be agreed and used in conjunction with profiling and in-migration data to model possible risk scenarios.

6.6 Community groups and local services

6.6.1 The baseline data presented in the WLIA and Baseline Report does not provide a detailed, community level profile of the range of the current use of Welsh within key community social networks, community activities and voluntary / community groups and local services. It would be essential to produce a robust linguistic profile of all communities within Anglesey as well as the KSA which notes in some detail the range and nature of community based ventures that work through the medium of Welsh or bilingually in order to have clear view of the situation as it is at present. This would assist with forming a more fine-grained analysis of the current baseline data and assist in the task of assessing what linguistic changes will or may take place over time and whether further remedial steps will need to be taken to mitigate and enhance community level use of Welsh. IACC's initial community language profile data (Appendix 1) begins that process.

6.7 Welsh Language in the Workplace

6.7.1 Opportunities for persons to use the Welsh language" in social situations at work and in the communities in which the workforce live will depend on many key factors which will need to be addressed in detail in Horizon's Corporate Welsh Language Policy and in its WLCMES, including the following:

- a) the linguistic profile of the workforce (currently unknown);
- b) distribution of the workforce in local communities (currently predicted according to gravity model but not known more precisely at this point);
- c) impact of the above on the proportion of Welsh speakers to non-Welsh speakers in schools, communities and social group encounters (currently unknown);
- d) managing the expectations of in-migratory workers from a majoritarian (English/ other majority language) cultural background and low awareness

levels of the Welsh language and culture (this issue has not been addressed to date in the Horizon WLIA);

- e) a realistic appraisal of the projected Welsh language acquisition rate among in-migratory workers and their families (this has not been addressed to date in the Horizon WLIA);
- f) the extent to which the normative use of Welsh is established and supported by managers in workplace situations (currently unknown and dependent upon Horizon's Corporate Welsh Language Policy and its implementation).

6.8 DCO Obligations and Requirements

6.8.1 The IACC recognises Horizon's current engagement and commitment in advocating the Welsh language as a 'Golden Thread' throughout all aspects of its project. The DCO, however, does not adequately reflect this and the documentation does not sufficiently detail and secure this commitment. In particular, the Worker Accommodation Management Strategy and Worker Management Strategy do not include robust thresholds for reporting and monitoring the spatial distribution of workers in order to minimise the potential effects of a large, in-migrating, temporary workforce who are unlikely to speak Welsh, on the use of the Welsh language within local communities.

6.8.2 This section presents each of the mitigation and enhancement measures contained in Horizon's Welsh Language and Culture Mitigation and Enhancement Strategy (WLCMES) according to the four themes of the strategy:

- a) **Workforce (Measures 1 – 13)**
- b) **Children, young people and families (measures 14 - 17)**
- c) **Community and local services (Measures 18 – 21)**
- d) **Accountability (Measures 21 – 24)**

6.8.3 Each measure is then assessed in turn for the adequacy of the steps that should be required to avoid, reduce, mitigate or compensate for adverse impacts. Where IACC considers measures to be inadequate, amendments to make measures acceptable are provided.

6.9 Workforce

6.9.1 Appointment of a Welsh Language and Culture Co-Ordinator (WLCC)

6.9.1.1 Horizon's proposed WCLMES enhancement measure:

- a) ***Measure 1 (Application Reference Number: 8.14): Horizon will appoint a Welsh Language and Culture Co-Ordinator (WLCC) to focus on the development and implementation of Welsh language and culture mitigation and enhancement measures during construction and operation of the Project (Lead: Horizon).***

6.9.1.2 *[The remit]...would include overseeing the development of Horizon's Welsh language skills competency framework and tools for assessing the Welsh language skills needs of posts (See measure 8) (Application Reference Number: 8.14) in partnership with the Horizon HR team. The role will also include liaising with Grŵp Llandrillo-Menai and Bangor University to develop the programme of Welsh language learning and awareness training (See measure 12) (Application Reference Number: 8.14) for the workforce, as well as overseeing the proposed in-house mentoring system. The WLCC would also liaise with key external partners such as the National Centre for Learning Welsh, Welsh Language Commissioner and Welsh Government in order to seek advice and take advantage of resources being developed by these partners.*

6.9.1.3 IACC's Response to WCLMES Measure 1

6.9.1.4 IACC welcomes Horizon's appointment of a Welsh Language and Culture Co-Ordinator who will work under the direction of Horizon's Head of Strategic Development (Wales) and be responsible for Welsh language matters within the Wylfa Newydd Project. A development of the magnitude of Wylfa Newydd requires broader ownership of the Welsh language across the organisation for the policy and mitigation measures to be effective. Central leadership and management buy-in will be required and it is expected that the Senior Management Group accountable for the delivery of WCLMES and Horizon's Corporate Welsh Language Policy (WCLMES, Measure 21) would draw together representatives from across the various operational areas of the Wylfa Newydd Project and would be responsible for implementing and monitoring the various measures, sharing good practice, collating data and monitoring progress in order to report on progress to the Welsh Language Commissioner at the end of each year. All major public sector employers in Wales operate in this way – including Local Authorities, Police Authorities, Health Trusts, Fire and Rescue Services, Universities, Housing Associations etc. Adopting this modus operandi could provide the impetus needed to progress Horizon's stated commitments regarding the Welsh language.

6.9.1.5 Determining the status and remit of the proposed Welsh Language and Culture Co-ordinator (WLCCO) is a matter of importance. The post holder will be charged with advancing the linguistic agenda in a robust manner whilst also operating in such a way as to gain the support and confidence of staff at all levels, including senior management. Studies have shown that language policies are most effective when they are accorded a high profile and authority within an organisation⁴⁷. A Welsh language officer with little authority and a low profile within an organisation's hierarchy is likely to be disadvantaged when the need arises to challenge more senior officers – e.g. regarding the language requirements of posts, or the need to comply with policy commitments. Consequently, IACC emphasises the importance of ensuring that the WLCCO is accorded the influence to implement robust Welsh language practices within Horizon.

6.9.1.6 IACC believes that Welsh Language Awareness Training (WLAT) and a bespoke induction to this role will be required for the Welsh Language and

Culture Co-ordinator, in order to ensure the effective introduction and implementation of the Policy.

6.9.1.7 WLAT will also be required for Horizon's Head of Strategic Development (Wales), in order to effectively manage the organisation's Welsh Language Policy and the role of the Welsh Language and Culture Co-ordinator.

6.9.2 Assessing the Welsh language skills requirements for jobs

6.9.2.1 Horizon's proposed enhancement measure:

a) ***Measure 2 (Application Reference Number: 8.14): Horizon will assess the Welsh language skills requirements for job roles when developing construction and operational job profiles at Wylfa Newydd. This assessment will be based on a Welsh language skills competency framework and assessment tool to be developed by Horizon. The level of Welsh language skills required for each post will be recorded as part of the recruitment process and included within the job profile (Lead: Horizon)***

6.9.2.2 *Implementing this measure assumes Welsh language and culture awareness training would be provided to 30-40 recruitment managers as an initial starting point. This would need to be followed up with more specific training to equip recruiting managers with the skills for assessing Welsh language skills needs of posts. Delivering this type of training could potentially be undertaken by the WLCC (see measure 1) (Application Reference Number: 8.14). It may require the involvement of either external training organisations or ensuring that the HR team includes individuals with experience of assessing the Welsh language skills needs of posts.*

6.9.2.3 IACC's Response to WCLMES Measure 2

6.9.2.4 IACC believes that this Mitigation would be more effective if it included a statement to the effect that Welsh language skills (of different levels) be required across all grades, including Senior and Middle Management during construction, operation and decommissioning phases. It is recognised best practice that all employees in an organisation gain basic courtesy Level 1 Welsh.³⁷ It would also be a realistic expectation that all Horizon staff follow the National Learn Welsh Centre's 10 hour on-line course Croeso Cymraeg Gwaith³⁸

6.9.2.5 The scope of the mitigation would also be strengthened by adding "...not only for Service interface situations but also to foster a bilingual working environment and the use of Welsh in the workplace in accordance with established best practice.

6.9.2.6 The delivery of Welsh Language Awareness Training and training regarding Recruitment procedures relating to this policy are highly specialised areas of

³⁷ This is a requirement for all North Wales Police staff for example.

³⁸ See Annex 9E Internal Use of Welsh in the Workplace Final Report November 2010

training and may need to be undertaken by experienced external agencies rather than the WLCC.

6.9.2.7 IACC agree that it is appropriate that Horizon use a language competency framework and assessment tool to assess the Welsh language skills requirements for all posts created for Wylfa Newydd. This is in line with good practice in the implementation of a workplace Welsh Language Policy. In addition:

- a) **Horizon should implement a Welsh Language Skills Strategy in line with best practice among organisations with Welsh Language Strategies.** A Welsh Language Skills Strategy enables an employer to:
 - i. Decide the levels of language competence required in the four aspects of language skills (understanding, speaking, reading and writing) in specific departments, teams and positions to enable the organisation to carry out its functions effectively and efficiently.
 - ii. Identify the language skills of the workforce
 - iii. Identifying and closing Welsh language skills gaps by:
 - i. appointing qualified individuals to vacant posts
 - ii. reorganising posts to redeploy qualified individuals to specific teams; and
 - iii. training current employees, enhancing their language skills and competences.

6.9.2.8 Horizon's WLCMES Measure 2 represents step 1 in the list above. WLCMES paragraph 4.2.27 in relation to Measure 9 notes that Horizon will 'maintain a formal record of the Welsh language skills of staff and monitor the progress of staff whose posts require Welsh language skills and attend training' equates to step 2 above. At present Horizon's WLCMES lacks explicit commitment to reviewing steps 1 and 2 on an ongoing basis throughout all stages of construction, operation and decommissioning. The WLCMES strategy would also be strengthened with explicit reference to step 3 above. It is the robust application of all 3 steps of a Welsh Language Skills Strategy that would mitigate any failure to recruit adequate numbers of Welsh speakers.

- a) **Horizon should undertake an annual audit of Language Skills requirements as part of its Welsh Language Skills Strategy. This annual evaluation of employees' Welsh Language skills should be embedded into staff annual performance appraisals in line with best practice.** This recommendation goes beyond the conventional concern with targets and outputs which are embedded within the language strategies of large organisations and it is far more concerned with outcomes. This measures the actual not the nominal behaviour of elements of the workforce. Reviewing annually as part of staff performance appraisals enables Horizon staff to become increasingly able to use Welsh in the workplace.

6.9.2.9 This is significant on three grounds (which are covered in more detail in the Welsh Language Use sections of the LIR):

- a) First, it reflects Horizon's commitment to the operational use of Welsh as an integral skill for selected employees.
- b) Secondly, it provides a robust data base and framework for the continued improvement of the training courses available, so that upskilling and growth are encouraged rather than allow a gradual decline once the initial enthusiasm has waned.
- c) Thirdly, it reinforces the relationship between the workforce and key elements of the immediate society such as community activity, local schooling, public services and entertainment, for it enables a section of the workforce to participate in and contribute to the enrichment of the host community. The regular audit of language skills requirement is an established practice among organisations who implement a bilingual workplace strategy.

6.9.2.10 The implementation of a Welsh language Skills strategy supported by a commitment to providing the Welsh language skills training provides a means of strengthening the Welsh language capacity of a workforce, which on initial recruitment may or may not fully meet Horizon intentions and IACC/public expectations. Fundamentally, the production of New Speakers of Welsh within the workforce would ameliorate somewhat the otherwise negative impact of the Horizon workforce on the proportion of Welsh speakers on Anglesey during the construction, operation and decommissioning phases.

6.9.2.11 Much of Horizon's Welsh Language Policy's success will depend on the HR Teams's ownership of the Recruitment, Training and Staff Development measures and procedures necessary for its implementation as per the statutory guidance of the Welsh Language. Horizon's relationship with the Welsh Language Commissioner should be formalised on a voluntary basis, as per the best practice arrangements established by other organisations not formally included within the ambit of the Welsh Language Measure 2011.

6.9.3 Interview panels

6.9.3.1 Horizon's proposed WCLMES enhancement measure:

Measure 3 (Application Reference Number: 8.14): ***Horizon will ensure a Welsh-speaking member of staff is included on interview panels for jobs where candidates are required to have Welsh language skills so that the candidate's linguistic skills can be properly assessed. (Lead: Horizon).***

6.9.3.2 *The majority of Horizon Wylfa Newydd staff are Welsh speakers and the appointment of the WLCC will further increase this capacity. WL Stakeholders noted that staff with Welsh language skills will be required to enable the Welsh language competency of applicants to be assessed during interviews. This measure could be further supported by increasing the numbers of Welsh speakers within Horizon's central HR team. Horizon has previously brought in external staff with Welsh language capacity to sit on interview panels when sufficient capacity does not exist internally*

6.9.3.3 IACC's Response to WCLMES Measure 3

6.9.3.4 IACC is uncertain that Horizon's claim that the majority of Horizon Wylfa Newydd staff are Welsh speakers is correct. It is imperative that the majority of the Wylfa Site Office staff speak Welsh and that critical roles such as HR staff have the advanced Welsh language skills necessary for all aspects of their roles to be able to be conducted through the medium of Welsh. It is also important for all Horizon headquarter staff in Gloucester to undertake Language Awareness Training as part of their induction training and for individuals in selected key roles that require close liaison with Wylfa newydd site staff to be encouraged to develop their ability to speak and use Welsh.

6.9.3.5 IACC believes that Horizon's adoption of a Welsh Language Strategy for the workplace that accords with current best practice would include provision for language choice to be offered for interviews - as per best practice guidelines.. ideally, panels should include more than one Welsh speaker, who should be well briefed on their role in the skills assessment element of the interview. Increasing the numbers of Welsh speakers within Horizon's central HR will be crucial to the implementation of this mitigation measure.

6.9.4 Information on career opportunities at Wylfa Newydd

6.9.4.1 Horizon's proposed WCLMES enhancement measure:

a) **Measure 4 (Application Reference Number: 8.14): *Horizon will distribute, on a regular basis, information on career opportunities at Wylfa Newydd to local communities and young people including the bilingual Wylfa Newydd 'Career Route Maps' and Job Profiles. Horizon will develop role model activities and resources to encourage awareness of career opportunities within the community. Welsh-speaking Horizon staff (including Welsh learners) and local suppliers will be involved and front these 'role model' activities and resources such as case study video clips, written materials, presentations in schools (Lead: Horizon).***

6.9.4.2 *Horizon has a bilingual website.... and has developed a section of the website aimed at young people (www.horizonnuclearpower.com/futures) which includes a series of bilingual educational resources (Career Route Maps) that aim to promote awareness of career pathways and job opportunities on the Project as well as increasing participation in STEM subjects locally.*

6.9.4.3 *Horizon plan to develop the Career Route Maps into an interactive tool which would allow young people to enter subjects that they're currently studying in order to be shown relevant job opportunity available at Wylfa Newydd. Horizon will include the general statement on the value placed on Welsh language skills (See measure 9) (Application Reference Number: 8.14) in information on job opportunities at Wylfa Newydd. Horizon have developed 6 'Career Route Maps' that outline the types of roles that will be available at Wylfa Newydd. Horizon has also developed six job profiles that are regularly*

used at events and the company is considering further developing them into video clips featuring staff, graduates and apprentices talking about their roles and experiences of working at Wylfa Newydd.

6.9.4.4 *As part of the promotion of opportunities to the local population, Horizon are working in partnership with North Wales Economic Ambition Board, Careers Wales and other key employers across North Wales to develop role model materials that could help encourage local people to consider a career at Wylfa Newydd. These materials will be developed during 2018 and may include video clips of Horizon apprentices that can be accessed via Horizon's YouTube channel.*

6.9.4.5 *Horizon are developing a STEM Ambassador Programme that will be rolled out during 2018. The role models programme of activity will involve Wylfa Newydd staff - including former pupils of the Isle of Anglesey's schools, Welsh speakers, Welsh learners and young people on their graduate and apprenticeship schemes. As part of this, the company is looking to develop video clips exemplifying good practice in interview techniques using Project staff, graduates, local staff and possibly apprentices.*

6.9.4.6 IACC's Response to WCLMES Measure 4

6.9.4.7 IACC requires a significantly improved Jobs and Skills scheme to encourage and facilitate the appropriate up-skilling of local residents to reduce out-migration of young people, especially in the short-to-medium term. This, alongside attracting local people and their families back to the Island through offering good employment opportunities at Wylfa Newydd, should also be prioritised in order to protect the Welsh Language and Culture.

6.9.4.8 No explicit emphasis is placed on the value of the Welsh language in these roles and in STEM subjects more broadly. **This omission must be rectified.** If the Wylfa Newydd Project is to have a positive impact on the ability of young Welsh speakers to gain employment with Horizon (either directly or as a contractor), considerable emphasis will need to be placed on the various plans mentioned above (including the production of Career Route Maps and Job Profiles) and the contribution of staff and contractors to various role model activities. Again, there is a need to ensure that these are effective role models, i.e. Welsh speakers working in a variety of roles and, ideally, ones who use the Welsh language in their roles. Welsh speakers should be prominent in the video clips mentioned. It is also suggested that career information should place an emphasis on opportunities to use Welsh in the workplace, opportunities for recruits to further develop their Welsh language skills and the 'added value' attached to the use of Welsh. This would accord with the Welsh Language Standard regarding Promoting Welsh and the local authority's corresponding Welsh Promotion Strategy.

6.9.4.9 No provision is made for supporting the recruitment of (not necessarily locally based) Welsh speakers to highly specialised posts that require undergraduate and post-graduate qualifications. Therefore, in addition to its

apprenticeship scheme, the IACC require that Horizon fund and implement a Student Sponsorship Programme for undergraduate and postgraduate students in specialised, nuclear industry related, fields of study. Such schemes have been successfully implemented in other fields (e.g. environmental science³⁹) where agencies had previously had difficulty in recruiting Welsh speakers to specialised posts.

6.9.5 Recruitment of Welsh speakers

6.9.5.1 Horizon's proposed WCLMES mitigation measure:

a) **Measure 5** (*Application Reference Number: 8.14*): ***As part of its recruitment strategy, Horizon will ensure all available job opportunities are advertised through recruitment channels that target a Welsh-speaking audience. This will include the Wylfa Newydd Employment and Skills Service as well as other local and national partners that engage with a Welsh-speaking audience. All job advertisements will be posted in English and Welsh. (Lead: Horizon)***

6.9.5.2 *As part of their broader recruitment strategies, Horizon will advertise posts through recruitment channels including those that target a predominantly Welsh-speaking audience..... As a first step, Horizon will identify a list of recruitment channels that would best enable Horizon to target Welsh speakers in the KSA and beyond. This could form part of the role of the WLCC (See measure 1)*

6.9.5.3 *In association with the HR team. Horizon will also advertise posts through the local brokerage service (Wylfa Newydd Employment & Skills Service) which is being established by the Department of Work and Pensions, Grŵp Llandrillo Menai, IACC, North Wales Economic Ambition Board, Welsh Government and Horizon.*

6.9.5.4 *As a first step, Horizon will also distribute job opportunities through organisations that engage with a Welsh-speaking audience (e.g. local authorities, youth organisations, cultural organisations).Following this, Horizon will develop a method for distributing job opportunities via these organisations (e.g. email distribution list). In addition, Horizon will distribute job opportunities to agencies involved in tracking young people (e.g. Careers Wales, local authorities, Universities) to promote job opportunities to those who may have moved away from the KSA.*

6.9.5.5 IACC's Response to WCLMES Measure 5

6.9.5.6 IACC welcomes Horizon's commitments to recruit Welsh speakers to its workforce. IACC notes that Horizon's WCLMES does not contain any specific targets to employ an agreed proportion of Welsh speakers across the various specialisms of its workforce. Horizon calculate that a 'minimum of 2,000

³⁹ For example the Student Sponsorship Schemes of Natural Resources Wales/Countryside Council for Wales

workers are expected to already residing in the KSA'. It is unclear how this figure is derived and Horizon provides no indication of the numbers or proportion of the local workforce that are expected to be speakers of Welsh. Horizon's original position as reflected in WCLMES March 2017 contained a number of commitments regarding linguistic targets and bilingual working practices which were absent in the WCLMES August 2017. These omissions were as follows⁴⁰:

- a) a commitment to include a linguistic target for relevant jobs;
- b) a commitment to include a linguistic courtesy for all Wylfa Newydd construction and operation staff;
- c) a commitment to being proactive in encouraging staff to develop Welsh language skills through training courses, and
- d) a commitment to use employee appraisals to establish skills requirements for specific roles.

6.9.5.6 Horizon's current WCLMES has re-instated three of these four omissions. The initial commitment to include a linguistic target for relevant jobs is not included. There is an implicit expectation that conducting a 'Consideration of the Welsh Language Skills of each post on the project' (WCLMES Measure 2) will identify the level of need for Welsh speakers. However, the IACC believe that setting targets for relevant jobs is necessary and will strengthen the strategy for recruiting Welsh speakers to certain posts; provide a focus for reviewing and revising as necessary the strategy for recruiting Welsh speakers.

6.9.5.7 It is realistic to expect that a high proportion of Welsh speakers be employed across the Horizon workforce. Indeed IACC consider that Horizon can assist IACC to increase the number and proportion of Welsh speakers on Anglesey and contribute to Welsh Government's target of creating 1 million Welsh-speakers by 2050 if it:

- a) **puts robust plans in place to recruit Welsh speaking workers, and**
- b) **develops the Welsh language skills of all of its workforce so that by the operational stage, the majority of Wylfa Newydd site staff will be able to use Welsh in the workplace.**

6.9.5.8 It is important to stress that IACC do not consider 'Welsh speakers' to all be fluent, native and first language speakers of Welsh. 'Welsh speakers' includes people for whom Welsh is an additional language acquired through statutory education or as an adult and form the growing population of 'new speakers of Welsh' in Wales and abroad. Welsh speakers will be at different points on a continuum of fluency and oral and literacy competences in the language. Over time, with a robust Welsh Language Policy, Welsh Language Strategy and Action Plan for implementing that policy together with a well-defined and implemented Welsh Language Skills Strategy it will be possible to develop the Welsh language skills of all staff across the workplace.

⁴⁰ See Annex 9D IACC letter to Horizon 30 November 2017 Re Draft DCO Documentation Review (Section 6 – Welsh Language and Culture)

6.9.5.9 In addition to the mitigation measures outlined in WCLMES and Planning Statement paragraph 6.4.466, it is IACC's position that the following are necessary to ensure that the number of Welsh speaking staff are maximised throughout the Horizon workforce:

- a) **An independent involvement and evaluation of the proposed competency framework and process for both interview and testing of Welsh language skills.** IACC consider this to be critical for designated positions, but also relevant for other positions. This is because, in general, prospective employers who seek bilingual skills, whether in a Welsh context or in an international comparative context, such as the Canadian Federal Government until recently, accepted that individuals with insufficient skills be appointed subject to their commitment to apprentice themselves to a course of language studies. However, all too often such promises are not kept and as a consequence the required skill set is not put into operation, thus diluting the organisations linguistic profile and capacity to deliver. The general maxim is that it is better to recruit qualified and appropriate staff from the outset rather than rely on internal systems to bring some staff up to speed over time. However, it is also IACC's position that where recruitment of workers with suitable Welsh language skills is not possible, that robust policies are in place to develop those skills post-recruitment.
- b) **That the individuals recruited to Senior Management and Middle Management roles as well as across the operational spectrum should be Welsh speakers or trained over time to have Welsh language skills they can use in the workplace.** This is because, for the policy and mitigation measures to be effective they need to be promoted at the highest level within the organisation. Studies have shown that the use of Welsh needs to be promoted within and from 'high prestige domains' to gain traction, authority and legitimacy within large organisations.⁴¹ High profile appointments e.g. North Wales Police's Chief Inspector have become fluent speakers of Welsh after being appointed to post. It would be a positive signal if Horizon senior and middle managers did likewise.

6.9.5.10 And, as described with regard to Measure 2 above:

- a) **That Horizon implement a Welsh Language Skills Strategy in line with best practice among organisations with Welsh Language Strategies.**
- b) **That Horizon should undertake a regular audit of Language Skills requirements as part of its Welsh Language Skills Strategy.**

⁴¹ Relevant studies include: *Internal use of Welsh in the Workplace*, IAITH Cyf/Welsh Language Board (2010) - Annex 9E; Eaves, S., Jones, K. Ioan, G. et al, *Final Report of the Project to promote Bilingual Workplaces* IAITH Cyf/Welsh Language Board (2007) - Annex 9F; Jones, K. & Eaves, S., *The Provision of Welsh Language Choice in the North Wales Criminal Justice Sector* IAITH Cyf (2008) – Annex 9G

6.9.6 Bilingual internal communications

6.9.6.1 Horizon's proposed WCLMES enhancement measure:

- a) **Measure 6** (Application Reference Number: 8.14): ***Horizon's Welsh language policy to be updated on an annual basis to include details on what types of internal communications will be made available bilingually (Lead: Horizon)***

6.9.6.2 *Horizon's current Welsh language policy [RD2] notes that the company 'will support and facilitate the use of Welsh in the workplace wherever possible, whilst recognising the operational language of the nuclear industry in the UK and of our regulators is English.' It also notes that Horizon 'will endeavour to use more Welsh in our internal publications wherever it is reasonable to do so.' This measure proposes updating Horizon's Welsh-Language Policy to include more detail on the type of internal communications that will be made available bilingually.*

6.9.6.3 IACC's Response to WCLMES Measure 6

6.9.6.4 IACC welcome this commitment and regard an annual review and updating of Horizon's Welsh Language Policy as a key aspect of an annual monitoring report which is voluntarily submitted to the Welsh Language Commissioner. IACC suggests expanding this measure to include a statement at the end to the effect ..."with a view to increasing these year by year." Supporting and extending the use of Welsh in the workplace will be a key consideration in this Process in accordance with Welsh Language Standards relating to the internal use of Welsh and the promotion of Welsh.

6.9.7 Permanent and temporary signs

6.9.7.1 Horizon's proposed WCLMES enhancement measure:

- a) **Measure 7** (Application Reference Number: 8.14): ***All permanent and temporary public signs relating to the Project will be bilingual (Lead: Horizon)***

6.9.7.2 *Horizon's Welsh Language Policy [RD2] also notes that Horizon '...will encourage all third parties operating on our behalf to install bilingual temporary signage in publicly accessible areas wherever possible.' All public signs at the Project site will be Horizon's responsibility. A more detailed review of different classifications of on-site signage should be undertaken by Horizon to consider whether it is appropriate for 'safety-critical' signage to be bilingual recognising the operational language of the nuclear industry and regulators in the UK is English. This review should also consider whether use of other languages where appropriate (e.g. where significant numbers of workers are non-Welsh or English speakers).*

6.9.7.2 IACC's Response to WCLMES Measure 7

6.9.7.3 IACC agree that permanent and temporary signs should be bilingual with the possibility of some signs in other languages as well in line with the best practice approach to the implementation of a Welsh language policy for the workplace.

6.9.8 Welsh language skills competency framework and assessment tool

6.9.8.1 Horizon's proposed WCLMES enhancement measure:

- a) **Measure 8** (Application Reference Number: 8.14): ***Horizon will develop and adopt a Welsh language skills competency framework and a Welsh language skills assessment tool for recruitment processes. Horizon will provide relevant recruitment managers with training to use tools to determine the language requirements of construction and operational roles (Lead: Horizon).***

6.9.8.2 *Horizon's Welsh language policy [RD2] notes that the company 'formally assess what level of Welsh language skills are required to perform each role in our organisation'. It also notes that 'We keep an informal record of the Welsh language skills of certain employees through our intranet system, so that we can direct Welsh language enquiries to the appropriate person. Welsh language skills will also be recorded on employee training records.' As part of this Strategy, Horizon will develop and implement a Welsh language skills competency framework using a recognised model such as the Association of Language Testers in Europe (ALTE) levels 0-5. This framework will draw on good practice from other organisations (e.g. North Wales Police, Ceredigion Council) and will enable Horizon to formally record the Welsh language skill level required for relevant posts at Wylfa Newydd. Horizon will seek the advice of the National Centre for Learning Welsh in developing this framework. An ALTE framework provides a tool for assessing the competence of individuals in terms of Welsh language skills and could be used to indicate what level of skills (0-5) would be required for relevant construction and operational posts at Wylfa Newydd. This would include an assessment of what oral and written skills would be required for posts. WL Stakeholders considered that using a recognised framework such as ALTE is considered preferable to labelling the Welsh language skills requirements of posts as 'essential' or 'desirable'. Horizon will seek the advice of the National Centre for Learning Welsh in developing this tool and draw on good practice from assessment tools used by other organisations (e.g. Grŵp Llandrillo-Menai, Carmarthenshire Council). Welsh language skills assessment tool can be used in conjunction with a Welsh language competency framework to help plan what level of Welsh language skills are required for a post....Developing this framework and assessment tool will be one of the roles of the Horizon WLCC in partnership with the HR team (See measure 1) (Application Reference Number: 8.14).*

6.9.8.3 IACC's Response to WCLMES Measure 8

6.9.8.4 IACC agree with this commitment as a part of the implementation of a Welsh Language Skills Strategy as described in relation to Measure 2 above. It is also suggested that the wording of this mitigation be revised to refer here (and in Measure 9 below) to an intention to seek to comply with the principles of the Welsh Language Standards relating to Recruitment (Section 5 of the Welsh Language Standards (No.1) 2015. The development of a Welsh language skills competency framework and assessment tool is highly specialised and may need to be undertaken by experienced external agencies in collaboration with / on behalf of the WLCC.

6.9.9 Distribution of information on Welsh language and culture to contractors and personnel

6.9.9.1 Horizon's proposed WCLMES mitigation measure:

a) **Measure 9** (Application Reference Number: 8.14): ***Horizon will distribute information to contractors and all personnel on the Welsh language and culture as part of recruitment materials. This will include a general statement on the value Horizon places on Welsh language skills, the level of Welsh language skills required for a post as well as background information on the Welsh language.***

6.9.9.2 *Horizon will develop a general statement on the value of Welsh language skills which will be included on all construction and operational job adverts/ job specs/ person specs where there is a relevant requirement within the postHorizon will also ensure that Project contractors in all tiers are required to include a similar statement on their recruitment materials.Ensuring that contractors also utilise this statement would support the commitment to 'ensure due consideration and respect is given to Welsh language and culture in our supply chain activities' in Horizon's Supply Chain Charter. Horizon will also note the level of linguistic skills required on recruitment materials for posts requiring Welsh language skills. As noted in measure 8, Horizon will adopt a Welsh language competency framework and assessment tool for deciding on the Welsh language requirements of posts at levels 0-5. The level of oral and written Welsh language skills required (based on the framework and assessment tool) will be specified in recruitment materials, most likely using descriptions as well as the levels..... Horizon will also maintain a formal record of the Welsh language skills of staff and will monitor the progress of staff whose posts require Welsh language skills and attend training....., Horizon will include background information on the Welsh language on the Isle of Anglesey and north west Wales within recruitment packs for posts. Information distributed will include basic background on the Welsh language and culture on the Isle of Anglesey and north west Wales, information on the local education system, the benefits of bilingualism and opportunities to learn the language. This could be a short summary of the welcome packs proposed for new staff and their families (See measure 17) (Application Reference Number: 8.14) to ensure consistency and avoid duplication.*

6.9.9.3 IACC's Response to WCLMES Measure 9

6.9.9.4 IACC agrees with this mitigation measure and suggests that here (as in Measure 8 above) the intention to seek to comply with the principles of the Welsh Language Standards relating to Recruitment (Section 5 of the Welsh Language Standards (No.1) 2015) is also added. It is also expected that the External Stakeholder Group be given the opportunity to review and agree the references to Welsh in the recruitment documentation.

6.9.10 Welsh language information requirements for Contractors

6.9.10.1 Horizon's proposed WCLMES mitigation measure:

- a) **Measure 10** (Application Reference Number: 8.14): ***Horizon will include Welsh Language information requirements as an agenda item for all contractor meetings. Horizon will provide information on their Welsh language capacity, Horizon's Welsh Language Policy and obligations, and how contractors will adhere to Horizon's Welsh language policy (i.e. through recruitment processes and internal and external communications). (Lead: Horizon).***

6.9.10.2 *Horizon's Welsh language policy [RD2] notes that the company 'will encourage contractors or third parties that perform activities on our behalf to comply with this policy'. Horizon will amend their specification creation procedure to require staff developing specifications (requestors) to consider whether works being commissioned require contractors to offer a bilingual service (e.g. for telephone enquiries or reception staff at offices). In cases where bilingual capacity is required, requestors will include this requirement as part of the specification and consider it as part of any assessment of proposals. Horizon will also include Welsh Language information requirements as an agenda item for inaugural contractor meetings where work is primarily being undertaken in north Wales. As a first step, this will be agreed with Menter Newydd as the Tier 1 contractor responsible for construction of Wylfa Newydd. Third parties providing services to Horizon will be duty bound to adhere to any linguistic requirements outlined in the tendering documents and specifications.*

6.9.10.3 IACC's Response to WCLMES Measure 10

6.9.10.4 IACC agrees with this measure and suggests that the wording be revised to refer to an intention /aim to comply with best practice and the advice of the Welsh Language Commissioner regarding Contracts and Procurement.

6.9.11 Use of local suppliers

6.9.11.1 Horizon's proposed WCLMES enhancement measure:

- a) **Measure 11** (Application Reference Number: 8.14): ***Horizon will ensure Menter Newydd and contractors in all tiers are provided with***

information on, and encouraged to use, local suppliers. Horizon's suppliers will be provided with the business database being developed by IACC, other local authorities, North Wales Economic Ambitions Board and Welsh Government (Lead: Horizon).

6.9.11.2 *Horizon's Supply Chain Charter commits to 'ensuring that the local community and supply chain are informed of new opportunities and given fair opportunity to compete'. Horizon has established a supplier portal and has been working with Welsh Government, IACC and North Wales Economic Ambitions Board to promote opportunities for local contractors. To ensure that local businesses (who are more likely to employ Welsh speakers) can take advantage of tendering opportunities at Wylfa Newydd,Horizon will ensure that Menter Newydd and contractors in Tiers 2 and below are provided with the business database being developed by IACC, other local authorities, North Wales Economic Ambitions Board and Welsh Government. Horizon and Menter Newydd should also monitor the value of contracts awarded to companies from north Wales as part of the construction phase. This will also help demonstrate the direct economic effect of the project over time.*

6.9.11.3 IACC's Response to WCLMES Measure 11

6.9.11.4 IACC agree with this approach.

6.9.12 Language and culture awareness training

6.9.12.1 Horizon's proposed WCLMES enhancement measure:

- a) **Measure 12** (Application Reference Number: 8.14): ***Horizon will provide language and culture awareness training to all construction and operational staff and require staff to demonstrate linguistic courtesy and awareness of Horizon's Welsh language corporate policy. Horizon will also develop a programme of Welsh language training at different levels for Project construction and operational staff where this is a relevant requirement within a post. Horizon will establish a Welsh language mentoring scheme for learners. Horizon will maintain their Welsh speaker badge scheme as well as ensuring that Menter Newydd and contractors in all tiers also operate such a scheme. Horizon will collect data on the Welsh language skills of its own workforce and update this on an annual basis. Horizon will encourage staff to take up Welsh language training opportunities. (Lead: Horizon).***

6.9.12.2 *Horizon will create a requirement for all Horizon Wylfa Newydd staff to be able to demonstrate linguistic courtesy and be aware of Horizon's Welsh language corporate policy. This measure will strengthen Horizon's current commitment by including compulsory language awareness raising as part of the corporate induction programme for staff at Wylfa Newydd, including both construction and operational staff.*

- 6.9.12.3 *Horizon will also seek the advice of the National Centre for Learning Welsh in developing this course. Developing and supporting the Welsh language awareness raising could form part of the WLCC's role (see measure 1). For staff with existing Welsh language skills, training could be tailored to help them encourage and support their colleagues to develop their skills (e.g. modelling good practice in encouraging Welsh learners, how to be a language champions / mentors within the workplace).*
- 6.9.12.4 *Horizon will make the Welsh language awareness e-learning module accessible for construction staff and suppliers and ensure contractors access it..... As part of the process of raising awareness of the Welsh language and culture, Horizon will place appropriate publicity materials (e.g. posters or videos) in areas where workers are likely to see them. This will include the Park and Ride facility and shuttle buses used by workers. In terms of broader Welsh language workforce training,*
- 6.9.12.5 *Horizon will ensure that a menu of training is available that maps to the Welsh language skills framework that is developed. Ensuring that relevant Project construction and operational staff are provided opportunities to develop their Welsh language skills as part of a continuum was considered a priority by WL Stakeholders. Horizon's Welsh Language Policy [RD2] notes that the company 'currently do not offer specific provision to help staff to improve their Welsh language skills. However, we aim to include Welsh language skills in our staff management and training processes in the future.*
- 6.9.12.6 *Horizon will seek the advice of the National Centre for Learning Welsh in developing their programme of workforce training. Horizon will monitor the progress of staff whose posts require Welsh language skills and attend training. This may involve utilising the self-assessment tool currently being developed by the National Centre for Learning Welsh.*
- 6.9.12.7 *In addition to establishing a programme of training, Horizon will encourage operational staff to develop their Welsh language skills through taking up training courses. Encouraging staff to take-up opportunities to learn Welsh will form part of the role of the WLCC.*
- 6.9.12.8 *For construction staff, Horizon will encourage Menter Newydd and contractors to provide information to workers on opportunities to learn Welsh. As part of this Strategy, Horizon's formal employee appraisal procedures will gather information on the demand for Welsh language training among employees whose roles require some Welsh language skills (ALTE levels 1-5).*
- 6.9.12.9 *Horizon will encourage Menter Newydd and contractors to provide information to construction workers on opportunities to learn Welsh. Horizon will maintain their Welsh speaker 'orange badge' scheme and ensure that Menter Newydd and contractors in Tiers 2 and below also operate such as scheme. Horizon currently encourage staff able to speak Welsh to wear a 'Cymraeg' (Welsh speaker) badge when they are at work (these are provided*

through the Welsh Language Commissioner's 'Iaith Gwaith' scheme) and provide badges to Welsh-speaking new starters with the company.

6.9.12.10 *Horizon will maintain its Welsh speaker 'Cymraeg' badge scheme and consider whether badges could be sewn into work clothes for Welsh-speaking staff. Horizon will also ensure that Menter Newydd and contractors in Tiers 2 and below adopt such a scheme. This will be discussed with contractors during inaugural contract meetings.*

6.9.12.11 IACC's Response to WCLMES Measure 12

6.9.12.12 IACC agrees with the actions described in this measure and note that this aspect of the WCLMES should be monitored and developed further throughout all construction, operation and decommissioning stages of the Project. This will ensure that the WCLMES evolves in response to any change in the levels of impact and the effect of mitigation and enhancement strategies throughout the lifecycle of the Wylfa Newydd project.

6.9.13 Collecting data on partners and children

6.9.13.1 Horizon's proposed WCLMES enhancement measure:

a) **Measure 13** (Application Reference Number: 8.14): ***Horizon will collect aggregate and anonymised data on partners and children moving to the KSA with construction and operational workers and share this data with local authorities. This will take account of data protection considerations but, where possible, include numbers of children, ages and Welsh language skill levels to provide information for education and early years planners. This process may be linked to the Worker Accommodation Management Service (WAMS) being developed (Lead: Horizon).***

6.9.13.2 *Horizon will develop a tool that can be utilised following recruitment for gathering data on whether families of new construction and operational recruits from outside the KSA are moving to the area. This will include gathering aggregate and anonymised information on the number of children moving to the area, the community they are likely to move to, how long they are likely to stay and their Welsh language skill levels*

6.9.13.3 *Horizon will engage with IACC and Gwynedd Council education departments to assess what information they require for planning Welsh language services (particularly early years, education and immersion services) at an early stage. This will include the level of detail required, frequency of information sharing and data protection considerations. Horizon will work with the local authorities to develop a consent-based method for sharing information on numbers of new construction and operational recruits and their families from outside the KSA moving to different communities. This will take account of data protection considerations but, where possible, include numbers of children, ages and Welsh language skill levels to provide information for education and early years planners.*

6.9.13.4 *To ensure that information is provided to education providers at the earliest possible stage, Horizon HR and IACC and Gwynedd Council Education Departments will discuss what information could be collected from new recruits to the Project and how this could be securely shared (with individuals' consent) following acceptance of a job offer. Consideration will need to be given to data protection obligations and aggregation and anonymization of data. Horizon is currently planning a Worker Accommodation Management Service (WAMS) in partnership with IACC and Welsh Government. This service could potentially support the collection of this type of data on workers' families.*

6.9.13.5 IACC's Response to WCLMES Measure 13

6.9.13.6 IACC welcomes this commitment in line with IACCs insistence that the early sharing of the data as described above is essential to put the necessary mitigation plans in place. In the absence of data, mitigation measures will have to be developed and funded on a worst case scenario basis.

6.9.14 Children, young people and families

6.9.14.1 Educational support for primary, secondary and FE students

6.9.14.2 Horizon's proposed WCLMES enhancement measure:

- a) **Measure 14** (Application Reference Number: 8.14): ***Horizon will continue to develop and provide bilingual educational support for primary and secondary pupils as well as Further Education students (Lead: Horizon).***

6.9.14.3 *The first aspect of developing primary bilingual educational classroom materials aimed at pupils in Key Stage 2 was completed in Autumn 2016. Six units which map to the school curriculum have been developed in partnership with primary teachers on the Isle of Anglesey. Horizon are considering developing materials aimed at Foundation Phase pupils. These would support existing materials in Key Stage 2 (ACT on STEM). These materials focus on promoting STEM careers among primary pupils and challenging stereotypical views on gender in STEM careers. Horizon will monitor usage of materials and evaluate teacher and pupils feedback on the resources as part of the monitoring process for the Strategy.*

6.9.14.4 *Horizon have developed science classroom materials for secondary schools including the 'Veg Batteries' educational resources for teachers and pupils. Two secondary schools on the Isle of Anglesey have already been provided with these materials and the remaining three will also be provided with them later in 2018. Horizon has also worked with two secondary schools to develop Key Stage 4 Physics lesson plans. Horizon will be supplying educational materials to enable schools to increase practical Physics sessions which compliment already existing resources develop by GwE (the north Wales regional educational consortium).*

6.9.14.5 *The Horizon Education Programme Co-ordinator will also be working with one of the secondary schools on the Isle of Anglesey to develop materials for the Welsh Baccalaureate qualification in Key Stage 4 and post-16 settings. These will be bilingual and available on the Horizon website. It will also be in partnership with WJEC and GwE, the north Wales education consortium. Once formalised it is hoped that the resources will be accredited by WJEC. Horizon have also held initial discussions with North Wales Economic Ambition Board to develop bilingual video clips which will support young people with interviewing skills and producing CV's. These will be developed further during 2018. Horizon will monitor usage of classroom materials and evaluate teacher and pupils feedback on the resources as part of the monitoring process for the Strategy.*

6.9.14.6 IACC's Response to WCLMES Measure 14

6.9.14.7 IACC agrees with the scope of this measure.

6.9.15 Project apprenticeship scheme

6.9.15.1 Horizon's proposed WCLMES enhancement measure:

a) **Measure 15** (Application Reference Number: 8.14): ***Horizon will maintain the Project apprenticeship scheme and continue to provide the 'Work Insight Week', or an equivalent scheme, to young people (Lead: Horizon)***

6.9.15.2 *Wylfa Newydd's first cohort of apprentices started in September 2016. There are 8 apprentices (6 of these are Welsh speakers and the other two are from the Isle of Anglesey). It is intended that the apprenticeship scheme will be expanded over the coming years. Horizon will maintain the apprenticeship scheme as the Project progresses and look to increase the numbers of places available in future years. The number of places offered, take-up, completion rates and progression to employment rates will be monitored on an annual basis and continue to be reported to WL Stakeholders.*

6.9.15.3 *Horizon will also continue to provide a 'Work Insight Week' to young people. Horizon have piloted a 'Work Insight Week' for 12 students from the Isle of Anglesey's secondary schools and Grŵp Llandrillo-Menai Further Education students. The Work Insight Week was increased to two weeks, targeting Years 11-13 students in July 2017.*

6.9.15.4 IACC's Response to WCLMES Measure 15

6.9.15.5 The investment by Horizon in the STEM facilities of Anglesey schools and the Coleg Llandrillo Menai site in Llangefni helps to ensure that the young people of Anglesey are trained to the highest standards, so that they can avail themselves of the job opportunities associated with the proposed project. As well as supporting this investment, it is important for this

investment to also **include an emphasis on the value in pursuing careers in STEM subjects either wholly or in part through the medium of Welsh.**

6.9.15.6 IACC notes that this need is not addressed either in the Welsh Language Impact Assessment nor the WLCMES. Including such an emphasis in any publicity material and associated documentation will allow a more meaningful progression from schools to further and higher education (where the Coleg Cymraeg Cenedlaethol plays an important role in promoting the study of STEM subjects through the medium of Welsh) and on to employment with Horizon (where, again, an emphasis will be placed on the value of being a bilingual employee).

6.9.16 Supporting immersion education

6.9.16.1 Horizon's proposed WCLMES mitigation measure:

- a) **Measure 16** (*Application Reference Number: 8.14*): **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 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. (Lead: IACC)**

6.9.16.2 *The WLIA identifies an estimated inflow of around 251 children during construction and operation (broken down to 220 school-age children during the construction phase and up to 31 during the operational phase). This data is based on Horizon's socio-economic assessment for the Project. The socioeconomic assessment estimates that 220 school-age children of construction staff will arrive between the start of construction and peak construction. A further 31 children are assumed to arrive during the operational phase. The socio-economic assessment does not break this down further by year. Currently, local authority Welsh language immersion centres within the KSA, provide intensive Welsh courses for incomers to enable them to participate fully in bilingual education. The language immersion service works with around 70 pupils per year and has five full-time members of staff. The provision includes a full-time intensive 10-week course for pupils at one of two immersion settings on the Isle of Anglesey with additional follow-up one-to-one work. Each language immersion teacher works with around 15 pupils in each of the autumn and spring terms (delivering a 10-week course at one of the centres) and then undertakes targeted follow-up work with pupils during the summer term. Five full-time members of staff currently provide Welsh language immersion courses to pupils based across 2 centres on the Isle of Anglesey. IACC representatives highlighted that immersion education at the centres tends to focus on primary pupils, with secondary pupils tending to request peripatetic teaching at their*

school site. Peripatetic teaching tends to be more resource intensive. The WLIA highlights that the inflow of school-aged children to the KSA during the construction phase would increase the demand for places beyond capacity at the immersion centres. WL Stakeholders highlighted that an expanded team would be required that would need to be able to work across many schools and centres as well as with different age groups. The precise nature of additional provision would depend upon:

- a) the number of school-age children moving to the KSA (estimated at 251 during the construction phase);*
- b) the age of children arriving: immersion provision for secondary pupils would be likely to be more resource intensive than for primary pupils;*
- c) the timing of the children moving to the area.*

6.9.16.3 *The peripatetic teacher service proposed by IACC would be able to work in primary and secondary schools across the local authorities as well as in immersion centres if required. WL Stakeholders were of the view that the peripatetic teacher service should include sufficient flexibility to operate in Gwynedd if additional demands are placed on immersion services there. WL Stakeholders also identified a need for capacity to provide support for pupils and families with low or no English language skills who want to access this type of support. This will require consideration as part of wider mitigation measures for Wylfa Newydd As part of the process of monitoring this Strategy, IACC & Cyngor Gwynedd Council should monitor the inflow of new pupils to schools and take-up of immersion provision against the projected data from Horizon's socio-economic assessments (see measure 13).*

6.9.16.4 IACC's Response to WCLMES Measure 16

6.9.16.5 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.

6.9.16.6 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'.⁴² **Ensuring adequate Welsh language immersion provision for incomer 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**

⁴² Examination Library Reference APP-[432], para B.4.382.

requires that Horizon provide the funding for adequate worst case scenario preparation in advance of Construction.

6.9.16.7 The 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.

6.9.16.8 Based on current capacity and anticipated growth in need for additional support (see Appendix 1 for further details), the Authority 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.**

6.9.16.9 **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
- c) Using the specialist staff to train primary sector teachers in all schools on Anglesey and, in particular, those most likely to receive incoming 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).⁴³

⁴³ 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. It is anticipated that material in other languages will also be needed to meet the needs of dependents of the international workforce employed at Horizon Wylfa Newydd project.

6.9.16.10 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 case scenario funding will be required from Horizon. This should be explicitly acknowledged in WLCMES mitigation Measure 16.

6.9.17 Welcome packs

6.9.17.1 Horizon's proposed WCLMES enhancement measure:

- a) **Measure 17** (Application Reference Number: 8.14): ***Horizon to develop and circulate welcome packs to all families of Project workers who move to the KSA. These will draw on information in the Welsh Government's planned Welcome Packs and will provide information on local services and the community. (Lead: Horizon, Welsh Government, IACC).***

Welsh Government are in the process of developing welcome packs for families who move to Wales and are considering piloting them on the Isle of Anglesey. There is potential for duplication if Horizon were to develop similar welcome packs independently (although welcome packs for Horizon staff could include supplementary information specific to the company). However, there would appear to be no mechanism to ensure that welcome packs are distributed and explained to incomers. The Horizon Welsh Language and Culture Co-ordinator, Welsh Government and IACC representatives should maintain an ongoing dialogue to discuss the proposed content of these language welcome packs and agree how Horizon can use the Welsh Government template for the packs. Following this, Horizon should consider what additional information is required for families of the Project workforce.

6.9.17.2 IACC's Response to WCLMES Measure 17

6.9.17.3 IACC agrees that this mitigation measure is appropriate. Further detail is needed however to specify how Horizon will adapt the content of the WG welcome packs. It is anticipated, for example that the workforce that is expected to be recruited will include workers and dependents from outside the UK. Spouses/partners will not necessarily be able to speak / read English. **The budget for this work will need to provide for the bilingual Welsh / English text to be translated and culturally adapted to Japanese and other anticipated languages, depending on the origin of the recruited workforce.**

6.9.17.4 'Circulating' needs to be defined. Making these pack available electronically on-line or distributed to each worker is necessary but not enough on its own. **IACC expect Horizon to commit to funding 'welcome sessions' specifically for the partners/spouses of workers.** These welcome

sessions would be a way of discussing the contents of the Welcome Packs. They would be an opportunity to meet the CIO with responsibility for community integration, Welsh for Adults providers, and other relevant service providers (e.e. childcare and pre-school provision).

- 6.9.17.5 There is a general need, in addition, to educate families relocating to Anglesey of the benefits associated with Welsh-medium education. The IACC agree that developing and distributing Welcome Packs for all project worker families is appropriate. However, **it is also crucial that steps to raise parental awareness of the linguistic sensitivity on Anglesey, the island's bilingual education system, the benefits of bilingualism and the availability of additional immersion support for incomer children is effectively disseminated as part of the recruitment process.** Given the importance of the IACC's bilingual education policy, it is essential that the parents and carers of prospective new admissions to the IACC school system are fully aware of the benefits of Welsh-medium education and supportive of their children's acquisition of the language.

6.9.18 Maintaining the linguistic character of schools

6.9.18.1 Horizon's proposed WCLMES enhancement measure:

- 6.9.18.2 For many Welsh-speaking children raised in homes without Welsh-speaking parents/carers, schools provide the principal opportunity for them to acquire and use the Welsh language. Any change in the linguistic makeup of schools caused by the Wylfa Newydd Project has the potential, particularly in the north of the island,⁴⁴ to affect the central role of schools as places where Welsh is acquired and used by the children and young people of Anglesey.

- 6.9.18.3 Without suitable mitigation and enhancement measures, the Project could detrimentally affect the use of the Welsh language amongst school-aged children. It is also vital that the mitigation and enhancement measures adopted are aligned with the work of the IACC to achieve its vision "*That all Anglesey's children and young people are proficiently bilingual and possess the ability to use both languages equally at the end of their educational career ensuring that no pupil is deprived of that ability or merit*".⁴⁵ Similarly these measures are crucial in attaining the Welsh Government's strategic aim to "*increase substantially the number of learners in the statutory education sector who develop Welsh language skills, and ensure that each learner develops skills in Welsh to a standard which will enable them to use the language in their everyday lives.*"⁴⁶

- 6.9.18.4 Maps 11, 18 and 19 in the Welsh Language Profile (Appendix 1) uses PLASC January 2018 data to provide a profile of the Welsh language ability of pupils in Anglesey's primary and secondary schools. PLASC data can also be used to profile what proportion of a school's pupils speak Welsh at home or not. The impact of the Horizon project on individual schools will

⁴⁴ Examination Library Reference APP-[432], paras B.4.378 and B.4.383.

⁴⁵ Welsh in Education Anglesey's Strategic Plan 2017-2020, page 1. ([Link](#))

⁴⁶ Cymraeg 2050: A million Welsh speakers, page 37. ([Link](#))

necessarily depend on the existing size and language profile of each school and the number of additional pupils created by the Horizon Project.

6.9.18.5 The IACC requires that, with the IACC's support (regarding provision of anonymised PLASC data), Horizon model the possible impact additional non-Welsh-speaking pupils could have, particularly on those primary schools and secondary school located in the north of the island.

6.9.18.6 This modelling exercise will help IACC and the individual schools to plan proactively for any increase in non-Welsh-speaking pupils associated with the construction and operational phase and, in due course, the decommissioning phase. It is crucial that early, proactive planning be undertaken in order to avoid disruption to the education of the dependants of incomer families/households and their host schools.

6.9.19 Community and local services

6.9.19.1 Funding provision of community language Services

6.9.19.2 Horizon's proposed WCLMES mitigation measure:

a) **Measure 18** (Application Reference Number: 8.14): ***Horizon will fund provision of community language services (including the development of appropriate training materials) to support the integration of incomers and develop capacity in the local community. This would be linked to the role of the Community Involvement Officers. (Lead: IACC)***

6.9.19.3 *This measure is designed to mitigate the effect of this inflow of workers during the construction period.The exact model of working would be determined by the lead partner (IACC) in partnership with Cyngor Gwynedd and existing community organisations represented on Fforwm Iaith Strategol Ynys Môn (such as Menter Môn, Urdd Gobaith Cymru and Young Farmers Clubs..... IACC should monitor and evaluate the effectiveness of these community language services and report back on this to the external stakeholder group overseeing this Strategy (see measure 22) on an annual basis.*

6.9.19.4 *As part of this measure, Horizon would therefore fund the development of appropriate training materials to support the integration of incomers and develop capacity in the local community. This type of training could include a focus on issues such as:*

- a) how to introduce the Welsh language and culture to incomers;*
- b) developing community leadership skills in a bilingual context;*
- c) how to run a bilingual event successfully;*
- d) chairing a meeting bilingually;*
- e) planning bilingual community activities e.g. groups, arts activities, sports clubs.*

6.9.19.5 *The first step in the implementation of this measure should be for the lead organisation (IACC) to review existing practice such as the development of 'Academi Arweinyddiaeth Gymunedol' (Community Leadership Academy) in Ceredigion led by Cered, Menter Iaith Ceredigion and Theatr Felinfach. The advice of the National Centre for Learning Welsh should also be sought in developing this module. Further information would need to be sought on the potential costs of developing such as module. Once developed, take-up and delivery of the course should be monitored and feedback from participants evaluated*

6.9.19.6 IACC's Response to WCLMES Measure 18

6.9.19.7 IACC agrees with the approach outlined in Measure 18 and sees this measure as meeting 4 aspects of integrating Horizon workers and their dependents within communities on Anglesey:

- a) providing training for local individuals to develop their community leadership skills and develop community capacity to maintain the use of Welsh and support the integration of incomers in the local community;
- b) implementing micro level language planning techniques to extend existing opportunities to use Welsh in the community;
- c) providing incomers with language and culture awareness training, Welsh language learning opportunities; and
- d) developing specific community integration and wellbeing projects.

6.9.19.8 Horizon have stated that the funding of community projects would form part of the community benefits package and is not therefore included in the WCLMES. IACC believes that there is a need for community projects to be linked to the various mitigation priorities of the WCLMES.

Community leadership training

6.9.19.9 IACC has conducted an initial review of existing practice such as the development of 'Academi Arweinyddiaeth Gymunedol' (Community Leadership Academy) in Ceredigion led by Cered, Menter Iaith Ceredigion and Theatr Felinfach. This project (now named 'Burum Bro') is structured to provide training to develop community leadership skills among individuals who can undertake strategic leadership roles within their communities and increase community resilience. IACC supports the adaptation of such a project to the needs of communities on Anglesey and the wider KSA that will be affected by Wylfa Newydd. Such a project would require a Project Officer with responsibility for co-ordinating and sustaining the administration of the project and identifying individuals to be recruited to the training. Additional personnel resources required would be a Programme Director and a team of experience trainers to deliver the training. It is anticipated that a budget of £50,000 - £100,000 set up costs would be required with ongoing annual running costs of around £50,000. It is envisaged that the 5 CIO's would be among the first cohort of individuals to participate in this training.

Micro level community language planning

6.9.19.10 Another aspect of developing community resilience and integrating incomers would be the implementation of the Welsh Government's micro language planning toolkit 'Gweithredu'n Lleol / Local Action'⁴⁷ The aim of this resources pack is to assist local groups to identify development needs and action in favour of the Welsh language within their local neighbourhood. In implementing the pack and its processes, it is intended that co-ordinated activity can be encouraged within Welsh neighbourhoods in order to try to set the best possible social conditions for the Welsh language to flourish on a local level. IACC envisage that the Community Involvement Officers could lead on this micro language planning within communities in their catchment areas.

Language and Culture Awareness Training and opportunities to learn Welsh

6.9.19.11 Seeking advice from the National Centre for Learning Welsh would be a positive step in developing suitable opportunities for Horizon workers and their dependents to learn Welsh. Advice, guidance and active practical support from the Centre that teaches Welsh for Adults at Bangor University would be an additional high quality resource.

6.9.19.12 The IACC supports Horizon's intention to produce training materials to aid the integration of incomer workers and their dependants and that the content of the training material outlined in WCLMES 4.4.8 should help community members to maintain their use of Welsh whilst supporting the integration of newcomers. Information should also be provided to every household in Anglesey and Gwynedd that provides advice and guidance on the importance of continuing to speak Welsh with and in the company of incomers. The support of the Community Translation Service (Measure 20) will be necessary to make community events inclusive and facilitate community cohesion while maintaining the use of the Welsh language.

6.9.19.13 The dissemination and impact of information materials will need to be monitored and evaluated carefully as providing information may, in itself, have little impact on peoples' actions and behavior. As part of this development, further consideration should be given to actively promoting the advantages of speaking Welsh and of being bilingual. Projects in this context should be proactive in promoting bilingualism as opposed to being reactive due to the large influx of a non-Welsh speaking workforce. This development should not only deal with how people moving in can integrate but should also be about making the local communities linguistically robust enough to survive this change in the linguistic dynamics of their local communities.

⁴⁷ Gweithredu'n Lleol resource pack ([Link](#))

6.9.19.14 The IACC further require agreement regarding the creation of community language hubs that provide Welsh language lessons, language awareness training and activities through the medium of Welsh for Welsh language learners.

Developing specific community integration and wellbeing projects

6.9.19.15 IACC believes that there is a need to consider in detail the impact of the in-migration of large numbers of non-Welsh-speakers to Anglesey on a range of local voluntary / activity / youth groups, many of whom operate through the medium of Welsh or bilingually at present. Will the language used in a football training session or a meeting of the Scouts, for instance, change as a result of the incorporation of new non-Welsh speakers into these groups? How might these effects be mitigated? These impacts are likely to be more pronounced in the north of the island, given the intensification of the project in North Anglesey. Horizon contest whether there is a need for 5 Community Involvement Officers, based in each secondary school catchment area, in order to deal with this issue. Map 21 in Appendix 1 identifies each of these five geographical areas. However the IACC consider these roles to be fundamental if the Welsh-medium character of many voluntary / activity / youth groups on Anglesey is to be maintained and enhanced.

5 Community Involvement Officers

6.9.19.16 Measure 18 is linked to the role of the 'Community Involvement Officers'. It is essential that the IACC be involved in determining the remit of the Community Involvement Officers. IACC views the role of the CIOs as encompassing the following:

- a) developing an intimate knowledge of the community networks, voluntary groups, community services within each of the 5 catchment areas
- b) monitoring community well-being, community cohesion and reporting any matters of tension to a higher level monitoring group
- c) data collectors - collecting additional language profile data to build upon and supplement IACC's initial language profile presented in Appendix 1. There is a need to add to IACC's initial community language profiling in order to establish robust baseline data before the start of construction and to continue to collect data as part of ongoing monitoring and mitigation activities.
- d) identify gaps in community provision in Welsh / bilingually
- e) provide training on Language Awareness Training and running bilingual activities among local groups
- f) lead on the implementation of Gweithredu'n Lleol / Local Action micro language planning within communities in their catchment areas.

6.9.19.17 In order to be effective, funding for the 5 CIO's will need to be prioritised in order for them to be recruited, trained and completing IACC's baseline community profile data prior to the commencement

of Construction. Funding for procuring the expertise in developing such a baseline and monitoring methodology will also be required.

- 6.9.19.18 Due to a lack of modelling beyond the Gravity Model, no details are provided regarding the specific communities which could be adversely effected. However, given that the impact of the non-home-based incomer workforce will potentially be quite substantial, particularly in the north and west of the island, **the IACC believes that it is crucial to employ CIO's to start the work of strengthening the language community well before the in-migration starts to take place. Funding is required from Horizon to enable the IACC to undertake this process in the near future as these services would need to be well established prior to any construction work in order to overcome any initial teething difficulties.**
- 6.9.19.19 **The IACC believe that 5 Community Involvement Officers and creation of community hubs are required and will play an important role in collecting data and in proactively developing measures to ensure continued Welsh speaking characteristics of these community organisations and activities.**
- 6.9.19.20 **It is also necessary for IACC and other stakeholders to provide input to the job descriptions of these posts in order to ensure complementarity with the work of other organisations and to maximise the effectiveness of resources.**

Integrating the spouses/partners of Horizon workforce

- 6.9.19.21 As part of the activities that are mentioned in general with respect to Measure 18 in paragraphs, IACC expect that Horizon provides the **funding for all spouses/partners to learn Welsh (through all levels from 'mynediad' to 'meistroli') for free** in collaboration with Learn Welsh Cymru North West. IACC expect this funding to be provided throughout construction, operation and decommissioning phases.
- 6.9.19.22 IACC also expect Horizon to make it explicit that they will fund community integration projects involving partners/spouses as part of its *Community and Local Services* theme. These projects should be developed in partnership with Learn Welsh Cymru North West, Menter Môn and other community groups.

Pre-school age children

6.9.19.23 Horizon's proposed WCLMES enhancement measure:

- a) **Measure 19 (Application Reference Number: 8.14): 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. As part of this**

dialogue, Horizon will monitor on an ongoing basis the number of workers bringing families, including those of pre-school age. This data will be used to identify the appropriate mitigation required to mitigate the effect on Welsh-medium provision.

6.9.19.24 *The effect of the Project on the number of pre-school age children (0-4) has not been forecast as part of the overall socio-economic assessment. In light of this, measures to mitigate any potential effect on the Welsh-medium early years sector will need to be agreed following the application. This will require an ongoing dialogue between Horizon and 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 mitigate the effect on local Welsh-medium provision. Measure 13, which relates to Horizon sharing information on the numbers of children moving to the KSA with Project workers, could provide IACC and Gwynedd Council with information for planning early years services (e.g. numbers of pre-school children moving to different areas and taking up provision) in collaboration with key early years providers such as Mudiad Meithrin and Menter Iaith Môn. Implementing these measures will enable an assessment of the effect of the Project on early years provision and the development of more detailed mitigation. Horizon's Welsh language pledge [RD3] notes that the company will support opportunities for parents and children to learn and speak Welsh together, drawing on good practice in language learning and language transfer. WL Stakeholders agreed that the inflow of families to the area will place additional demands on early years provision in the KSA, including maintained and nonmaintained childcare and nursery education settings.). An early years Childcare Sufficiency Assessment for the Isle of Anglesey was published in March 2017....and cCapacity issues in childcare and early years provision, particularly Welsh-medium childcare and 'Ti a Fi' (Ti a Fi are parent and toddler groups delivered and run through the medium of Welsh will be considered as part of ongoing dialogue between Horizon, IACC and Gwynedd Council.*

6.9.19.25 IACC's Response to WCLMES Measure 19

6.9.19.26 Horizon's statement of its intention to 'engage and facilitate ongoing dialogue with IACC, Gwynedd Council, Mudiad Meithrin and Menter Iaith Môn is welcome but insufficient as a mitigation measure. It is also insufficient to state that Horizon will 'discuss the inflow of pre-school children and the impact on local Welsh-medium provision'. By the time this takes place, it may be too late for many pre-school providers to have mitigation and enhancement strategies in place.

6.9.19.27 Substantial pre-planning needs to take place between the organisations noted, in order to foresee changes and to put additional Horizon funded support in place well in advance of any in-migration related to the Wylfa Newydd project.

6.9.19.28 IACC are also strongly of the view that Horizon's proposal that 'The level of mitigation agreed would be proportionate to the number of workers that

would bring their families' **is inappropriate**. No estimates are given for the number of pre-school children dependents. **The increase in pre-school children (age 0 – 4) expected on Anglesey as a consequence of Horizon Wylfa Newydd Project is not solely confined to the number of workers with pre-school aged dependents moving to join their parent / carer to live on the island. Some of these workers and their spouse / partner may have additional children after relocating to the area. Some workers will also chose to live on Anglesey and have children with local or non-local partners at some point in the future. Horizon need to be involved and contribute to the funding of additional Welsh-medium childcare and pre-school provision throughout the island.** IACC's Childcare Sufficiency Assessment Form (CSAF) (2017) identifies that:

- a) there is a shortage of Welsh-speaking childminders across the county (CSAF p.46)
- b) some of the school nursery classes are at capacity, should there be an increase in demand and eligibility this is an area that would need development (CSAF p.39)
- c) there are gaps in Welsh-medium and bilingual childcare provision in parts of the Island (CSAF, p.39)
- d) Mudiad Meithrin identify a gap in Ti a Fi and Cylch Meithrin provision in some wards on Anglesey (Map 10, Appendix 1 shows the location of Mudiad Meithrin's current Cylch Meithrin provision).
- e) Since September 2017 IACC is committed to providing 30 hours a week of government-funded early education and childcare for working parents of three and four year olds for up to 48 weeks of the year in line with its *Taking Wales Forward* policy. IACCs Supporting Families Unit report that delivering this policy means that the additional capacity identified in CSAF 2017 is no longer available as a consequence of implementing the 30 hour provision policy. There is no additional capacity available for a further increase for demand.

6.9.19.28 It is IACC's position that funding from Horizon is necessary to create additional Welsh medium pre-school childcare and education capacity across the island based on reasonable worst case scenario planning.

Community Translation Service

6.9.19.29 Horizon's proposed WCLMES mitigation measure:

- a) **Measure 20** (Application Reference Number: 8.14): ***Horizon to help fund a community translation service (where relevant to Horizon Wylfa Newydd) to enable local organisations to provide simultaneous translation facilities for community groups. This will assist local community groups to effectively engage and discuss issues relating to the Wylfa Newydd Project. The details will be established pre-construction.***

6.9.19.30 *Further discussion is needed with Menter Môn to scope funding requirements. The measure could be monitored by Menter Môn reporting on usage of the service to the external stakeholder group overseeing this Strategy (See measure 22) on an annual basis*

6.9.19.31 IACC's Response to WCLMES Measure 20

6.9.19.32 IACC welcomes Horizon's commitment to fund a Community Translation Service but believes that Horizon adopts an overly narrow definition of its scope.

6.9.19.33 The current scope of the measure proposed by Horizon restricts community translation for Wylfa Newydd Project events and not other events in the wider community. There is a danger that following this principle will overly narrow the scope of this service. Given the inevitable involvement of Wylfa Newydd project workers and their dependants in community based activities, **it is essential that Horizon funding for a broader scope to the Community translation Service is provided.** The funding of a community translation service can help in some respects with this issue but this will only be useful in the context of formal meetings and public events (e.g. local shows, PTA meetings, town and community council meetings, pub quizzes, local history / cultural society meetings etc.). Adopting a more inclusive approach to this community translation service will help with some of the fundamental challenges that will be faced by many voluntary community groups during the construction and operational phases of the proposed project. Horizon's indication that they would provide financial support for this service is a welcome proposal and gives practical support for organisations wishing to provide a bilingual context to meetings being held in both languages. The data collected by IACC as part of its language profiling study (Appendix 1) provides a profile of the Welsh language ability and use of Welsh in some community organisations. Data from Town and Community councils, for example indicates the current use of translation facilities for these public meetings (Map 27, Appendix 1). There is a need for data to be collected from a wider range of community organisations in order to identify the full need for such a service. This could be undertaken by the 5 CIO's in collaboration with Menter Môn and M edrwn Môn. **There is a need for Horizon to undertake a scoping exercise to evaluate the costs and practicality of such an investment in terms of funding and the availability of qualified interpreters. This service should be in place well in advance of the arrival of incomer workers and the service could also support Horizon as it holds public consultation meeting prior to the development of the Wylfa Newydd Project.**

Accountability

6.9.19.33 Oversight and accountability for WLCMES and WLP within Horizon

6.9.19.34 Horizon's proposed WLCMES mitigation measure:

- a) **Measure 21** (Application Reference Number: 8.14): ***Horizon will establish a management group which will have oversight of and be accountable for the delivery of this Welsh Language and Culture Mitigation and Enhancement Strategy as well as Horizon's Corporate Welsh Language Policy (Lead: Horizon).***

6.9.19.34 *Horizon will establish a management group to include senior leaders from Horizon as well as the WLCC (see measure 1) and key managers from the HR, Training/Learning, Education & Development and Supply Chain/Commercial teams. The group's terms of reference would need to be established but would broadly be to review progress against each of the measures in the Strategy and put in place necessary measures to overcome any difficulties*

6.9.19.35 IACC's Response to WLCMES Measure 21

6.9.19.36 The Wylfa Newydd Project will occur at a critical time in the stabilisation and recovery of the Welsh language as a community language and it is vital that in order to try and mitigate against the negative effects of the project on the vitality of the Welsh language, that suitable, acceptable, and robust monitoring and evaluation measures are included and put in place as part of Horizon's Welsh Language and Culture Mitigation and Enhancement Strategy (WLCMES)⁴⁸

6.9.19.37 Furthermore, the IACC and Anglesey Public Service Board have a statutory duty to promote the wellbeing goals identified in the *Well-being of Future Generations (Wales) Act (2015)*, one of which is to promote "a Wales of vibrant culture and a thriving Welsh Language" and needs to monitor progress on this journey. The direct and cumulative effects of Wylfa Newydd Project and other projects in the pipeline will transform the socio economic profile of the area with potential to have unforeseen major adverse impacts on the vitality of the Welsh language in some if not all Anglesey communities unless closely monitored and adequately mitigated and/or compensated.

6.9.19.38 The IACC agrees that Horizon should establish a senior management group that will have oversight of and be accountable for the delivery of WLCMES and Horizon's Corporate Welsh Language Policy. However, a development of the magnitude of Wylfa Newydd also requires broader ownership of the Welsh language across the organisation for the policy and mitigation measures to be effective.

6.9.19.39 IACC expects central leadership and management buy-in from Horizon and that the Senior Management Group accountable for the

delivery of WLCMES and Horizon's Corporate Welsh Language Policy would draw together representatives from across the various operational areas of the Wylfa Newydd Project and would be responsible for implementing and monitoring the various measures, sharing good practice, collating data and monitoring progress in order to report on progress to the Welsh Language Commissioner and the external stakeholder group at the end of each year.

6.9.19.40 All major public sector employers in Wales operate in this way – including Local Authorities, Police Authorities, Health Trusts, Fire and Rescue Services, Universities, Housing Associations etc. Adopting this modus operandi could provide the impetus needed to progress Horizon's stated commitments regarding the Welsh language as a Golden Thread in all its endeavours.

External stakeholder Group

6.9.19.41 Horizon's proposed WCLMES mitigation measure:

a) **Measure 22** (Application Reference Number: 8.14): ***Horizon will establish and chair an external stakeholder group (Welsh Language and Culture Coordinator) to monitor the implementation of the Strategy and provide advice on its delivery (Lead: Horizon)***

6.9.19.42 *External monitoring and oversight is important to ensure that the Strategy is scrutinised and that the expertise of local WL Stakeholders is utilised in implementing the measures. Establishing an external stakeholder group, potentially drawing on the membership of the existing WLIA steering group and the Isle of Anglesey Welsh Language Strategic Forum (Fforwm Iaith Strategol Ynys Môn) will provide a source of independent monitoring and ensure that the Strategy is aligned with the activities of partner organisations. The group's role will broadly be to review progress against each of the measures in the Strategy and advise on measures required to overcome any difficulties. A key task for the group will be to develop an accountability framework for monitoring the Strategy.*

6.9.19.43 IACC's Response to WCLMES Measure 22

6.9.19.44 IACC agrees that an external stakeholder group (ESG) be established 'to monitor the implementation of the Strategy and provide advice on its delivery'.

6.9.19.45 However, the IACC disagrees that this group be established and chaired by Horizon. The ESG should be convened by IACC and chaired independently.

6.9.19.46 Given the scale of the project, the status of the Welsh language and culture as a golden thread relating to all key aspects of the proposal and the potential risk to the implementation of a number of local (IACC) and national (Welsh Government) policies and strategies if not adequately monitored,

the external stakeholder group must be convened by IACC and chaired independently.

6.9.19.47 The membership of the group should be drawn from the existing WLIA steering group and the Isle of Anglesey Welsh Language Strategic forum.

6.9.19.48 Criteria for the selection of stakeholders and their terms of reference will be robustly defined and made transparent in line with best practice in the field of risk and impact management. **Costs associated with the running of the ESG should be covered by Horizon.**

Evaluation of impact

6.9.19.49 Horizon's proposed WCLMES mitigation measure:

a) **Measure 23** (Application Reference Number: 8.14): ***Horizon will complete an evaluation of the impact of the Project on the Welsh language in the KSA overseen by the external stakeholder group (Lead: Horizon)***

6.9.19.50 *The precise terms of reference, timing and methodology for this evaluation will be agreed by Horizon and the external stakeholder group. However, the evaluation could include an interim phase (e.g. mid-way through the construction phase) and a final phase (e.g. at the end of the construction phase). The evaluation would be able to examine how the actual effects of the Project compare to anticipated effects. This will serve two purposes:*

- a) *At the interim phase, enabling Horizon and the external stakeholder group to consider whether any amendments required to the implementation of the mitigation measures;*
- b) *At the final stage, providing data to inform future language planning for major developments.*

6.9.19.51 IACC's Response to WCLMES Measure 23

6.9.19.52 IACC views these arrangements for evaluation as completely inadequate.

6.9.19.53 Given the extended number of years between each of the two interim evaluations and the need, in the case of the Welsh language, for any negative impact to be anticipated and mitigated early on an ongoing basis, monitoring and review needs to take place on an annual basis.

6.9.19.54 The IACC requires an annual monitoring report (in line with other statutory annual reporting)⁴⁸.

⁴⁸ e.g. Welsh Government's Welsh Language Strategy annual reports, submission of annual Welsh Language Standards implementation reports to the Welsh Language Commissioner by bodies who are statutorily required (or who have volunteered) to do so.

6.9.19.55 It is appropriate that Horizon be responsible for the ongoing collection of evidence with regard to the implementation and evaluation of the WLCMES. However, **an independent evaluation of the impact of the progress of the WLCMES strategy in mitigating and enhancing the impact of the project on the Welsh language and culture will be conducted annually by IACC with suitable compensation provided by Horizon to offset the cost of providing / procuring a robust monitoring and evaluation service.**

Implementation and monitoring of WLCMES

6.9.19.56 Horizon's proposed WCLMES mitigation measure:

- a) **Measure 24** (Application Reference Number: 8.14): ***Horizon will implement the Welsh Language and Culture Mitigation and Enhancement Strategy prior to and throughout the construction period of the Project. Horizon will monitor and report on compliance with the Welsh Language and Culture Mitigation and Enhancement Strategy every six months to the management group (noted in measure 21) (Application Reference Number: 8.14) and the Strategy will be reviewed on an annual basis. (Lead: Horizon)***

6.9.19.57 *The implementation of the Welsh Language and Culture Mitigation and Enhancement Strategy will be monitored on an ongoing basis throughout the construction phase. Horizon will report to the management group (noted in measure 21) (Application Reference Number: 8.14) on its compliance with the Welsh Language and Culture Mitigation and Enhancement Strategy. In addition, an annual review of the Strategy will be completed to monitor its implementation.*

6.9.19.58 IACC's Response to WCLMES Measure 24

6.9.19.59 **Horizon has developed its WLCMES for the run up and construction phases of the Project only. IACC requires Horizon to agree:**

- a) **to implement the WLCMES and its annual action plans annually throughout the construction, operation and decommissioning periods; and**
- b) **to establish procedures to monitor and evaluate annually throughout all three phases of the project.**

6.9.19.60 While the IACC recognise that the content of the WLCMES will differ during the Operation and Decommissioning phases, it is necessary to acknowledge explicitly at this stage that a revised WLCMES with annual action plans will be produced for phases 2 and 3 of the Wylfa Newydd Project. The measures established to monitor and evaluate the ongoing impact and mitigation / enhancement strategies will similarly need to be continued in phases 2 and 3.

Horizon's Wider mitigation and enhancement measures

6.9.19.61 Horizon's proposed WCLMES enhancement measure:

6.9.19.62 *Additional mitigation and enhancement measures that are relevant to the Welsh language and culture are included in other DCO submissions. These measures relate to issues such as managing where Project workers live, considering any effects on local healthcare provision, maximising benefits to local businesses and re-using lost Welsh-language place names.*

6.9.19.63 *Measures within these topic areas that are relevant to the Welsh language are included in the Workforce Accommodation Strategy (Application Reference Number: 8.4):*

- a) Comprehensive Health Impact Assessment Report (Application Reference Number: 8.19);*
- b) Jobs and Skills Strategy (Application Reference Number: 8.3) and ES Volume D - Power Station Main Site D11 –*
- c) Cultural heritage (Application Reference Number: 6.4.11).*

IACC's Response to Horizon's wider mitigation and enhancement measures

6.9.19.64 In order for IACC to meet its policy targets to grow the number and percentage of Welsh speakers on the island, it is essential that there are robust measures in place to achieve this goal. The IACC therefore wishes to see measures that will protect and enhance the Welsh Language and wishes to avoid concerns regarding clashes of cultures, loss of sense of identity, loss of the Welsh Language, lack of understanding and knowledge of Welsh culture and the lack of willingness to learn the Welsh Language. The Welsh Language Charter has a vital role in assisting schools to preserve this Welsh-speaking environment and culture and additional resources will be required to reduce the IACC's concerns.

6.9.19.65 Learning a new language and assimilating into a new culture calls for a great deal of determination and resolve, especially so in the context of minority languages and this is successfully accomplished by only a small percentage of individuals enrolled on language training courses.⁴⁹ Therefore, the IACC require that in addition to funding language immersion support for the school-aged dependants of the Horizon workforce that additional mitigating measures aimed at facilitating the effective learning and using of Welsh by the Horizon workforce are developed and their impact evaluated.

6.9.19.66 While the IACC has conducted an initial profile of community language use, a robust linguistic profile of all communities within Anglesey as well as the KSA is required which notes in some detail the range and nature of community based ventures that work through the medium of Welsh or

⁴⁹ In 2010, for example, 56 people sat the WJEC Higher Examination, that corresponds to at least level B2/C1 of the ALTE/European Framework of reference and roughly to an A level examination. See Hywel M Jones (2012) *A statistical overview of the Welsh language*, Welsh Language Board publication. ([Link](#))

bilingually in order to have clear view of the situation as it is at present. This would assist with forming a more fine-grained analysis of the current baseline data and assist in the task of assessing what linguistic changes will or may take place over time and whether further remedial steps will need to be taken to mitigate and enhance community level use of Welsh.

7.0 Summary of principle steps to avoid, reduce, mitigate or compensate for impacts

- 7.1 The Sense of Place document illustrates why Anglesey is considered to be a very unique and special place where the Welsh language and culture are integral to Anglesey's island identity. This is reflected in Planning Policies and the IACC's Objectives. The Welsh language and Culture serve as the 'golden thread', weaving together history and heritage with a strong sense of belonging, community, community cohesion and overall well-being in line with the IACC's duties under the Well-being of Future Generations (Wales) Act.
- 7.2 Within Wales, Anglesey plays a crucial role in maintaining the vitality of the Welsh language and is counted as one of the strongholds of the Welsh language⁵⁰. Nevertheless, the vitality of the Welsh language on Anglesey is fragile, particularly in certain wards and the total numbers and the percentage of Welsh speakers has been in long term decline.
- 7.3 Arresting and reversing this decline is a strategic aim of the IACC and its partners, including the Welsh Government, which has a vision for growing the number of Welsh speakers to a million by 2050 (link to FM statement). The IACC is keen to contribute to this ambitious target, and sees the potential for a major role to be played by the Wylfa Newydd project.
- 7.4 The most important contribution which the Wylfa Newydd project can make to the vitality of the Welsh language is through the creation of a range of jobs for local people, especially its young people. This will help reverse the trend of out-migration whereby people move away to find work which matches their qualification and skills sets, which have not been available on Anglesey. This, together with attracting back people and their families who have moved away to return also attracted by the jobs on offer from Wylfa Newydd and other planned projects (see Cumulative Impacts Chapter) will increase the number of Welsh speakers and alter its demographic profile which is critical for the longer term.
- 7.5 However, in considering the role of the Wylfa Newydd project a distinction must be drawn between the Construction and Operational phases. As for the Construction phase there are potentially significant negative impacts on the Welsh language should the influx of temporary workers be such that they overwhelm the local communities in which they live and visit with adverse effects on the day to use of Welsh as a first language, community cohesion, demands for services and facilities, schools, traffic and transport, etc. Hence, the need for the suite of preventative and mitigation measures outlined in this and Chapter and the other LIR Chapters, which demonstrates the 'golden thread' nature of

⁵⁰ Anglesey Welsh Language Strategic Forum: Welsh Language Strategy 2016 – 2021, page 9. [\(Link\)](#)

the Welsh language referred to in paragraph 7.1 above.

- 7.6 As for the operational phase there is high potential for positive effects on Welsh language and Culture through the proposals. However, the IACC is of the view that these actions can be reinforced and complemented by measures which are summarised below.
- 7.7 By ensuring that any relevant new development takes into consideration all possible effects on the ability of the local population to use the Welsh language, the land use planning system has an acknowledged contribution to make to the wellbeing of the Welsh language and culture on the Island.
- 7.8 The IACC's assessment of potential local impacts indicates that the Project could result in a range of impacts (adverse and positive) on communities and result in additional demands on existing community facilities, which are important domains to sustain and enhance the Welsh language and culture on the Island. These differ from those identified by Horizon. Without robust mitigation and monitoring strategies, from a Welsh language and culture perspective, the IACC remains concerned that the relevant policy tests and criterion identified in the Policy PS9 of the adopted Joint LDP and GP14 of the adopted Wylfa Newydd SPG will not be achieved.
- 7.9 The IACC recognises Horizon's engagement and commitment in advocating the Welsh Language as a 'Golden Thread' throughout all aspects of the project.
- 7.7 However, the 'actions' which filter through the DCO documents, especially with regard to the Construction phase, do not reflect this commitment adequately and do not go wide and deep enough to ensure that the Welsh Language is considered and protected throughout all aspects of the project. In particular, further consideration should be given to:
- a) **Worker Accommodation Management & Worker Management Strategy**
The IACC will require robust monitoring and reporting of the spatial distribution of the workers. Management and control of the workforce is required to minimise the potential effects of a large temporary workforce on these local communities. This must be managed and controlled through the Construction Worker Accommodation Management Service (CWAMS) in 'real time'. **(Applicable to both construction and operational phases)**
 - b) **Linguistic Character of Schools** – Horizon have not adequately considered the impact of the development on the linguistic character of schools. Horizon's predicted 220 school-aged child dependents during the Construction phase is too conservative. IACC estimates that there will be 500 - 510 additional children in this period. Such figures will adversely alter the balance of Welsh and non-Welsh speakers in schools across the KSA. Without mitigation and enhancement measures, this could detrimentally affect the use of the Welsh language amongst school-aged children. Furthermore, Horizon Investment is needed to ensure that primary and secondary school aged dependents gain the Welsh immersion and English as an Additional Language support they need. **(Applicable to both construction and operational phases)**

- c) **Welsh Tradition and Culture** - Based on research evidence, the construction period of the project will have an adverse effect through diluting the Welsh Language, Culture and Traditions in the KSA. The IACC requests measures that will protect and enhance the Welsh Language to meet its policy targets to grow the number and percentage of Welsh speakers on the Island. **(Applicable to both construction and operational phases)**
- d) **Education and Employment linked to the Welsh Language** - The IACC requires a significantly improved scheme to encourage and facilitate the appropriate up-skilling of local residents to reduce out-migration of young people especially in the short-to-medium term. Attracting local people and their families back to the Island through offering good employment opportunities at Wylfa Newydd should also be prioritised. **(Applicable to both construction and operational phases)**
- e) **Children, Young People and Families** – there are concerns regarding the impact of in-migrating workers and their dependents on the use of the Welsh Language in community groups and activities for young people and their families. There is a need to monitor and mitigate the impact of the in-migration of large numbers of non-Welsh speakers to Anglesey on a range of youth organisations and youth / family activities in the community, across Anglesey and particularly in the north of the island. **(Applicable to both construction and operational phases)**
- f) **Community groups & Local Services** - Mitigations to overcome the effect on provision of local services would include funding of a robust Community Language Services (to be developed with stakeholders), production of training materials to aid integration of incomer workers, broadening the scope of the Community Translation Service, and supporting the provision of the early years (pre-school) services. **(Applicable to both construction and operational phases)**

7.8 IACC specifically require the following mitigation measures to ensure that Horizon's commitment to advocating the Welsh language as a **'golden thread'** throughout all aspects of the project is fully realised:

Workplace

7.9 The IACC expects, therefore, that the main aim and starting point of the policy and mitigation measures with regard to Wylfa Newydd Project as an employer and workplace should be to ensure:

- a) that the development has a positive effect, rather than an adverse effect, on "opportunities for persons to use the Welsh language" locally; and
- b) that the Welsh language is treated "no less favourably than the English language" within the organisation and its operations.

7.10 In view of the anticipated impact of the Wylfa Newydd project upon the local vitality of the Welsh language, the IACC are strongly of the opinion that Horizon should follow established best practice in developing a bilingual workplace. The current text of the WLCMES makes little reference to robust monitoring and reporting measures. A voluntary agreement with the Welsh Language Commissioner to adopt annual monitoring and reporting arrangements would be

appropriate. A positive initial step would be to seek the Welsh Language Commissioner's comments on and approval of Horizon's Welsh Language Policy and WLCMES measures.

- 7.11 The IACC requires the Workforce Management Strategy to include comprehensive details of the principles that Horizon and its partners will follow to manage and control the workforce and therefore minimise the potential effects of a large temporary workforce on these local communities.
- 7.12 Determining the status and remit of the proposed Welsh Language and Culture Co-ordinator (WLCCO) is a matter of importance. IACC emphasises the importance of ensuring that the WLCCO is accorded the influence to implement robust Welsh language practices within Horizon.
- 7.13 Horizon should implement a Welsh Language Skills Strategy in line with best practice among organisations with Welsh Language Strategies.
- 7.14 Horizon should undertake an annual audit of Language Skills requirements as part of its Welsh Language Skills Strategy. This annual evaluation of employees' Welsh Language skills should be embedded into staff annual performance appraisals in line with best practice.
- 7.15 IACC requires a significantly improved Jobs and Skills scheme to encourage and facilitate the appropriate up-skilling of local residents to reduce out-migration of young people, especially in the short-to-medium term.
- 7.16 IACC require that Horizon fund and implement a Student Sponsorship Programme for undergraduate and postgraduate students in specialised, nuclear industry related, fields of study.
- 7.17 It is realistic to expect that a high proportion of Welsh speakers be employed across the Horizon workforce. Indeed IACC consider that Horizon can assist IACC to increase the number and proportion of Welsh speakers on Anglesey and contribute to Welsh Government's target of creating 1 million Welsh-speakers by 2050 if it:
 - a) puts robust plans in place to recruit Welsh speaking workers, and
 - b) develops the Welsh language skills of all of its workforce so that by the operational stage, the majority of Wylfa Newydd site staff will be able to use Welsh in the workplace.
- 7.18 An independent involvement and evaluation of the proposed competency framework and process for both interview and testing of Welsh language skills is required.
- 7.19 That the individuals recruited to Senior Management and Middle Management roles as well as across the operational spectrum should be Welsh speakers or trained over time to have Welsh language skills they can use in the workplace.

Children, young people and families

- 7.20 Ensuring adequate Welsh language immersion provision for incomer 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 enrolment, IACC requires that Horizon provide the funding for adequate worst case scenario preparation in advance of Construction.
- 7.21 Based on current capacity and anticipated growth in need for additional support, the Authority 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.
- 7.22 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.
- 7.23 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 case scenario funding will be required from Horizon. This should be explicitly acknowledged in WLCMES mitigation Measure 16.
- 7.24 It is also crucial that steps to raise parental awareness of the linguistic sensitivity on Anglesey, the island's bilingual education system, the benefits of bilingualism and the availability of additional immersion support for incomer children is effectively disseminated as part of the recruitment process.
- 7.25 The IACC requires that, with the IACC's support (regarding provision of anonymised PLASC data), Horizon model the possible impact additional non-Welsh-speaking pupils could have, particularly on those primary schools and secondary school located in the north of the island.

Community and local services

- 7.26 The IACC believe that 5 Community Involvement Officers and creation of community hubs are required and will play an important role in collecting data

and in proactively developing measures to ensure continued Welsh speaking characteristics of these community organisations and activities.

- 7.27 Measure 18 is linked to the role of the 'Community Involvement Officers'. It is essential that the IACC be involved in determining the remit of the Community Involvement Officers. IACC views the role of the CIOs as encompassing the following:
- a) developing an intimate knowledge of the community networks, voluntary groups, community services within each of the 5 catchment areas
 - b) monitoring community well-being, community cohesion and reporting any matters of tension to a higher level monitoring group
 - c) data collectors - collecting additional language profile data to build upon and supplement IACC's initial language profile presented in Appendix 1. There is a need to add to IACC's initial community language profiling in order to establish robust baseline data before the start of construction and to continue to collect data as part of ongoing monitoring and mitigation activities.
 - d) identify gaps in community provision in Welsh / bilingually
 - e) provide training on Language Awareness Training and running bilingual activities among local groups
 - f) lead on the implementation of Gweithredu'n Lleol / Local Action micro language planning within communities in their catchment areas.
- 7.28 In order to be effective, funding for the 5 CIO's will need to be prioritised in order to for them to be recruited, trained and completing IACC's baseline community profile data prior to the commencement of Construction. Funding for procuring the expertise in developing such a baseline and monitoring methodology will also be required.
- 7.29 It is also necessary for IACC and other stakeholders to provide input to the job descriptions of these posts in order to ensure complementarity with the work of other organisations and to maximise the effectiveness of resources.
- 7.30 In order to meet the pre-school childcare and education needs of Wylfa Newydd workforce dependents, funding from Horizon is necessary to create additional Welsh medium pre-school childcare and education capacity across the island based on reasonable worst case scenario planning.
- 7.31 It is essential that Horizon funding for a broader scope to the Community Translation Service is provided. This service should be in place well in advance of the arrival of incomer workers and the service could also support Horizon as it holds public consultation meeting prior to the development of the Wylfa Newydd Project.

Accountability

- 7.32 IACC expects central leadership and management buy-in from Horizon and that the Senior Management Group accountable for the delivery of WLCMES and Horizon's Corporate Welsh Language Policy would draw together representatives from across the various operational areas of the Wylfa Newydd

Project and would be responsible for implementing and monitoring the various measures, sharing good practice, collating data and monitoring progress in order to report on progress to the Welsh Language Commissioner and the external stakeholder group at the end of each year.

- 7.33 The external stakeholder group (ESG) established 'to monitor the implementation of the Strategy and provide advice on its delivery' should be convened by IACC and chaired independently. Costs associated with the running of the ESG should be covered by Horizon.
- 7.34 The IACC requires an annual monitoring report in line with other statutory annual reporting.
- 7.35 It is appropriate that Horizon be responsible for the ongoing collection of evidence with regard to the implementation and evaluation of the WLCMES. However, an independent evaluation of the impact of the progress of the WLCMES strategy in mitigating and enhancing the impact of the project on the Welsh language and culture will be conducted annually by IACC with suitable compensation provided by Horizon to offset the cost of providing / procuring a robust monitoring and evaluation service.
- 7.36 Horizon has developed its WLCMES for the run up and construction phases of the Project only. IACC requires Horizon to agree:
 - a) to implement the WLCMES and its annual action plans annually throughout the construction, operation and decommissioning periods; and
 - b) to establish procedures to monitor and evaluate annually throughout all three phases of the project.

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