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**Subject:** Wylfa Newydd DCO Examination Horizon - Deadline 2 Submissions  
**Date:** 04 December 2018 21:56:02  
**Attachments:** [8.12 A5025 Off-line Highway Improvements sub-CoCP.PDF](#)  
[Compulsory Acquisition Objections Schedule.pdf](#)  
[Response to post-hearing documents including any written submissions of oral case \(Deadline 2\).pdf](#)  
[Crown Land and Interests s.135 Schedule.pdf](#)  
[Statutory Undertaker and Special Category Land – s.127, 132 and 138 Schedules.pdf](#)

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Good Evening

Please find attached Horizon's Deadline 2 submissions relating to :

- A5025 Off-line Highway Improvements sub-CoCP
- Compulsory Acquisition Objections Schedule
- Response to post-hearing documents including any written submissions of oral case
- Crown Land and Interests s.135 Schedule
- Statutory Undertaker and Special Category Land

Kind Regards

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## Wylfa Newydd Project

Response to post-hearing documents  
including any written submissions of oral case  
(Deadline 2)

PINS Reference Number: EN010007

4 December 2018

Revision 1.0

Examination Deadline 2

Planning Act 2008

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

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# Contents

|     |                                                                          |    |
|-----|--------------------------------------------------------------------------|----|
| 1   | Introduction .....                                                       | 1  |
| 1.1 | Purpose of this Report .....                                             | 1  |
| 2   | Oral Submission: Roger Dobson and John Urquart .....                     | 2  |
| 2.1 | Comments on Oral Submission by Roger Dobson and John Urquart .....       | 2  |
| 3   | Oral and Written Submission: Felin Honeybees Limited .....               | 19 |
| 3.1 | Comments on Oral and Written Submission by Felin Honeybees Limited ..... | 19 |

# Appendices

|              |                                                                     |  |
|--------------|---------------------------------------------------------------------|--|
| Appendix 3-1 | Record of Engagement with Felin Honeybees Limited and Katie Hayward |  |
|--------------|---------------------------------------------------------------------|--|

# List of Tables

|           |                                                                                                             |    |
|-----------|-------------------------------------------------------------------------------------------------------------|----|
| Table 2-1 | Key issues identified from Oral Submission by Roger Dobson and John Urquart with Horizon's commentary ..... | 2  |
| Table 3-1 | Horizon's responses to the key points raised in Felin Honeybees Limited's submission .....                  | 20 |
| Table 3-2 | Record of Engagement .....                                                                                  | 22 |

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# 1 Introduction

## 1.1 Purpose of this Report

- 1.1.1 This report provides Horizon's responses to the oral submissions made at the Open Floor Hearings held on 25 October 2018 and written submissions received at Deadline 1 (13 November 2018). The report responds to submissions received from Roger Dobson (and Llanbadrig Community Council), Felin Honeybees, and John Urquhart (Zencity Limited) (REP1-034, 039 and 035).
- 1.1.2 The first Open Floor Hearing (OFH) for the Wylfa Newydd Nuclear Power Station DCO examination was held on Thursday 25 October 2018. The Examining Authority (ExA) requested that Interested Parties should submit submissions to the ExA at Deadline 1 (Wednesday 14 November 2018) and Horizon would need to respond formally to the oral submissions by Deadline 2 (Tuesday 4 December 2018).
- 1.1.3 The table below provides a summary of the oral and written submissions and a response from Horizon to each of the points raised.

## 2 Oral Submission: Roger Dobson and John Urquart

### 2.1 Comments on Oral Submission by Roger Dobson and John Urquart

**Table 2-1 Key issues identified from Oral Submission by Roger Dobson and John Urquart with Horizon's commentary**

| Issue / Topic                        | Summary of oral submission (s)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Horizon's Response to oral submission (s)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|--------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>General Comment</b>               | Llanbadrig has hosted a Nuclear Power Station for over 60 years. In that time Wylfa A has been a good neighbour employing significant numbers of people many of whom continue to reside within our community. Wylfa A had an exemplary record of efficient generation and safety. Impressively, it generated beyond the original design life by some 20 years. In principle we support the Wylfa Newydd project and believe it will be very important in meeting the UK's future energy demands whilst making a much-needed contribution to the local and wider North Wales economy. | Noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Site Visits</b>                   | Encouraged ExA to visit Treglele, Cemaes and Llanfechell; note the 60mph speed limit reducing to 40mph on the A5025 on approach to Treglele the minor road through Treglele and Llanfechell; also welcome to visit Mr Dobson at his own property which overlooks about 2/3rds of the development and has been described by an Officer of the County Council as a 'viewing platform'.                                                                                                                                                                                                 | ExA confirmed at the Preliminary Meeting on Monday 22 October 2018 that it had undertaken an unaccompanied site inspection and would publish the list of locations visited on the PINS website.<br><br>Horizon, in consultation with the IACC, has prepared a proposed schedule for the accompanied site inspection that has taken into account comments made during the Open Floor Hearings and includes stops at Treglele and Cemaes, as well as a stop within close proximity to Mr Dobson's property. Whilst there is no stop proposed for Llanfechell it is proposed that the site visit attendees will travel through the village as part of the route., This is to be submitted as part of the Deadline 2 submission package. Notwithstanding the above it should be noted that the final schedule is subject to the ExA's discretion. |
| <b>Lack and delay of Information</b> | There have been references to Horizon not providing adequate information or failing to provide information in a timely manner.                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Horizon has undertaken a comprehensive consultation process through both statutory and non-statutory engagement with the local community and key stakeholders. Horizon has undertaken a multi-stage pre-application                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |



| Issue / Topic | Summary of oral submission (s)                                                                                                                                                                                                                                                                               | Horizon's Response to oral submission (s)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|---------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|               | <p>Recognises the complexity and scale of this project and is conscious of the considerable burden placed upon the hard working and talented managers of Horizon.</p> <p>There is a perception that Horizon gives greater priority to bats, owls and sea birds than it does to people / local community.</p> | <p>consultation process to ensure that consultees had the opportunity to provide feedback at appropriate points in the development of the proposals. The formal stages of the pre-application consultation process were:</p> <ul style="list-style-type: none"> <li>• Stage One Pre-Application Consultation: September – December 2014;</li> <li>• Stage Two Pre-Application Consultation: August – October 2016;</li> <li>• Stage Three Pre-Application Consultation: May – June 2017; and</li> <li>• Consultation on Additional Land: January – February 2018</li> </ul> <p>In addition to the formal consultation stages, other periods of informal consultation were also undertaken. This informal consultation included working groups, community liaison groups and update events.</p> <p>Please see the Consultation Report (APP-037) which details the approach undertaken by Horizon to both formal pre-application consultation and additional informal consultation with stakeholders and the community.</p> <p>The Consultation Report describes how Horizon has analysed, recorded and had regard to comments received at each stage of the consultation. The way in which the consultation process has informed the iterative design evolution of the Wylfa Newydd DCO Project is set out in the Design and Access Statement (APP-407 to 410).</p> <p>The Planning Inspectorate (in their Section 55 Acceptance of Applications Checklist) and IACC (in their adequacy of consultation response) concluded that Horizon's pre-application consultation was undertaken in accordance with requirements of the Planning Act 2008.</p> <p>Following submission of the DCO application, Horizon has continued to develop Statements of Common Ground with key stakeholders and has held monthly Open Surgery events where members of the community can meet and put their questions to the Horizon team.</p> <p>Horizon refutes the suggestion that it gives greater priority to wildlife than people and the local communities and would highlight that the comprehensive consultation process undertaken so far, and ongoing discussions through the Statement of Common Ground process, demonstrate Horizon's intention to engage in meaningful discussions with local communities. Moreover, Horizon is receptive to all concerns raised regarding its proposals and will continue to engage with all interested parties who would wish to do so.</p> |

| Issue / Topic                                                          | Summary of oral submission (s)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Horizon's Response to oral submission (s)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| <p><b>Lack and delay of Information (cont.):<br/>Example cited</b></p> | <p>Document 6.10.2 ES Volume J2 describes effects upon receptors in Tregle and between Tregle and Cemaes. The document refers to 55 receptors experiencing major adverse effects; it states intra-project cumulative noise effects due to interactions are identified to occur for a period of 32 quarters commencing in Year 1 and 100 quarters commencing in Year 11. It then goes on to state that for commercial and office properties high noise levels during construction could cause annoyance and reduce speech intelligibility. For properties close to the development boundary vibration during construction could cause annoyance, feelings of alarm and, in the most severe cases, could cause damage to structures. Predictably the people I represent are concerned. I wrote to Horizon on the 1<sup>st</sup> July requesting that they identify affected properties and asking what Horizon intended to do to communicate this to affected residents. I have raised this at several SOCG meetings since and have not received an answer, save clarification that some of the receptors are not residential properties</p> | <p>In relation to concerns that damage to structures may be caused by vibration from construction activities, Horizon would like to make clear that this finding of major adverse effects from vibration only relate to 12 properties (not 55) and this effect is prior to the application of additional mitigation secured in the Wylfa Newydd CoCP [APP-414].</p> <p>This additional mitigation at section 8.3 of the Main Power Station Site sub-CoCP [APP-415] will ensure safe working distances for vibration causing activities. In particular under section 8.2 of the Wylfa Newydd CoCP [APP-414] Horizon is committed to producing Section 61 applications to IACC for all activities that may cause noise and vibration disturbance. This process will ensure Best Practicable Measures are put in place to reduce noise and vibration including implementation of safe working distances outlined above when the appointed contractor has a detailed design.</p> <p>The establishment of safe working distances in relation to construction vibration will ensure that any equipment that is identified as having potentially adverse vibration effects can be located sufficiently away from any receptors to ensure that any vibration effects on such receptors are negligible. Where works are required within the safe working distances, alternative equipment or working methods would be investigated and vibration levels would be reduced to the greatest extent practicable. If any significant effects are identified at receptors when the S61 application is being produced, Horizon will notify any properties that are predicted to experience significant effects from vibration. This commitment to notify receptors if the section 61 identifies any significant effects will be made via an update to the Wylfa Newydd CoCP at Deadline 4 (17 January 2019).</p> <p>Since the submission to the Planning Inspectorate of the DCO Application, Horizon has looked further at its proposals for noise mitigation. As a response to ongoing SOCG discussions with various stakeholders, Relevant Representations received and the Requests for Non-Material Change for Working Hours, Shift Patterns and HGV delivery windows that are currently out for consultation, Horizon has decided to extend the eligibility area and qualifying noise criteria for noise mitigation under the Local Noise Mitigation Strategy (LNMS). This extends the area around the WNDA which is automatically eligible for noise insulation.</p> |

| Issue / Topic                                       | Summary of oral submission (s)                                                                                                            | Horizon's Response to oral submission (s)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                     |                                                                                                                                           | <p>This extension will ensure that all properties that experience major adverse noise effects under the assessment of noise in chapters C5, D6, E6, F6,G6 and H6 of the Environmental Statement will be notified that they will be eligible for noise insulation on affected doors and windows within living rooms and bedrooms. In addition, some properties will now also be eligible for noise insulated fences, although this will be dependent upon the findings of a noise survey undertaken on each property who respond to notification by Horizon that they are eligible for the scheme. Further detail around these additional commitments will be made at Deadline 3 (18 December 2018), and secured via an update to the LNMS within the Wylfa Newydd CoCP.</p> <p>Horizon is satisfied that the updated LNMS is commensurate with the noise effects to be encountered by local residents as a result of the Wylfa Newydd DCO Project. The HS2 and Heathrow third runway schemes outlined by the Interested Party are wholly different schemes. The Wylfa Newydd DCO Project is not predicting any significant noise effects during routine operation of the Power Station, with all noise effects being attributed to construction. The majority of these effects at the Wylfa Newydd Development Area are envisaged to occur within the first 3 years of construction, before noise levels decrease to become less significant, whilst along the A5025, noise effects will reduce beyond that of the baseline environment after the construction phase of the Wylfa Newydd DCO Project is complete as the implementation of the A5025 Off-line Highways Improvements brings traffic away from the majority of households along the route. Comparatively, the HS2 and Heathrow Third Runway Projects are expected to cause significant effects from noise through their operation in perpetuity, and thus, their noise insulation schemes cover compensation as well as noise insulation which the LNMS does not. However, Horizon does re-iterate its commitment in relation to Property Price Support for people wishing to leave the PPS boundary area previously consulted upon around the WNDA. In response to this concern however, Horizon is also proposing to commission an independent third-party commissioner to oversee disputes around offers of noise insulation where they arise.</p> |
| <b>Lack and delay of information (SOCG process)</b> | In summary after 15 weeks still no clearer and there are only 5 weeks and 3 days to deadline 2. This jeopardises the SOCG process. Accept | Horizon has had direct contact with Roger Dobson via email and through drafting of the Statement of Common Ground (SOCG) between Horizon and North Anglesey Council's Partnership (NACP). Horizon is committed to ongoing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

| Issue / Topic     | Summary of oral submission (s)                                                          | Horizon's Response to oral submission (s)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |              |           |                    |                  |                                       |                                                                                             |                  |                                       |                                                                          |            |                                       |                                                                          |               |                                                                      |                                     |                   |                                                                                    |                                         |              |           |                    |                |                                             |                                                            |
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|                   | that on our side we need to bring more urgency to the SOCG process but so does Horizon. | <p>engagement with all relevant stakeholder groups through the SOCG process and will continue to do so throughout examination.</p> <p>Horizon has undertaken a significant amount of engagement with stakeholders so far, and the draft SOCG records the engagement Horizon has had with NACP as set out below:</p> <table> <tr> <th>Meeting Date</th><th>Attendees</th><th>Purpose of Meeting</th></tr> <tr> <td>16 November 2017</td><td>Horizon, DWD, representatives of NACP</td><td>Initial meeting to discuss approach to SoCG and key issues from PAC2 and PAC3 consultations</td></tr> <tr> <td>12 December 2017</td><td>Horizon, DWD, representatives of NACP</td><td>Follow up meeting to discuss issues and potential approach to resolution</td></tr> <tr> <td>1 May 2018</td><td>Horizon, DWD, representatives of NACP</td><td>Follow up meeting to discuss issues and potential approach to resolution</td></tr> <tr> <td>9 August 2018</td><td>Horizon, DWD, Steer (Transport Consultants), representatives of NACP</td><td>Meeting focused on transport issues</td></tr> <tr> <td>12 September 2018</td><td>Horizon, DWD, Andy Hunt Quod (Accommodation Topic Expert), representatives of NACP</td><td>Meeting focused on accommodation issues</td></tr> </table> <p>Horizon has also met with Llandbadrig Community Council (LICC) regarding drafting a SOCG as set out below:</p> <table> <tr> <th>Meeting Date</th><th>Attendees</th><th>Purpose of Meeting</th></tr> <tr> <td>20 August 2018</td><td>Horizon, Quod, DWD, representatives of LICC</td><td>Initial meeting to discuss approach to SoCG and key issues</td></tr> </table> | Meeting Date | Attendees | Purpose of Meeting | 16 November 2017 | Horizon, DWD, representatives of NACP | Initial meeting to discuss approach to SoCG and key issues from PAC2 and PAC3 consultations | 12 December 2017 | Horizon, DWD, representatives of NACP | Follow up meeting to discuss issues and potential approach to resolution | 1 May 2018 | Horizon, DWD, representatives of NACP | Follow up meeting to discuss issues and potential approach to resolution | 9 August 2018 | Horizon, DWD, Steer (Transport Consultants), representatives of NACP | Meeting focused on transport issues | 12 September 2018 | Horizon, DWD, Andy Hunt Quod (Accommodation Topic Expert), representatives of NACP | Meeting focused on accommodation issues | Meeting Date | Attendees | Purpose of Meeting | 20 August 2018 | Horizon, Quod, DWD, representatives of LICC | Initial meeting to discuss approach to SoCG and key issues |
| Meeting Date      | Attendees                                                                               | Purpose of Meeting                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |              |           |                    |                  |                                       |                                                                                             |                  |                                       |                                                                          |            |                                       |                                                                          |               |                                                                      |                                     |                   |                                                                                    |                                         |              |           |                    |                |                                             |                                                            |
| 16 November 2017  | Horizon, DWD, representatives of NACP                                                   | Initial meeting to discuss approach to SoCG and key issues from PAC2 and PAC3 consultations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |              |           |                    |                  |                                       |                                                                                             |                  |                                       |                                                                          |            |                                       |                                                                          |               |                                                                      |                                     |                   |                                                                                    |                                         |              |           |                    |                |                                             |                                                            |
| 12 December 2017  | Horizon, DWD, representatives of NACP                                                   | Follow up meeting to discuss issues and potential approach to resolution                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |              |           |                    |                  |                                       |                                                                                             |                  |                                       |                                                                          |            |                                       |                                                                          |               |                                                                      |                                     |                   |                                                                                    |                                         |              |           |                    |                |                                             |                                                            |
| 1 May 2018        | Horizon, DWD, representatives of NACP                                                   | Follow up meeting to discuss issues and potential approach to resolution                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |              |           |                    |                  |                                       |                                                                                             |                  |                                       |                                                                          |            |                                       |                                                                          |               |                                                                      |                                     |                   |                                                                                    |                                         |              |           |                    |                |                                             |                                                            |
| 9 August 2018     | Horizon, DWD, Steer (Transport Consultants), representatives of NACP                    | Meeting focused on transport issues                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |              |           |                    |                  |                                       |                                                                                             |                  |                                       |                                                                          |            |                                       |                                                                          |               |                                                                      |                                     |                   |                                                                                    |                                         |              |           |                    |                |                                             |                                                            |
| 12 September 2018 | Horizon, DWD, Andy Hunt Quod (Accommodation Topic Expert), representatives of NACP      | Meeting focused on accommodation issues                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |              |           |                    |                  |                                       |                                                                                             |                  |                                       |                                                                          |            |                                       |                                                                          |               |                                                                      |                                     |                   |                                                                                    |                                         |              |           |                    |                |                                             |                                                            |
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| 20 August 2018    | Horizon, Quod, DWD, representatives of LICC                                             | Initial meeting to discuss approach to SoCG and key issues                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |              |           |                    |                  |                                       |                                                                                             |                  |                                       |                                                                          |            |                                       |                                                                          |               |                                                                      |                                     |                   |                                                                                    |                                         |              |           |                    |                |                                             |                                                            |

| Issue / Topic                                                 | Summary of oral submission (s)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Horizon's Response to oral submission (s)                                                                                                                                                                                  |                                               |                                                                           |
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|                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 11 October 2018                                                                                                                                                                                                            | Horizon, DWD, representatives of LICC and MCC | Joint meeting with Mechell Community Council to continue SoCG discussions |
|                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | A draft SOCG to NACP has been issued, formally via the clerk of NACP, in advance of each of the meetings to allow review and discussion at the meetings. The drafts were accompanied by additional information as follows: |                                               |                                                                           |
|                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Draft</b>                                                                                                                                                                                                               |                                               | <b>Other Info provided</b>                                                |
|                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 1 <sup>st</sup> draft issued 4 <sup>th</sup> December 2017                                                                                                                                                                 |                                               | Presentation given on SOCG process                                        |
|                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 2 <sup>nd</sup> draft issued 29 <sup>th</sup> June 2018                                                                                                                                                                    |                                               | N/A                                                                       |
|                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 3 <sup>rd</sup> draft issued 25 <sup>th</sup> July 2018                                                                                                                                                                    |                                               | Steer response to Wood queries on transport together with traffic counts. |
|                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 4 <sup>th</sup> draft issued 7 <sup>th</sup> September 2018                                                                                                                                                                |                                               | LNMS consultation document.                                               |
|                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 5 <sup>th</sup> draft issued 10 <sup>th</sup> October 2018                                                                                                                                                                 |                                               | Rule 6 letter.                                                            |
| <b>Marine Off-Loading Facility (MOLF) increased movements</b> | Recorded history of Cemaes Harbour goes back to medieval times. It has been in the ownership of Llanbadrig Community Council since 1965. The harbour is tidal but when tides permit its acts as a harbour of refuge. In recent times we have facilitated crew transfers for Horizon's off shore drilling activities. We continue to be committed to help Horizon for the construction and operation of the MOLF and other Horizon marine activities. We support the plan to increase movements for the MOLF because it will reduce road traffic and is environmentally the best logistic solution. | Support for the RfNMC for revised vessel movements is noted.                                                                                                                                                               |                                               |                                                                           |

| Issue / Topic                                                   | Summary of oral submission (s)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Horizon's Response to oral submission (s)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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| <b>Blasting and Marine Vessels</b>                              | Support Horizon's proposal to extend the permitted hours for blasting subject to the evening limit being 7 p.m. and not dusk where that is later. We believe that most children should be in bed by that time.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Support for the RfNMC for revised blasting hours is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Mitigation for residents – LNMS and PPS and compensation</b> | <p>For Nearby residents within 1 kilometre of the new station boundary. Horizon published a Neighbourhood Support Scheme in 2014 which has only had minor changes since. The plan has two components: mitigation for property owners who remain and Property Price Support for those who leave. Horizon has argued that their plan draws upon relevant precedent from other similar projects. Relevant precedent in 2014 is probably not relevant today or indeed in 2020. We believe that HS2 and Heathrow Third Runway are relevant precedents. In addition, the plan refers to the area being close to an active Wylfa A – which has been dormant since December 2015 and is scheduled to complete de fuelling by the end of 2019.</p> <p>Different approaches to compensation from other schemes. What are RD expectations given his proximity? What has been proposed by HNP – mitigation for property if occupier stays and price support if they decide to leave. £5,000 to help people move – even if people stay they should still receive compensation.</p> <p>ExA confirmed compensation not a matter for the ExA.</p> | <p>To clarify, Horizon's Neighbourhood Support Scheme, when consulted upon alongside PAC2, had two components</p> <ul style="list-style-type: none"> <li>• Horizon's Property Price Support Plan and</li> <li>• Disturbance Mitigation Plan (renamed as Local Noise Mitigation Strategy in the DCO)</li> </ul> <p>The Property Price Support Plan is not part of the DCO application, but the Local Noise Mitigation Strategy (LNMS) is now part of the Wylfa Newydd Code of Construction Practice (APP-414) as it is required to mitigate significant effects reported in the Environmental Statement.</p> <p>As noted above, the LNMS will be extended so that more properties have the benefit of noise mitigation and that for this reason, Horizon is satisfied that the LNMS adequately mitigates noise to be expected by residents. As noted above Horizon are satisfied that the updated LNMS is not comparable to the schemes at HS2 and Heathrow where the effects are expected for perpetuity . The updated LNMS is commensurate with the noise effects to be encountered by local residents as a result of the Wylfa Newydd Project.</p> <p>With regard to the concerns raised about the costs of moving and lack of adequate compensation, the <i>Department of Communities and Local Government: Planning Act 2008: examination of applications for development consent guidance</i> confirms that compensation is not a matter for consideration as part of the DCO examination process. This approach was confirmed by the Examining Authority at the Open Floor Hearing.</p> |

| Issue / Topic                           | Summary of oral submission (s)                                                                                                                                                                                                              | Horizon's Response to oral submission (s)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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| <b>Mitigation – noise and vibration</b> | ExA question on what noise does RD experience currently. RD response that he has lived in property for 20 years. Close to Wylfa A – has been low background hum, today – agricultural machinery is noisy as well as birds of prey and A5025 | Noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Mitigation – local residents</b>     | Neighbourhood Support Scheme in 2014 – only minor change made since.                                                                                                                                                                        | <p>The Neighbourhood Support Scheme (NSS) was consulted upon alongside PAC2 as a voluntary scheme to mitigate effects in the local community. When consulted upon, the NSS had two components:</p> <ul style="list-style-type: none"> <li>• Horizon's Property Price Support Plan; and</li> <li>• Disturbance Mitigation Plan (which has now become the LNMS in the DCO)</li> </ul> <p><b>The Property Price Support Plan</b></p> <p>The Property Price Support Plan provides residents who wish to relocate the difference between the value of the property with and without the Power Station proposals (i.e. the loss in value), plus a sum towards the costs of moving and professional fees (including valuations) incurred. The Property Price Support plan is not part of the DCO application, but since launch in 2015 a number of applications have been received and all qualifying applicants have received offers of financial support.</p> <p>Loss will be established using the Royal Institute of Chartered Surveyors 'Red Book' professional standards. Additionally, Horizon proposes to pay owners a sum of £5,000, in recognition of the survey and legal fees they may incur by moving. The PPS is a private agreement outside of the consenting process, and should be considered on a voluntary basis only.</p> <p><b>The LNMS</b></p> <p>The LNMS, is secured via commitments in the Wylfa Newydd CoCP [APP-414] and is required to mitigate significant effects identified in the Environmental Statement that the contents of the LNMS are aligned and consistent with similar schemes undertaken by large scale infrastructure projects such as Crossrail and Thames Tideway Tunnel. Together, Horizon considers that these two</p> |



| Issue / Topic                                                                           | Summary of oral submission (s)                                                                                  | Horizon's Response to oral submission (s)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|                                                                                         |                                                                                                                 | <p>schemes provide adequate support and compensation for property owners near to and affected by construction of the Wylfa Newydd Power Station site.</p> <p>Since the submission to the Planning Inspectorate of the DCO Application, Horizon has looked further at its proposals for noise mitigation. As a response to ongoing SOCG discussions with various stakeholders, Relevant Representations received and the Requests for Non-Material Change for Working Hours, Shift Patterns and HGV delivery windows that are currently out for consultation in the community, Horizon has decided to extend the eligibility area and qualifying noise criteria for the Local Noise Mitigation Strategy (LNMS). The area around the WNDA which will be automatically eligible for noise insulation has been extended under this update. This change will ensure that all properties that experience major adverse noise effects under the assessment of noise in chapters C5, D6, E6, F6, G6 and H6 will be notified that they will be eligible for noise insulation on affected doors and windows within living rooms and bedrooms. As a further development of this scheme, some properties will now also be eligible for noise insulated fences, although this will be dependent upon the findings of a noise survey undertaken on each property who respond to notification by Horizon that they are eligible for the scheme. Further detail around these additional commitments will be made at Deadline 3 of the DCO examination, and secured via an update to the Wylfa Newydd CoCP.</p> |
| <p><b>Landscape mounds (not in written statement but in oral submission at OFH)</b></p> | <p>Key driver for the landscape mounds is the storage of leftover material, not noise and visual mitigation</p> | <p>All material excavated within the Wylfa Newydd Development Area would be retained on-site within the Wylfa Newydd Development Area. A significant proportion of the excavated material would be used to form the level areas needed for the Power Station building platforms and to level the construction compounds. The remaining excavated materials would be needed to create landscape mounds to form an appropriate landscape setting for the Power Station. These mounds are an essential part of the mitigation identified for the landscape and visual effects and in some instances provide important mitigation for noise effects.</p> <p>The final operational landforms will create a new landscape setting that reflects the existing open, rolling, drumlin landscape character of the surrounding area, in conjunction with an appropriate architectural design of the Power Station. During construction, the progressive creation of mounds seeks to minimise</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |



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|                    |                                                                                                                                                                                                                                                                                                          | <p>double handling of materials and deliver landscape mounding to provide the mitigation referred to above during the construction phase where possible.</p> <p>The reuse of these materials would be managed in accordance with the Definition of Waste: Development Industry Code of Practice. This would allow the reuse of excavated materials as far as possible without them being defined as waste which is in accordance with paragraphs 5.14.1 - 5.14.9 of the Overarching National Policy Statement for Energy (EN-1).. The materials management strategy for the Wylfa Newydd Project is set out in section 9 of the Wylfa Newydd CoCP (APP-414)</p> <p>The design concept for the landscape design around the Power Station is largely driven by the existing landscape character and qualities of the local area, characterised by the vegetated drumlin landforms, irregular field patterns and mosaic of local landscape typologies.</p> <p>The design concept is to restore the naturalistic setting to the Power Station where possible, through the re-provision of land for sympathetic to agricultural use interwoven with areas of appropriate semi-natural habitats. Earth mounds will also seek to visually 'anchor' the Power Station within the existing landscape and soften views.</p> <p>The intention is to facilitate bringing the open rolling drumlin landscape character of the wider WNDA as close to the Power Station Site as security requirements and other practical design constraints allow.</p> <p>Further to the outline of the benefits of the proposed landscape mounds, it is also noted that the need for the material to be retained on site also means likely significant environmental effects are avoided had the situation arisen that the excavated material required movement off-site. The movements associated with removing such a large volume of material would be likely to result in effects on traffic and transport, noise and air quality.</p> |
| <b>Site Campus</b> | <p>There are conflicting views in Community Council about the merits of concentrating temporary Worker Accommodation on one site as opposed to across several sites, which could have a legacy benefit. Personal view based on commercial experience is that Horizon's arguments about impact on the</p> | <p>Noted support to Site Campus from Roger Dobson despite conflicting views from people he represents.</p> <p>It should be noted that the need to accommodate up to 4000 workers on site is based firstly, on the fact that Temporary Workers Accommodation (TWA) is needed for 4000 workers and seeking to avoid excess demand being placed on existing provision and other disruption to local communities. Secondly, there</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

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|                    | <p>Welsh language, traffic, travel time of workers and importantly cost are very persuasive.</p> <p>ExA questions what is the broader view of community council to site campus proposals.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <p>are significant benefits to housing 4000 works in a single on-site campus in terms of delivering combined facilities (such as leisure and health provision) and workforce management (ensuring that the impact on existing communities can be minimised).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Site Campus</b> | <p>If the 4,000- bed campus becomes reality we are concerned that Horizon brings forward some plan including contingencies for mitigating the effect on local communities. There are residents of Cemaes who lived through the Wylfa A construction. They liken Cemaes at that time to the Klondike gold rush. The equivalent of the 'Wild West saloon' was a hotel called the Faraway which was at the bottom of my garden. As a community want the best of all worlds; keen that Horizon workers patronise local businesses and inject some welcome prosperity. At the same time, don't want any anti-social behaviour or even worse criminal activity. Accept that there is no easy answer to this conundrum but suggest whether the North Wales Police should consider a temporary police station in one of Horizon's empty properties. Horizon might fund extending CCTV in the villages and possibly deploy its mobile security personnel in a deterrent role.</p> | <p>Horizon has concluded that on balance, the environmental and social effects of the construction workforce on the existing community is best managed through locating a significant proportion of them in a single, temporary purpose-built campus as close as possible to the Power Station Site.</p> <p>Horizon recognises that the Temporary Workers Accommodation has the potential to adversely affect local communities with Treglele and Cemaes the closest to the Site Campus, particularly in relation to an increased demand on local services.</p> <p>A range of on-site welfare, leisure, sport and recreational amenities, retail and convenience stores, a bar and medical services aim to avoid or reduce the effects on local communities. These are intended to mitigate the socio-economic effects of the Site Campus and the Wylfa Newydd DCO Project as a whole by reducing demand from workers for important community services such as healthcare.</p> <p>Beneficial effects are also likely in the local economy and labour market given the considerable number of workers anticipated to reside at the Site Campus during the construction phase. It is likely that businesses located within the Local Area of Influence (LAI) could experience some beneficial effects in terms of an increase in business.</p> <p>A Workforce Management Strategy and Code of Construction Practice (CoCP) are other measures that will mitigate or manage effects, including a Community Liaison Group (CLG), and Community Involvement Officers, as well as a dedicated hotline for any issues that arise.</p> <p>Horizon are committed to working with the emergency services during the construction and operation of the Wylfa Newydd development. Horizon continues to engage with North Wales Police on this issue through the Statement of Common Ground process. The Section 106 Agreement will contain provisions which will ensure that the direct impacts of the Wylfa Newydd Project on emergency services are adequately mitigated.</p> |

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|                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>Horizon is working with North Wales Police and other public bodies to include IACC and the emergency services in to draft a Community Safety Management Strategy (CSMS) in accordance with draft Requirement PW11. The CSMS will set out how Horizon will work with existing public bodies, including IACC and the emergency services, and will include a framework of communication routes and ways of working to mitigate any potential impact of the construction workforce within the community.</p> <p>The Workforce Management Strategy (WMS) sets out the principles to minimise negative impacts on the local communities and prevent anti-social behaviour. These principles will form the basis of a Code of Conduct that all personnel will comply with during the construction of the Project and will be enforced by Horizon through its contractors.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Roads - traffic</b> | <p>Heard that road management is the responsibility of the County Council; been lobbying the IACC for over six months on the matter of reducing speed limits on the A5025 at Treglele with installation of a pedestrian crossing; and the speed limit on the minor road through Treglele and Llanfechell as now unsafe.</p> <p>Increased Traffic resulting from the SPC activity will make matters worse and traffic associated with the main construction will make matters very much worse. Believe Horizon should prohibit workers from using the minor road as a 'rat run' and monitor use of the rat run by workers. Believe that given frustrations with the County Council that body may listen to ExA and Horizon more than they have listened to NACP and LCC.</p> | <p><b>Vehicle Speeds</b></p> <p>The speed limit through Treglele is already reduced to 40mph compared to the majority of the rest of the A5025 which is 60mph. Horizon do not propose to change this.</p> <p>Appendix E of the Transport Assessment contains a comprehensive assessment of accident across Anglesey. This concluded that there are no accident clusters located on the A5025.</p> <p>If vehicles associated with the Wylfa Newydd Project are observed to be driving unsafely this can be reported through the arrangements described in Section 3.3 of the Wylfa Newydd CoCP [APP-414]. Issues can also be raised through the Transport Sub-Group and funds are available to implement mitigation or management measures, such as changing speed limits (with the approval of the Highway Authority), if agreed and approved through the processes set out in the Wylfa Newydd CoCP [APP-414].</p> <p>Furthermore, the Workforce Management Strategy (WMS) [APP-413], which sets out the foundational principles for the Code of Conduct requires personnel to comply with any strategies set out in the Wylfa Newydd CoCP including adherence to speed limits, the highway-code, identified route restrictions and be respectful of other road users including agricultural vehicles, pedestrians, cyclists and livestock.</p> |

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|                          |                                                                                                                                                                                                                     | <p><b>“Rat-running”</b></p> <p>Workers living in central north-western Anglesey will likely use the most direct route to site. Therefore, Horizon would expect workers living in the villages of Mechell, Treglele, and Llanfechell to use the B-roads to access the WNDA Site. Please see Figure 6-8 of Appendix F of the Transport Assessment (APP-107) which shows the expected density of workers by ward on Anglesey and the Mainland. This shows that Horizon are not expecting many workers to be living in the central north-western section of Anglesey and that the vast majority of workers are expected to live in Holyhead, Bangor, Amlwch, and Caernarfon.</p> <p>Horizon understand that the “minor road” where there are rat running concerns is the road through from Rhoss-y-Bol to Cemaes that runs through Llanfechell to the WNDA. The C2-3 Traffic Flows document [APP-100] contains all the road links that are expected to see changes owing to Wylfa Newydd Project traffic and sets out the changes to traffic flows from 2016 to 2020, 2023 and 2033. The data provided in APP-100 shows the maximum change in traffic expected through Llanfechell (Link 38) is predicted to be no more than +3% over an average day in any given scenario.</p> <p>However, we understand the concern relates to workers living further afield, in places such as Llangefni, using B-roads to access the WNDA when they could use A-roads (mainly the A5025).</p> <p>Following stakeholder feedback, Horizon has been considering changes regarding measures to reduce the chances of rat-running through villages such as Llanfechell. As a result of this process Horizon has amended section 5.6 of the Wylfa Newydd CoCP to make it clear that construction workers will be required to stick to 'A' class roads and avoid 'B' class roads wherever practicable to avoid causing unnecessary nuisance and disturbance to local communities. This information will be provided to all construction workers at their induction and they will be required to comply with it as part of the Code of Conduct.</p> |
| <b>Roads – accidents</b> | Accidents on A5025 – ExA asked how many accidents in the last 5 years. RD no reliable information but last 20 years, 4 serious accidents due to speeding and overtaking. 30mph limit should be extended past garage | A detailed analysis of existing accident data recorded by North Wales Police is provided in the DCO application and this is described in Section 4.9 of App C2-4 DCO Transport Assessment (APP-108). The analysis provided in Section 4.9 states that accident clusters were found in four locations on the A55, A5 and A487. An accident cluster was not found on the A5025. (Note that a cluster is                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

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|                                                     | <p>as garage now accommodates a post office resulting in increase in pedestrian traffic, need to encourage people to slow down.</p>                                                                                                                                                                                            | <p>defined by Welsh Government, in its report <i>Accident cluster sites and fatal road accidents on the Welsh Trans-European Network – Transport</i>, as a site where there are at least four personal injury accidents in a three-year period within a 100m diameter (as per the 6.3.19 ES Volume C - Road traffic-related effects (project-wide) App C2-4 - DCO TA Appendix E - Accident Analysis document)). Paragraph 4.9.3 concludes:</p> <p><i>“Based on this analysis, the records for personal injury accidents included in clusters do not demonstrate strong correlation of causes that would be of relevance to the Wylfa Newydd Project.”</i></p> <p>Further details of the accident analysis are provided in Appendix E Accident Analysis (APP-106) of the DCO Transport Assessment. This includes an analysis of all recorded accidents on the A5205 (see Section 2.10 to Section 2.21). The location of these accidents is shown in Figure 1-2.</p> <p>In addition, it should be noted that the Wylfa Newydd Code of Construction Practice ( details the construction worker Code of Conduct which will include information on the use of HGV routes and safety and operational requirements. If vehicles associated with the Wylfa Newydd Project are observed to be driving unsafely this can be reported through the arrangements described in Section 3.3 of the Wylfa Newydd Code of Construction Practice (APP-414). Issues can also be raised through the Transport Sub-Group and funds are available to implement mitigation or management measures, such as changing speed limits (with the approval of the Highway Authority).</p> <p>Furthermore, the Workforce Management Strategy states that all personnel will comply with the Construction Traffic Management Strategy as set out in the Wylfa Newydd Code of Construction Practice including speed limits, the highway-code, identified route restrictions and be respectful of other road users including agricultural vehicles, pedestrians, cyclists and livestock.</p> |
| <p><b>Working hours of construction workers</b></p> | <p>Horizon are currently proposing that construction workers should be employed on a variety of shifts. The underlying concept is that they work 10 or 10.5-hour shifts timed from passing through turnstiles at the site and not accounting for travel time. This equates to people working on average 57.5 hours a week.</p> | <p>Horizon takes its duties of care to its workforce very seriously. The shift patterns have been determined having regard to extensive experience of delivering similar projects elsewhere. Horizon submitted a Workforce Management Strategy with its DCO application which includes principles that will be included within the subsequent Code of Conduct such as that the workforce is to be treated fairly through appropriate industrial relations agreements and processes</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

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|               | <p>This is legal in the UK because we allow individuals to opt out of the working time regulations. It would not be possible in most European countries.</p> <p>It is now well established that excessive working hours results in</p> <ul style="list-style-type: none"> <li>• poor productivity and quality</li> <li>• a high incidence of accidents</li> <li>• poor health and high absenteeism</li> <li>• and social issues such as family break down</li> </ul> <p>End of shifts – workers hurry to get home, drive too fast, fatigue leads to road accidents. 38 hour working week for Wylfa A. Excessive working is not the way to deliver project</p> | <p>and that working hours and conditions must be appropriate, and accord with relevant health, safety and environment standards and legislation.</p> <p>Working hours are different for the various component sites of the project. The overall Wylfa Newydd Code of Construction Practice [APP-414]) states that activities at the worksites across the Wylfa Newydd DCO Project will be varied. Required working hours and shift patterns for the various parts of the Wylfa Newydd DCO Project are set out in the relevant sub-CoCPs [APP-415 - APP-420].</p> <p>Horizon will take all reasonable steps to limit the adverse effects of the Wylfa Newydd DCO Project as far as possible. Mitigation and good practice measures are proposed in order to avoid, reduce or compensate for adverse impacts where possible. These measures are set out in the Mitigation Route Map [APP-422].</p> <p>Horizon takes its responsibilities to the people and communities that neighbour the Wylfa Newydd Development Area and the Associated Development sites very seriously. The various mitigation strategies that form part of this application have been considered and designed with the interests of local people in mind. Where possible Horizon has sought to reduce the impacts on the surrounding properties including local businesses and residents through measures such as:</p> <ul style="list-style-type: none"> <li>• control of and restrictions in relation to traffic movements from workers and HGV movements, which will avoid peak hours and seek to minimise impacts on the local road network;</li> <li>• the provision of the Site Campus, which will reduce daily vehicle trips on the local road network as much as possible, mitigate impact on Welsh language and culture, and will also have the benefit of being able to provide a single, managed campus that is in close proximity to the construction site;</li> <li>• restrictions that seek to limit certain noisier activities to the extent possible during noise sensitive times;</li> <li>• the preparation of Community Safety Management Strategy which will set out how Horizon will work with existing public bodies, including IACC and the emergency services, and will include a framework of communication routes and ways of working to mitigate impact of the construction workforce within the community;</li> </ul> |



| Issue / Topic | Summary of oral submission (s) | Horizon's Response to oral submission (s)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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|               |                                | <ul style="list-style-type: none"> <li>the enforcement of a worker Code of Conduct, following the principles set out in the Workforce Management Strategy; and</li> <li>the establishment of a Community Liaison Group to, amongst other things, allow the community to raise concerns in relation to environmental effects.</li> </ul> <p>Under the Health and Safety at Work Act 1974 Act and the Management of Health and Safety at Work Regulations 1999, all employers, including the self-employed have a duty, so far as reasonably practicable, to protect the health, safety and welfare at work of all their employees. This also includes a duty to ensure others are not exposed to health and safety risks through their undertaking.</p> <p>Working hours will vary on the Wylfa Newydd DCO Project as the works progress. As with any project there may be requirements to work either shift or extended hours to meet the overall objectives of the project. The working arrangements will comply with the requirements of the relevant National Agreements, in terms of Working Time Directive. This allows for periods of work in excess of 48 hours/week provided the agreed average is not exceeded in a 52 week control period. It is intended to develop shift patterns that are compliant to The Working Time Regulations (1998), as amended, of 48 hours averaged over the control period. The working rule agreements make provision for opt out however this is not envisaged to be standard practise. Horizon will monitor individuals who may wish to exercise their right to 'opt out' through the provisions incorporated with the relevant agreements so far as it is within our control. We will be ensuring everyone takes the required number of holidays annually.</p> <p>Through the appointed PMC (Project Management Contractor) organisation it is expected that appropriate risk assessments shall be undertaken, and measures introduced, that are reasonably practicable, to remove or control identified risks. This will include the number of hours worked and how these hours are scheduled to mitigate/remove risk. The PMC organisation has specific experience in implementing such arrangements on major construction projects including the UK Rail Industry and will introduce management arrangements that meet with UK HSE guidance on managing working hours and shift working arrangement.</p> |

| Issue / Topic | Summary of oral submission (s) | Horizon's Response to oral submission (s)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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|               |                                | <p>Furthermore, the benefit of the provision of the onsite Worker Campus significantly reduces the number of workers travelling from site at the end of the shift, hence mitigating the risk identified in this question. Where resource may be required to work an extended shift to finish pre-planned work activities (i.e. large concrete pours) these can be selected such that they are accommodated in this onsite facility. The proposed shift patterns will be run through the HSE Fatigue calculator to determine the fatigue and error risk of workers and ensure that, at the end of their last shift, it is within acceptable limits for safety critical work on a construction site and that they are fit for their commute home. Fatigue management procedures will be adopted to ensure any additional hours worked beyond the planned, assessed rota are authorised only after review of the fatigue risk and any additional controls such as mandatory rest time in camp or transport home are put in place. These would be local management arrangement resulting from the worker risk analysis. (<a href="http://www.hse.gov.uk/research/rrhtm/rr446.htm">http://www.hse.gov.uk/research/rrhtm/rr446.htm</a>)</p> |



### 3 Oral and Written Submission: Felin Honeybees Limited

#### 3.1 Comments on Oral and Written Submission by Felin Honeybees Limited

- 3.1.1 Horizon notes the concerns raised by Katie Hayward, Managing Director of Felin Honeybees Limited, at the Open Floor Hearing held on 25 October 2018 (REP1-039). Horizon is committed to continuing its engagement with Felin Honeybees Limited to ensure that it understands the impacts of the Wylfa Newydd DCO Project on the business and so that such impacts are addressed appropriately.

##### **Background to engagement**

- 3.1.2 Felin Honeybees Limited was incorporated on 21 April 2016, according to the Companies House Register.
- 3.1.3 Felin Honeybees Limited is located on, and run out of, a property known as Felin Gafnan, which is owned by the National Trust; although Horizon understands that some of its business activities are conducted at other locations. Felin Gafnan is located outside of the Order Limits under the draft DCO, directly to the west of the Wylfa Newydd Development Area ("WNDA").
- 3.1.4 In 2016, the National Trust confirmed that Katie Hayward occupies Felin Gafnan with her husband on the basis of an agricultural tenancy. The lease is unregistered.
- 3.1.5 Over the last few years Horizon has formally engaged with Katie Hayward (both in respect of her role as the Managing Director of Felin Honeybees Limited and as the occupant of Felin Gafnan) and National Trust. This has included regular engagement with Katie Hayward through direct communications by the Horizon site management team and stakeholder engagement team. In-person meetings have also been held with Katie Hayward concerning the potential impacts of the Wylfa Newydd DCO Project on Felin Gafnan and on Felin Honeybees Limited. Details are set out in Appendix 1.
- 3.1.6 The most recent meeting between Horizon and Felin Honeybees Limited took place on 30 November 2018, where Katie Hayward was accompanied by the Assembly Member for Anglesey and another individual. A number of actions were agreed at that meeting, some of which are now complete and others which are being progressed.
- 3.1.7 Table 3-1 below summarises Horizon's response to the key points from the Felin Honeybees Limited's submission at the Open Floor Hearing.

- 3.1.8 Following a recent land registry search, Horizon has confirmed that Katie Hayward's husband owns a nearby property in Treglele ("Property 2"); although the Person with an Interest in Land form identifies her parents as tenants and Katie Hayward as the owner. A record of the engagement with the PWILs at Property 2 is also included in Appendix 1.

**Table 3-1 Horizon's responses to the key points raised in Felin Honeybees Limited's submission**

| Issue / Topic                          | Summary of submission (s)                                                                                                                    | Horizon's Response to submission (s)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Location</b>                        | Katie Hayward stated in the submission that she is "the woman who lives in the Marine offload facility and on the boundary of Wylfa Newydd". | <p>As noted above, Felin Gafnan (which is occupied by Katie Hayward and Felin Honeybees Limited) is located in the vicinity of, but outside of the DCO Order Limits, to the north of the western side of the WNDA. Cestyll Gardens is also located between Felin Gafnan and the Order Limit boundary for the WNDA.</p> <p>The Marine Off-Loading Facility is located within the Order Limits, approximately 500m to the north-east the residential dwelling at Felin Gafnan. No elements of the MOLF, or any associated works (e.g. construction compounds) will be constructed on Felin Gafnan.</p>                                                                                                                                                                                                                                                                                                              |
| <b>Effects on Property</b>             | The oral submission refers to Katie Hayward's belief that her "business and home is going to be lost".                                       | <p>Horizon does not intend to acquire the land on which Felin Gafnan is located because it is not required for the Wylfa Newydd DCO Project, and so has been excluded from the Order Land.</p> <p>Horizon is continuing to engage with both Katie Hayward and the National Trust in respect of any impact the Wylfa Newydd DCO Project is likely to have on her family, Felin Honeybees Limited and Felin Gafnan.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Environmental Impact Assessment</b> | Katie Hayward stated that she "is the woman who is not in the EIA or the DCO".                                                               | <p>Chapter D3 Socio-Economic of Horizon's Environmental Statement [APP-122] considered the potential impacts on local businesses associated with the construction, operation and decommissioning of the Wylfa Newydd DCO Project. Felin Honeybees Limited was identified in Table D3-4 on page D3-7 as one of those local businesses within the local area of influence, a 5km radius from the boundary of the WNDA.</p> <p>Horizon has obtained advice from its Environmental Impact Assessment consultants that it is not standard practice to provide impact assessments of specific businesses in an environmental statement. Such an undertaking would involve exploring the finances of companies in order to assess any impact and making that information public. This would likely involve a full review of the business accounts, the business model and resilience to change and external factors.</p> |

| Issue / Topic | Summary of submission (s) | Horizon's Response to submission (s)                                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------|---------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|               |                           | <p>For this reason, the assessment of impacts on local businesses included within the Environmental Statement considers impacts on local businesses as a whole, rather than on a business-by-business basis.</p> <p>However, Horizon will continue its engagement with Felin Honeybees Limited to ensure that it understands the impacts of the Wylfa Newydd DCO Project on the business and so that such impacts are addressed appropriately.</p> |

## Appendix 3-1 Record of Engagement with Felin Honeybees Limited and Katie Hayward

**Table 3-2 Record of Engagement<sup>1</sup>**

| Date     | Contact type | Originator    | Subject                                                                                                                                                                    |
|----------|--------------|---------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 22.01.13 | Hotline call | Katie Hayward | Enquiry from Katie Hayward regarding a field opposite her house and a wayleave agreement with Horizon                                                                      |
| 22.04.13 | Hotline call | Katie Hayward | Katie Hayward requested information on surveys being done as she was tendering with National Trust to keep bees at her property                                            |
| 13.08.14 | Letter       | Fisher German | Enclosing licence agreement                                                                                                                                                |
| 29.09.14 | Letter       | Fisher German | Enclosing payment for licence                                                                                                                                              |
| 15.01.15 | Letter       | Fisher German | Enclosing new licence agreement                                                                                                                                            |
| 17.03.15 | Email        | Fisher German | Informing of survey access                                                                                                                                                 |
| 09.04.15 | Email        | Fisher German | Informing of survey access                                                                                                                                                 |
| 15.04.15 | Hotline call | Katie Hayward | Enquiry about whether pest control would be involved in Cafnan demolition works                                                                                            |
| 20.04.15 | Email        | Horizon       | Response to hotline call regarding work at Cafnan Farmyard, confirming correct environmental and ecological approach to removal works and that no pest control is required |
| 29.06.15 | Letter       | Fisher German | Enclosing new licence agreement                                                                                                                                            |

<sup>1</sup> Letters were primarily sent to Felin Gafnan; however, some were sent to Felin Honeybees Limited' registered address in Essex. Where the Originator was Fisher German or Bruton Knowles, they were acting on Horizon's behalf.

| Date     | Contact type   | Originator     | Subject                                                                                                                                                                                                                                                                       |
|----------|----------------|----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 03.12.15 | Letter         | Fisher German  | Enclosing new licence agreement                                                                                                                                                                                                                                               |
| 02.03.16 | Hotline call   | Katie Hayward  | Requested a copy of a document                                                                                                                                                                                                                                                |
| 27.06.16 | Letter         | Fisher German  | New licence agreement issued                                                                                                                                                                                                                                                  |
| 14.07.16 | Email          | Fisher German  | Following up on new licence agreement                                                                                                                                                                                                                                         |
| 21.07.16 | Letter         | Bruton Knowles | Initial contact referencing letter sent to Property 2                                                                                                                                                                                                                         |
| 28.07.16 | Telephone call | Katie Hayward  | Complaint that contractors working in a field near her property accessed it via her boundary wall on the left-hand side of her driveway and left the wall damaged. Very minor damage found to have been caused by SPEN. Horizon followed up with both SPEN and Katie Hayward. |
| 30.08.16 | Letter         | Bruton Knowles | Notice of Second Stage Consultation being launched                                                                                                                                                                                                                            |
| 16.09.16 | Letter         | Bruton Knowles | Printed copies of summary documents sent to Felin Gafnan                                                                                                                                                                                                                      |
| 23.05.17 | Letter         | Bruton Knowles | Notice of Third Stage Consultation being launched                                                                                                                                                                                                                             |
| 28.07.17 | Email          | Fisher German  | Attaching copy signed licence agreement for 12 months                                                                                                                                                                                                                         |
| 02.08.17 | Letter         | Fisher German  | Requesting a meeting with representatives from National Trust and Horizon                                                                                                                                                                                                     |
| 05.10.17 | Letter         | Fisher German  | Enclosing cheque                                                                                                                                                                                                                                                              |
| 10.10.17 | Letter         | Fisher German  | Advising of survey access                                                                                                                                                                                                                                                     |
| 15.11.17 | Hotline call   | Katie Hayward  | Complaint about NGET work and enquiry relating to old footage used by the BBC incorrectly showing some of the National Trust land concreted                                                                                                                                   |
| 10.12.17 | Text           | Katie Hayward  | Complaint about noisy drilling work. Workers were asked to be mindful of local residents.                                                                                                                                                                                     |

| Date     | Contact type      | Originator     | Subject                                                                                                                                                                                                                                                                |
|----------|-------------------|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 16.01.18 | Letter            | Bruton Knowles | Notice of Consultation on additional land                                                                                                                                                                                                                              |
| 01.02.18 | Letter            | Bruton Knowles | Confirmation of Legal Interest in Land                                                                                                                                                                                                                                 |
| 09.07.18 | Letter            | Bruton Knowles | Confirmation of acceptance of DCO application                                                                                                                                                                                                                          |
| 16.10.18 | Letter            | Fisher German  | Advising of survey access                                                                                                                                                                                                                                              |
| 18.10.18 | Visit to property | Bruton Knowles | Repeat visit to Property 2 undertaken to confirm occupancy. PWIL form completed by the parents of Katie Hayward which confirmed that Katie's husband was the owner of Property 2 and her parents the tenants.                                                          |
| 25.10.18 | Letter            | Katie Hayward  | Regarding Felin Honeybees Limited and the Wylfa Newydd DCO Project's impact on the business and her home                                                                                                                                                               |
| 08.11.18 | Letter            | Bruton Knowles | Letter to Felin Gafnan and the registered address <sup>2</sup> of Felin Honeybees Limited enclosing updated referencing letter, PWIL form and plan (following the Examining Authority's consideration that Felin Honeybees Limited may have a relevant claim (PD-005)) |
| 19.11.18 | Telephone call    | Katie Hayward  | Phone call following receipt of updated referencing letter, PWIL form and plan (8 November 2018); Request to send all correspondence to Felin Gafnan.<br><br>Horizon's agent requested return of PWIL forms so that updated address is documented.                     |

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<sup>2</sup> Letter was originally sent to Felin Honeybees Limited' registered address in Essex.