

**From:** [James.Hooker@gov.wales](mailto:James.Hooker@gov.wales)  
**To:** [Wylfa Newydd](#)  
**Cc:** [daniel.patterson@wsp.com](mailto:daniel.patterson@wsp.com); [Ruth.Jones@wsp.com](mailto:Ruth.Jones@wsp.com); [Lee.Gordon@Weightmans.com](mailto:Lee.Gordon@Weightmans.com); [Helen.Robinson@weightmans.com](mailto:Helen.Robinson@weightmans.com); [Robin.Beckmann@gov.wales](mailto:Robin.Beckmann@gov.wales); [Gwenllian.Roberts@gov.wales](mailto:Gwenllian.Roberts@gov.wales)  
**Subject:** Interested Party 20011597 (Welsh Government) - Response to Deadline 2 (4th December 2018)  
**Date:** 04 December 2018 20:35:05  
**Attachments:** [18.12.04 Welsh Government - Written Representation Final for Submission.pdf](#)  
[04.12.18 Written Representation - Summary of Written Representation.pdf](#)  
[04.12.18 Final - WG Responses to ExAs FWQs - Final for Submission.pdf](#)

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FAO: Ms Kay Sully

## **Wylfa Newydd Nuclear Power Station DCO**

Good evening,

On behalf of Welsh Government please find attached:

### Written Representations

#### Responses to ExA written questions

#### Comments on updated application documents

The Welsh Government note that Horizon has submitted an amended DCO document at Deadline 1. The Welsh Government consider that at this juncture these changes are of a relatively minor nature and do not address the majority of comments raised by WG at the first DCO specific hearing on the 24<sup>th</sup> October, and that are subject of continuing ongoing discussion with HNP. Consequently we do not propose to submit formal comments at this time.

### Statement of Common Ground

Horizon Nuclear Power will be submitting an agreed first draft Statement of Common Ground between Horizon and Welsh Government.

### Notification of attendance at Issue Specific Hearings

- The Welsh Government will be attending the Socio-economic and Transport Issue specific hearings on the 7<sup>th</sup> and 8<sup>th</sup> January 2019. At the table will be legal counsel (QC/Junior Counsel) and relevant thematic specialist. In support will be various consultants and Welsh Government officials.
- The Welsh Government will be attending the DCO Issue Specific Hearing on the 9<sup>th</sup> January. At the table will be legal counsel (QC/Junior Counsel/Solicitor) and the Wylfa Newydd Spatial Planning Manager. In support will be various consultants.
- The Welsh Government intends to also attend the Environment Issue Specific Hearings on the 10<sup>th</sup> and 11<sup>th</sup> January. At the table will be legal counsel (to be confirmed who) and relevant environmental policy specialist. The purpose of attendance will be mainly as an observer and to clarify any points of Welsh Government policy, or answer Examining Authority questions (where this would not prejudice the role of Welsh Ministers in relation to the devolved consents that Horizon are also applying for). As identified in our Written Representation Welsh Government would expect that Natural Resources Wales would lead on providing comments on technical environmental matters.

I understand that confirmation of attendees needs to be provided on the 3<sup>rd</sup> January. It would be very useful to have sight of the agendas for the Issue Specific Hearings as soon as possible, and ideally before the Christmas break, in order to ensure that we can field appropriate representation.

### Attendance at the Accompanied Site Visit – 13<sup>th</sup>/14<sup>th</sup> February 2019

The Welsh Government would wish to attend the accompanied site visit, and would be

grateful if it were possible for 2 spaces to be reserved.

In respect of proposed locations to visit the Welsh Government would suggest that in addition to various viewpoints to see the main site and associated development sites the Examining Authority may also wish to visit:

- Cestyll Historic Park and Garden- views towards MOLF and view toward site (access can be arranged via Cadw/National Trust in liaison with Magnox/NDA).
- Menai Bridge viewpoint (to see the route for the 3<sup>rd</sup> Menai Crossing)
- Britannia Bridge (by vehicle) – to see the single lane traffic, existing junction arrangements, and (depending on time of day) existing congestion.
- The proposed Park and Share sites at: Bangor, Caernarfon, Four Crosses, and Gaerwen.
- The proposed shuttle bus routes (by vehicle) across the middle of Anglesey (as identified in Appendix D of the Welsh Government Written Representation).

Many thanks.

Kind Regards,

James

**James Hooker**

Wylfa Newydd Spatial Planning Manager/

[Rheolwr Cynllunio Gofodol Wylfa Newydd](#)

Welsh Government/[Llywodraeth Cymru](#)

Cathays Park, Cardiff/ [Parc Cathays, Caerdydd](#)

[CF10 3NQ](#)

[Tel/Ffon: 03000 255731](#)

[Fax/Ffacs: 02920 825622](#)

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Llywodraeth Cymru  
Welsh Government

# **WYLFA NEWYDD NUCLEAR POWER STATION**

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## **Summary of Written Representation**

DEADLINE 2 – 4 DECEMBER 2018



## ROLE OF WELSH GOVERNMENT

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Welsh Government is listed in legislation as a Statutory Party in respect of any Nationally Significant Infrastructure Project in Wales. Welsh Government has stated that in principle it is supportive of a new nuclear facility at Wylfa in the context of energy security, contribution towards meeting our decarbonisation agenda, and the potential social and economic opportunities that could be provided over its lifetime for future generations. However, this support is conditional on all the potential impacts in relation to key areas of interest to the Welsh Government being sufficiently mitigated.

The key areas of interest to Welsh Government are set out in this document along with a summary of key concerns in respect of those areas; potential impacts and how Welsh Government proposes those impacts should be mitigated. While the project would benefit the UK, Welsh Government is keen to ensure that the costs of mitigation are not borne by the Welsh public purse.

### Welsh Language: The Golden Thread

Welsh Government and Horizon agree that the need to protect and promote Welsh language and culture within the communities of Anglesey, Gwynedd, and North Wales is a golden thread that is essential to the development and delivery of Wylfa Newydd.



## PLANNING OBLIGATIONS AND DCO REQUIREMENTS

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### Draft DCO Requirements

On 24 October 2018, Welsh Government submitted comments on the draft Development Consent Order (DCO) to the Examining Authority. Welsh Government's comments were based on a preliminary review of the draft DCO and Welsh Government reserved the right to raise further detailed comments throughout the examination process.

Welsh Government focussed on nine key areas of the draft DCO that require amendment to enable Wylfa Newydd to be considered acceptable in planning terms, and to ensure it is respectful of the Devolution settlement and the devolved powers of Welsh Government:

- Marine requirements – Definition of discharging and enforcing authorities;
- Application of the Marine and Coastal Act 2009;
- Appeal Authority;
- Deemed Approval (Schedule 18);
- Statutory Nuisance (Article 10);
- Hedgerows (Article 75(4));
- DCO Requirements – use of tailpieces;
- DCO Requirements reliant on inadequate application documents; and
- Additional necessary DCO requirements as identified in thematic area topic section of the written representation.

Specific concerns regarding the DCO Requirements in relation to the principal issues raised through this Written Representation have been captured within each technical chapter.

### Section 106 Obligations

Welsh Government wishes to emphasise that it must be recognised that all the potential negative impacts of Wylfa Newydd could, if not sufficiently mitigated, fall entirely within areas of responsibility which are devolved to the Welsh Government. A key objective therefore for the Welsh Government during the DCO process is to ensure, all negative impacts are fully mitigated by Horizon and that the potentially significant costs to the public purse are avoided.

The Welsh Government is keen to fully respect and support the key role that the local planning authority, Isle of Anglesey County Council, will play in relation to the Section 106 agreement as host authority. Welsh Government will therefore work with Horizon, Isle of Anglesey County Council, other affected local authorities, and other key stakeholders as part of a Team Wales approach and focus its attention on:

- Mitigation of impacts which will be felt beyond the administrative boundary of Isle of Anglesey County Council and/or where legal responsibility or funding sits with the Welsh Government. Examples include: the strategic highway network, tackling rehousing in cases of homelessness in neighbouring local authorities, post-16 education and training, economic development across the region, health, heritage matters and tourism beyond Anglesey;
- The role of proposed Wylfa Newydd Major Projects Oversight Panel and contingency funding for mitigation if unforeseen impacts arise so to avoid the cost of mitigation being borne by the public purse; and
- Supporting IACC in its work to secure effective mitigation for Anglesey.

Welsh Government's comments on the section 106 agreement as submitted to the Examining Authority at Deadline 1 can be found on the Inspectorate's website. Welsh Government has raised detailed concerns in relation to three fundamental mechanisms that Horizon are relying on to deliver effective mitigation and monitoring for Wylfa Newydd:

- Wylfa Newydd Major Projects Oversight Panel;
- Workforce Accommodation Management Strategy; and
- Wylfa Newydd Employment and Skills Service.

Specific concerns regarding the planning obligations in relation to the principal issues raised through this Written Representation have been captured within each technical chapter.



## WELSH LANGUAGE AND CULTURE

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The Welsh language has official status in Wales and is a material planning consideration when determining planning applications. Both the Isle of Anglesey and Gwynedd have been recognised for their high concentration of fluent Welsh speakers and communities where Welsh is the main language of communication. The Isle of Anglesey and Gwynedd are traditional Welsh-speaking heartlands in Wales and include the second highest and highest proportion, respectively, of Welsh speakers throughout Wales, with 57.2% and 65.4% of the residents able to speak Welsh, respectively.

Horizon has submitted a Welsh Language Impact Assessment as part of the DCO application. The WLIA is a stand-alone document which identifies predicted effects, both beneficial and adverse, of Wylfa Newydd on the Welsh language and culture. An independently chaired Welsh Language Steering Group was developed by Horizon to guide the WLIA process. Welsh Government has outlined unresolved concerns which have been raised by Welsh Government and are discussed in more detail as part of this representation. These include:

- The Welsh Language & Culture Mitigation and Enhancement Strategy: More specifically, the delivery, timing and monitoring of the mitigation measures proposed.
- Sensitivity testing of construction workers and their distribution within the study area.
- The Code of Construction Practice: Approach to monitoring impacts and mitigation.

Welsh Government have raised the following concerns in relation to the draft S106 agreement:

- Welsh Language and Culture Co-ordinator: The responsibilities of the WLCC outlined in the draft S106 document, during the construction period and operational period, are welcomed by Welsh Government. However, the current wording allows far too much flexibility to amend/reduce these responsibilities as Wylfa Newydd progresses.
- Welsh Language Education (Annual) Contribution: The annual contribution, which will fund peripatetic teachers to support current Welsh immersion education, has not been defined. In addition, Welsh Government are concerned that a secured contribution has not been identified for Gwynedd Council.
- Community education obligation: Horizon are committed to maintaining any existing programmes of educational support. Welsh Government wish to see a well-defined document or description of Horizon's existing programme of educational support to agree transparency of such a commitment.
- Welsh Language and Culture Sub-Group: No information has been provided on how the impacts on the Welsh language and culture will be monitored, how Horizon will respond to impacts that occur, and how the mitigation will be secured or implemented. No Terms of Reference have been included for the Welsh Language and Culture Sub-Group.
- Community Language Services: These services will form part of the Community Involvement Officers (CIO) remit. The separate funding required to deliver the community language services, as outlined in the Environmental Statement, has not been defined;
- Community Translation Service Contribution: The contribution has not been defined in the draft S106 document;
- Interview Procedures: Welsh Government are requesting a commitment from Horizon that candidates for roles will have the opportunity to be interviewed in Welsh, if that is the language which they are most comfortable with, regardless of the role which they are applying for (even if Welsh is not a requirement for the role).



## EDUCATION, SKILLS AND LABOUR SUPPLY

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While it is acknowledged that Wylfa Newydd presents an opportunity for employment in North Wales, Welsh Government is concerned that there is a significant risk of displacement of skilled and experienced individuals. This could destabilise what is already a fragile economy, not only on Anglesey but across the wider North Wales region and further into Wales. With little spare current capacity in the labour force it will be difficult to replace workers that are employed on Wylfa Newydd.

Horizon has submitted a Jobs and Skills Strategy which sets out emerging thoughts on how Horizon can help to deal with these vacancies as they arise through a broad-based Wylfa Newydd Employment and Skills Service. The Jobs and Skills Strategy would be backed by a Skills Fund which would be secured by the section 106 agreement. Horizon's approach to the strategy is to plan for the skills the project will need, it will be a demand-led approach that focuses on employment opportunities and draws on up to date labour market forecasting.

Welsh Government welcome the inclusion of the Wylfa Newydd Employments and Skills Service and Skills Fund within the Jobs and Skills Strategy. However, there remain unresolved concerns which have been raised by Welsh Government in relation to:

- Insufficient information on the definition of the workforce and the types of roles and skills required in the construction and operation of Wylfa Newydd.
- Insufficient information on the Supply Chain Action Plan and Supply Chain Service.
- Payment terms for the construction workforce.
- The displacement of skilled workers across the several sectors, including construction, engineering & social care.
- The long-term funding/operation of the Wylfa Newydd Employment and Skills Service and specific parameters.
- The DCO application provides limited information about what the Skills Fund is, how it will be managed, when it will be available and for how long, as well as the mechanics of the monitoring group.

The Welsh Government wants to maximise the employment of local people on Wylfa Newydd without causing an adverse impact on the local labour market and economy, and enable residents to gain higher quality employment on the project.

Welsh Government request that the Examining Authority consider the following comments in relation to the draft DCO Requirements:

- Requirement to define 'local', 'visitor', and 'worker'.
- Requirement for 90% local operational workforce.
- A commitment from Horizon to provide training through the Wylfa Newydd Employment and Skills Service to enable residents within the North Wales region to gain higher quality employment.

Welsh Government have raised the following concerns in relation to the draft S106 agreement:

- Skills Fund: Further details and triggers in relation to the Skills Fund.
- Jobs and Skills Implementation Plan: Request for Horizon to provide terms of reference and a commitment to operational workforce.
- Wylfa Newydd Employment and Skills Service: Commitment to deliver, retain, and fund the WNESS. Clarification around the spatial coverage and responsibility of post-16 funds.
- Jobs and Skills Sub-Group: No information has been provided on how the impacts on Education, Skills, and Labour Supply will be monitored, how Horizon will respond to impacts that occur, and how the mitigation will be secured or implemented. No Terms of Reference have been included for the Jobs and Skills Sub-Group.



## ECONOMIC DEVELOPMENT AND SUPPLY CHAIN

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Welsh Government acknowledges Wylfa Newydd is one of the largest investments in Wales in a generation and provides the potential to make a significant contribution to the North Wales economy. Wylfa Newydd presents a unique opportunity for a stronger, more balanced, and diverse North Wales economy and skilled workforce.

Conversely, the potential adverse impact of economic displacement in the region arising during the construction period of such a large development cannot be underestimated. There is limited spare capacity in the local economy and job opportunities at Wylfa Newydd are likely to attract people in existing employment across the North Wales region. This will induce displacement of the local workforce and without proper intervention and mitigation, will have a huge impact on existing businesses.

Supporting the growth of the supply chain in Wales which can provide a valuable economic legacy well beyond the relatively narrow time parameters associated with the direct investment in site construction is a key issue for Welsh Government. In the short term, without an agreed and meaningful Supply Chain Action Plan focussed on Welsh business opportunities and suppliers, there is a real risk that a significant proportion of contracts and jobs will be sourced further afield, reducing the benefits for Wales.

Welsh Government has unresolved concerns in relation to:

- **Supply Chain Action Plan:** The Supply Chain Action Plan is being developed to support the realisation of the goals set out in the Supply Chain Charter. The Supply Chain Action Plan would be secured through the section 106 agreement. Welsh Government has not been provided with any detail about the Supply Chain Action Plan.
- **Supply Chain Portal:** Horizon is proposing a web-based procurement platform that allows interested suppliers to register for opportunities at the Wylfa Newydd project. Welsh Government has not been provided with any detail about the Supply Chain Portal.
- **Supply Chain Service:** The service will oversee the delivery and implementation of the Supply Chain Action plan and will be jointly formed of stakeholders and delivery partners from the Wylfa Newydd supply chain. Welsh Government has not been provided with any detail about the Supply Chain Service.
- **Supply Chain Value:** Welsh Government has not seen any commitments from Horizon regarding Key Performance Indicators or targets associated with the Supply Chain Action Plan.
- **Displacement of local workforce:** Displacement is a potential negative impact of the construction of Wylfa Newydd. Welsh Government has raised concerns with Horizon. Welsh Government have provided their own evidence base in support of this concern through the Written Representation.

Welsh Government request that the Examining Authority consider the following comments in relation to the draft DCO Requirements:

- A commitment from Horizon to provide detail on how Wylfa Newydd will ensure local businesses are involved in the supply chain during the construction and operational phases.
- To monitor supply chain activity to determine whether the benefits are being realised.

Welsh Government have raised the following concerns in relation to the draft S106 agreement:

- **Supply Chain Action Plan:** Request for Horizon to provide terms of reference and identify the potential scale of the supply chain and local economic value.
- **Supply Chain Sub-Group:** No information has been provided on how the impacts on economy and supply chain will be monitored, how Horizon will respond to impacts that occur, and how the mitigation will be secured or implemented. No Terms of Reference have been included for the Supply Chain Sub-Group.
- **Economic Development Officers:** Wylfa Newydd will introduce regional impacts on local businesses and employment. There is a need to ensure that any economic development mitigation operates on a regional basis.



## TOURISM

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Welsh Government recognise that the construction and operation of the Wylfa Newydd project is likely to have significant effects on the tourism sector in Anglesey with wider impacts felt within Gwynedd and Conwy and the wider North Wales region. It is the objective of Welsh Government to ensure mitigation for the tourism sector from both the short and long term adverse impacts associated with the Project, and continue to grow a world-class sector.

Welsh Government has recognised the following key impacts on the tourism sector:

- **Accommodation:** The impact of Wylfa Newydd workers staying in tourist accommodation. There is the impact on the tourists themselves who may find that there is less availability in existing accommodation, at potentially higher prices. There is also the impact on the accommodation itself, in terms of quality of what is on offer (due to lower expectations and requirements of workers);
- **Wider regional impacts:** Welsh Government have raised concerns relating to the consideration of impacts on tourism beyond Anglesey, in the wider North Wales region;
- **Displacement of current tourism staff and skills:** Welsh Government consider that there is a risk of displacement of workers currently in the Anglesey (and North Wales) tourism sector, when there is a competing offer of Wylfa Newydd work. Welsh Government acknowledges the potential benefits and investment which could be brought to the area, but consideration needs to be given to mitigating this risk for existing employers; and
- **Perception / Anglesey tourism brand:** There is a potential impact on the reputation of Anglesey as a high-quality tourism brand. During the construction phases, but also continuing into the operation of the power station, visitors and tourists could be deterred from visiting the area because of the development of Wylfa Newydd.

Welsh Government have raised the following concerns in relation to the draft S106 agreement:

- **Tourism (annual) Contribution:** Further detail regarding the value and calculation of the fund, the regional contribution, the availability of the tourism fund, and triggers for release of the fund.
- **Tourism (Contingency) Fund:** The impacts on tourism will be felt at the regional level. The draft S106 Agreement should include a contingency fund for other stakeholders to call upon.
- **Tourism Officer Contribution:** Wylfa Newydd will introduce regional impacts on the tourism sector, including Gwynedd and Conwy. There is a need to ensure that any mitigation (and monitoring) operates on a regional basis.
- **Tourism (Welsh Government Annual Contribution):** Welsh Government have requested further clarification behind the purpose of providing the Great Britain Tourism Surveys to the Tourism and Leisure Sub-Group
- **Visitor Centre:** Horizon have not committed to building or operating a visitor centre beyond obtaining planning consent. Welsh Government request a commitment in the S106 Agreement for Horizon to build and operate the visitor centre throughout the operational life of the project.
- **Tourism and Leisure Sub-Group:** No information has been provided on how the impacts on tourism will be monitored, how Horizon will respond to impacts that occur, and how the mitigation will be secured or implemented. No Terms of Reference have been included for the Tourism and Leisure Sub-Group.



## TRANSPORT AND INFRASTRUCTURE

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Transport is a key issue for the Welsh Government in considering Wylfa Newydd. Wylfa Newydd has a significant transport requirement both in terms of construction logistics and travel patterns of construction workers. Without appropriate intervention, both construction and operation traffic will exacerbate existing congestion on the trunk road network, have a detrimental impact on road users and local communities, and weaken response times of the emergency services.

Welsh Government is concerned that the Horizon travel plan is overly complex, is excessively expensive to secure, lacks appropriate controls, and will be difficult to enforce. The failure of the travel plan to deliver the proposed mode share will lead to Horizon failing to achieve the objectives of the ITTS, specifically to encourage the use of sustainable travel and reducing the need to travel.

A consequential impact of the failure to reduce the number of car movements will be a failure to meet the objective to enhance highway capacity and safety. Additional vehicle kilometres travelled in the network will lead to an absolute increase in the number of collisions. Fly-parking will clutter up the highway reducing its capacity and potentially reducing visibility at junctions and along the carriageway which also increases the likelihood of collisions.

Welsh Government have requested the following requirements which must be attached to the DCO:

- Construction Traffic Management Plan: Requirement for Abnormal Indivisible Load Management Plan and overarching Construction Traffic Management Plan outside of the Wylfa Newydd Code of Construction Practice. Construction Traffic Management Plan and Code of Operational Practice must be agreed with Welsh Government before construction commences.
- Accommodation of workers: The number living in the temporary worker accommodation must be monitored to demonstrate it will reach 4,000 workers by 2023 or corrective action must be taken. Horizon must report the number of workers living within 600 metres of a bus route to demonstrate that the key assumption about mode choice and mode share is correct.
- Travel Plan Officer: Travel Plan officer needs to be appointed before construction commences.
- Shuttle bus services: Demand-related shuttle bus services has to be agreed and Horizon has to demonstrate that the routes, frequency and types of vehicles will be available to workers for a contracted period, usage of the bus services has to be recorded by service to fulfil the objectives of the Travel Plan.
- Park and ride at Dalar Hir: Horizon must demonstrate that the shuttle bus service between Dalar Hir and the Wylfa Newydd Development Area is in place and will remain operational during the construction phase, and park and ride at Dalar Hir must be operational before Construction commences and have 1,900 spaces by 2022.
- Parking at the WNDA: All cars and the number of passengers arriving at the WNDA need to be counted on an hourly basis each day to calculate the average car occupancy to demonstrate that the Travel Plan is operating.
- Highways: Horizon must protect the local highway network from fly-parking by removing illegally and / or inconsiderately parked vehicles at its expense and A5025 highway improvements must be complete/open by 2020.
- Freight: Clear commitments preventing pouring of nuclear concrete until the MOLF is delivered or limiting HGV movements to a maximum of 320 per day throughout the construction period. Logistics centre must be operational before Construction commences, a system to track construction related traffic using the A55 and Britannia Bridge must be provided and the number of construction related vehicles crossing Britannia Bridge recorded on an hourly basis; and threshold for construction related vehicles using Britannia Bridge.

Welsh Government have raised the following concerns in relation to the draft S106 agreement:

- A commitment to additional park & ride sites.
- Contribution to the Third Menai crossing.
- Clear commitments preventing pouring of nuclear concrete until the MOLF is delivered or limiting HGV movements to a maximum of 320 per day throughout the construction period.
- Contingency funding for unforeseen impacts on the strategic road network



## DIGITAL INFRASTRUCTURE

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New infrastructure developments have the potential to impact on the digital communication network both directly (through physical obstruction to telecommunication links and construction activities) and indirectly through usage of the existing networks and reducing capacity. The Wylfa Newydd development is no different, through this examination process Welsh Government want to ensure that:

- The population of Anglesey and North-West Wales do not suffer any degradation of digital connectivity;
- The emergency response services do not suffer any degradation of digital connectivity; and
- Horizon are committed to delivering a reliable digital communication network solution for their staff (throughout the life of the project) which does not have a detrimental impact on the existing networks.

At peak, 9,000 workers will be accommodated in the North-West Wales region, 4,000 of which will be accommodated within the Temporary Worker Accommodation (TWA). Without intervention, Welsh Government are concerned that businesses, citizens and the Wylfa Newydd construction workforce will experience a degraded digital communication experience due to additional capacity constraints across the networks.

There is currently no evidence within the DCO application that Horizon have considered the impact on the digital communication network. In addition, there is no evidence that the consultation responses provided by Welsh Government have been captured in the Consultation Report.

Welsh Government requests that Horizon conduct an urgent audit of existing digital networks infrastructure to fully understand the potential implications of introducing congestion and performance degradation to the existing network. Welsh Government will continue to work with Horizon in preparing an appropriate specification and identifying contractors where appropriate.

Welsh Government request that Horizon make a commitment that, subject to the conclusions of the technical assessment, Horizon will deliver a reliable digital communication network solution which mitigates the potential degradation of existing networks. In any event Welsh Government would expect this to be a priority for Horizon as part of the offer to promote the uptake of bedspaces on the Site Campus.



## HEALTH AND WELLBEING

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It is essential the Wylfa Newydd does not have an adverse impact on health and well-being. There is a need to ensure that an increase in population during the construction phase does not lead to a reduction and/or deterioration in the access and quality of services for the local communities and population of North Wales. Welsh Government has unresolved concerns in relation to:

- Site Campus Medical Centre: This facility would be available for the onsite medical and healthcare services for which the construction workforce would have to register for in order to make use of, rather than making use of the community NHS services.
- Non-home-based workers: there will be approximately 3,000 non-home-based workers (and associated dependents), who will make their own provision for accommodation in Anglesey or the mainland;
- Community Involvement Officers: Horizon will appoint a bi-lingual CIO who would be a “key interface between the local community, key stakeholders and Horizon management”.
- Safeguarding vulnerable groups: Safeguarding would be a key focus of the health monitoring group which would be set up to implement the HIA mitigation strategy. Horizon have discussed that they will produce a Community Safety Management Strategy.
- Displacement of healthcare and social care service workforce: Horizon have identified that there would be the movement of workers between roles during construction (defined as labour churn). The HIA has recognised that the health and social care community sector has challenges in employing people in these roles, and that the quality of the service in the area could decline in quality if it is harder to retain or recruit staff.
- On-site and off-site workforce behaviour: an impact on traffic and transport through increased congestion could affect health trip related journey times, particularly as the main hospital services for Anglesey are based in Bangor. Horizon have committed to the appropriate provision of emergency services for the construction workforce.

Welsh Government have requested information and/or clarification of the following:

- A detailed specification of the medical services which would be delivered on the Site Campus Medical Centre;
- Health insurance checks should be included for European Union citizens and international construction workers;
- Further clarification and assessment work is required to agree appropriate demand estimates that inform mitigation and monitoring measures relating to the delivery of community health services (i.e. dentistry and pharmacy) to support off-site construction workforce;
- Confirmation that the free NHS prescriptions offered in Wales will be covered for the construction workforce;
- A more detailed assessment is required in relation to safeguarding and health protection;
- Horizon will need to provide support to IACC and BCUHB in developing Workforce Strategies to help mitigate the displacement of the healthcare and social care workforce as a result of the employment offer at Wylfa Newydd. Further evidence and mitigation measures are required, for example relating to skills and training;
- Welsh Government would welcome a commitment from Horizon to provide support for the workforce relating to health promotion and occupational health activities, both for mental and physical well-being; and
- Further detail is required about contingency planning for the emergency services. There should also be further information on the proposed financial contribution associated with that contingency plan.

Welsh Government has requested the following requirements are attached to the DCO:

- Clarification about controlled occupancy of the Site Campus Health Facility and provision of dentistry.
- Welsh Government cannot agree to the proposed mitigation for protecting safeguarding groups until Horizon have provided the Community Safety Management Strategy.

Welsh Government have raised the following concerns in relation to the draft S106 agreement:

- Welsh Government requests that the s106 includes a provision to agree a protocol for referrals to NHS services and ensures delivery of mitigation through a firm commitment to deliver the on-site medical facility (at the appropriate time) and that all necessary financial contributions are also secured.
- There are no Terms of Reference included for the Health and Wellbeing Sub-Group. Welsh Government request that the S106 agreement includes the Terms of Reference for the Tourism and Leisure Sub-Group.



## HOUSING AND ACCOMMODATION STRATEGY

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Welsh Government is concerned about the impact of Wylfa Newydd on the housing market and those seeking accommodation (construction workers and the local community) and that this will extend across the Socio-economic Key Study Area (KSA) and potentially into other parts of North Wales. The inadequate consideration for the accommodation of the construction workforce could give rise to adverse impacts including but not limited to:

- Pressure on the local housing stock (particularly the private rented sector, and tourist accommodation).
- Reduced provision and choice of accommodation for local households at an affordable price (both first time buyers and those wishing to rent privately).
- Risk of displacement and homelessness within the local community (including Welsh speakers).

Mitigation measures are required to deal with these potential adverse impacts and the type and scale of these are set out at the end of the chapter. The measures identified are those which the Welsh Government considers necessary to support the implementation of the Workforce Accommodation Strategy put forward by Horizon and to deal with potential impacts that are not foreseen (contingency) and are over and above measures to implement the Strategy.

Welsh Government have raised the following concerns/comments in relation to the draft DCO Requirements:

- **Temporary Worker Accommodation:** To avoid impact on the housing market, there needs to be a clear mechanism to ensure earlier delivery (as well as a commitment to ongoing occupancy) of the TWA. This should be secured through a Requirement in the DCO and will need to commence in Year 1, with future delivery to keep pace with the build-up in demand. While responsibility for attaining the agreed occupancy will remain with Horizon, some specification of the mechanisms may be useful (e.g. price reductions until the accommodation is utilised). There needs to be an agreement mechanism for monitoring the extent which Horizon's assumptions for the TWA are realised, and agreement on scaled measures for both driving compliance with those assumptions, and for additional mitigation if it is found that the gap between assumptions and practice is unable to be closed quickly.

Welsh Government have raised the following concerns in relation to the draft S106 agreement:

- **Workforce Accommodation Management Service:** To properly monitor take up of accommodation including location, type and cost, all workers should be automatically registered with WAMS. The efficiency of the service and standard of accommodation offered should be sufficient to encourage workers to use the service. Where the service is not subsequently utilised effort should be made to obtain details of the alternative arrangements made (whilst respecting the rights of individuals to make own accommodation choices). Appropriate recording systems will need to be maintained and these will accord with relevant data protection regulations. Monitoring information will need to be shared with the oversight board.
- **Housing Fund (and Contingency Fund):** While Horizon's proposal for a flexible housing fund is welcomed, there is little detail about the scale and how this relates to the level of impacts that may occur, as well as its operation. In addition to the main Housing Fund, a Contingency Fund should also be set up to fund measures to mitigate the impacts on the local community of adverse outcomes not foreseen in the Workforce Accommodation Strategy.



## HISTORIC ENVIRONMENT

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Cadw acknowledge that changes in the historic environment are inevitable. However, to enable the historic environment to deliver rich benefits to the people of Wales, any impacts and changes to significant historic assets must be managed in a sensitive and sustainable way. The Wylfa Newydd project has the potential to affect nationally important heritage assets, particularly on the Isle of Anglesey.

Cadw has unresolved concerns in relation to:

- The substantial harm on Cestyll (Grade II) Registered Park and Gardens.
- Exclusion of temporary sewerage treatment plant, located within Essential Setting of Cestyll Gardens, from the Environmental Impact Assessment.
- Horizon's proposed mitigation strategy for Cestyll Gardens.
- The potential impacts and mitigation strategy for buried archaeology within and around the Wylfa Newydd Development Area.
- The mitigation and restoration strategy for historic buildings.
- The setting impacts on Trelignath Burial Chamber Scheduled Monument.

Welsh Government have raised the following concerns/comments in relation to the draft DCO Requirements:

- Provision of a Conservation Management Plan: There is a need for a Conservation Management plan with clear binding commitments. There is a significant adverse impact on the Cestyll (Grade II) Registered Parks and Gardens and currently a lack of commitment to implement the mitigation measures.
- Written Scheme of Investigation: Welsh Government need a commitment from Horizon to provide WSI for protecting all historic assets which remain in-situ on-site. In the event Horizon do not comply with the strategy, Horizon will be required to complete any excavation works prior to commencement of construction of the authorised development.
- Recording/assessment/archiving of artefacts: Welsh Government request a DCO Requirement committing Horizon to carry out assessment and analysis of any artefacts discovered (including appropriate archiving/recording) or provide appropriate funding for a third party to manage these works.

Welsh Government have raised the following concerns in relation to the draft S106 agreement:

- Provision of Historic Environment Fund: To deliver the Conservation Management Plan and long-term management of historic assets (including Cestyll (Grade II) Registered Parks and Gardens and Listed Buildings).
- Provision of funds for excavation assessment and analysis: There is a need for Horizon to provide a commitment to the provision of funds for the assessment, recording and archiving of artefacts found during onsite excavations.
- Restoration fund: There is also a need for Horizon to provide a commitment to the provision of funds for restoring historic buildings in the event of damage as result of construction activities.

## ENVIRONMENT

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Wylfa Newydd will have an impact on air quality, flooding, waste and water supply, and Welsh Government has a commitment to monitor, manage and reduce the impact of development on the natural and built environment.

There has been agreement that Welsh Government will provide comments in relation to Welsh environmental policy. However, the Welsh Government's environmental advisor, Natural Resources Wales (NRW), will lead on providing technical environmental issues, which includes matters such as Habitats Regulations Assessment (HRA).

Welsh Government have reviewed and considered the relevant parts of the DCO documentation in relation to the Wylfa Newydd project.

- Flooding: The Flood Consequence Assessment (FCA) produced by Horizon as part of their environmental assessment. This has identified a higher risk of flooding to residential properties upstream of Cemaes, as well as a potential increase in flood depth on Cemlyn Road. Welsh Government require clarification on how the Technical Advice Note (TAN) 15 tests have been considered as part of the DCO.
- Waste Management: Horizon have provided clarification on why there was an increase of 50,000 tonnes for the volume of waste from construction and demolition.
- Water supply and water stress: Horizon have stated that the foul water produced in the construction area and from the Site Campus would be treated in a package plant near the coast at Porth-y-pistyll and the existing Dŵr Cymru Welsh Water (DCWW) Cemaes Waste Water Treatment Works, respectively. The existing Cemaes plant would have to be upgraded (possibly supplemented by a package plant), if the TWA is fully occupied by the maximum 4,000 workers. There needs to be full details of how the water treatment solution would be upgraded to facilitate all the workers and services on the Site Campus.

Welsh Government have raised the following concerns/comments in relation to the draft DCO Requirements:

- DCO requirement for Horizon to produce relevant Site Waste Management Plans for WNDA and Associate Developments prior to Commencing construction of those elements.