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OFFICIAL

Dear Mr. Hawthorne,

RESPONSE TO THE HORIZON NUCLEAR POWER WYLFA NEWYDD PROJECT PRE-APPLICATION CONSULTATION – STAGE THREE (PAC3)

I am writing to you on behalf of the Isle of Anglesey County Council (“IACC” or “the Council”) setting out its formal response to the PAC3 consultation. In doing so, I am following a similar approach and structure to that adopted in response to the previous consultations. This is with the aim of demonstrating consistency and transparency through a coherent narrative of the IACC’s position as Horizon Nuclear Power’s (“Horizon”) proposals for the Wylfa Newydd Project have evolved and substantially changed over time.

This response follows and builds on previous consultation responses in highlighting key issues and is not an exhaustive assessment of the proposals. The IACC has acted in good faith in presenting high-level views on various points including potential mitigation measures. However, there is an absence of detail in this PAC3 consultation which is unacceptable. Therefore, these comments are offered as guidance and a basis for further discussion as without a detailed picture of the proposals, it is not possible to measure the impacts and effects nor to assess the level of mitigation required.

As highlighted in the IACC’s response to the Statement of Community Consultation (SOCC) in April 2017, it is unacceptable and contrary to the objective of promoting meaningful consultation that the PAC3 consultation was limited to the minimum statutory period of 28 days (30 days with Bank Holidays). With changes to the design and layout of the power station, changes to the consenting strategy as well as fundamental changes to the worker accommodation strategy, the IACC believes that these are significant changes which merited a longer consultation period. As noted previously, the consultation could also have included significantly more detail and information on these changes in order for the IACC and the public to meaningfully consider and respond.

This letter and the following appendices constitute the IACC’s response to the PAC3 consultation. This consultation response has regard to national policy statements and relevant guidance on the consultation process.

- Appendix A – High Level Strategic Report
- Appendix B – PAC2 / PAC3 Summary of changes table

BACKGROUND

The IACC Vision for the New Nuclear Build at Wylfa, as set out in the Wylfa Newydd Supplementary Planning Guidance, is that it is “a positive driver for the transformation of the economy and communities on Anglesey, providing sustainable employment opportunities, improving the quality of life for existing and future generations and enhancing local identity and distinctiveness”. This Vision translates into a set of seven key objectives:

1. *Contributes to the delivery of the Anglesey Energy Island Programme and the Anglesey Enterprise Zone, placing the island at the forefront of energy research and development, production and servicing;*
2. *Drives the transformation of the Anglesey and North Wales economies and maximises opportunities for the employment and upskilling of local people;*
3. *Delivers significant and enduring infrastructure benefits to the Island’s communities;*
4. *Supports improvements to the quality of life (including health, wellbeing and amenity) of the Island’s residents, visitors and workers during its construction and operation;*
5. *Recognises and strengthens the unique identity of the Island and its communities;*
6. *Promotes the sustainable movement of people and materials and provides resilient transportation infrastructure capable of attracting and sustaining economic growth and creating sustainable communities; and*
7. *Conserves and enhances the Island’s distinctive environment and resources, taking into account climate change.*

The continued support of the IACC for the Project is based on the expectation that this Vision and these objectives are going to be met.

KEY ISSUES

The key issues outlined below are in headline terms to avoid repetition. They therefore need to be read in conjunction with the more detailed comments in the Appendices.

1 Level of PAC3 Information

- 1.1 Despite PAC3 being welcomed as a means of consulting on the proposed changes since PAC2, it lacks the substance and detail necessary to enable the IACC to properly comment. In IACC’s view, the PAC3 consultation has been insufficient and inadequate as it has not provided the necessary level of information to allow full engagement with and meaningful comment to be given by the Council. Horizon should note that the adequacy of consultation is of key importance and, if not addressed now, potentially will become an issue later in the process.
- 1.2 This lack of detail means that the IACC are not able to meaningfully assess the potential impacts of the project, examine the validity of Horizon’s proposals or to influence and shape the proposals. Given that Horizon are proposing to submit the DCO application in 2017, the IACC would have expected to have been consulted on a revised draft Preliminary Environmental Information Report (PEIR) / Environmental Impact Assessment (EIA).
- 1.3 Given that Horizon have advised that this is the final consultation prior to submission the IACC is unlikely to see the required detail until the DCO application is submitted. This is unacceptable in a process which is designed to be front-loaded. IACC understand that Horizon intend to share the outputs of assessments and further details prior to submission. IACC stress that this is now essential. Once submitted there will be limited ability to change any of the DCO elements. The DCO consultation process

is designed to allow consultees to influence the project through iterative design. This approach has not been followed with the information necessary to provide meaningful responses and influence the project. This is despite fundamental changes to the project at a very late stage in the process. It is contrary to the ethos of the DCO regime that detail on major elements and their impacts will not be available until submission. The Council cannot meaningfully assess the impacts and appropriateness of the proposed mitigation. The IACC note that the Planning Act 2008: Guidance on the pre-application process states:

“The pre-application consultation process is crucial to the effectiveness of the major infrastructure consenting regime. A thorough process can give the Secretary of State confidence that issues that will arise during the six months examination period have been identified, considered, and – as far as possible – that applicants have sought to reach agreement on those issues”.

- 1.4 Given the above guidance, we are concerned about the ability of the IACC to enter into meaningful engagement with Horizon on the content of a Statement of Common Ground, without the necessary detailed information. We also note that the lack of detail provided has also been raised as an issue by other statutory consultees and by the Planning Inspectorate in the 2017 scoping opinion¹. Horizon is pushing the provision of detail to an inappropriately late stage in this process and making it difficult for consultees to engage properly and fully. For example, it is still not clear exactly what it is proposed to include in the DCO as enabling works; PINS note that *“it is unclear which elements of the SPC works the Applicant intends to seek consent for through the TCPA regime and which elements through the NSIP regime”*. The need for the DCO application to be well prepared and to justify and evidence the decisions made was reiterated by PINS².
- 1.5 Horizon’s “optimisation process” has resulted in the concentration of the project and its impacts in North Anglesey - for example the proposal is now for up to a maximum of 4,000 workers all to be located adjacent to the main construction site with another 1,032 in the immediate area. With Temporary Construction Workers Accommodation (TCWA) for up to 4,000 workers on-site and over 1,000 workers expected to live in existing accommodation in North Anglesey (PRS, latent, owner occupied and tourism accommodation), this will put significant added pressures and impacts on North Anglesey and its communities. The IACC cannot accurately assess these impacts without the evidence base being shared.
- 1.6 Within PAC3 there are a number of statements of commitment to plans, measures or provision of mitigation in varying forms. These are welcomed, but without detailed provisions on scale, timing, funding, delivery measures and monitoring regimes, these ‘commitments’ amount to no more than generalised statements of intention, with no certainty that the mitigation will be secured and delivered. Progress is critical prior to DCO submission.
- 1.7 In approaching this issue the IACC introduced the concept of a Community Resilience Fund. Given the complexity of the Project there is a need to deliver a mitigation response that has sufficient flexibility to respond to what is going to be a very dynamic and complicated construction process. As a means of responding to some of the uncertain impacts, a Community Resilience Fund would:

¹ Planning Inspectorate Scoping Opinion, Proposed Wylfa Newydd Project, Planning Inspectorate Reference: EN010007, June 2017

² PINS Note of meeting on 07 June 2017

- respond decisively to unexpected, unquantifiable and unforeseen impacts;
- address the consequences of development;
- specifically target and empower local people in responding to the impacts of development; and,
- be intentionally flexible in order to be able to address impacts as they occur and tackle the problem of unusable funds arising from overly restrictive distribution criteria.

- 1.8 In addition to other forms of mitigation, including financial contributions, the IACC believes there is a very strong case for a Community Resilience Fund (CRF) to be provided as part of the Development Consent Obligations to mitigate against any unquantifiable or unexpected impacts as a result of the project, even with provision of additional information as part of a DCO application. The IACC note that EDF Energy agreed the principle of a Community Fund specifically for this purpose within their Section 106 with Somerset Councils in relation to the Hinkley project DCO. Whilst the IACC appreciate there are differences between the Wylfa and Hinkley projects, Hinkley did not have this concentration of workers on the main site, the impact of which is likely to be very significant.
- 1.9 The principle of such a fund is considered to be essential in *“building the genuine partnerships with the communities which Horizon plan to be part of”* over the next 100 years and more.
- 1.10 The Community Resilience Fund should take account of the proximity principle and needs to address the unquantifiable impacts on North Anglesey hosting this major construction project for up to 10 years.

2 Jobs and Skills

- 2.1 The major change from PAC2 to PAC3 is the revision in workforce numbers. Peak demand for labour has fallen from 10,700 to 8,500; this equates to a 20% reduction in the workforce which is a significant change. Horizon has, however, assumed a peak of 9,000 for assessment purposes. The new workforce profile has also meant a change to peak demand, which is now set to occur in 2023 rather than 2022.
- 2.2 IACC’s response to PAC2 set out its desire to see local employment above the previous 2,700 (25%) level but we note, with concern, in the PAC3 documentation that the percentage of local employment has decreased to 2,000 (22%). No evidence has been provided to justify why this already low figure has decreased. This decrease in local employment during the construction phase both in actual numbers and percentage terms is unacceptable. The IACC notes that a major contributing factor towards the project having a positive effect is through the provision of local and regional employment and business opportunities. The reduction in local labour, coupled with the increased impacts in the north of the Island, is not welcome. The aspiration for local labour should be much higher and why it has been set at such a low level requires justification. The IACC and Horizon must now work together, along with other partners, to put in place robust mechanisms to increase the local labour percentage (noting that the local labour target is set at 34% at Hinkley Point C). There is no justification to specify why the local employment figure and percentage cannot be higher. A higher figure is entirely achievable with a greater commitment towards training and equipping the local people to be part of the labour pool.
- 2.3 As specified in the IACC’s response to PAC2 (Appendix A – Paragraph 3.5) there are clear opportunities to significantly increase this percentage. Consequently, it is not

clear to IACC why the share of local workforce jobs has not risen. Had the percentage of local jobs in the project remained fixed at PAC2 levels, the local share of the new workforce jobs profile would have been closer to 30% at peak which itself is closer to the target set for Hinkley Point C (of 34%).

- 2.4 Horizon has stated that they expect “up to 85%” of the operational jobs to be taken by local residents. IACC would like this to be a minimum level with a target of 100%. Linked to this IACC would request clarity regarding when and how this target will be monitored over time. Indeed, this also applies to the monitoring and achievement of construction jobs. The IACC do acknowledge and welcome the fact that the target of 45% has increased significantly since PAC2 and welcome detail on strategies and interventions adopted to ensure this is the case.
- 2.5 The provision of funding for a capital investment programme for schools is welcomed, however its timing after the implementation of the DCO is not acceptable and investment is required **now**. Whilst we appreciate the risk of investing pre-final investment decision (FID), this requires to be balanced against the consenting risk to the project of not satisfactorily avoiding greater adverse impacts by employing a smaller number of local people. Given that education and training facilities will need to be designed, consented and built before courses can begin, the likelihood is that the construction will be virtually finished by the time any student is in a position to have benefited from the investment proposed. Communities will have therefore suffered the considerable impact of hosting the construction project and the only ‘real’ offer to the young is the chance of a job during operation. The IACC insists that Horizon review their programme for investment in education and training facilities to ensure local employment targets are met. Evidence from Somerset in relation to Hinkley Point C reveals that it has taken 5 years for the benefits of an “education inspire” programme to show demonstrable impact on the types of courses being studied and the skills of young people at the end of their education being sufficiently good to enable them to successfully enter the workforce.
- 2.6 Whilst the IACC wish to maximise local take up of Wylfa Newydd jobs, it is mindful that there could be a trade off with potential displacement, unless appropriate steps are taken to boost the supply side of the economy. We note that the IACC and Horizon have a differing view on displacement which needs to be further discussed and resolved prior to the submission of the DCO.
- 2.7 The IACC remain committed to continued collaboration to ensure that the people of Anglesey and across North Wales are able to take full advantage of the employment opportunities during the construction and operation of Wylfa Newydd.

3 Economy and Supply Chain

- 3.1 Horizon have noted that they will shortly commence a trial of the Wylfa Newydd Employment and Skills Service with the aim of centrally locating all Project job vacancies. This is welcomed and is a positive step forward where there has been constructive and encouraging collaborative working to date. It is vitally important that this work is increased in intensity to ensure that opportunities for local people are maximised.
- 3.2 The IACC recognise the steps taken to develop a Supply Chain Action Plan and efforts to register companies via Early Constructor Engagement contracts. However, the IACC would like more detail and evidence that local business opportunities will be maximised. For example, any additional information that would show the types and size of contracts that will be available could, at this stage, encourage further

engagement from Anglesey businesses. The IACC require that local companies are given opportunities to participate fully in the supply chain during construction and operational phases. For example that Bus Services, Food and Catering, Laundry Services (not exhaustive) are provided by local companies so that socio-economic benefits of the project are maximised.

- 3.3 The IACC require Horizon to invest in a Supply Chain Investment Team now to enable the best possible chance for local businesses (individually and collaboratively) to successfully compete for and win work. The stated commitment to supply chain support delivers nothing without suitable implementation of a detailed, funded and monitored delivery plan. Identifying suitable businesses, providing clear advice on the training, skills and accreditation necessary to win work, allowing the opportunity and providing funding for businesses to come together to collaborate is essential. The equivalent service for the Hinkley Point C project was in place 5 years before the Final Investment Decision and the majority of contracts let to local firms have followed collaborative agreements.
- 3.4 The IACC remain committed to continued collaboration to ensure businesses on the Island and across North Wales are able to participate and take full advantage of the opportunities created by the construction and operation of Wylfa Newydd.

4 Worker Accommodation/Housing

- 4.1 There has been a significant and fundamental change in Horizon's Construction Worker Accommodation Strategy since PAC2. In PAC2, Horizon had a range of construction worker accommodation options (including Land and Lakes, Madyn Farm and Rhosgoch). Now Horizon propose to house up to 4,000 workers on-site in temporary workers accommodation (TWA) and 3,000 in existing accommodation. This has not been mentioned or included as a potential option in any formal consultation prior to PAC3.
- 4.2 There is a total lack of detail on the proposals to house 4,000 workers on site. No impact assessments have been provided and no evidence produced to allow mitigation to be considered or proposed by the Council. This is fundamentally at odds with the approach set out in DCO process guidance. The lack of detail on these proposals extends to even basic information on the campus. This is also noted in the PINS 2017 scoping opinion³ which states that *"details of the on-site accommodation campus are limited and its location has not been identified"*.
- 4.3 The IACC can see that Horizon might require some limited presence on site due to operational requirements (as per the previous proposals for 500 essential workers to be accommodated on site). However, the greatly increased scale of the current Temporary Construction Workers Accommodation campus is of major concern. This will effectively be the **3rd largest community/settlement** on the Island (behind Holyhead and Llangefni with Amlwch currently having a population of 3,700 (Census 2011)). The lack of detail in PAC3 means that the IACC cannot assess the potential environmental, social and economic impact of such a major development in a rural area like North Anglesey. This is unacceptable at this late stage in the process.
- 4.4 The control and management of the workers is of major concern from a social and community perspective. More detail is required on the off shift workers and their

³ Planning Inspectorate Scoping Opinion, Proposed Wylfa Newydd Project, Planning Inspectorate Reference: EN010007, June 2017 at 2.56

discretion to leave the TWA. There is a fundamental lack of detail on the Workforce Management Plan and worker behaviours. The IACC requests a detailed Community Impact Assessment to inform its consideration, at this late stage in the process, of up to 4,000 bed TWA facility on site.

- 4.5 Phasing of development is also a cause for concern. The bulk of the TWA will not be ready until 2022-2023. This will put increased impact on existing accommodation. Horizon focus on peak year but impacts will be felt either side of peak. **If** the TWA approach is to be pursued the IACC insists that the 1st phase of the construction workers accommodation is constructed immediately following FID and is available for the start of Main Construction.
- 4.6 The lead in time for the delivery of any additional accommodation (within existing stock or via new build) is significant. The IACC is aware that it has taken 3 years for the Somerset Councils to deliver around 800 bed spaces following the payment of s106 contributions. The PAC3 material indicates that the DCO is expected to be granted in 2019 and the workforce profile indicates that by the end of 2020 the workforce expected to comprise 5000 workers. The indicative phasing for the on-site campus is that it will not be operational until 2021 and then only providing 1000 bed spaces. Further details are urgently required from Horizon on the scale, timing, design, and quality etc. of the TWA. Horizon state that the TWA will be used for 6 years, but there is no detail on the potential phasing scenarios, how the site will be decommissioned and the land returned to its previous condition.
- 4.7 The 3,000 workers in existing accommodation broadly aligns with PAC2 (3,320 in PAC2). However the IACC is concerned that this figure has remained constant regardless of reduction in construction worker numbers. In other words, if construction worker numbers decrease (from 9,000 to 8,000 or less) Horizon propose to scale down the TWA as opposed to proportionally scaling down the numbers in all other sectors (e.g. PRS and tourism) to lessen the impact. An example would be 650 workers in caravans.

5 Highways and Transport

- 5.1 Following changes to the Accommodation Strategy in PAC3 the IACC are concerned how transportation of the workers both to and from site, and during periods off-shift will be managed.
- 5.2 The indicative programme shows that work on the MOLF will commence in 2019 and will take 2 years to construct becoming operational in 2021. The PAC3 consultation provides no detail on the amount of vehicle movements between the start of construction and the end of 2021 and these movements would take place at the same time as the Park and Ride site, the A5025 on and off line improvements are being undertaken and prior to the on-site campus being built. The PAC3 consultation provides no detail on a programme for the construction of the associated development (including programming of the on-line works relative to the off-line works) and, therefore, it is impossible to assess the impact of the construction works to the A5025 or traffic movements prior to the MOLF being operational. Horizon must work with the IACC to ensure that the impacts of construction related traffic movements prior to the key elements of Associated Developments being put in place are managed and mitigated.
- 5.3 Provided the proposed improvements to the A5025 are implemented, the IACC consider the capacity of the A5025 is adequate and 1,200 cars travelling to and from site instead of 260 buses is acceptable provided that the workers **use this route**.

Robust traffic management and regulating plans will need to be agreed, monitoring will need to be provided and enforcement will be required to ensure that workers use this designated route. The IACC need greater clarity on this detail.

- 5.4 The IACC is concerned with the increase in on-site car parking from 1,000 to 1,900. Irrespective of size, further detail is required as to who is allowed to park on site and where the workers living in the TWA will park.
- 5.5 Should Horizon be able to demonstrate that the other impacts of the main site campus proposal can be made acceptable, then the IACC firmly believe that the on-site parking provision should remain at 1,000, park and ride provision should be a minimum of 2,700 and all people travelling daily to site should be required to park at the park and ride and be bused to site. Mini-buses could then operate to transport workers around the communities/facilities/services etc. as required. This is important not only from a highway safety perspective, but also in terms of community impacts and managing and controlling the workforce.
- 5.6 The IACC is concerned with the lack of detail around the car sharing and parking. Horizon is proposing a transport strategy with greater emphasis on car sharing with at least 3 workers per vehicle required to park on-site during peak year. This is highly questionable in the IACC's view given that at present monitoring information relating to Hinkley Point C is showing between 3% and 4% of workers are car sharing. Despite the principle of this strategy being supported, given the lack of detail on how this is to be implemented and enforced, the IACC have serious concerns regarding workers leaving cars in laybys, undesignated parking areas etc. to share cars in order to get onto the Wylfa Site. We note with concern that 'fly parking' dominates discussions with the community in Somerset at this early stage of the Hinkley Point C project. The 3 workers per car should also be implemented throughout the construction phase, not just during peak year.
- 5.7 The IACC would strongly advise that Horizon apply for satellite Park and Ride / Park and Share facilities along the A55 (including the Mainland) and to the north of the island (such as Amlwch / Benllech / Llanerchymedd) as part of their DCO (or as separate TCPAs). The IACC is committed to work with Horizon to identify potential sites and ensure that these sites are deliverable.
- 5.8 Similarly with bus routes, being a rural area and requiring to be at the bus stop very early in the morning, workers will drive to pick up points and leave cars. IACC believe that satellite park and ride / park and share sites are essential.
- 5.9 The reduction in parking spaces from 5,800 to 3,800 is not necessarily a positive change from PAC2 to PAC3. With 2,000+ local people travelling to the Park and Ride or to site on a daily basis, 3,000 workers in existing accommodation travelling to site as well as potentially up to 4,000 workers living on-site (the majority of which will have cars) the IACC is concerned that there is not sufficient parking for the project. The high-level figure of peak construction workers has decreased by 2,200 (i.e. 10,700 to 8,500 workers) and the car parking spaces has decreased by 2,000. This suggests that parking has decreased by a ratio of nearly 1:1.
- 5.10 Evidence from Hinkley shows that EDF are applying to the Councils in Somerset for their 8th park and ride site (4 more than originally consented in their DCO) which demonstrates what a significant issue parking is. The IACC believe that Horizon's strategy for parking and transporting workers needs to be re-considered.

- 5.11 The IACC maintains its objection to Dalar Hir as the justification and mitigation for this site have not been adequately addressed since the PAC2 process.

6 Welsh Language and Culture

- 6.1 In its responses to previous consultations the IACC spelt out the expectation that the Welsh Language and culture is treated as an all-encompassing theme and golden thread underpinning consideration of impacts and mitigation of all aspects of the Wylfa Newydd project. Horizon's reassertion of their commitment to acknowledging this approach is welcomed. However, the reality is this is not evident from the PAC 3 documentation. The IACC therefore brings the attention of Horizon to the methodology they adopted in preparing the draft PEIR as part of PAC2. This included a section in each chapter which considered the Welsh language implications of the proposals. This explicit Welsh language and culture 'proofing' should be included in the DCO submission and supporting documents.
- 6.2 It therefore follows that the Questionnaire which asks consultees to rank types of projects in order of importance is flawed as Welsh language and Culture is in the list of projects.
- 6.3 The IACC welcomes the announcement of the appointment of a Welsh Language and Culture Coordinator to assist in the further development, implementation and monitoring of an agreed programme of measures. The IACC wishes to be involved in the recruitment process for this important post which should report to the independent Steering Group on a regular basis.
- 6.4 The IACC is of the firm view that the appointed Co-ordinator should have access to specialist linguistic planning expertise which was instrumental in the development of the Actions and draft Strategy, and support in using the Welsh Government's Risk Assessment Methodology. This will be critical during the construction period.
- 6.5 The IACC notes that the three key themes for the broad areas of mitigation and enhancement in Horizon's Welsh Language Pledge replicate the 3 priority areas in the IACC Welsh Language Strategy published by the Welsh language Strategic Forum ([Link](#)). This Strategy is based on the Vision "*for the 2021 Census to see an increase in the number of Welsh speakers and that the number of Welsh speakers increases to at least 60.1% as it was in 2001*". These priorities underpin the draft Mitigation and Enhancement Strategy proposals which will need to be re-visited in the light of the project changes outlined in PAC 3. The IACC therefore expects this alignment to be reinforced in the content of the final Strategy and its implementation.
- 6.6 PAC 3 outlines proposed changes to the Wylfa Newydd project. A key change is in respect of the Worker Accommodation Strategy. This, together with housing workers in existing tourism, private rented sector and other accommodation types, has implications for nearby communities in relation to the use of facilities and services. The documentation refers to the Site Campus Management Plan identifying measures to help ensure that any adverse effects on local communities and Welsh language and culture. However, no indication of the likely degree of interaction nor detailed proposals are provided. The Council requires a holistic and spatial view to be taken on the potential benefits and impacts and their mitigation. The IACC therefore takes issue with the Horizon statement that it will provide a small scale fund to mitigate specific community impacts, including cumulative effects. This is considered pre-emptive and the size of the fund should relate directly to the mitigation and enhancement measures required.

- 6.7 The IACC appreciate Horizon's acceptance that the in-migration of non-Welsh speaking construction workers will reduce the proportion of Welsh speakers. However, the impact and therefore the appropriate mitigation will be dependent upon the number, their location, degree of interaction with the communities in which they are residing and the duration of their stay.
- 6.8 With regard to education and skills the Council has set out high level measures in the draft Mitigation and Enhancement Strategy which draw in its Welsh Education Strategic Plan. These include a Welsh language Skills Assessment tool and attainment targets for Welsh Language training, and specialist capacity, courses and facilities to support families and their children re-locating to Anglesey.
- 6.9 In addition to being a golden thread, Welsh language and culture is one of the seven Wellbeing Goals required to be taken into account together with the principles of sustainable development in the decision making of the IACC and other listed bodies which are Key Stakeholders in the Wylfa Newydd project. Horizon goes some way to acknowledging the inter-relationships between these Goals in its statement recognising the connection between a strong economy, jobs and the well-being of the Welsh language and culture on Anglesey. This connection is considered to be contingent upon the level of investment in skills training, sustainable communities, etc. which are discussed in detail in the relevant accompanying sections. The well-being of the Welsh language is inextricably linked not only with jobs (the Goal of 'A Prosperous Wales/Anglesey') but with all other six Goals. The IACC therefore requests that Horizon follows the approach being taken with its Health Impact Assessment (which covers the Goal of 'A Healthy Wales/Anglesey'), i.e. in cross-referencing mitigation measures in other Assessments and Strategies. For example, a major strand of the draft Welsh Language Mitigation and Enhancement Strategy relates to education and skills measures which will be dealt with in detail in the Socio-Economic Section of the Environmental Statement in the DCO submission.

In addition to the above high level appraisal, there are further comments on the design and layout of the power station, off-site power station facilities and other topics (such as Health and Wellbeing) within the relevant Appendices. In this response, the IACC has intended to comment on the changes from PAC2 to PAC3 only. **The issues raised by the IACC in PAC2 therefore remain valid and should be read in conjunction with this response.**

CONCLUSIONS

As was the case with the PAC2 response, the IACC's conclusions are based on the statements made in the Foreword to the PAC3 Consultation Overview Document, which hopefully continue to apply. Horizon's statement that *"Wylfa Newydd has the potential to change lives for the better across Anglesey and bring major investment and opportunities for communities and individuals across North Wales and beyond"* is fully endorsed by the IACC. However, this high level objective needs to be exemplified with clear, binding and funded commitments. These now need to be considerably better defined. Horizon's words need to be translated into tangible commitments and actions which meet the expectations of people, businesses and communities in the area, and for which they are equipped to capitalise upon.

The concept of a 'social licence' to operate was also endorsed. The PAC2 documentation sets out what Horizon have been told on a consistent basis, and how it has responded to the calls for investment in education and skills programmes, creation of thousands of local jobs during construction and high quality careers for generations during the life of the power station, and respect for and championing of the local heritage, culture and language. These calls have again been echoed in this response.

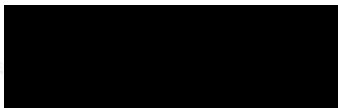
Turning to the statements in the latest Foreword, the IACC accepts that *“your focus is to design a Power Station Project that is high quality, deliverable, safe affordable and reflects community views, and ‘your focus is on making this a reality’”*. The IACC’s intention in preparing this response has been to assist you in this process. This has been grounded in reality with the consideration of impacts and their mitigation being evidence and policy based, with cognisance of the potential effects on both a cumulative and spatial basis.

Your acceptance of responsibility to manage the impact of the construction phase, in particular on the way of life, the language and the culture of this beautiful part of Wales’, is wholly endorsed however such statements have no weight unless they are supported by defined commitments. Accordingly your detailed proposals to achieve this are eagerly anticipated.

You refer to working closely with the IACC and other public bodies to establish as much consensus as possible on how best to deliver this project. The Council remains committed to working with Horizon and other key stakeholders. We will continue to seek the best outcomes for Anglesey and North Wales. However, this is not at any cost and we urge Horizon not to take the support of this Council or its communities for granted.

I look forward to continued constructive engagement with Horizon.

Yours sincerely,



Gwynne Jones
Prif Weithredwr / Chief Executive

APPENDIX A – HIGH LEVEL STRATEGIC REPORT

1.0 INTRODUCTION

- 1.1 On the 24 May 2017 Horizon Nuclear Power Wylfa Limited (“Horizon” commenced Pre-Application Consultation Stage 3 (PAC3) on the changes to proposals for the Wylfa Newydd Project (the Project).
- 1.2 The consultation documents include a Consultation Overview Document and a Main Consultation Document with appendices. The latter describes the updates and proposed changes to the scheme since the Stage Two Pre-Application Consultation (PAC2). These changes are the result of a design optimisation process and changes in legislation which allow for Associated Development to be applied for within the DCO.
- 1.3 The Isle of Anglesey County Council (“IACC” or “the Council”) has reviewed the consultation documents and this document, the accompany letter and the other appendices provide the Council’s consultation response to the information contained within the Main Consultation Document and its appendices.
- 1.4 This response comprises high level comments and is not an exhaustive detailed assessment of each theme or issue. The IACC has presented its comments to help shape the proposal and where possible to provide suggestions and/or solutions as mitigation to address impacts as to make the development a success for the Isle of Anglesey’s residents, its economy, communities and environment.
- 1.5 The Council notes as an overarching point that there is a lack of detail throughout PAC3 which makes a proper assessment of the proposals, their impacts and the sufficiency of the evidence base impossible. The approach to elements such as the worker accommodation strategy have the potential to fundamentally alter the impacts of the project and it is not acceptable that the evidence base for these changes, including the consideration of alternatives to the proposals included in PAC3, and the assessment of their impacts has been omitted.
- 1.6 Within PAC3 there are a number of statements of commitment to plans, measures or provision of mitigation in varying forms however there are no specific proposals. Without detailed commitments on the scales, timing, funding, delivery measures and monitoring regimes for mitigation these ‘commitments’ cannot be assessed with regard to the impacts they are intended to address and little weight can be given to them. Horizon requires to provide the detail which demonstrates how these statements of intention will translate into the delivery of the necessary actions at the appropriate time.
- 1.7 The IACC advises that many of the proposed mitigation measures proposed in outline in PAC3 would, on the limited information given, represent too little provision delivered too late in the process. For example the education and skills programmes need to start far enough in advance to equip local residents to access roles as they become available, commencing these following the commencement of construction means that several years of opportunities will be lost. This is not an acceptable outcome for the Island’s communities.
- 1.8 For consistency and transparency, the comments presented are structured around themes and sites presented in PAC3 which focuses on the changes only. Chapters 2-8 is a thematic response and Chapter 9 is a response on environmental matters which are site specific.

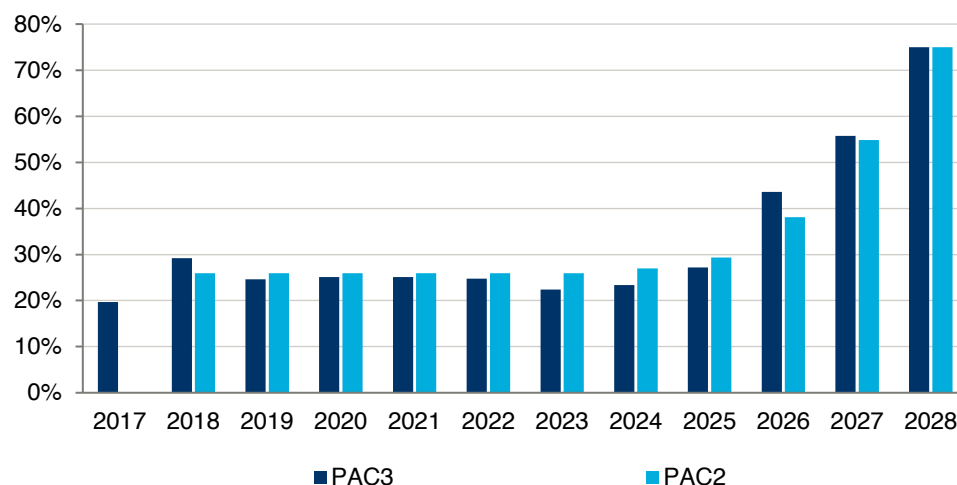
2.0 JOBS & SKILLS

Employment Creation

- 2.1 The IACC recognises that the project can offer huge opportunities for the local economy. Employment creation will have an immediate positive impact, while investment in skills and training could boost the supply side of the economy through an enlarged labour pool with higher levels of productivity. In addition, the ability for firms and individuals to gain nuclear construction related experience should provide longer term opportunities to secure contracts for the maintenance of Wylfa Newydd once operational, and work on future nuclear new builds in the UK and elsewhere. Consequently, the IACC are eager that all stakeholders work together to maximise the benefits for the local labour force and local businesses to help transform the local and regional economy.
- 2.2 In doing so it is important that take-up of employment opportunities at Wylfa Newydd by local labour is encouraged, supported and maximised at both the construction and operational phases. Similarly, it is important that supply chain opportunities are promoted widely amongst local firms and that they are supported in accessing those opportunities. Support and training provision must have an adequate number of spaces to meet demand from Anglesey residents and businesses in a timely manner.
- 2.3 In this chapter, we discuss:
- a) Changes in workforce demand from PAC2 to PAC3, and the need to have greater clarity on the demand for, and supply of, skills;
 - b) The potential trade-off between maximising the share of jobs taken by local people, and displacement;
 - c) The pool of unemployed and inactive that could be utilised to expand the pool of available labour and help to mitigate against displacement;
 - d) The steps being taken to invest in skills and training, the further measures proposed and the additional need for training and education to understand if these are sufficient and capable of being delivered to fill skills gaps and mitigate against displacement; and
 - e) The significant potential benefit of local supply chain opportunities and what is being done to maximise local business involvement.
- 2.4 The major change from PAC2 to PAC3 is the revision in workforce numbers. Peak demand for labour has fallen from 10,700 to 8,500. Horizon has however assumed a peak of 9,000 for reporting and planning purposes. The new workforce profile has also meant a change to peak demand, which is now set to occur in 2023 rather than 2022.
- 2.5 Despite the fall in overall employment numbers, the share of Wylfa Newydd jobs expected to be taken by local labour decreased slightly which has a negative impact on the absolute number of local jobs as discussed below. The data in figures 1 to 3 are taken from the impact modelling work by Oxford Economics (on behalf of IACC), which was informed by the workforce profile information provided by Horizon. Given the overall workforce numbers have fallen the small decrease in the share of local employment means the number of jobs expected to be taken by residents has fallen over the period (except for 2017 and 2019). This means that there will be around 800 less resident jobs in 2022 and over 500 less jobs per year from 2023 to 2027 (see Figure 2). Despite there being a slight increase in the proportion of jobs being taken by local labour in 2026 and 2027, it is not enough to compensate for the absolute fall in the construction workforce.

Fig 1: Share of Wylfa Newydd employment taken by locals

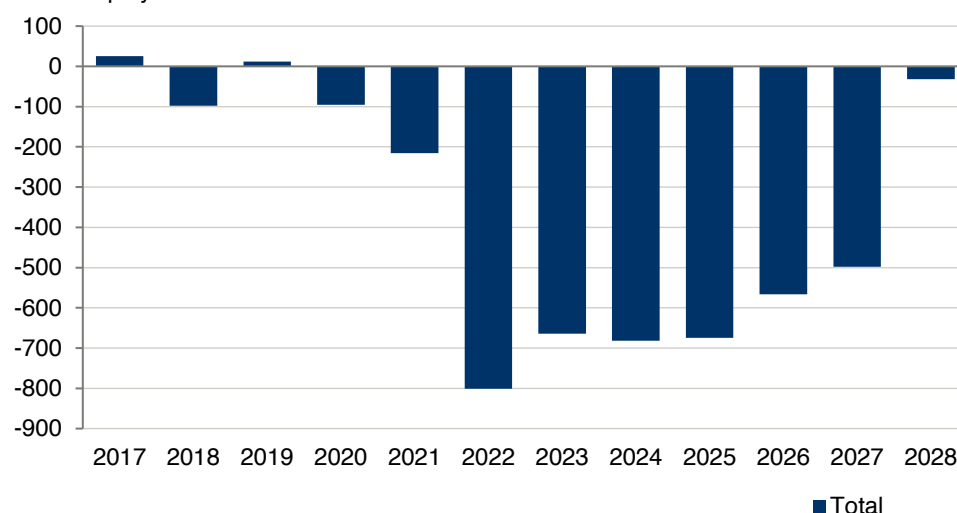
Share of local labour



Source: Oxford Economics

Fig 2: The change in resident jobs arising from the altered workforce profile

Local employment



Source: Oxford Economics

2.6 We acknowledge that reducing the workforce is an outcome of Horizon's Optimisation exercise. All the same, a workforce of 8,500 is still a very high figure in Anglesey's context and substantial impacts will remain. These impacts must be fully assessed and mitigated or compensated for. IACC's response to PAC2 set out our desire to push local involvement above the previous 25% level however in the PAC3 documentation the percentage of local employment has decreased to 22% which is going in the opposite direction. That local employment during the construction phase has decreased both in actual numbers and percentage terms is unacceptable as it reduces an already low provision further without any evidence being presented to justify this. As specified in the IACC's response to PAC2 (Appendix A – Paragraph 3.5) there are clear opportunities to significantly increase this percentage. Consequently, it is not clear to IACC why the share of local workforce jobs has not risen. Had the absolute number of locals involved in the project remained fixed at PAC2 levels, the local share of the new workforce jobs profile would have been closer to 30% at peak which itself is closer to the target set for Hinkley Point C⁴. As already raised at PAC2 the IACC

⁴ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010001/EN010001-005333-8.16%20Economic%20Strategy%201.pdf>

request that Horizon engage in detailed discussions on this matter to identify how to put mechanisms in place to increase the target local workforce figure.

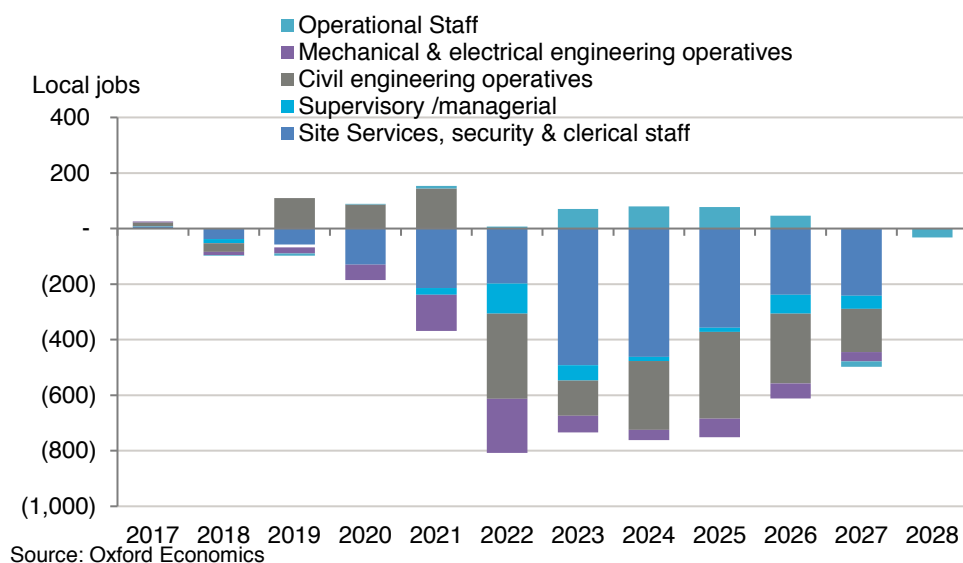
- 2.7 The rationale for keeping the local share of a declining workforce profile fixed is not clear to IACC and we would request more information on the strategy underpinning the decisions to reduce local labour in the construction phase. The IACC requests that further work to be undertaken on the supply and demand for skills to better assess the number of local people who could participate in working on this major energy development, and to also reflect the potential for skilled people to return to Anglesey attracted by the jobs and salaries on offer.
- 2.8 In addition, Horizon has stated they expect “up to 85%” of the operational jobs to be taken by local individuals. The IACC do acknowledge and welcome the fact that the target of 45% has increased significantly since PAC2. However, IACC would like this to be a minimum level with a target of 100% as the stated “up to 85%” is only an estimate; without measures to secure delivery this important potential benefit cannot be given weight as there is little confidence it will be delivered. Linked to this IACC would request clarity regarding when and how the target will be met and monitored over time. Indeed, this also applies to the monitoring and achievement of construction jobs.
- 2.9 We also note, that Figures 1 to 3 exclude the 1,000 workers required to carry out routine maintenance during outage periods once the plant is operational. This source of employment has not been consulted upon and was not previously considered in recent economic modelling undertaken by IACC. Additional jobs are welcomed by IACC, but we would request further information on these roles. For example are these part-time, full-time or temporary employment? It is also not clear how many of these jobs are expected to be taken by locals. This will clearly affect the potential impacts of these roles as regular influxes of 1000 temporary workers will incur significant impacts of their own while temporary jobs for locals creates different impacts, particularly in the local labour market.
- 2.10 The key issue under this theme is that the project will create a large number of roles at varying levels and across skill levels local take up of which requires to be maximised. This represents a valuable opportunity to secure the use of local labour and provide a direct benefit to the host community. However to realise that opportunity binding and ambitious local labour targets need put in place, monitored and delivered during construction and operation.

Demand for Skills

- 2.11 IACC welcome the additional detail on occupational and skills demands. At present there is a broad indication of the types of jobs that will be required at peak (Table 4.2) but these are percentage figures so it's not possible to understand how many people by specific job will be needed and how this matches with existing labour supply and subsequently what the ability of local training and education organisations is to meet these needs. This data will be essential in helping to plan training and skills provision in a timely manner.
- 2.12 There is further work required to match the labour demand from Wylfa Newydd to the current supply of labour, identifying resulting gaps and the capacity of the various bodies involved with training and skills development to fill any gaps. The commitment to work with Welsh Government and the North Wales Economic Ambition Board to fund and deliver additional training to meet the needs of the Wylfa Newydd project is supported by IACC.

- 2.13 Whilst there is a commitment to training and skills development in the construction phase further detail on what this will comprise is needed. In particular front loading and early provision of training to allow early phase construction jobs to be accessed requires to be included. There is a risk that the major opportunity created by the construction phase to create local jobs and training opportunities is lost if training is not provided early enough.
- 2.14 Whilst the construction workforce profile data helpfully splits out jobs by broad category, by site, and trade breakdown, it would also be useful to understand the qualification levels required for all jobs. For example, the IACC are uncertain how the future demand for labour would look if split by qualification level and subject (e.g. X number of STEM graduates, y number of electricians at NVQ level 3, etc.).
- 2.15 By extension, it is crucial to have an analysis of the demand and supply of skills in the local economy ahead of DCO submission. This would enable a more detailed analysis of local capacity, a better understanding of displacement, the underemployed and how the local unemployed and inactive can play a role. A detailed understanding of future skills gaps would also enable targeted and specific training to be developed in time for the maximum benefit to be achieved. For example, at present IACC does not have a clear understanding of what additional training is required from higher education, and further education to meet future demand by Horizon. Detail is needed of the requirement for additional skills in the immediate supply chain (more detail on the contracts available to local business would assist with this and address this in detail below).
- 2.16 The largest loss of jobs from the downward revision of workforce numbers from PAC2 to PAC3 is in the “Site Services, security and clerical staff” category followed by “Civil Engineering operatives” (see Figure 3). This gives some guidance on the changing demand for types of jobs, but is incomplete and IACC request more detail on the demand and supply for skills and qualifications.
- 2.17 The flow of people into the labour pool can be increased through the promotion of suitable subject choices in school to meet the requirements for the range of jobs on offer. The IACC welcome the support for improving and learning facilities at the secondary schools. However, further detail is required on the level and scope of this commitment. There is a need to agree and allocate mitigation value and timetable payments and works in accordance with the priorities identified by the detailed evidence requested at 2.14 above (2019 will be too late to begin the process of capital investment in schools in order to positively influence and enhance future workers’ STEM skills and attainment). The information to identify the most effective Works needs to be provided in short course to allow design of these to begin ahead of the DCO.

Fig 3: The change in resident jobs by type

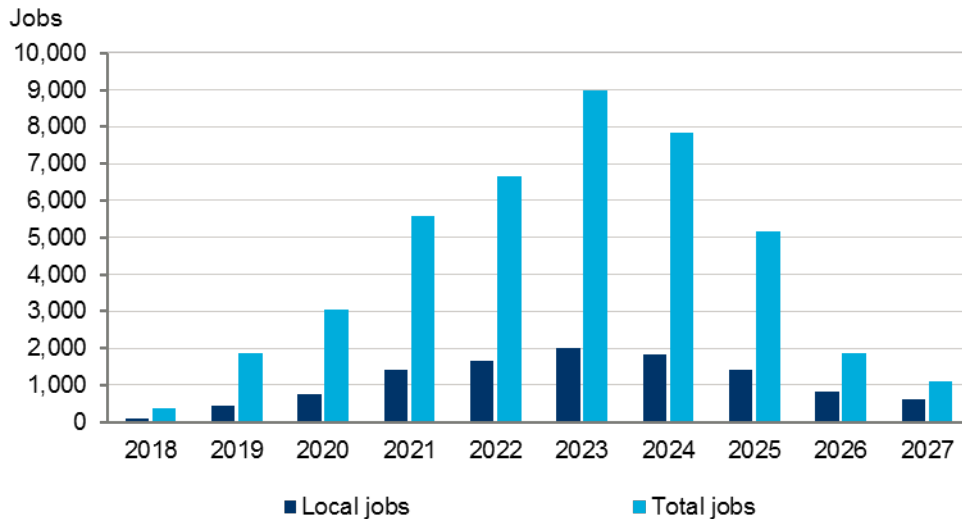


Maximising employment whilst mitigating against displacement

- 2.18 IACC wish to maximise local take up of Wylfa Newydd jobs, but are mindful that there could be a trade off with potential displacement unless appropriate steps are taken to boost the supply side of the economy. In practical terms, the lower level of demand for local labour as set out in PAC3 will reduce the likely displacement of labour from existing local businesses.
- 2.19 PAC3 provides that labour demand will peak in 2023 at 9,000, and just over 2,000 of these roles are expected to be filled by locals (see Figure 4)⁵. No detailed analysis of the demand and supply of skills in Anglesey has been provided and therefore it is difficult to assess potential displacement impacts accurately. The level of unemployed and inactive can be used to provide a crude estimate of potential spare labour capacity in Anglesey. We can also look at the scale of job creation at Wylfa Newydd compared to current employment levels. To this can be added the increased flows from school leavers and college with relevant qualifications and potential 'returners'. The latter could be made aware of jobs and training through targeted social media and professional press advertising and other mitigation measures.

Fig 4: Workforce demand at Wylfa Newydd

⁵ If the economy were at full capacity, then this would in theory result in 100% displacement as the labour would be taken from existing firms. It would also likely result in wage inflation making the industry less competitive. At the time of writing the OBR estimated a positive output gap which is associated with higher rates of resource utilisation (<http://budgetresponsibility.org.uk/forecasts-in-depth/the-economy-forecast/potential-output-and-the-output-gap/>). Their central estimate of the output gap was 0.2%. In other words, the UK economy was estimated to be at capacity.



Source: Oxford Economics

- 2.20 Published APS data shows that from January 2016 to December 2016 some 1,700 individuals in Anglesey were unemployed. This is equivalent to 5.6% of the working age population and compares to 4.9% and 4.8% for GB and Wales respectively. For illustration, to match the Welsh average unemployment in Anglesey would have to fall by just over 240.
- 2.21 It is possible that these individuals will expand the size of the labour pool by filling posts directly and vacancies created through people leaving jobs to take better jobs/roles at Wylfa Newydd, however, it has not been possible to undertake a detailed analysis of the skills supplied by the unemployed and the likely skills demanded by the private sector. It is considered to be reasonable to assume however that some degree of training would be required given the breakdown of roles required at Wylfa Newydd. Training needs to be provided to increase 'other routes to employment' as suggested by Horizon and deliver the claimed potential benefits in local labour to the community.
- 2.22 In addition, according to the APS there were also 10,200 individuals inactive in Anglesey (January 2016 to December 2016), of which it is reported that 2,300 wanted a job. It is not clear however if these individuals want a part-time or full-time job, or if they are looking for something specific or require training. It is also unclear how their skills would match the roles at Wylfa Newydd, but perhaps training could open opportunities such as catering and security. Although there is some capacity in the pool of the unemployed and inactive, a key factor is whether they have appropriate skills. We know Wylfa Newydd requires nearly 900 local individuals to fill engineering related roles, 237 for supervisory and managerial and 191 for operational staff which totals 1,328 local people. It is unlikely that many of those coming from inactivity will have the skill sets to work directly on Wylfa Newydd or to backfill jobs. IACC request that Horizon urgently undertake further research on these parts to allow training and recruitment to be appropriately targeted and deliver.
- 2.23 It is likely that local labour taking up engineering, supervising, managerial and operational opportunities as Wylfa Newydd will already be in employment. There are however a further 689 jobs that might require lower skill levels (i.e. the off-site and on-site services, security and clerical staff) which might be better suited to the unemployed and inactive. Policy Interventions are likely to be required to provide people with the confidence, skills and training to obtain these jobs, and proposals to achieve this require to be discussed in short course.

- 2.24 Ultimately the Wylfa Newydd project will demand both construction and built environment related staff and skills but also people and skills relating to administration, logistics (including bus/shuttle services)catering, hospitality, leisure, social care and other non-construction related sectors to support the project. The level of additional demand from Wylfa Newydd is likely to cause labour shortages in existing sectors and businesses. There is a key opportunity for Horizon and its supply chain to invest in training in these areas to mitigate these impacts, to provide a sustainable legacy from the project and to support key sectors of the economy. Given this there is a need for Horizon and its supply chain to commit to additional investment in training for service and other non-construction sector roles to support the Wylfa Newydd project.
- 2.25 Having identified the potential impacts in general more information is required to identify how best to target interventions to meet the identified need and provide suitable mitigation. Consideration needs to be given to mitigating measures such as:
- a) Provision of contracts for local companies which might stop individuals from leaving and securing work with a larger tier 2 supply chain company;
 - b) Training for the unemployed and inactive to back fill vacated jobs which could expand the skills available to business and help Anglesey's companies to meet existing and future contracts;
 - c) Encouragement of those in training to pursue courses related to the Wylfa Newydd workforce profile; and
 - d) Encouragement of ex-Anglesey residents to return home take up new job opportunities.

In summary the demand for skills evidence is unacceptably incomplete and further work is required. This information is required to allow the necessary and appropriate targeting of jobs and training to maximise opportunities and supply the labour Horizon requires ahead of roles arising reducing the need for in-migration where roles could be filled by local labour whilst protecting existing employers and businesses.

Training and Apprenticeships

- 2.26 An analysis of the labour force survey reinforces the wealth of literature on the importance of training and skills attainment. The table below shows that as the level of highest qualification held by residents of Wales rises, broadly speaking so too does their propensity to be employed and their average gross weekly pay. Furthermore, given Gross Value Added (GVA) is essentially the sum of wages and profits, we can assume that raising skill levels should, all other things being equal, raise productivity levels in Anglesey.

Fig 5: Economic activity and average pay by highest qualification in Wales

Level of highest qualification held (living in Wales)	Economic Activity Status			Average gross weekly pay in main job
	Share of Employed	Share of Unemployed	Share of Inactive	
NQF Level 4 and above	79	2	18	£644
NQF Level 3	74	4	21	£385
NQF Level 2	64	7	29	£359
Below NQF Level 2	58	6	36	£337
Trade apprenticeships	70	2	28	£310
Other qualifications	65	3	32	£295
No qualifications	37	4	60	£303
Total	67	4	29	£475

Source: Labour Force Survey

- 2.27 Accordingly, not only can training mitigate against displacement by boosting the supply of skills / labour to the economy, investment in training and skills attainment can boost productivity leaving a lasting difference in the economy. The IACC are therefore keen to maximise the legacy benefits of this flagship capital project.
- 2.28 We welcome the fact that Horizon are actively planning and investing in several training programmes. The PAC3 documentation notes the supply chain is expected to generate apprenticeships in construction, built environment and related trades. These are expected to be at levels 2 and 3 (which Figure 5 shows can have a material difference to employability and weekly pay). Horizon will need to identify how apprenticeships will be encouraged / enforced as part of the contracts to be awarded.
- 2.29 Experience from elsewhere is useful in providing examples of successful mitigation approaches here. In delivering the Investment Strategy for Northern Ireland⁶, The Strategic Investment Board introduced 'social clauses' into contracts for major public works. These clauses required contractors to deliver employment and training opportunities for apprentices and the long-term unemployed. This has been developed further and expanded into the "Buy Social"⁷ Construction Model where for example one long-term unemployed individual must be recruited for each £1m of contract value.
- 2.30 The consultation document identifies the potential for the project to create apprenticeship and trainer opportunities in construction and related trades but does not determine where the responsibility for delivering, funding and supporting these opportunities lies in order for Horizon to claim these potential benefits they must secure delivery of them. It is not enough to state that they may arise. It is also important that apprenticeship opportunities are not limited to specific age groups and this should be included in the delivery strategy. The Wylfa Newydd project is also likely to generate opportunities outside of the construction and built environment trades including areas such as catering, hospitality, leisure and logistics. At present there is no firm commitment to training in these areas or indication of where the financial investment to support that would come from. It is noted that Horizon have committed to working with partners to address the issue and the Council are keen to engage on this.

⁶ <http://isni.gov.uk/PDFs/Investment%20Strategy.pdf>

⁷ <http://buysocialni.org/>

- 2.31 We welcome news that Horizon have taken in 10 apprentices in the Technical Apprenticeship Scheme in 2016 with a further 12 planned for 2017/18. It would be useful to understand how Horizon will run the Technical Apprenticeship Scheme over the lifetime of the construction project. Also, the level of these proposals relative to the overall scale of the project is comparatively small and in some cases the longer term numbers and outcomes are unknown. Clarity is required on the detail; for example, how many apprenticeship places will be created each year and will the number rise in line with peak demand for labour?
- 2.32 We also welcome the efforts to add nuclear context to courses at University of Bangor, the £1m investment in the Engineering provision at Grwp Llandrillo Menai from Bangor to Llangefni and engagement with schools to encourage take up of STEM subjects. We are eager to understand how these actions fit in with Horizon's wider skills / training strategy and when these further investments will be made to increase the flow of pupils/graduates available to potentially work at Wylfa Newydd or as part of the supply chain with local contractors.
- 2.33 More information is also required on any programmes or incentives to incorporate or re-train existing Magnox staff (or those recently left who still possess relevant skills) to play a role in the construction or future operational phases of Wylfa Newydd. Clear proposals are needed in this respect.
- 2.34 The potential positive employment impacts are claimed as a key benefit of the project. The need to secure local benefits for existing residents and workforce is of therefore central importance to stakeholders as recognised in the PAC3 response (A8.1). This includes investment in training facilities and courses alongside measures to ensure that the jobs created in the construction, operational and decommissioning phases are taken up by the local workforce and supply chain contracts can be accessed by local businesses (A 8.1, A8.3, and A8.6).
- 2.35 The current position in relation to skills and training set out in PAC3 and the existing commitment from Horizon and future potential for training and skills development presents a real risk of losing these opportunities and wider economic benefits. In addition to all of the measures discussed IACC would propose the creation of a training fund to mitigate the risks of losing benefits and ensure there is adequate resource to meet future needs.

In summary, the need to secure local benefits for existing residents and workforce is of central importance this includes investment in training facilities and courses alongside measures to ensure that the jobs created in the construction, operational and decommissioning phases are taken up by the local workforce and supply chain contracts can be accessed by local businesses.

Employment and Skills Service and Jobs and Skills Strategy

- 2.36 IACC welcomes and recognises the commitment to creating an "Employment and Skills Service" and "Jobs and Skills Strategy" and for working regionally with the NWEAB. Further engagement and collaboration is required and it is now important to work in partnership to agree the detail to ensure these services are workable and effective. IACC are keen that there is an adequate supply of skills to ensure displacement is kept at a minimum. Key education and training stakeholders require urgently to have an understanding of skills demand and supply in the supply chain for Wylfa Newydd so that this can be incorporated in their wider Regional Skills plan.

- 2.37 In addition - there is no clear indication of Horizon's financial commitment to the Employment and Skills Service or the extent to which Horizon's supply chain is signed up to using the brokerage. The service is currently funded by DWP but needs commitment from all partners to make this effective during the main construction phase and beyond. The trial of the service will be an important step in establishing the longer term parameters for the project and the involvement and commitment of partners including Horizon, Menter Newydd, DWP, Grwp Llandrillo Menai, IACC, Welsh Government, NWEAB and others as the project progresses. This is welcomed and is a positive step forward where there has been constructive and encouraging collaborative working. The IACC is keen to be involved in this process to ensure that opportunities for local people are maximised and requests for the detail on the next steps and timing for the Service to developed and dialogue on how to get involved.
- 2.38 Furthermore, the Employment and Skills Service should not be the only method for engaging in the development of local skills. The brokerage is only one method to ensure local employment is supported and other interventions are required. In order to provide greater clarity the precise remit and role of the brokerage service should be set out in order to give a consistent view on what is to be provided. Similarly how the other routes to employment are to be made operational (par 4.4.12) should also be clearly set out with specific mechanisms, quantified targets, funding and other details including staffing.
- 2.39 The consultation document identifies that the jobs and skills strategy will set out how Horizon will work with partners to fund training. At this stage in the project development and consultation process we would have expected this to have been completed and to be clear on the scale of financial commitment to training and mechanisms to deliver. Without appropriate intervention at an early stage the opportunity to maximise training and skills opportunities in construction, operation and decommissioning will be lost through a lack of commitment and inadequate pre-planning. This should be addressed urgently and pre-submission of the DCO.
- 2.40 Whilst the IACC acknowledges progress on the Employment and Skills Service and Jobs and Skills Strategy, the same cannot be said in relation to the Education Strategy. The IACC have yet to receive a copy of this strategy despite numerous requests. The IACC requests to receive a copy of the strategy (including in draft format if it is not yet ready for formal consultation) The Council would be happy to work in partnership towards preparation of the final document with Horizon.

Jobs and skills summary

The employment and upskilling of local labour and retention of young and skilled people within Anglesey are key potential benefit of the project and this should be reflected in much higher targets for local labour in both construction and operation underpinned by clear, detailed, funded and timely commitments to deliver these targets. In order to achieve this education and skills training provision needs to be commenced early enough to allow all of the available opportunities to be accessed.

3.0 ECONOMY AND SUPPLY CHAIN

Maximising Supply Chain Opportunities

- 3.1 The IACC welcome the ongoing commitment to developing the Supply chain charter and action plan (para. 8.2.3) but there is still too little detail as to the specific mechanisms, actions and funding to achieve the principles, expectations and behaviours set out. The IACC will continue to work with Horizon its supply chain and partners in the public and private sector to design and deliver this commitment.
- 3.2 Menter Newydd's engagement and early contract activity alongside Hitachi's work with UK partners is welcomed as is the identification of Welsh companies registered as potential suppliers with Hitachi. This work needs to be continued and translated into solid contract opportunities working in partnership with local and regionally based businesses as well as work with the public sector to overcome any constraints/ barriers to supply chain entry. We would also welcome engagement in short course on the detail of the procurement plan and individual work packages to allow development of relationships with the local supply chain and ensure that local uptake of opportunities is maximised.
- 3.3 The commitment to spend 60% of the project in the UK is welcomed. The value earmarked for the UK would appear to be high when viewed in the context of past work undertaken by Oxford Economics for BIS and DECC⁸. The Council naturally want to maximise the local share of this UK based spend. Currently Horizon estimate that around £400m will be spent locally which IACC recognise would provide a significant injection of demand into the local economy. IACC would like to understand how this estimate was arrived at and more detail is necessary. For example, have Horizon analysed the capacity of the local supply chain and estimated the likely value of contracts available to local businesses?
- 3.4 We appreciate the steps taken to develop a Supply Chain Action Plan and efforts to register companies via Early Constructor Engagement contracts. However, the IACC require more detail and evidence as to how local business opportunities will be maximised. For example, any additional information that would show the types and size of contracts that will be available could, at this stage, encourage further engagement from Anglesey businesses. The IACC emphasise that local companies must be given opportunities to participate fully in the supply chain during construction and operational phases and supported in doing so where necessary. For example non-technical or specialist services such as Bus Services, Food and Catering, Laundry Services (not exhaustive) should be provided by local companies so that socio-economic benefits of the project are maximised. The Council requests more information on how small business consortia will be encouraged and supported to secure this work. The Council notes that the packaging of contracts for the A5025 works was deliberately designed to facilitate involvement from a range of operators of differing sizes, a similar approach should be taken to suitable contracts for the project to ensure that the potential benefits to smaller local and regional businesses are delivered and the Council will seek the inclusion of such an approach in the procurement strategy.
- 3.5 It is important that there are clearly set out, agreed and robust mechanisms demonstrating how local involvement in supply chain contracts will be monitored. Therefore, in addition to a firm commitment to understand local supply chain capacity, promote the Supply Chain Contracts Service and engage with small business to help

⁸ <http://namrc.co.uk/wp-content/uploads/2013/04/economic-benefits.pdf>

them secure contracts, Horizon should also commit to a thorough and robust monitoring framework with additional mitigation measures provided where monitoring shows that local supply chain opportunities are not being taken up by local businesses.

- 3.6 It is positive that 100 out of the 500 registered businesses on Hitachi's supplier website are in Wales. IACC would welcome further dialogue surrounding the credibility of those businesses to become part of the supply chain, identification of any gaps in skills, accreditations etc. and how the public sector can assist in overcoming those.
- 3.7 The list of proposed work with stakeholders (4.6.8) is a positive development in this respect but further work is needed to identify specific commitments and provide clarity on the number, scale and size of supply chain opportunities that the project will require.
- 3.8 The 55% figure of local/regional supply chain value for early phase work on the Wylfa Newydd site is welcomed but without details is not a meaningful figure. To ensure confidence is fostered within the local economy, local spend should continue and information thereon be shared. Being able to accurately demonstrate this commitment to the local and regional supply chain throughout the project will be critical. Further resources and the use of contractual data to allow ongoing monitoring of this position is required with both Horizon, Menter Newydd and their supply chain signing up to this provision.
- 3.9 PAC3 represents a positive step in the development of activities to support local and regional businesses to access supply chain contracts, however more is required. The work supply chain charter and action plan must include more concrete proposals and financial commitments to the range of measures that have been outlined in our previous response to PAC2 (e.g. support to help develop and maintain intelligence and background information on businesses, ongoing support for staff resource to support business development, contributions to capital build enterprise centre, provisions and staff resource to allow effective monitoring and reporting against targets for local content) alongside the early stage activities presented in the PAC3 consultation document.
- 3.10 The need to secure local benefits for existing residents and workforce is of central importance to stakeholders as recognised in the PAC3 response (A8.1). This includes investment in training facilities and courses **now** alongside measures to ensure that the jobs created in the construction, operational and decommissioning phases are taken up by the local workforce and supply chain contracts can be accessed by local businesses (A 8.1, A8.3, and A8.6).
- 3.11 Whilst there has been a welcome commitment and more detail on some of these areas: plans, targets, mitigate and monitoring measures there is still work to be done to develop the supply chain elements of the project to help maximise the economic benefit to local businesses and wider economy. We look forward to continuing discussions on these matters.

Economy and supply chain summary

The targets for local and regional spend and the involvement of local businesses are supported however more detail is required on how these will be delivered. Detailed, measureable strategies and plans to monitor and deliver these must be agreed in short course and before DCO grant.

4.0 CONSTRUCTION WORKERS ACCOMMODATION

- 4.1 This section includes the response of the Partneriaeth Tai Ynys Môn Housing Partnership (the Partnership) to PAC3.
- 4.2 Section 5.1 of the Main Consultation Document introduces the changes made by Horizon in its approach to accommodating construction workers. The most significant change from PAC3 is the intention to accommodate up to 4,000 workers on the main site in a temporary, purpose built, campus. The Council requires Horizon to provide more information to justify its decision to locate the stated number of workers on site together with the evidence of the consideration of alternatives and much greater detail on the changes in impacts resultant on this and to set out in greater detail why the revised approach is preferable to that set out at PAC2. Horizon needs to be able to justify the current proposal against JLDP Policy PS9A and Wylfa Newydd SPG GP10.

Background to the approach to accommodating construction workers

- 4.3 Table 5.2 establishes Horizon's position with regard to the demand for and supply of accommodation, across different housing sectors.
- 4.4 The PAC3 documentation should have provided information on how demand and supply has been calculated for each accommodation type. The PAC3 documentation itself provides no justification or explanation for the derivation of the demand and supply figures and therefore provides no opportunity for consultees to understand the methodologies used in the calculations and meaningfully respond. This significantly limits the ability of those consultees who have not been party to non-statutory consultation on this subject area to provide their opinions on the appropriateness or otherwise of the numbers shown. This is in particular an issue for owner – occupied properties where the number of bed-spaces alone is not an appropriate measure given that some types of worker are likely to wish to purchase homes with multiple bed spaces which will not be used to accommodate workers.
- 4.5 The Council **does not** agree with the capacity figures as set out within the table which suggests that there is considerable 'spare' capacity in the sectors⁹. In reality the private rented sector in particular is already under significant stress before allowing for the additional demand from construction workers.
- 4.6 The Council is of the opinion that the characteristics of the private rented sector in Anglesey therefore differs in comparison to the national picture. Letting properties over a long period of time reduces churn and the capacity for properties becoming vacant for workers to rent.
- 4.7 The Council is aware of experience from other major investment projects which shows that workers prefer to share rented accommodation with a maximum of two and not three persons as assumed by Horizon. This would significantly increase the demand on the PRS presently identified within PAC3 and increase the impacts over that shown

⁹ As evidenced by the IACC Construction Worker Assessment Evidence Base Report and by the emerging findings of the Arc 4: Review of the Private Rented Sector in North West Wales – Anglesey report.

in current figures. This should be allowed for to ensure a worst case assessment is presented.

- 4.8 The effects of Welfare Reform are evident now with existing tenants increasingly finding it difficult to rent accommodation. The Council and Partnership believe the impact of Wylfa workers on the housing market will exacerbate the situation. The impact of increased demand could be a rise in rents leading to displacement of the most vulnerable and a potential increase in homeless. The Council and Welsh Government (WG) have commissioned independent work into this area and have data which identifies the most vulnerable households which will be affected with many living in the private rented sector. The IACC cannot share this data with Horizon in its current form due to Data Protection.
- 4.9 In order for the Council to be able to accept the PRS demand figure identified within the table in PAC3 a number of mitigation measures will need to have been adopted in advance of the commencement of construction with a continuation of monitoring and the provision of mitigation during their stay. Without mitigation the impact of displacement and increasing unaffordability would be unacceptable and the Council would object to the WAMS.
- 4.10 The Council does not agree that the level of supply identified for owner occupied correctly reflects the robustness of the market to accommodate additional demand and disagrees that there is significant headroom in the sector. The Council's information suggests that overall mean house prices increased by 21.7% between the third quarter in 2011 and the third quarter in 2015, compared to an increase of 9.2% across Wales over the equivalent period and that average house prices were notably higher (14%) than Wales as a whole¹⁰. These figure suggest a sector with little headroom to accommodate construction workers could lead to a rise in house prices and exacerbate existing problems of affordability. In order to accommodate the anticipated increase in demand a number of mitigation measures will need to have been adopted in advance of the arrival of construction workers and continue during their stay. Measures will need to be taken to encourage rates of new build in line with the JLDP housing trajectory and the JLDP spatial framework to ensure the necessary capacity is delivered. The JLDP has taken into account the effect of the Wylfa Newydd development in setting housing numbers but delivery has not met anticipated rates in the recent past. This planned capacity can be available only if the Plan's housing trajectory is achieved. There needs to be a link between the annual monitoring of the JLDP that the Council will undertake and a strategy agreed with Horizon for suitable mitigation (possibly through intervention) should the delivery level be below the anticipated housing trajectory.
- 4.11 The Council agrees with the demand and supply figures for latent accommodation. To meet the increased demand created by the project Horizon will need to support measures to encourage supply to be made available. The IACC will also require information on how the WAMS would ensure that the use of latent accommodation includes safeguarding considerations. Put simply – this is ensuring process of checks and controls to ensure that any workers accessing latent accommodation where there

¹⁰ Local Housing Market Assessment Update May 2016 (IACC)

are children or vulnerable adults have been assessed as being suitable for that specific living context.

- 4.12 The Council advises that the supply figures for tourism and caravans vastly exaggerates the actual level of realistic supply and is therefore not accepted¹¹. There is no explanation within PAC3 as to the methodologies behind the figures quoted. Consultees who have not been party to non-statutory consultation with Horizon will therefore be unable to make meaningful comment on these numbers. Information available to the Council suggest that the demand for 650 bed spaces in caravans cannot be met from existing supply without changes to licencing and planning permissions as many of the existing caravan sites are restricted in their ability to accommodate non-tourists, or are unable to operate 12 months in the year. Additionally the Council has identified concerns (including health concerns) that some caravan accommodation offers a standard of accommodation which may not be suitable to winter occupancy.
- 4.13 As noted above, the long term temporary residential use of existing holiday accommodation (permanent self-catering accommodation and non-permanent accommodation (caravans and chalets) will require planning permission. This type of development is not supported by the existing development plan or the JLDP unless it can be demonstrated that it accords with Policy PS11 in the latter Plan and, in the case of existing caravans, chalets or other forms of non- permanent holiday accommodation, it accords with Policy TAI 8.
- 4.14 PAC3 is silent on the location of the accommodation, both the location of available supply but also where demand will be focussed. A lack of information inhibits the ability of consultees to make meaningful comment. The impacts of the accommodation proposals cannot be fully and meaningfully assessed without this information as the spatial distribution will affect not just the accommodation impacts but community cohesion, leisure, community and recreational facilities, medical and social care services and Welsh language and culture. The omission of this detail is accordingly unacceptable at this late stage in consultation. This raises a serious risk that relatively well paid workers will take up accommodation in the PRS displacing other residents and disturbing the housing market. This is not acceptable.

The Justification for Proposed on-site campus

- 4.15 In principle the development of some on-site campus accommodation for key or essential workers is supported by JLDP policy when located within the Wylfa Newydd development area provided that the proposed development aligns with Policy PS 9, Policy PS 9A and a range of Policies that consider impacts on areas of local, national and international value to landscape (e.g. views into and out of AONB), biodiversity (e.g. SSSI) (Policy PS 16) and heritage (Policy PS 17) as well as impacts, for example, on the safe and free flow of traffic, e.g. onto and along the A5025 (Policy TRA 1).
- 4.16 The Council will however require significantly more information from Horizon on the potential effects in order to avoid objection and for it to consider compliance with development plan policy of the significantly increased numbers now proposed. In addition it will require further information to justify and demonstrate the acceptability of

¹¹ Based upon information held by the Council regarding planning permissions, site licences and the spatial distribution of caravan and tourer sites.

the figure of 4,000 workers requiring accommodation. It needs to understand in greater detail the optioneering process which led to the identification of 4,000 as the appropriate number and what impact assessments have been undertaken. Without a draft PEIR / EIA it is not possible for the IACC to comment on the potential impact of having 4,000 workers (plus over 1,000 in existing accommodation) in North Anglesey. The Council would expect to see evidence that a range of figures from the PAC2 figure of 500 up to the PAC3 figure have been considered and an environmental assessment of each alternative.

- 4.17 The ES should include a full description of alternatives considered and in particular the environmental performance of the alternatives proposed at PAC2 versus those at PAC3. Such an assessment should be significantly more detailed than the cursory assessment presented within PAC3. The consideration of alternatives should include the consideration of existing **planning consents for developments providing worker accommodation** elsewhere before proposing modular accommodation in temporary buildings in line with the JLDP.
- 4.18 Horizon proposes to implement the on-site campus in phases and the Council requires to understand and agree the trigger points at which phases are delivered and to ensure that suitable mitigation is in place for each phase and for restoration.
- 4.19 The Main Consultation Document PEIR presents Horizon's assessment of the environmental effects arising from the changes made at PAC3. Tables 5-6 and 5-7 focus upon construction and operational effects arising principally from the proposed on-site campus. There is no consideration of decommissioning and restoration of this area. The Council expects decommissioning effects to be identified and will require information on the timescale for decommissioning, phasing (if proposed) and means of reinstatement. Security for reinstatement may also be required.
- 4.20 The assessment should also consider the effects arising from the change in the number of workers proposed from the figure presented at PAC2 to that at PAC3 (from 10,700 to 9,000). Whilst the assessment tables provide an attempt to assess matters such as the removal of Rhosgoch or the Amlwch sites from consideration they do not consider the wider socio-economic effects resulting from the proposed reduction in worker numbers and concentration of TCWA in North Anglesey.
- 4.21 The assessments presented within PAC3 provide insufficient information to enable consultees to properly respond to the conclusions of effect. The 'PEIR' lacks sufficient baseline information on site conditions and detail on the proposed campus to enable the Council to agree or disagree with the findings of significance reported within the tables. For example reference is made to the potential for hydrological changes to lead to significant adverse residual effects upon the Tre'r Gof SSSI possibly leading to its long-term deterioration and loss. However no details are provided on the proposed drainage regime, on the existing ground and surface water flows to the receptor and how they might be compromised, or on the compensation measures – to include the provision of compensatory habitat should it be lost. Horizon should clarify whether the potential for its loss has been increased as a result of the PAC3 changes. If the probability of possible loss is greater as a result of the proposal to accommodate the 4,000 workers at the on-site campus then this reinforces the Council's requirement for

there to be a detailed assessment of both alternative sites and alternatives numbers of workers accommodated on site.

Worker Accommodation Management Service (WAMS)

- 4.22 JLDP Policy PS 9 requires that the accommodation requirements of construction workers should be met in a way that minimises impact on the local housing market and does not result in unacceptable adverse economic, social, linguistic or environmental impacts. The WAMS success/ effectiveness as a tool to manage worker accommodation impacts depends on whether or not construction workers will be required to use it. Its value would be diluted if use is optional and not mandatory.
- 4.23 The Council welcomes the commitment to the WAMS however its remit and monitoring scheme should be extended to monitor homelessness, house prices and rent levels on Anglesey as well as the wider KSA in order that both Horizon and the Council are able to understand the pressures in the market and the requirement for additional mitigation should prices rise, and impacts be greater than predicted ES. Triggers will need to be identified for different accommodation sectors and locations (e.g. North Anglesey, Holyhead, the wider JSA) with additional mitigation measures agreed in advance should the trigger points be reached.
- 4.24 The IACC has previously provided comments on the Terms of Reference for the WAMS (on 15th May 2017) and this response should be read in conjunction with that response.

Site Campus Management Plan

- 4.25 The Council welcomes the intention to provide on-site community infrastructure facilities. It is noted that these facilities may not satisfy all construction workers' requirements, for example reference is made to the requirements of workers who may not chose to return home on the weekend. Continued discussion will be required with the Council to ensure that any relevant off site facility (such as an existing leisure centre or reception area) has the capacity to accommodate the additional impact or demand as set out in Policy PS 9 and Policy PS 2.
- 4.26 Using the FiT standards in order to provide sufficient open space requirement for 4,000 workers on the site at least 6.4ha of outdoor sports facilities should be provided on the site. This quantum may need to be increased however if the recreation facilities are also to be used by workers irrespective of where they live as is referenced at Table 5.4 in the Main Consultation Document.
- 4.27 Considerable further detail is required on the scope, design, layout etc. of the amenity building so that the IACC can assess whether it will meet the need of the workforce without adversely affecting existing facilities and services. The 3,000 workers living in existing accommodation, for example, will need to use local facilities and services and as shown by the population of the area this will have the potential to have significant impacts on these. Stating that a 'small community fund' will be provided to meet these impacts is wholly unacceptable. Detailed impact assessments will need to be undertaken and appropriate mitigation provided.
- 4.28 The lack of details of the health and well-being provision on the proposed campus and potential impact workers could have on the local leisure centres is unacceptable. It is

not clear if the facilities on site will be a sports hall or fitness room as it is currently identified as gym, the space allocated for the gym is also not defined which could result in having an effect on the local leisure centres if the area is not sufficient for number of users (see comment at 4.25 above). There are no details in relation to aquatics provision and needs of the workers in relation to this aspect which will certainly have an impact on local swimming pools. The outside multi sports area has been identified but further details in relation to flooring type is not identified e.g. 3G / tarmac which again could have an impact on the local provision at the leisure centres as workers will travel to play on better facilities. These details require to be provided in order that the impact on local facilities can be assessed.

Accommodation Strategy

- 4.29 The strategy provides limited additional information to that provided within Chapter 5. In addition to the comments provided in relation to the WAMs already made, the Council would need to agree with Horizon a timescale for the establishment of the WAMS which should be established and operational before the start of construction of the Wylfa Newydd project.
- 4.30 The Council and Partnership welcomes the commitment to provide a housing fund. The fund needs to be in place in advance of construction to support the provision of new accommodation including affordable and social homes for rent, prior to the arrival of construction workers onto the island. Details of a timescale will need to be agreed with the Council which should include for the phased delivery of new accommodation ahead of and throughout the construction period.
- 4.31 In addition to the measures identified within the document, mitigation in the form of funding from Horizon to provide improvement grants available to landlords and to support to landlords to register with Rent Smart Wales. Funding to support the return of empty homes and other vacant buildings into the property market and to encourage the supply of latent accommodation from within existing communities will also be required to enable the provision of the capacity Horizon wishes to make use of. Funding should also be provided to cover the increase in demand for Environmental Health Officers, Housing Options Officers and Empty Homes Officers.

Transporting the Workers

- 4.32 The Council has serious concerns with regard to the PEI contained within Chapter 6 Transporting the Construction Workforce and Materials. The document identifies a number of changes to the scope of the assessment as a result of the optimisation process following PAC2 including changes in the amount of materials to be delivered by road and in the amount of construction waste generated yet neither of these changes are considered within the Table 6.4 of the PEI. Furthermore Table 6.4 incorrectly identifies sources of environmental effects as receptors (Road traffic from temporary workers' accommodation is not an environmental receptor). These errors invalidate the PEI. A similar misunderstanding occurs within tables 6.6, 6.7 and 6.9, 6.10.
- 4.33 The PEI fails to consider effects arising from the decommissioning of the main site campus which the Council considers could be substantially greater than those

predicted for a 500 bed campus at PAC2. The effects upon the environment as a result of the traffic required to decommission the campus should have been provided.

- 4.34 Misunderstandings contained within Table 6.4 are further reinforced by comments that the increase in vehicle movements are within the design capacity of the roads. This conclusion again demonstrates a misunderstanding of the EIA process, consideration should instead be given to the effects of the increase in road traffic upon environmental receptors as a result of, for example noise, vibration, visual, severance, driver delay, pedestrian delay, fear and intimidation, etc. unless they can be scoped out. The appropriateness or otherwise of the highway to accommodate vehicles is not in itself an environmental consideration, instead it should be the environmental effects that would arise from its increased use.

Construction workers accommodation summary

The Council does not agree that the baseline information on availability of accommodation is correct as that contradicts its own evidence. Horizon need to engage in short course on establishing an agreed baseline. Furthermore, some of the assumptions upon which Horizon's number are based are rejected meaning that the Council considers the numbers which are provided to be flawed and does not accept that these cannot be used to assess impacts. Horizon has not presented the evidence base for or a suitable consideration of alternatives to the onsite provision, it is not acceptable to increase this campus by 8 times without providing the evidence base to allow assessment of that. The detail to undertake a community impact assessment and allow meaningful discussion of impacts and mitigation is entirely lacking and it is unacceptable that at this stage detail on issues such as worker transportation, worker management and the provision of leisure and recreation facilities is entirely omitted.

5.0 HIGHWAYS & TRANSPORT

- 5.1 The following report summarises key 'Highways and Transport' issues identified by the Isle of Anglesey County Council (IACC) following the review of PAC3. To avoid unnecessary repetition, reference will be made to IACC's formal PAC2 consultation response should key issues reoccur.

Horizon's Gravity Model

- 5.2 The IACC believes that an independent verification of HORIZON's Construction Worker Distribution Gravity Model is required following the review of Technical Note: Home Based and Non-Home Based Worker Travel Gravity Model (document no. 60PO8007/SOC/TM/002).
- 5.3 The gravity model estimates the geographical distribution of workers who either travel from their homes (Home Based Workers) or who are based in temporary accommodation (Non-Home Based Workers). The gravity model outputs are based on a series of emerging input characteristics in respect of worker numbers, proportion of job types/skills, and proportion of accommodation types.
- 5.4 Not unlike many fields of work in modelling impacts of developments/projects there are three steps that lead one to develop and justify mitigation measures, namely:
1. Assumptions
 2. Inputting and distribution of assumptions in a model
 3. Outputs
- 5.5 The mitigation measures IACC seeks will be based on the outputs, but the basis of those outputs need to be robust which raises concerns to the assumptions made by HORIZON. These assumptions effects upon all work-streams, including language/culture, housing, traffic and transport, education, health services, tourism, etc.
- 5.6 Key assumptions (not exhaustive) that will need to be verified to ensure output accuracy may include:-
- Locating 4000 workers at the TWA on site
 - Peak Worker distribution i.e. 2000 home based and 3000 non-home based
 - Split of Home Based Workers and Non-Home Based Workers by Anglesey Area
 - Profile of home based workers
 - Occupation groups workforce breakdown
 - Proportion of each occupational grouping likely to be taken by local people
 - Accommodation stock for non-home based workers
 - Estimated headroom for non-home based workers
- 5.7 In addition, in the context of Traffic and Transport, these results have a significant influence on the following:
- Strategic location of any park & share facilities
 - Identification of highway routes susceptible to deterioration
 - Proposed routes of HORIZON shuttle bus service
 - Identifying unsuitable highway routes for proposed bus service
 - Pick-up points of construction workers
 - Parking provision near any pick-up point
 - Potential congestion points

- 5.8 The IACC seeks confirmation that the construction worker distribution gravity model(s) has been assessed and validated independently by a suitable and capable person, in order to progress with assessing the impacts of this workforce distribution on the highway network.

A5025 Highway Improvements from Valley to the Wylfa Newydd Development Area (WNDA)

- 5.9 As previously stated in PAC2 response (para. 8.1), the IACC welcomes the proposed online and offline works to the A5025 as they are vital to Horizon's Freight Transport Strategy. However the IACC seeks evidence that the proposed new A5025 roundabout at Valley and A55 Junction 3 roundabout/slip road have sufficient capacity to accommodate the significant volume of traffic that will be departing Wylfa to gain access onto the A55, especially on the evening of the 11th day of a working shift period.
- 5.10 The traffic flows will affect the new Ysgol Rhyd y Llan and its pupils therefore careful consideration is required to regulate traffic during school opening and closing times.
- 5.11 The IACC welcomes the improvements carried out to Nanner Road as part of Horizon's preparatory works. However Horizon will need to demonstrate that all improvements which are required to ensure Nanner Road is fit for purpose, such as works to the adjoining A5025 junction, have been completed prior to any closure of Cemlyn Road.

Sustainable Travel

- 5.12 Evidence from the Hinkley Point C project highlights the parking problems which have arisen on that similarly sized project. As a result of these problems, EDF has applied to Somerset County Council for additional park and ride facilities (four park and ride sites were included in DCO application, EDF are now applying (through TCPA) for their 8th park and ride site). This demonstrates both the practical and commercial advantages of securing and providing sufficient park and ride / share facilities at strategic locations as part of a coherent, robust strategy addressing worst case impacts at a suitably early stage.
- 5.13 The IACC reiterates its disappointment at the lack of acknowledgment by Horizon for the need of park and share facilities on the Island (and the mainland) to supplement the proposed park and ride site. The need for such facilities was demonstrated by the IACC at PAC2 (para. 8.10). Notwithstanding Horizon's position, the IACC has provided a list of park and share locations which could be utilized by Horizon, thus providing resilience and flexibility to their transport strategy.
- 5.14 The IACC is very concerned regarding the lack of detail surrounding car sharing and parking. Horizon have stated that 3 workers per vehicle is required to be allowed to park on site. Although the IACC support the principle of sustainable transport, given the lack of detail within PAC3 and present monitoring information from Hinkley Point C which demonstrates that only 3%-4% of people are car-sharing the IACC have serious concerns regarding the implementation and enforcement of Horizon's strategy. The concept of 3 workers per car must be implemented throughout the construction phase to increase sustainable transport. Horizon should demonstrate how this will be delivered or increase vehicle numbers to reflect the realistic likely impact.
- 5.15 The IACC has concerns of a significant increase in uncontrolled traffic numbers using Class II, III and unclassified roads to access the parking spaces at the WNDA, especially on a daily commuting basis. Relocating all the proposed parking spaces at the WNDA to the park and ride facilities would remove this risk. However the IACC would consider alternative measures to reduce this risk, such as prioritising parking

spaces at the WNDA. In order to minimise impacts on the highway network and local communities a more cohesive robust strategy is brought forward including as a minimum that park and ride provisions remains at 2,700 spaces, on-site provision is restricted to 1,000, satellite park and ride / park and share sites are brought forward and that workers living in the main site TWA must park at Dalar Hir (assuming that this site ultimately goes ahead) for the duration of their stay. The Park and Ride will also need to be operational (in blocks of 250-500 if necessary) prior to construction commencing.

- 5.16 Horizon will need to demonstrate how they will implement mandatory and reactive mitigation measures. This will include measures to manage and enforce construction worker travel movements to restrict uncontrolled traffic using unsuitable roads (applicable to all construction workers).

Road improvements to the A5025 between Wylfa Newydd and Amlwch (A5025 North)

- 5.17 Further to Horizon's statement that a funding package will be provided to the IACC to deliver limited online highway improvements to the A5025 between Wylfa Newydd and Amlwch, the IACC are eager to discuss and agree a feasible and robust road safety improvement scheme.
- 5.18 With Horizon estimating that daily worker travel movements along the A5025 North will now increase from 7% up to 15%, this implies a relatively low increase compared with current traffic levels. As per the IACC's previous request at PAC2 (para. 8.18), the traffic flow increase should be shown as an hourly increase in all traffic associated with the Wylfa Newydd project, rather than the vehicle Annual Average Daily Traffic (AADT). This will highlight the significant increase in traffic levels expected at shift start / end times and allow the identification of appropriate mitigation measures.

Construction and Operation of Associated Development sites (including Temporary Workers' Accommodation)

- 5.19 The IACC has identified the potential adverse impacts on the highway network as a consequence of construction traffic related to the Associated Development sites. As per IACC's previous request at PAC2 (para. 8.24.1), Horizon should submit Construction Traffic Management Plan's (CTMP) for all Associated Developments and A5025 highway improvements.
- 5.20 To reduce this potential adverse impact on the highway network, Horizon should construct the Logistics Centre and the Park and Ride facility prior to any other Associated Development. This would allow the movement of construction vehicles to be appropriately managed in order to minimise the impacts on the highway network.
- 5.21 The construction of the MEEG/AECC&ESL should not commence until the A5025 offline improvement works have been completed. This would reduce the risk associated with the conflict with new school at Llanfaethlu.
- 5.22 The IACC seeks to enter into a formal agreement with Horizon, under Section 59 of the Highways Act 1980, to conduct highway condition surveys of routes to the WNDA and all Associated Development sites. The IACC would suggest Horizon undertake highway work to future-proof these routes to reduce the risk of delay to their construction programme.
- 5.23 The IACC recommends that Horizon provide a fund for the ongoing highway maintenance works that will be required to all roads that link Associated Development

sites with the Wylfa Newydd site, as well as the improved A5025 from Valley to Wylfa to address the damage their use of the highway network will cause.

Utilizing the Marine Off-Loading Facility (MOLF) and A5025 highway improvements

- 5.24 The IACC welcomes the intention of minimising road freight movements by maximising the use of the proposed MOLF. However further discussions are required to agree the volumetric thresholds of construction traffic which it would be acceptable to route along the A5025 during the different stages of the Wylfa Newydd construction period. Such stages would include prior to the A5025 offline improvements and also prior to the MOLF being in operation or unavailable. The IACC does have concerns that any delay in the construction and delivery of the MOLF would have a significant impact on the highway network. The IACC seek clarity and assurance from Horizon that the MOLF will be operational by 2021 in time for main construction and what mitigation measures are being prepared where there is any delay. Further detail is also required on the amount of construction material expected to be delivered on to site whilst the MOLF is being constructed.

Highways and Transport Summary

As has been noted in other sections the Council considers the lack of detail provided on this theme to be unacceptable. The Council does not accept the Gravity Model used and therefore cannot agree the baseline figures with Horizon at this time. The Council also does not accept that some of Horizon's assumptions such as car-sharing rates are realistic or appropriate. Horizon requires to ensure that the traffic modelling takes multiple scenarios into account and is robust and realistic, the Council does not accept that the current modelling reaches the required standard. Given that the baseline and impacts cannot be agreed it is not possible to progress meaningful discussion on precise forms of mitigation as should be in progress at this stage.

6.0 WELSH LANGUAGE AND CULTURE

- 6.1 In its responses to previous consultations the IACC set out the expectation that the Welsh Language and culture is treated as an all-encompassing theme and golden thread underpinning consideration of impacts and mitigation of all aspects of the Wylfa Newydd project. Horizon's reassertion of their commitment to this approach is welcomed, however, this approach is not evident in the PAC 3 documentation where Welsh Language is not a thread throughout the documentation but is treated as a separate topic. The IACC therefore brings the attention of Horizon to the methodology they adopted in preparing the draft PEIR as part of PAC2. This included a section in each chapter which considered the Welsh language implications of the proposals. This explicit Welsh language and culture 'proofing' should be included in the DCO submission and supporting documents. It therefore follows that the Questionnaire which asks consultees to rank types of projects in order of importance is deeply flawed as Welsh language and Culture is in the list of projects.
- 6.2 The IACC has been an active member of the Wylfa Newydd Welsh Language Steering Group established by Horizon. The Group has called on specialist linguistic planning and facilitation expertise which led to the production of a list of Actions which formed the basis for a draft Welsh Language and Culture Mitigation and Enhancement Strategy. The IACC notes the referencing of this work in the main Consultation Document and looks forward to working with Horizon and fellow Group members in developing these measures and their delivery.
- 6.3 The IACC therefore appreciates the announcement of the appointment of a Welsh Language and Culture Coordinator to assist in the further development, implementation and monitoring of an agreed programme of measures. The IACC would be happy to provide any support or input it can to the recruitment process for this important post and would request the opportunity to review and comment upon the job description prior to advertisement of the role. This co-ordinator should report to the independent Steering Group on a regular basis.
- 6.4 The IACC is of the firm view that the appointed Coordinator should have access to specialist linguistic planning expertise which was instrumental in the development of the Actions and draft Strategy, and support in using the Welsh Government's Risk Assessment Methodology.
- 6.5 The IACC notes that the three key themes for the broad areas of mitigation and enhancement in Horizon's Welsh Language Pledge replicate the 3 priority areas in the IACC Welsh Language Strategy published by the Welsh language Strategic Forum. This Strategy is based on the Vision 'for the 2021 Census to see an increase in the number of Welsh speakers and that the number of Welsh speakers increases to at least 60.1% as it was in 2001'. Through cooperation and taking practical steps that is attainable. These priorities underpin the draft Mitigation and Enhancement Strategy proposals which will need to be re-visited in the light of the project changes outlined in PAC 3. The IACC therefore expects this alignment to be reinforced in the content of the final Strategy and its implementation.
- 6.6 PAC 3 outlines proposed changes to the Wylfa Newydd project. A key change is in respect of the Worker Accommodation Strategy. This has implications for nearby communities housing workers in existing tourism, private rented sector and other accommodation terms and the use of facilities and services, and the combined interactions with workers accommodated on the campus. The documentation refers to the Site Campus Management Plan identifying measures to help ensure that any adverse effects on local communities and Welsh language and culture. However, no

indication of the likely degree of interaction nor detailed proposals are provided. The Council requires a holistic and spatial view to be taken on the potential benefits and impacts and their mitigation. The IACC therefore consider the Horizon statement that it will provide a small scale fund to mitigate specific community impacts, including cumulative effects to be wholly insufficient. The specification of the fund as small is considered pre-emptive and the size of the fund should relate directly to the mitigation and enhancement measures required following appropriate assessment which has not been included in PAC3.

- 6.7 The IACC appreciate Horizon's acceptance that the in-migration of non-Welsh speaking construction workers will reduce the proportion of Welsh speakers. However, the impact and therefore the appropriate mitigation of this in-migration will be dependent upon the number of workers migrating, their dependents, their location, school places required, degree of interaction with the communities in which they are residing and the duration of their stay.
- 6.8 With regard to education and skills the Council has set out high level measures in the draft Mitigation and Enhancement Strategy which draw in its Welsh Education Strategic Plan. These include a Welsh Language Skills Assessment tool and attainment targets for Welsh Language training, and specialist capacity, courses and facilities to support families and their children re-locating to Anglesey. Also, Welsh skills (Bilingual) should be assessed and included as part of the recruitment process for apprenticeships in order for Horizon to treat Welsh as a golden thread throughout all processes and actions and to identify the potential impacts and scale of education required as well as helping to identify returning residents with some existing Welsh Language ability.
- 6.9 In addition to being a golden thread Welsh language and culture is one of the seven Wellbeing Goals required to be taken into account together with the principles of sustainable development in the decision making of the IACC and other listed bodies which are Key Stakeholders in the Wylfa Newydd project. Horizon goes some way to acknowledging the inter-relationships between these Goals in its statement recognising the connection between a strong economy, jobs and the well-being of the Welsh language and culture on Anglesey. This connection is considered to be contingent upon the level of investment in skills training, sustainable communities, etc. which are discussed in detail in the relevant accompanying sections.
- 6.10 The well-being of the Welsh language is inextricably linked not only with jobs (the Goal of 'A Prosperous Wales/Anglesey') but with all other six Goals. The IACC therefore requests that Horizon follows the approach being taken with its Health Impact Assessment (which covers the Goal of 'A Healthy Wales/Anglesey'), i.e. in cross-referencing mitigation measures in other Assessments and Strategies. For example, a major strand of the draft Welsh Language Mitigation and Enhancement Strategy relates to education and skills measures which will be dealt with in detail in the Socio-Economic Section of the Environmental Statement in the DCO submission. The IACC would also suggest that a similar approach to that taken to Welsh Language as being holistic to every element of the project is adopted with Health and Wellbeing.

Welsh Language Summary

Horizon has again failed to give Welsh Language and Culture the weight the Council requires and is not treating it as an all-encompassing theme despite saying that it will. This is a key issue for Anglesey and the Council has advised Horizon at every opportunity that it should be considered holistically across all aspects of the project and Horizon should not attempt to deal with it in isolation. The current approach treats this as one of various possible areas of impact and therefor completely fails to

recognise the clear message on this which it has been given. The Council requires Horizon to integrate Welsh Language and Culture as a key consideration and area for impact assessment across the entire project, any other approach will be deficient.

7.0 **TOURISM**

- 7.1 Tourism is a key economic sector for the Island both currently and in the long term. It accordingly must be given the most careful and thorough consideration. The IACC welcomes Horizon's recognition of the importance of the tourism sector to the Anglesey economy. The proposed mitigation including the creation of a Tourism Fund is a critical element in ensuring that the various impacts on the sector do not adversely affect the wider economy. The proposed Tourism Fund is welcomed. The scope of activity for which the Tourism Fund could be used should be more clearly specified and include, but not be limited to (for example):
- 7.1.1 Measures to monitor and report on use of tourism accommodation to help understand impacts, develop and implement appropriate mitigation as the project progresses;
 - 7.1.2 Measures to monitor and report on visitor activity and expenditure to fully understand the impacts on the tourism sector and develop appropriate mitigation responses including promotional and marketing activity;
 - 7.1.3 Measures to address any degradation in accommodation standards created by using tourism accommodation to house construction workers;
 - 7.1.4 Development of a marketing and promotional campaign to address the issues and concerns relating to negative visitor perceptions and the subsequent impacts on tourism revenues, employment and economic output.
 - 7.1.5 Capital investment to improve tourism infrastructure and facilities to ensure that the tourism offer on the Island is protected and enhanced where possible.
- 7.2 The Fund would also need appropriate governance and decision making arrangements to ensure sound and objective decision making. There is a need to progress this aspect alongside the arrangements for the other funds proposed as mitigation by Horizon. IACC welcomes the opportunity to continue discussion and involvement in the design, governance and delivery of the Fund. Specifically there is a need to determine matters including the potential size of the Fund, its legal structure and the role of various partners including the private sector in determining how and what the Fund is utilised for, and how that relates to the identified impacts of the project.
- 7.3 In relation to tourism accommodation it is essential that monitoring forms part of the wider mitigation relating to the impacts on housing in its widest sense. IACC strongly support the need for Horizon to provide a Construction worker accommodation management service and this needs to have the ability to monitor and manage accommodation across all types and tenures. IACC welcome the proposal from Horizon to fund this service. This service will need to be operational before the start of Main Construction as tourist accommodation is likely to be targeted first by construction workers whilst the temporary workers accommodation is being constructed.
- 7.4 IACC's position is that the reference to "significant spare capacity" in the tourism accommodation sector is incorrect based on existing evidence and a number of factors that limit the potential use of accommodation. These include the actual make up and distribution of bed spaces alongside other factors including licensing, site restrictions, practicalities of accommodating visitor and construction workers on the same sites and owner appetite for letting to construction workers. More work is required on these aspects to agree a way forward.
- 7.5 Beyond the actual capacity available in the tourism stock there remains the issue of deteriorating accommodation standards impacting on the operation of the tourism sector and how this will be mitigated by Horizon. This was highlighted in PAC2 as an

area of concern and this continues to be the case. As noted previously the Housing and/or Tourism Funds can provide a means of mitigating these impacts.

- 7.6 The IACC remain concerned that the level of additional demand from Wylfa Newydd is likely to cause labour shortages and displacement in existing sectors and businesses and this would include employment and firms in the tourism sector. This presents an opportunity for Horizon and its supply chain to invest in training in areas to ensure there is an adequate supply of labour for the demand created by Wylfa Newydd. This would also help mitigate displacement impacts and provide a sustainable legacy from the project to support key sectors of the economy including tourism. Given this there is a need for Horizon and its supply chain to commit to additional investment in training for service sectors roles to support the Wylfa Newydd project.
- 7.7 A number of references to the visitor and media reception centre are made within the PAC3 consultation document. Whilst the use of an international design competition for the permanent facility is welcomed there is a concern that there is no definite commitment to build the Visitor and media centre and that this element of the project may not be delivered. The IACC require that the stated intention to apply for planning permission to a firm commitment to design, construct and operate the facility is amended to a deliverable, secured, and funded commitment to do so. The temporary viewing area during construction is an idea that IACC supports but this should not be seen as a substitute for a permanent visitor facility. IACC feels that the role of Wylfa Newydd's construction in attracting visitors (and locals) should not be underplayed. Further detail is needed to understand how this demand would practically be accommodated both within the temporary visitor platform and in terms of the additional demand on road infrastructure created by these additional visitors.
- 7.8 There is a need for further commitment and investment to train and develop staff for Wylfa Newydd in areas where the project will create demand for skills which overlap with the tourism sectors skill needs e.g. catering, hospitality, leisure, logistics. At the current time there is no indication that Horizon or its supply chain will be offering support and financial investment in these areas to support training that responds directly to the demand that the Wylfa Newydd project is creating.

Tourism summary

The recognition of the importance of the tourism sector is welcome but requires to be demonstrated through action rather than words. Detailed, funded plans with suitable monitoring regimes and agreed measures to counteract impacts which go beyond those anticipated need to be put in place early. The consequential impacts of the project such as labour displacement are not currently adequately addressed and far more detail is required on these to allow meaningful impact assessment and the identification of suitable mitigation.

8.0 **HEALTH AND WELLBEING**

- 8.1 The Well-being of Future Generations (Wales) Act 2015 applies to a number of public bodies in Wales (including the Council as a Local Authority and the Welsh Government). IACC takes the view that as the DCO relates to a Nationally Significant Infrastructure Project in Wales it should also have regard to this legislation and the importance of the principles of it which the Welsh Government has given statutory force.
- 8.2 IACC is of the view that detailed information on the project must be provided in order to enable the Council and other listed bodies in the legislation to make informed decisions, having full regard to the Wellbeing statutory duties¹², namely the Sustainable Development Principle and 7 National Wellbeing goals. Horizon must provide the Council and Welsh Government with the information necessary to allow them to comply with the statutory requirement.
- 8.3 Horizon will already be aware of the Local Authority's position on this crucial matter. Indeed, the matter was raised by the Council in its response to the Wylfa Newydd Project Update document, the Health Impact Assessment Interim Report (HIAIR) and also PAC2, when it stated that *"the document fails to acknowledge sufficiently the statutory footing of wellbeing in Wales and the requirements of the Well-being of Future Generations (Wales) Act 2015 and the Social Services and Well-being (Wales) Act 2014."*¹³ This view is maintained.
- 8.4 In order to allow IACC to fully respond to the proposals Horizon should provide detailed project information in order to enable IACC and other public bodies to make informed decisions and give meaningful responses, consider the proposed development through the lens of the wellbeing legislative framework, treating wellbeing as an all-encompassing theme; and to adopt the statutory wellbeing needs assessments¹⁴ as a common baseline for the health and wellbeing themes and impact assessments and as a baseline for ongoing monitoring of emerging, unforeseen impacts. The recently published Community Involvement Officers report (dated April, 2017) should also form part of this common baseline.

Scope of Impact Assessments

- 8.5 The IACC have previously commented on the adequacy and robustness of the scope of draft impact assessments¹⁵ as part of its formal response to PAC2 and impact assessment interim reports. In its PAC2 response, further representations were made by the Council which strongly advised Horizon that the impact assessments and any mitigating actions could not be developed in isolation, without full consideration of the entire project. The proposals continue to lack sufficient detail. Clarity is crucial in order to enable:
- 8.5.1 A comprehensive, well informed assessment of community, health, social care and wellbeing impacts.
 - 8.5.2 Development of legacy proposals for communities on the Island as part of the mitigation of adverse impacts (both locality specific and Anglesey wide).

¹² Wellbeing of Future Generations (Wales) Act 2015

¹³ [Isle of Anglesey C.C. \(24/10/2016\) Response to the Horizon Nuclear Power Wylfa Newydd Project Pre-Application consultation – Stage Two. Paragraph 7.11](#)

¹⁴ Public Service Board Wellbeing Assessment (Wellbeing of Future Generations (Wales) Act 2015; Population Needs Assessment (Social Services and Wellbeing (Wales) Act 2014

¹⁵ Health, Environmental and Equalities Impact Assessments

- 8.6 The current impact assessments do not reflect the outputs of the Horizon project optimisation process. For example, the HIA does not consider/assess the impacts of 4,000 Temporary Worker Accommodation spaces at the Wylfa Newydd Site. IACC is of the view that this alone has fundamentally changed the proposed Wylfa Newydd development and brings with it additional, adverse impacts. The location of worker accommodation remains a fundamental, crucial component of the proposed development in its entirety – both in terms of workers accommodated on site but also the remaining 3,000 workers who will be accommodated in local communities or commuting from their own homes. Accommodating a significant number of temporary workers on site, within the WNDA, has not been scoped into the HIA or discussed and considered by the HIA Steering Group. This gives the IACC and other public bodies little confidence that effects on Health and Well-being have been fully identified or adequately mitigated in order to minimise adverse impacts.
- 8.7 To address the concerns regarding the inadequate impact assessment at PAC3, Horizon must ensure robust, integrated impact assessments of potential impacts across the spectrum of community, health, social care and wellbeing considerations, which reflect the outputs of the recent Optimisation Review, are undertaken and consulted upon. Horizon will require collaborate with IACC and wellbeing partners to ensure impacts are identified and mitigated as part of the overall impact assessment and mitigation approach.

Air Quality

- 8.8 The latest Local Air Quality Management in Wales (June 2017) Policy Guidance includes the WHO Guideline Value of $10\mu\text{g}/\text{m}^3$. Our argument is that as any increase in PM2.5 could give rise to health effects (there is little evidence that there is a threshold below which no adverse health effects would be anticipated (WHO, REVIHAPP, 2013)) the current UK Air Quality Standard of $25\mu\text{g}/\text{m}^3$ is discredited and should not be used as one of the significance criteria in the HIA. The WFGA advocates maintaining or improving upon existing PM2.5 concentrations and the IACC believes it's no-longer appropriate to use the $25\mu\text{g}/\text{m}^3$ standard. Even at $10\mu\text{g}/\text{m}^3$, this is significantly higher than the current levels in the area and the average exposure levels in Wales / Anglesey. The new Policy Guidance has a strong emphasis on the Wellbeing of Future Generations Act 2015 and we believe that our approach is the correct one to take.
- 8.9 Although it is not a deprived community, Horizon have identified that the local community has lower than average respiratory health within par 2.5.5. The recently introduced Local Air Quality Management Technical Guidance [\(TG16\)](#) April 2016, introduces a new role for Local authorities in England to work towards reducing emissions and concentrations of PM2.5 in place of an annual mean; while a new annual mean objective of $10\mu\text{g}/\text{m}^3$ is introduced for Scotland. No reference is made to the stance in Wales and as such, IACC believe that the Welsh Government's Policy Guidance on Local Air Quality provides the clearest indication of the position relating to PM2.5 in Wales.

Safeguarding, community cohesion and tensions

- 8.10 Chapter 7 considers effects on communities but is limited almost solely to environmental and transport impacts. IACC have also previously commented at length on potential safeguarding and community cohesion impacts and also adverse effects

on local communities¹⁶. Safeguarding, lifestyle and behaviours are all issues of significant concern which will adversely affect the cohesion of local communities and it is unacceptable that Horizon have not fully recognised the importance of ensuring robust safeguarding arrangements in place, as previously proposed by IACC.

- 8.11 Safe workforce is a core element of an organisation's safeguarding approach and there is little in the PAC3 documentation on how Horizon intend to establish a policy framework to regulate workforce conduct across all internal and contracted services. Horizon must demonstrate leadership in this area. In order to do this Horizon requires to mainstream safeguarding impact assessments in contractor / sub-contractor tendering processes. Robust employer framework should be adopted by Horizon demonstrating their Corporate Social Responsibility commitments on these issues, and providing clarity on expectations regarding workforce behaviour (to apply within and outside working hours). This should include Safer Recruitment policies and processes, appointment of a Horizon Safeguarding Champion/Co-ordinator, mandatory safeguarding training and safeguarding code of conduct for the entire workforce. The Council invites Horizon to work with partners including Bangor University to undertake a study on the community cohesion, safeguarding and protection impacts of the development over the construction phase, and would be pleased to assist with this collaboration.
- 8.12 Support for the goal of an **Island of cohesive communities** is essential and the promotion of safer communities through joint working with the Police and other Blue Light services and the community safety partnership is a prerequisite of a robust strategy. IACC continue to be concerned about the potential increase in human trafficking and modern day slavery activities often associated with large-scale projects. We reiterate our view that these behaviours have serious, adverse impacts on local communities and to require to be assessed and addressed to avoid these impacts as far as practicable. The revised temporary worker accommodation proposal creates additional safeguarding and cohesion impacts which Horizon must assess and mitigate. For example, a significant number of the workers to be accommodated on-site will have access to their vehicles and be free to access services off site, across the Island. Further, PAC3 does not discuss the detail regarding the remaining circa 3,000 workers who will be accommodated in local communities or commuting from their own homes.
- 8.13 To address the identified issues Horizon require to develop a multi-disciplinary, multi-agency Wellbeing Hub in Amlwch to mitigate against the impacts in communities that are within close proximity to the Wylfa Newydd site. A full community cohesion impact assessment must be included as part of the Environmental Impact Assessment, to realise the goal of an Anglesey of cohesive communities. This has previously been detailed in the IACC response to PAC2. Horizon must also ensure that a robust framework is in place to complete an Equalities Impact Assessment, within the Welsh national policy context. Horizon's supply chain policies must include as a pre-requisite for all traders to be approved/vetted as a passport to bidding for associated developments contracts and also contracts to service the site and workers (such as ancillary services). All of these measures require to be underpinned by an ongoing robust monitoring arrangements to ensure early identification and appropriate service response to any emerging adverse impacts. 8.14 **Vulnerable children, young people and adults** should be considered as groups being particularly sensitive within the population. These groups are often integrated in local communities, living independently and supported to meet their care and support needs.

¹⁶ IACC formal response to the Project Update Document (January, 2016), HIAIR (March, 2016) and Stage II Pre-application Consultation (October, 2016)

- 8.14 Horizon must engage with local communities on Anglesey to ensure they make clear their expectations on direct workforce and contractors' conduct. Input from local communities should be canvassed to inform impact assessments and ensure robust mitigation measures to minimise potential adverse effects. Horizon must ensure that all sensitive groups are identified and impact assessed as part of the Equalities Impact Assessment. Following assessment and identification of mitigation ongoing robust monitoring arrangements are required to ensure early identification and appropriate response to emerging adverse impacts.

Engagement and consultation

- 8.15 Multiple references were made in the PAC2 documentation to an intention on the part of Horizon to undertake further engagement with local communities and effected groups. As previously stated by IACC in its formal response to project documentation¹⁷, this engagement must include vulnerable and hard to reach groups and be undertaken in a meaningful and engaging manner avoiding tokenism. IACC believes that meaningful engagement and consultation cannot be undertaken within a 4 week consultation period and that is certainly not in keeping with good practice¹⁸.
- 8.16 As previously proposed by IACC, Horizon should adopt the Participation Cymru 10 National Principles of Public Engagement framework as a foundation for a robust programme of engagement and consultation with local communities and vulnerable groups Horizon are also strongly advised to adopt and action the recommendations of the recently published Community Involvement Officers report (April, 2017).

Monitoring

- 8.17 Effects on communities are very likely to include impacts of modern slavery, human trafficking and sexual exploitation, potential increase in rates of anti-social behaviour and increase in risk taking behaviours. These impacts in turn will result in increased safeguarding referral rates to statutory bodies (which include IACC). Wellbeing including the safeguarding of children and adults from potential adverse impacts is often at the "softer", less tangible end of the scale and therefore very challenging to quantify. However, without appropriate intervention such effects can have detrimental impacts for resilience of individuals and communities.
- 8.18 The document discusses a "small scale fund to mitigate impacts". Although the IACC welcome the commitment to a fund, this fund will need to be proportionate and of a suitable scale to meet the potential impacts. Horizon must ensure that an adequately resourced fund is established to respond to emerging adverse impacts with robust governance arrangements in place (to include clarity on scope/parameters, triggers and intervention indicators, escalation process, authority to commit expenditure). There is also a need to ensure the availability of adequate funds to respond appropriately to emerging impacts which in the absence of timely interventions will result in detrimental outcomes for individuals and communities and a reputational issue for the developer. These unquantifiable or unforeseen impacts will need to be included within the scope of a Community Resilience Fund (CRF) to ensure that Anglesey and its residents are not adversely impacted by the proposed development. Horizon should establish a process for multi-agency monitoring of baseline conditions and evidence on impacts of the Wylfa Newydd development upon local communities (to include safeguarding, cohesion and demand on social care services)

¹⁷ Project Update Report, HIAPR, Stage II Pre-Application Consultation

¹⁸ Participation Cymru 10 National Principles of Public Engagement framework

Health and Wellbeing Summary

IACC continues to require that the proposed development be considered in accordance with the wellbeing legislative framework and that wellbeing is treated as an all-encompassing theme underpinning consideration of impacts and mitigation of all aspects of the Wylfa Newydd project. The continuing omission of information on this topic is unacceptable and Horizon require to provide comprehensive, well informed assessment of community, health, social care and wellbeing impacts. These impacts should be addressed by mitigation proposals for communities on the Island which are target, funded and supported by realistic delivery plans.

9.0 ENVIRONMENT: SITE SPECIFIC

- 9.1 There is insufficient detail within the Main Consultation Document to enable the Council to provide detailed and meaningful comments on the various environmental issues (Public Rights of Way and Access, Landscape and Visual Amenity, Ecology, Archaeology and Cultural Heritage), so the comments provided in this document are provisional and may change as further information is made available. The DCO consultation guidance¹⁹ sets out that consultees need to be given sufficient information on a project to be able to recognise and understand the impacts, that information has not been included in the PAC3 consultation.
- 9.2 Some important environmental resources and receptors (including landscape, visual, ecological, archaeological and cultural heritage receptors) have been omitted from the plans and from the text of the Main Consultation Document and appear to have been overlooked. It is important that the baseline information is comprehensive and up to date and that the assessments take this baseline information into account. There is still very limited information provided on the ecology baseline and an absence of details on the proposed mitigation measures.
- 9.3 All the plans provided in the Main Consultation Document are small in scale and poor in reproduction quality such that it is impossible to read most of the annotations and keys. All plans should be reproduced at appropriate scales, with all annotations and keys clearly decipherable, they should be based on up-to-date Ordnance Survey maps or more detailed site surveys and should include all recent developments, e.g. the newly constructed Llanfaethlu School should be shown on the plan for Section 5 of the A5025 Highway Improvements, in Appendix D.
- 9.4 With regards to the proposed flexibility in the locations and dimensions of buildings, structures, stacks and roads on the Power Station site, the Site Campus, the Off-Site Power Station Facilities and the Associated Development, as defined in paragraph 1.4.6 – 1.4.10, all these should be clearly identified on layout plans and elevations, together with the flexibility required in each case. All potentially sensitive receptors around these buildings and structures should be identified, “acceptable worst case” scenarios should be identified and assessed and the limits to the locational and dimension parameters defined to ensure that the predicted impacts are not exceeded.
- 9.5 **All of the Council’s comments on the PAC2 / PEIR consultation remain valid and should be addressed in the final DCO submission and TCPA applications (where applicable) (except those relating to scheme components which have been deleted from the Project).**

The Power Station Main Site

- 9.6 The Council notes Horizon's decision to reduce the scope of SP&C works to be undertaken ahead of the grant of the DCO. Para 2.3.7 states that Horizon intends to submit a separate TCPA planning application to the Council for the SP&C works in 2017, consultation on this SP&C application is anticipated in summer 2017 and that

¹⁹ Department for Communities and Local Government, Planning Act 2008: Guidance on the pre-application process, March 2015

the majority of what was deemed SP&C works (s.61z consultation December 2016) will now be included in the DCO.

- 9.7 Unfortunately, PAC3 does not provide any substantial information on the precise scope of the SP&C works now proposed and so no detailed comments can be provided at this stage. The consultation to be undertaken in summer 2017 will require to address all the issues previously raised and to enable the Council to provide their comments on this aspect of the Project.
- 9.8 As part of this process, details of the mitigation proposals to be incorporated into the SP&C works will be required to allow the Council to assess the effects of the SP&C application. These mitigation proposals need to be part of the TCPA application and cannot be entirely deferred to the DCO application as they should include detailed proposals for restoration / mitigation, etc. should the main DCO works not proceed. The Council maintains its previously stated position that these works will form the first phase of the project and must be treated as such. The SP&C works cannot be considered in isolation from the project as a whole and this connectivity and the cumulative impacts will need to be appropriately assessed for both applications (DCO and SP&C TCPA).

Design and Layout of the Power Station

- 9.9 The power island is further from the A5025 and local communities but, as a result, it is closer to Cestyll Registered Historic Park and Garden (RHPG). The impacts on Cestyll RHPG need to be further assessed, and mitigation and enhancement measures need to be agreed through the production and implementation of a Conservation Management Plan (CMP).
- 9.10 Increased platform heights could increase the heights of buildings and structures relative to the surrounding area which could make a material difference to the appearance and predicted effects of these buildings and structures on seascape, landscape, visual amenity and heritage assets. All potentially sensitive receptors around these locations should be identified, "acceptable worst case" scenarios should be identified and assessed and maximum platform levels defined to ensure that the predicted impacts are not exceeded.

Appearance of the Permanent Power Station Buildings

- 9.11 From a landscape, visual amenity and cultural heritage perspective the following points need to be considered:
- 9.12 Using darker shades for the smaller buildings, together with a limited palette of surface finishes will make these buildings more recessive in the landscape and will help reduce the low level visual "clutter".
- 9.13 The use of a strong expression of colour on the reactor buildings needs to be carefully considered. An appropriate colour(s) could make these buildings iconic features, whilst an inappropriate colour(s) could overemphasise their scale and visibility. Consideration

should be given to the use of the more earthy colours of the geology of the island (see the Rock Clock at the Watch House in Port Amlwch).

- 9.14 Further details on the external appearance (layout, siting, dimensions, design, materials, surface finishes, etc.) of all the main and ancillary Power Station buildings should be provided, as both plans and elevations, together with photomontages from nearby locations to give a better understanding of the scale and appearance of the Project and to enable more meaningful assessments of the effects on landscape, visual amenity and heritage assets.

Wales Coast Path

- 9.15 Appendix A – para 9.8 and Appendix C – para 2.4.1 of IACC’s response to PAC2 stressed the importance of having the route of the Coastal Path, during the operational phase, positioned as close to the sea as possible offering users the best coastal route option with enhanced sea views. This was to ensure that one of Natural Resources Wales’ Wales Coast Path Route Criteria is satisfied: “*RC4: The route should be as close as possible to the sea as practicable and desirable*”.
- 9.16 Horizon has not explained why a footbridge across the frontage of the cooling water intake structure is not feasible. A structure using tall support towers is not the only engineering option available. For example fibre reinforced polymer footbridges spanning up to 300m have been constructed elsewhere. These long spans have been achieved without the need for masts and cable supports, made possible by the use of ultra-lightweight carbon fibre composite.
- 9.17 The proposed inland route for the coastal path involves a lengthy inland diversion and will be significantly unattractive to walkers as it will be positioned in a corridor between the power station site and the A5025. The diverted route would also add approximately 4km to the length of the overall route. The IACC are eager to discuss alternative paths or engineering solutions that would allow the path to be positioned as close to the sea as possible. The Coastal Path is very important to the leisure, recreation and tourism offer of Anglesey (being part of a wider Wales Coastal Path) and it’s important that the integrity of this Coastal Path offer is protected, if not enhanced as a result of this project. The IACC would strongly advocate for the Coastal Path to be re-instated on the coast following the completion of the main construction, and Horizon is requested to re-examine this option.
- 9.18 To help mitigate the inland diversion of the Wales Coast Path, a network of footpaths is proposed within the WNDA, to provide alternative sea views and other attractive routes for recreational walkers during operation of the Power Station. These will include a route along the Afon Cefn and a route over the new drumlin landform. These new footpaths could add value by providing views and interpretative information relating to the landscape, ecology, archaeology and culture heritage of the area, e.g. views to significant monuments and landscape features such as the hill top standing stones at Llanfechell. Any long term / legacy benefits from the archaeological programme could feed into interpretive material for users of the footpaths and these footpaths could connect with and provide access to Cestyll RHPG.
- 9.19 No information has been provided on the proposed route of the dual footpath and cycle path that would be created linking the Copper Trail to Cemaes via Penrhyn (not shown on any plans in PAC3). Currently, the Copper Trail follows Sustrans NCR 566 which

comes within 1km south of Cemaes. Horizon proposes to re-route a section of NCR 566 between Llanfechell and Cemlyn Bay as part of the A5025 online highways improvements which will divert NCR 566 and the Copper Trail further from Cemaes so it would be helpful to know the route of this proposed link between NCR 566 and Cemaes and how it links in with the proposed re-routing of NCR 566.

- 9.20 Figure 2-8 showing the Wales Coast Path diversion is insufficient to accurately assess the proposed routes due to the small size and scale of the base map. The Council would welcome further discussions with Horizon on the final alignment of the Coast Path.

Cemaes Bathing Water

- 9.21 The Local Authority raised the issue of Cemaes Bathing Water in its response to the Scoping Consultation in April 2016 specifically stating: “mitigation measures need to be in place to prevent sedimentation entering the bay to maintain and if possible enhance the water quality of the bay. Such measures need to be designed to cope with heavy rainfall events”.
- 9.22 We understand that the Planning Inspectorate and NRW also identified that the Scoping Opinion had not consider the potential impacts on Cemaes Bay as a European designated Bathing Water. Whilst Horizon have subsequently indicated that the effect of sediment and other water quality Parameters will be considered in the Marine Environment chapter of the Environmental Statement, it is not acceptable that this issue has not been included in the PAC 3 consultation. We question what, if any, further opportunity the Local Authority and other agencies will now have to comment on this matter before the DCO Submission, particularly as the water quality has been designated as poor for the 2017 bathing season and it is imperative that HORIZON ensures that it does not impact negatively on Cemaes Bay EU Bathing Water. As such, the consequences of larger numbers of shipping movements and the possibility of increased turbidity etc. must be considered and mitigation measures agreed to minimise adverse impacts. To this end, the Local Authority and its partners should be given an opportunity to comment on the Marine Environment chapter of the Environmental Statement before the DCO submission.
- 9.23 Horizon clearly state that the numerous mitigation measures relative to noise and vibration in and around the DCO and Associated Development areas will be addressed within the Environmental Statement. Therefore, the Local Authority and its partners should be given an opportunity to comment on the Environmental Statement before the DCO submission in order to ensure that any technical aspects within the mitigation proposals are robust and resilient in order to protect the amenity of both residential properties and businesses alike.
- 9.24 The IACC would also wish to seek early clarity upon the detailed mitigation measures proposed for residential properties and businesses. These were previously alluded to in the ‘Voluntary Local Noise Mitigation Plan’ as part of the PAC 2 consultation, although such specific mitigation measures were absent. Such mitigation measures should not just be confined to noise and vibration, but should view environmental issues holistically and iteratively (i.e. noise, air quality, artificial light, odour, etc.) and the impacts these will have. We would point out that we consider the worker accommodation at the WNDA would be a relevant receptor in terms of all the air quality objectives and the local authority continues to seek HORIZON commitment to the adoption of the WHO Annual Objective for PM2.5; particularly given the UK

Government's commitment to reducing concentrations of this pollutant and current average exposure levels on Anglesey and Wales currently fall well below the WHO limit²⁰.

Marine Off-Loading Facility and Breakwaters

- 9.25 The breakwater has moved approximately 20 metres to the west (further out to sea) and has also increased in its scale and massing. It is unclear what effect the changes to the breakwater might have on the 'significant views' out from Cestyll RHPG (valley and kitchen gardens) or on the settings of Cestyll RHPG and neighbouring listed buildings.
- 9.26 With regards to the MOLF, the potentially adverse effects on the Cestyll RHPG and the significant seaward views should also be considered.

Landscape and Environmental Masterplan

- 9.27 With regards to the LEMP, the IACC have specific comments at a high level on matters surrounding Public Rights of Way & Access, Landscape and Visual Amenity, Ecology, Archaeology and Cultural Heritage and noted below:
- 9.28 Further information is required regarding the timing, routing and legal mechanism to establish the network of new public rights of way on the WNDA. Proposed new rights of way should be detailed in a schedule to be submitted with the DCO and a Footpath Implementation Plan (FIP) should be developed in discussion with the Council. The IACC are eager to agree the content of this plan.
- 9.29 The LEMP masterplans (Stages One to Five) should be produced at a much larger scale, overlaid onto an existing Ordnance Survey map or more detailed survey of the site and should be accompanied by several cross sections that illustrate the relative heights of the proposed mounds and site activities when viewed from surrounding settlements and visitor locations such as Cemlyn Bay, etc.
- 9.30 The bund shown on the LEMP Stages Three and Four alongside Tregle is very narrow and would not be very high (even with slopes of 1:2). Also, it is not shown with any tree planting on it. More detail is required on this bund and consideration should be given to its re-design if this bund does not largely screen the construction phase activities from properties in Tregle.
- 9.31 Slope gradients of 1:2 are not consistent with the typical gradients of the existing drumlins (1:8 to 1:24) and are steeper than the angle of repose for granular material (typically 1:3 or less) so would require measures to retain the surface layers in place. It would be better to create asymmetric mounds with steeper slopes facing into the site and less steep and more natural looking "final" slopes facing outwards during the construction phase. The outer slopes could then be planted during the construction

²⁰ Stats Wales: <https://statswales.gov.wales/Catalogue/Environment-and-Countryside/Air-Quality/airqualityindicators>

phase and the planting would not need to be disturbed when the mounds are re-modelled to their final form.

- 9.32 Depending on the steepness of the final landform slopes and their suitability for agriculture, it may be appropriate to increase the amount of broadleaved woodland planting on the final mounds.
- 9.33 The LEMP masterplans (Stages One to Five) do not show the candidate Wildlife Sites – Arfordir Mynydd y Wylfa – Trwyn Penrhyn (which is within the WNDA) and Trwyn Pencarreg, which gives a false impression of the importance of these areas for biodiversity. These sites should be shown on these masterplans as they are very likely to be confirmed as Wildlife Sites in the current JLDP process.
- 9.34 The LEMP plans do not show the current boundary of the Cestyll RHPG which lies partly within the WNDA. The current boundary includes both the valley garden and the separate kitchen garden, both of which have significant seaward views. Consequently, the temporary construction fence runs through the current RHPG and LEMP Stages Three and Four show proposed development works within the RHPG.
- 9.35 The RHPG is now a statutory designation (under the Historic Environment (Wales) Act 2016) and it is understood that the statutory boundary (to be confirmed by Cadw) is likely to be more extensive. Clarity needs to be sought from Cadw on the proposed statutory boundary for this RHPG and this should be shown on the LEMP Stages One – Five, with **no works of any kind** proposed within this statutory boundary.
- 9.36 A Conservation Management Plan (CMP) needs to be prepared for Cestyll RHPG and mitigation and enhancement measures need to be embedded within the LEMP. In addition, Horizon has a unique opportunity to work in conjunction with the other landowners of the RHPG to fund and promote the successful conservation and management of the now statutory RHPG for the public's present and future appreciation /enjoyment.
- 9.37 Notwithstanding the above way forward the inclusion of greater detailed drawings, specifications and plans showing the proposed interface between the statutory RHPG boundary and the WNDA site are necessary to be able to assess the nature and level of adverse impacts on the setting of the statutory RHPG prior to the formulation of any mitigation and enhancement measures.
- 9.38 As noted in para 9.32 above, a Conservation Management Plan (CMP) needs to be prepared for Cestyll RHPG and mitigation and enhancement measures need to be embedded within the LEMP. In addition, Horizon has a unique opportunity to work in conjunction with the other landowners of the RHPG to fund and promote the successful

conservation and management of the now statutory RHPG for the public's present and future appreciation /enjoyment.

Off-Site Power Station Facilities

Landscape and Visual Amenity

- 9.39 In Tables 3-3 and 3-4 landscape and visual receptors should also include: residents in nearby properties and motorists on the A5025.

Ecology

- 9.40 In Tables 3-3 and 3-4 ecological receptors should also include Great Crested Newts (GCNs) which are known to be present in the area and adequate GCN surveys are required.

Archaeology and Cultural Heritage

- 9.41 The area designated for landscaping and overflow parking to the south of the buildings is known to contain prehistoric settlement remains and a full excavation of all archaeological remains in this area will be required in advance of any proposed development on this site.

Proposed Mitigation

- 9.42 With regards to the quality of the landscaping and reducing potential effects on local residents, it is important to ensure that sufficient space is provided around the boundary of the site (between the existing site boundary walls/vegetation and the proposed buildings/hard standings) to accommodate a substantial belt of vegetation.

Site Campus

Indicative Phasing

- 9.43 Figure 5-1 suggests that the need for accommodation on the Site Campus starts to decline by Q2 2025 and will not be required by the end of 2025 (by end of Stage 2: Main Construction phase, see Figure 2-1). The decommissioning of the Site Campus should be phased, in line with the actual reduction in accommodation needs during the course of the construction phase of the Power Station and not left until the end of the construction phase.

Emerging Scheme Design

- 9.44 The proposed building locations, roads and pedestrian routes shown on Figure 5-3 largely avoid the important landscape features on this part of the WNDAs, such as the rocky crags and existing ancient woodland and the final design of the Site Campus

should also avoid these features, which should be protected during the construction phase to ensure that their preservation is not inadvertently compromised.

- 9.45 This cliff top location is likely to be very exposed. If not already undertaken, Horizon should monitor and model the wind on this site and should design the layout and structure of the Site Campus buildings and associated landscaping so that the buildings are capable of withstanding the forces, the outdoor spaces between the buildings do not become wind tunnels and the hard and soft landscaping proposed on the site can survive the conditions.
- 9.46 All lighting needs to be designed to avoid impacting on Anglesey's "Dark Sky Status" initiative.
- 9.47 The construction of the campus (as shown on Figure 5-3) will directly impact on significant buried archaeological remains, including an extensive medieval Christian cemetery, a late Roman or Early medieval domestic settlement site and other more discrete archaeological features. Full excavation of all archaeological remains in this area will be required in advance of any proposed development on this site in order to preserve by record all significant archaeological deposits.
- 9.48 Table 9-3 states that the main implication for the HRA arising from the proposed change to the Site Campus is the management of foul water discharge. However, the significant increase in on-site accommodation means that an additional 3,500 construction workers will be housed on-site and this could also give rise to greater effects on nearby European sites as a consequence of increases in visitor pressure. Therefore, the HRA should also consider the potential effects of increased visitor pressure on the nearby European sites.

Preliminary Environmental Information

Public Rights of Way and Access, Landscape and Visual Amenity

- 9.49 The retention of the Wales Coast Path leading from Cemaes to Wylfa Head during the construction and operational phases of the Site Campus is welcomed. However, there will still be significant adverse effects on the recreational amenity value of these footpaths. Further information on the location and specification of the fence between the Site Campus and Wales Coast Path is required, together with an assessment of the anticipated increase in usage of the surrounding footpaths as a result of the Site Campus.
- 9.50 The seascape, landscape and visual amenity assessment (SLVIA) of the Site Campus should be undertaken as a separate assessment from the SLVIA of the Power Station, and should consider the effects of the construction, operational and decommissioning phases on all the resources and receptors listed in Tables 5-6 and 5-7 plus the Isle of Anglesey AONB and Heritage Coast, and also intra-project cumulative effects.
- 9.51 With regards to Tre'r Gof SSSI, there is a disconnect between the assessment of effects in the 'ground water and surface water' sections of Table 5-6 (moderate adverse effect) and the ecology section, where the assessment scenario notes that "*the proposals could result in long-term loss of the SSSI*". This difference is present within the PAC2 documents also, and it is not clear how the substantial increase in the size

of the workers accommodation is being reflected in the assessments. The loss of the SSSI would obviously be a substantial and significant effect that would be difficult to offset or compensate, and there must be more clarity on this aspect.

- 9.52 The potential effects of a concentration of up to 4000 residents on local ecological receptors, particularly through urbanisation or visitor pressure effects on nearby designated sites, is not identified as a potential effect. Whilst effects may be limited due to various mitigation measures (e.g. provision of local leisure facilities) or mitigating factors (e.g. easy walking access to Cemlyn Bay from the accommodation campus is unlikely to be available due to the presence of the construction site), the potential effects of increased visitor pressure on ecological receptors, particularly designated sites, should be considered within the EIA and (for the European sites) in the HRA also.
- 9.53 There are still no detailed ecological surveys or assessments for any of the sites and there is an urgent need for this work to be undertaken and forwarded to the Council for comment.
- 9.54 The predicted impacts on landscape and visual amenity, including night time visual impacts, are also likely to result in an increase in the impacts on the settings of monuments (e.g. the standing stones north of Llanfechell), listed buildings (e.g. the Church of St Padrig at Llanbadrig) and the Cemaes Conservation Area.
- 9.55 A reassessment of the construction, operational and decommissioning impacts of the WNDA on the settings of Historic Assets is required in light of the increase in on-site campus accommodation.
- 9.56 Mitigation should also include measures to ensure that the Site Campus buildings and proposed landscaping can withstand the prevailing winds and do not create conditions that are unfavourable for the resident workers and the landscaping proposed on the site. Effective and complete decommissioning that returns the landscape in this part of the WNDA to its existing character will be essential.

Dalar Hir Park and Ride

- 9.57 A LEMP for the Dalar Hir Park and Ride facility, incorporating all the access, landscape and ecological proposals described in paras 6.6.8 - 6.6.9 should be submitted as part of the DCO.
- 9.58 A full LVIA should be undertaken for the Dalar Hir Park and Ride that considers the construction, operational and decommissioning phases of this facility and the effects on all sensitive receptors listed in Tables 6-6 and 6-7, plus the AONB, residents in properties around the site, cyclists on Sustrans NCR 8 (Lôn Las Cymru) which runs along a minor road approx. 300m south of the site and users of the nearby Karting Centre at Bryngoleu.
- 9.59 Ecology is not identified as a receptor in Tables 6-6 and 6-7 and there is no reference to any changes in ecological effects. There are protected species on and near to the site that need to be considered, the layout of the scheme has changed and an ecological protection zone is being proposed. Further clarification is required as to

whether ecological effects are likely to be the same or different as a consequence of the changes proposed.

Parc Cybi Logistics Centre

- 9.60 The wider Parc Cybi site could be developed in the future for mixed uses (as per March 2005 permission) and not just for industrial uses and the site is elevated and visible from the surrounding AONB landscape, from the B4545 and golf course to the southwest, from the Lon Trefignath Cycle route to the immediate south of the site and from nearby residential areas. Therefore, it is not appropriate for the boundary treatment to consist of just a narrow grassed boundary and a 2.4m high mesh panel security fence.
- 9.61 It is recommended that the existing stone walls and woodland should be extended around the other three boundaries of the site (which would not obscure the sightline between the burial chamber and standing stone) to provide screening of the parked HGVs and other structures on the site from the surrounding sensitive landscape, visual and cultural heritage receptors.
- 9.62 In addition to ponds (to the west and northeast of the site) and Trefignath burial chamber (to the east), there is also a rocky outcrop within and close to the southern corner of the site, a small mature deciduous woodland in the western corner of the site, stone walls along the south-western boundary and an important line of sight between the burial chamber and Ty Mawr standing stone to the west.
- 9.63 The site is also steeply sloping with a drop of over 10m between the southern and northern corners of the site.
- 9.64 The design and layout of the Parc Cybi Logistics Centre should retain all of these important ecological, landscape and heritage features.
- 9.65 As noted above, the site is strongly sloping and a considerable amount of fill will be required to make the site usable for HGVs. Infilling the site would result in a steep slope alongside the A55 and consideration should be given to planting this slope with woodland.
- 9.66 It is stated in para 6.5.5 that there is not anticipated to be any movement of construction materials between the WNDA and other Project sites. However, if the Parc Cybi site is to be developed, then it may be appropriate to use some of the surplus materials from the WNDA to make up the levels on this site (subject to materials suitability, transport and other environmental impacts).
- 9.67 A full LVIA should be undertaken for the Parc Cybi Logistics Centre that considers the construction phase (including the effects of importing into the site the materials required to make up the levels), the operational and decommissioning phases of this facility, with mitigation to include the retention and enhancement of the existing boundary features and assesses the effects on all sensitive receptors listed in PAC2 and PAC3.
- 9.68 Again, ecology is not identified as a receptor in Tables 6-9 and 6-10 and there is no reference to any changes in ecological effects. The layout of the scheme has changed

and further clarification is required as to whether ecological effects are likely to be the same or different as a consequence of the changes proposed.

- 9.69 From an Archaeology and Cultural Heritage perspective these setting impacts have not been adequately considered. Setting is not simply a visual amenity (although this is an important aspect of setting – particularly the views between the monuments in this case). The impact of the Parc Cybi Logistics Centre, including HGV movements, lighting, etc., on the settings of the burial chamber and Ty Mawr standing stone, and also on the important line of sight between these two Heritage Assets, needs to be properly considered.
- 9.70 This reassessment of the impacts of the Parc Cybi Logistics Centre on the settings of Historic Assets should be undertaken in accordance with new Cadw guidance and measures to mitigate and enhance the settings of these monuments need to be embedded in future design and mitigation plans.

A5025 Highway Works

On-Line Highways Improvements

- 9.71 The Council has been consulted on the draft LEMP for the A5025 On-Line Highways Improvements and would like all their comments and suggestions on the appropriate replacement and enhancement of roadside boundary treatments, the planting around the settlement ponds and their concerns regarding the diversion and A5025 crossing points of Sustrans routes NCR 5 and NCR 566 to be taken into account in the LEMP to be submitted with the TCPA application for these works.

Off-Line Highways Improvements

- 9.72 The Council would welcome the opportunity to discuss the appropriate boundary treatments along the new sections of the A5025, to comment on landscape masterplans, species lists, ecological enhancement, recreational routes, etc. to be incorporated into a LEMP to be included in the DCO for the A5025 Off-Line Highway Improvements.

Environmental summary

There is insufficient detail within the Main Consultation Document to enable the Council to provide detailed and meaningful comments on the various environmental issues. The Council notes that PINS have also raised concerns about the lack of information in the scoping opinion (2017). The lack of detail and omission of important environmental resources and receptors (including landscape, visual, ecological, archaeological and cultural heritage receptors) have been omitted from the plans means that the Council cannot meaningfully comment on many aspects at this time. Horizon have stated that the numerous mitigation measures required around the DCO and Associated Development areas will be addressed within the Environmental Statement. It is not acceptable that the DCO submission will be the first opportunity that the IACC will have to examine these and this approach risks the Council concluding that any technical aspects are not suitably robust and resilient, cannot be accepted and must therefore be objected to at the DCO examination. In order to minimise this risk Horizon should meaningfully engage with the Council and other consultees in detail with all of the required information ahead of the DCO submission.

APPENDIX B - High Level Comparison of PAC2 & PAC3

Topic /Theme /Site	Horizon PAC 2 Position	Horizon PAC 3 Position	IACC Comments	RAG
Construction Worker Numbers	<ol style="list-style-type: none"> 10,750 workers at peak (2022) 'Home Based' Workers 2,700 (25%) Non-Home Based Workers 8,000 	<ol style="list-style-type: none"> 9,000 workers at peak (2023) 'Home Based' Workers 2,000 (22%) Non Home Based Workers 7,000 	<ol style="list-style-type: none"> The IACC requests the justification as to why the number of homebased workers has been reduced. It is unacceptable that construction job numbers for local people has decreased in both actual and percentage terms. There is no justification to specify why the local employment figure and percentage cannot be higher and supported by a greater commitment towards training and equipping the local people to be part of the labour pool. The IACC will continue to collaborate with HNP to see the number of homebased workers maximised. The IACC note Horizon's 90 minute travel to work area as home-based. However, given Anglesey is the host area there is an expectation that there is a significantly higher proportion of home-based workers from Anglesey rather than being equally spread across the wider region. Despite numerous requests Horizon have only provided a high level breakdown of job types and trades. This needs to be broken down into more detailed roles and skill level required and duration of the contract length. PAC3 focuses on peak worker number details – no information has been provided on displacement/labour churn for the duration of the project. 	
Construction Workers Accommodation	Sites <ol style="list-style-type: none"> Land & Lakes option to house 3,500 workers. Madyn Farm (Permanent Legacy Housing) 200 workers. Rhosgoch recognised as 'top up site' for 1,500 workers. Amlwch A & B option to house 800 workers. 500 'essential key workers' to be housed on site. 	Sites <ol style="list-style-type: none"> Up to 4,000 on-site in TWA. No other sites considered for TWA. Now refer to TWA as 'Site Campus'. 	<ol style="list-style-type: none"> The PAC3 consultation lacks the detail on the TWA required in order for the IACC to provide an informed response. No justification has been provided for the increase in on-site construction worker accommodation from 500 to 4,000. A detailed Worker Management Plan is essential in order to inform a Community Impact Assessment as part of the wider Environmental Impact Assessment. This is required in order for the Council to make a reasoned judgement on the proposal and its impacts and mitigation. If the on-site TWA approach is to be pursued, the IACC insists that the TWA is available from the start of the project (built up in blocks of 250 – 500 as necessary) The lack of detail and evidence on the TWA impacts enhances the requirement of a 	

			<p>Community Resilience Fund to mitigate any unquantifiable or unforeseen impacts.</p> <p>5. The IACC require further detail on the proposed Housing Fund and how this can be utilised to mitigate adverse impacts on existing housing and accommodation.</p>	
	<p>Accommodation Sector</p> <ol style="list-style-type: none"> 1. 2,700 home based 2. 730 purchase own property 3. 1,100 in PRS 4. 400 Latent accommodation 5. 1,100 in tourism 6. 4,700 'new stock required' (TWA) 7. Total 11,000 	<p>Accommodation Sector</p> <ol style="list-style-type: none"> 1. 2,000 home based 2. 600 purchase own property 3. 900 in PRS 4. 400 in Latent accommodation 5. 1,100 in tourism (650 in caravans) 6. 4,000 in TWA on site 7. Total 9,000 	<ol style="list-style-type: none"> 1. The IACC is concerned that the number of workers in existing accommodation has remained broadly constant since PAC2, despite the considerable reduction in construction worker numbers. The IACC believes that the number of construction workers in existing accommodation should be further decreased to reduce impacts on existing accommodation sectors (in particular tourism and PRS) and requests the justification/evidence as to why the number has not been reduced. IACC does not accept the capacity figures set out by Horizon for existing accommodation. IACC's evidence shows that there is limited capacity in these accommodation sectors and without significant mitigation to increase supply, Wylfa Newydd will have a significant adverse effect on Anglesey's housing sector. 2. Reduction of 700 home based workers and 700 workers in TWA since PAC 2 means that the number in existing accommodation has only reduced by 600 since PAC2. 3. The take up of workers accommodation part of the tourism accommodation stock should be based on the IACC's Bed stock surveys which quantifies the number of operators prepared to let out as accommodation for workers. Horizon's approach of applying an occupancy rate as a basis for identifying availability is fundamentally flawed as some operators will not want to house construction workers. 4. The IACC recognise that there may need to be some capacity for temporary construction workers to stay in caravans, however we have concerns with regard to the number, location and management/ enforcement of such sites. As noted by the SoS in the recent DCO Scoping Opinion (section 3.106) Horizon should consider the impacts on tourism accommodation (particularly caravans and B&B facilities) in their ES. 	

	Spatial Distribution (in existing accommodation) <ol style="list-style-type: none"> Anglesey North 1,218 Anglesey South 661 Anglesey West 933 Menai Mainland 508 Total 3,320 	Spatial Distribution (in existing) <ol style="list-style-type: none"> Anglesey North 1,032 Anglesey South 636 Anglesey West 892 Menai Mainland 441 Total 3,000 	<ol style="list-style-type: none"> The concentration of workers in North Anglesey is of huge concern (4,000 in TWA and 1,032 in existing accommodation) as the IACC has not received the relevant impact assessments/evidence to understand the potential environmental, social and economic impacts of this fundamental change in Horizon's strategy. The role of the proposed CWAMS is seen by the Council as critical for the registration of workers and different types of accommodation and their allocation – particularly on a spatial basis to ensure that capacities are not exceeded. As previously noted this lack of justification/ evidence contributes to the requirement for a Community Resilience Fund to address unknown or unquantified impacts. 	
Highways & Transportation (Transporting People)	Parking <ol style="list-style-type: none"> 2,700 Parking spaces at Dalar Hir 500 parking spaces on-site (up to 1,000 whilst constructing P&R). 1,100 Parking Spaces at Rhosgoch (TWA) 1,000 spaces from Land & Lakes No encouragement / incentives for car sharing. No satellite park & share sites proposed. Dalar Hir intended for daily commuters. 	Parking <ol style="list-style-type: none"> Reduce Dalar Hir from 2,700 spaces to 1,900. Increase onsite from 1,000 (or 500) to 1,900. No other parking provided. Dalar Hir would be 'partially used as long term parking for a proportion of workers at the site campus' – however no detail. Minimum average car share ration of 1.2 (with an aspiration of 1.5). 1,200 more car movements per day expected to site (600 cars arriving and leaving per day). The increase in 600 daily car movements arises from an increase from 500 car parking spaces at the Power station Site to 1,100 during the construction stage. Although not stated in PAC3, by inference Horizon expect 800 parking spaces to be on-site for workers living on the site campus (i.e. to make it up to 1,900). 	<ol style="list-style-type: none"> The IACC maintains its position from PAC2 and Dalar Hir is not considered a suitable location for Park & Ride. There is no additional justification in the PAC3 to lead the IACC to change its position. There requires a comprehensive transport management plan to frame considerations of each proposal and impacts on specific communities. This information is required urgently. The IACC believe parking provision at the main park and ride site should remain at 2,700 spaces. As part of the on-site construction worker management strategy the IACC requests that those residing onsite should park at the Park & Ride location for the duration of their stay. It is essential that there are a number of satellite park and share facilities in key towns and villages across the Island for the home-based workers and non-home based workers living in existing accommodation. The IACC will be seeking this through the s106 agreement. The IACC (in conjunction with the Welsh Government) are eager to work with Horizon to identify suitable sites for park & ride / park & share. 	
	Car Sharing / Sustainable Transport <ol style="list-style-type: none"> Car sharing was not prominently featured in PAC2. 	Car Sharing / Sustainable Transport <ol style="list-style-type: none"> Horizon now encourage and will incentivise car sharing. Minimum of 3 workers per car to park on-site, but only during peak year. No satellite park & share sites proposed. Car sharing approach will be facilitated through a web-based database and mobile application to 	<ol style="list-style-type: none"> The IACC welcome the encouragement and the incentivising of car sharing. This is a positive step forward since PAC2, however, this is just one initiative in a sustainable transport plan – details of which need to be provided by Horizon. 	

		<p>match workers living in close proximity and on similar shifts.</p> <ol style="list-style-type: none"> 5. Parking management and enforcement will be developed to minimise impacts on local residents and 'prevent indiscriminate parking'. Horizon is aiming for an overall 6. Project-wide car share factor of two workers per car. They claim this is consistent with other comparable Nationally Significant Infrastructure Projects. 7. Horizon now not proposing to provide shuttle buses from railway stations (due to decreased demand). 8. Fewer shuttle buses along A5025 (East & West) due to 'reduced demand'. 25 daily shuttle buses North and 20 daily shuttle buses along A5025 West. 	<ol style="list-style-type: none"> 2. However the IACC is yet to receive the worker management strategy to understand how this will be enforced which is unacceptable. 3. The IACC believe that only cars with a minimum of 3 workers per car should be allowed to park on-site throughout the construction period if the on-site TWA is pursued. 4. To mitigate and the potential consequences of this (i.e. workers 'fly-parking' in layby's and other undesignated and problematic locations) the IACC believes that a number of satellite park and share facilities are required in key towns and villages across the Island 5. The IACC are eager to work with Horizon to identify suitable park & ride / park & share facilities. Horizon's assumed average ration of 2:1 is unrealistic without facilities to actively promote this. 6. The web-based database and mobile application is a good idea in theory. However given the rural nature of Anglesey, the weather conditions, and the early morning shifts, workers will drive to meet in a single location (i.e. park & share). 7. Furthermore, given the workforce churn, workers are not likely to be sharing with the same people week in week out which will be difficult to promote and manage. 8. What measures are there to prevent workers from meeting in Dalar Hir and driving to site in one car (which is much quicker than a bus)? 9. The location of the park & ride (and park & share facility) will have an impact on where workers will want to live. The IACC don't believe that this correlation has been appropriately considered as part of the Gravity Model. 	
Highways & Transportation (Transporting Materials)	<p>Marine</p> <p>A number of Wylfa Newydd Project components would be required in the marine environment to support the construction and operation of the Wylfa Newydd Power Station:</p> <ol style="list-style-type: none"> 1. a north-western breakwater for the CWS at Porth-y-pistyll, which would be detached from the shore once construction was completed; 2. a north-eastern breakwater for the CWS at Porth-y-pistyll, which would be connected to the shore; 3. CWS intake at Porth-y-pistyll, with associated vessel protection barrier; 	<p>Marine</p> <ol style="list-style-type: none"> 1. The Eastern Breakwater has increased in length by up to approximately 60m and now totals up to approximately 150m. 2. The Western Breakwater has reduced in length by up to 50m, now totalling up to approximately 500m. This breakwater has also moved approximately 20 metres to the west (further out to sea). 4. semi-dry approach to dredging is now preferred because it reduces the volume of material that needs to be excavated underwater, avoids the need 5. for underwater blasting, and improves the safety and control of construction activities 	<ol style="list-style-type: none"> 1. IACC have no objection to the provision of the MOLF and support maximising the amount of material that can be delivered using the facilities 2. The main issue is the length of time for construction of the provision of the MOLF relative to the amount of material and equipment needed to be delivered to site. The IACC seek clarity and assurance from Horizon that the MOLF will be operational by 2021 in time for main construction and what mitigation measures are being considered for any delay. Further detail is also required on the amount of construction material expected to be delivered on to site whilst the MOLF is being constructed. Any use of the 	

	<p>4. a MOLF adjacent to the north-eastern CWS breakwater, incorporating two separate quays. One quay would allow AILs, large plant and equipment to be driven off the</p> <p>5. vessels (called a Roll-on/Roll-off quay), while the other would enable bulk materials to be lifted to the shore by crane (the bulk materials quay); and</p> <p>6. CWS outfall infrastructure to the west of Wylfa Head.</p> <p>Materials</p> <p>7. 5.5million tonnes transported to and from Anglesey during the construction phase to support the construction of the Power Station, Off-site Power Station Facilities, Associated Development and Off-line Highway Improvement works</p> <p>8. Horizon estimate that between 60% and 80% of all materials associated with the construction of the Wylfa Newydd Project would be delivered by sea, using the MOLF</p> <p>9. Horizon have assessed a worst case scenario of 40% of material to be delivered by road</p> <ol style="list-style-type: none"> Bulk materials: 4.4m tonnes 80% by sea 20% by road Common materials: 685,000 tonnes 100% by road Containerised goods: 72,000 tonnes 100% by road AILs 42,000 tonnes 100% by sea Waste 125,000 tonnes 100% by road 	<p>6. The design of the MOLF now provides two platforms (with three quays) with several mooring dolphins, rather than one long quay wall. The changes increase the cargo handling capacity of the MOLF and reduce the amount of seabed excavation required.</p> <p>7. Marine vessel movements would increase from approximately 48 per month to approximately 55 per month.</p> <p>Materials</p> <p>8. No changes in the amount of material required to construct the Power Station, Off-site Power Station Facilities, Associated Development and Off-line Highway Improvement works</p> <p>9. No change to the percentage of material to be delivered by sea to the MOLF</p> <p>10. No change to the worst case scenario for road deliveries being assessed</p> <p>11. 40 HGV deliveries per hour along the A5025 between 07:00 and 19:00 Monday to Friday</p> <p>12. Lower number of deliveries on a Saturday morning and very low volumes of HGVs at other times</p> <p>13. All Abnormal Indivisible Loads (AILs) delivered by sea</p> <p>14. No change to operational deliveries</p> <p>15. Bulk materials: 4.2m tonnes 80% by sea 20% by road</p> <p>16. Common materials: 1,075,000 tonnes 100% by road</p> <p>17. Containerised goods: 63,000 tonnes 100% by road</p> <p>18. AILs 52,000 tonnes 100% by sea</p> <p>19. Waste 175,000 tonnes 100% by road. The amount of construction material has increased by approximately 0.2 million tonnes to approximately 5.5 million tonnes over the duration of the construction period.</p> <p>20. All material excavated within the WNDA will now be retained within this area 50,000 tonnes more construction waste material is now predicted to be generated Around 200,000 tonnes less concrete is now predicted to be generated as a result of design optimisation of the nuclear reactor units</p> <p>21. The predicted tonnage of common materials appears to have increased by around 50% from the previous consultation, however this is simply due to the inclusion of Associated Development and Off-site Power Station Facilities in the figures for the first time</p>	<p>A5025 as a fall-back position is wholly unacceptable without an appropriate mitigation package for the impacts of such use being agreed.</p> <p>3. The IACC requests a better understanding of the construction programme, in order to assess the impacts and opportunities of the MOLF, as with all Associated Developments in order to understand the cumulative impacts and respond appropriately.</p> <p>4. The Council requires details of alternatives to the MOLF during adverse weather and tidal conditions such as the use of the Port of Holyhead and implications of additional HGV movement.</p> <p>5. The IACC requests the traffic management plan to better understand amount of vehicle movements between the start of construction and the end of 2021 and these how movements would take place at the same time as the Park and Ride site, the A5025 on and off line improvements are being undertaken and prior to the on-site campus being built</p> <p>6. The IACC will need to consider restrictions on the amount of movements of HGVs, Buses and Cars prior to the key elements of Associated Development being put in place. If Horizon wish for an unrestricted consent then the DCO application will have to be assessed on a worst case basis</p>	
Consenting	<p>DCO for Wylfa Newydd Power Station</p> <ol style="list-style-type: none"> Power Station land-based elements, including Main Plant, Common Plant and supporting buildings <ul style="list-style-type: none"> Power Station construction and landscaping, including: closure of Cemlyn Road; drainage proposals; and 	<p>DCO for Wylfa Newydd Power Station</p> <ol style="list-style-type: none"> Horizon are now proposing to apply for the majority of Project components through the Development Consent Order (DCO) application Wylfa Newydd Power Station and associated works including an electrical connection to the National Grid substation; 	<ol style="list-style-type: none"> One of the most significant and fundamental changes from PAC2 to PAC3 is the change in Horizon's consenting strategy. With the Wales Act 2017 receiving royal ascent in January 2017, associated developments (e.g. park & ride, construction workers accommodation etc.) can now be included within the DCO application. 	

	<p>4. permanent footpath works</p> <ul style="list-style-type: none"> • Power Station Access Road • Off-Site Power Station Facilities <p>5. Alternative Emergency Control Centre; 6. Environmental Survey Laboratory; and 7. Mobile Emergency Equipment Garage.</p> <ul style="list-style-type: none"> • Temporary Workers' Accommodation adjacent to the Power Station Site, in the Wylfa Newydd Development Area, for construction workers undertaking essential tasks <p>TCPA</p> <p>8. Enabling Works: Site preparation and clearance works at Power 9. Station Site and environs 10. Replacement Alternative Emergency Control Centre and District Survey Laboratory for Existing Power Station (on behalf of Magnox Limited) 11. A5025 On-line Highway Improvements 12. A5025 Off-line Highway Improvements 13. Purpose built Temporary Construction Workers' 14. Accommodation (Off-Site) 15. Park and Ride facilities for construction workers 16. Logistics Centre 17. Visitor Centre</p> <p>Marine licences (together with a potential HEO)</p> <p>18. Cooling Water System, breakwaters and Marine 19. Off-Loading Facility, including dredging</p> <p>Environmental permits and</p> <p>20. Regulatory licences, including a Nuclear Site Licence (NSL)</p>	<p>3. MOLF and breakwaters; 4. Off-site Power Station facilities, comprising the AECC, ESL, and MEEG; 5. Temporary Site Campus (4000 bed spaces); 6. Temporary Park and Ride facility at Dalar Hir; 7. Temporary Logistics Centre at Parc Cybi; and, 8. A5025 Off-Line Highway Improvements comprising: 9. A5 east of Valley Junction to north of Valley Junction (A5/A5025); 10. north of Llanynghenedl to north of Llanfachraeth; 11. south of Llanfaethlu to north of Llanfaethlu; 12. north of Llanrhyddlad to north of Cefn Coch; and 13. north of Cefn Coch to Power Station Access Road Junction. 14. Horizon's proposal includes an intermediate level radioactive waste storage facility which remains unchanged from the Stage Two Pre-Application Consultation. However, we are now proposing a single combined spent fuel store and high level radioactive waste storage facility rather than separate facilities, which will be constructed to be available 10 years after the start of operations (2035). 15. Radioactive waste could remain on the Power Station Site for up to approximately 140 years after the end of electricity generation, although we expect to be able to reduce these timescales.</p> <p>TCPA</p> <p>16. Separate planning applications to Isle of Anglesey County Council (IACC) for 17. Site Preparation and Clearance works (reduced scope from PAC2) and 18. A5025 On-line Highways Improvements.</p> <p>19. This is as a result of changes in legislation which now allow Horizon to apply for Associated Development within its DCO.</p>	<p>2. The lack of detail and pre-application discussion and engagement on the former associated development moved into the DCO so far is unacceptable. . In particular, the change from 500 on-site temporary workers accommodation to 4,000 is a fundamental and significant change to the project and this has not been adequately consulted upon during the pre-application stage. PAC3 is the first opportunity the IACC and others will have had to comment on the TWA for 4,000 workers. The lack of detail and impact assessments in PAC3 is unacceptable as the IACC and the public will not see this detail until after the DCO application has been submitted, this is entirely contrary to the front-loaded approach the DCO regime requires.</p> <p>3. This is wholly unacceptable as the IACC and others are not able to fully assess the potential impacts to make an informed and reasoned judgement on the proposals. The IACC cannot therefore make definitive comments at this stage, and reserve the right to make future representations at the DCO stage.</p> <p>4. In summary, the IACC have no objection to the associated development applications being included in the DCO. However, the lack of detail in PAC3 and the fact that this detail will not be provided until after the DCO is submitted is unacceptable and means that the project is at risk from lack of meaningful and substantive consultation on these elements.</p>	
Welsh Language & Culture	<p>1. The WLIA Interim Report was published and consulted upon as part of PAC2. 2. Noted in PAC2 to support and contribute to enhancing the Welsh language and culture.</p>	<p>1. Horizon will be appointing a Welsh Language and Culture Co-ordinator who will oversee the implementation of detailed measures to be developed with the Welsh Language and Culture Steering Group. 2. Horizon is not consulting on detailed measures, as it will be part of the role of the Co-ordinator to advise and implement these. Further detail will be provided</p>	<p>1. The Council and Horizon see the Welsh Language and Culture a golden thread, which runs through all aspects of the project, therefore the Welsh Language and Culture must be seen as fundamental to the whole of way of life and wellbeing for people of all ages.</p>	

		<p>in the Welsh Language Impact Assessment (WLIA) which will be submitted with the DCO application.</p> <ol style="list-style-type: none"> 3. List of Actions (from the Welsh Language Steering Group) has formed basis for a draft Welsh Language and Culture Mitigation and Enhancement Strategy. 4. Committed to ensuring that the Welsh Language and Culture is protected and where possible, enhanced. Intended to achieve this by enabling a beneficial local legacy in terms of access to jobs and the economic benefits arising from the Project, to encourage local people to stay and move back to the area. 5. Promoting the use of linguistic courtesy through the construction workforce to help facilitate community cohesion. 6. Already contributing to the vitality of the Welsh language and culture by supporting a series of local events and initiatives and also by means of incorporating the Welsh language as an important aspect of working life, education and community services. 7. During the operational stage of the Project, up to 85% of employees are expected to be home-based workers living locally. This is an increase on the previous estimate and is expected to have significant beneficial effects for the long-term viability and vitality of Welsh language and culture, especially within Anglesey and north-west Gwynedd. 8. Since PAC2, Horizon has continued to identify measures to mitigate the adverse effects, and enhance the beneficial effects of the Project on the Welsh language and culture 9. Independently chaired WLIA Steering Group 10. Welsh Language considerations for the workforce: <ul style="list-style-type: none"> - Consider Welsh language requirements for each job role 11. Welsh language training (at different levels) 12. Linguistic courtesy (language awareness training and welcome packs) 13. Supporting local authorities to plan local services 14. The use of Site Campus would lead to a significant increase in the local population near to communities of Cemaes and Tregele and is likely to reduce the proportion of Welsh speakers. Largely dependent on the level of community interaction between the workers and the host communities. 	<ol style="list-style-type: none"> 2. The intention of Horizon to employ a Welsh Language Co-ordinator is very much supported by the IACC. 3. It is essential for the Steering Group, of which IACC is a member, to be fully involved in the recruitment process. The IACC would request sight of and input into the draft Job Description prior to advertising. 4. Whilst these are specific measures in the draft Mitigation and Enhancement Strategy prepared by the Wylfa Newydd Welsh Language Steering Group, other measures have not been referred to. Consideration must be given to ensure all mitigation measures are met. 5. The IACC is of the firm view that the appointed Coordinator should have access to specialist linguistic planning expertise which was instrumental in the development of the Actions and draft Strategy, and support in using the Welsh Government's Risk Assessment Methodology. 6. The IACC notes that the three key themes for the broad areas of mitigation and enhancement in Horizon's Welsh Language Pledge replicate the 3 priority areas in the IACC Welsh Language Strategy. IACC therefore expects this alignment to be reinforced in the content of the final Strategy and its implementation. 7. The IACC appreciate Horizon's acceptance that the in-migration of non-Welsh speaking construction workers will reduce the proportion of Welsh speakers. However, the impact and therefore the appropriate mitigation will be dependent upon the number, their location, degree of interaction with the communities in which they are residing and the duration of their stay, this information has not been provided and the impact accordingly cannot be properly assessed. 8. Horizon's proposal to house construction workers on-site which could potentially minimise the impact on the Welsh Language. However, the IACC request the detail of the workers management strategy in order to better understand how those workers will be managed to assess the impacts and opportunities prior to making an informed judgement. 9. The IACC remain concerned regarding the 3,000 workers to be housed in existing accommodation and again request the construction worker 	
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			<p>management strategy to better understand how those workers will be managed to assess the impacts and opportunities prior to making an informed judgement.</p> <p>10. The IACC is concerned with the potential displacement of existing residents from the housing market (PRS and owner occupied). The IACC is also concerned with the potential displacement of tourists from tourism accommodation.</p> <p>11. The IACC welcome the Horizon Apprenticeship Scheme and request that the recruitment of local young people increases year on year</p> <p>12. The IACC welcome the commitment to capital investment for all five secondary school and are eager to work with Horizon in order to scope the activity, level of investment and agree timescale for delivery as 2019 is too late.</p>	
Economy & Supply Chain	1. Supply Chain Charter draft included	<ol style="list-style-type: none"> 1. Supply Chain Charter being reviewed to understand if it needs refinement following the Project changes. 2. Encourage its delivery partners to engage directly with the supply chain 3. Local investment value over construction period increase to up to a total of £400 million (following further work carried out to understand the economic benefits of the Project). 4. Increase to over £20M per annum can be expected to the Anglesey economy over the operational life of the Power Station. 5. 500 businesses registered on Hitachi's supplier website (100 in Wales) 6. Supply Chain Contracts Service will be established – promoting opportunities for businesses to engage with the Wylfa Newydd supply chain. 7. Will establish a Supply Chain Action Plan – supply chain charter (aim of spending 60% of the Project value in the UK throughout construction period) 	<ol style="list-style-type: none"> 1. The IACC requests sight of Horizon's procurement programme and contract strategy including details on how local participation (type and size of contract) will be maximised and managed to provide certainty and confidence that North Wales businesses will be able to take advantage of the opportunities available. 2. – IACC request that Horizon carry out the work and put in place delivery plans to understand local supply chain capacity, promote the Supply Chain Contracts Service and engage with small companies to help them secure contracts. 3. An Action Plan must be in place now to demonstrate how Supply Chain Contracts Service will be implemented and monitored. 4. All contractors must commit to the Supply Chain Contracts Service. 5. IACC would welcome conversation surrounding the ability of businesses registered on Hitachi's supplier website (from Wales) to become part of the supply chain. 6. Monitoring of local/ regional expenditure should continue. 7. IACC consider it vital that Horizon work with the public sector to identify the potential skills gap, accreditation levels etc. of local businesses to ensure they are able to compete for opportunities during construction and operation of the project. 8. The IACC is very eager to work in collaboration with HNP to progress the Supply Chain agenda. 	

Jobs & Skills	<ol style="list-style-type: none"> 1. Construction workers at peak 10,700 2. Peak workforce requirements projected to be in 2022 3. Home-based workers (construction) – 25% 4. Operational workforce 850. 5. 45% of employees of operational workforce being local 6. Apprenticeship Scheme running 10 recruited 	<p>Jobs</p> <ol style="list-style-type: none"> 1. Construction workers at peak 8,500 (but assuming 9,000 peak for assessment work) 2. Peak workforce requirements projected to be in 2023 3. Home-based workers (construction) – 22% 4. Operational workforce 850, with up to 1,000 additional workers to carry out routine maintenance during outage periods. 5. 85% of employees of operational workforce being home-based workers living locally. 6. Apprenticeship Scheme still running, in process of recruiting another 12 apprentices 7. More information about the types of jobs in PAC3. 8. Updated projections on the number of workers required to construct and operate. 9. Peak workforce requirement by Project component in PAC3 (no such information in PAC2) 10. Peak workforce requirement by job type in PAC3 (no such information in PAC2) 11. Peak construction workforce trade breakdown in PAC3 (no such information in PAC2) 12. Workforce requirement by specialism, qualification level, and employer type (for operational workforce) provide in PAC3 (no such information in PAC2) <p>Skills</p> <ol style="list-style-type: none"> 13. Provided £1M contribution to GLLM and remain committed to develop training programme for engineering apprentices. 14. Since 2012, £360k provided to Cwmni Prentis Menai. 15. Heavy Plant Training - GLLM 16. Will support a capital investment programme for all five secondary schools on Anglesey to improve the science and technology facilities, to help promote the take up of STEM subjects. 17. Will shortly be commencing trial of the Wylfa Newydd Employment and Skills Service – centrally locating all Project job vacancies and identifying skills gaps and provision. Maximise ability of local people to access the opportunities by the Project. 18. Technical Apprenticeship Scheme; Graduate Development Programme; other routes to employment; Training and Simulator Building. 19. MoU with Bangor University – working with Bangor University to add a nuclear context to several existing courses. 	<ol style="list-style-type: none"> 1. Positive steps in this area since PAC2 in terms of the number of local jobs at the operational stage. The next step is to create an Action Plan to deliver 85% (and above) of local labour employment throughout the operational period. This will need to be monitored and mechanisms in place to increase the figure should the target not be met. 2. The IACC welcome increase in local operational workforce from 45% to 85% - IACC would like this 85% to be a minimum level not an aspirational one. 3. It is unacceptable that local employment during construction has decreased from 25% (2,700) to 22% (2,000). The IACC requests the justification and evidence to support this decrease. 4. There is no justification to specify why the local employment figure and percentage cannot be higher. Greater commitment towards training and equipping the local people with the necessary skills to be part of the labour pool is required now. 5. Horizon have indicated that a proportion of local employment will be in non-STEM related jobs. These include professional roles in HR and Procurement to Security and Catering for which training must be put in place in a timely manner and ahead of the demand. 6. The IACC welcome Horizon's apprenticeship scheme, and are eager for recruitment to increase year on year. 7. The IACC welcome the commitment to capital investment for all five secondary schools and are eager to work with Horizon in order to scope the activity, level of investment and agree timescale for delivery. Its timing after the implementation of the DCO is fundamentally unacceptable. 8. The IACC insists that Horizon review their programme for investment in education and training facilities to ensure local employment targets are met. This is required now to increase the numbers of local people who will be in a position to apply for high-level jobs at Wylfa Newydd. 9. The Employment and Skills Service very much welcomed and a positive step forward but detailed, funded plans for its delivery now need to be put into place. IACC are eager to continue to be involved in the process. 10. Steps need to be taken to boost the supply side of the economy – mindful of displacement. IACC 	
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			<p>would welcome further discussion and agreement with Horizon on this. The Council is aware of potential to increase the labour pool by attracting back local people who have moved away to take up employment. The Council therefore requires Horizon to support a lead public body to initiate a tracking system on similar lines to “Llwybro” model and to utilise all appropriate channels of communication including social media.</p> <p>11. The information on workforce requirement by specialism, qualification level, and employer type (for operational workforce) provided in PAC3 needs to be broken down in more detail to assess skills supply and demand to inform training requirements.</p>	
Tourism	<ol style="list-style-type: none"> 1. Reference in PAC2 that the Land and Lakes development would be positive and contribute directly to the primary tourism objectives of the Island. 2. Expected the Wylfa Newydd Power Station itself becomes a visitor attraction 3. Visitor and Media Reception Centre (to be consulted through TCPA) 4. Infrastructure improvements to enhance visitors' experience (such as improvements to the A5025, public rights of way and cycle paths, provision of Visitor and Media Reception Centre, resource for both leisure and education). 	<ol style="list-style-type: none"> 1. Will support a Tourism Fund to assist tourism initiatives to respond to changes arising from the construction and operation of Wylfa Newydd. 2. Temporary construction visitor facilities proposed e.g. a viewing area for visitors for the construction stage of the Project. 3. Visitor and Media Reception Centre will be applied for separately once the Project is operational. 	<ol style="list-style-type: none"> 1. The IACC welcome the broad commitment to a Tourism Fund – however we are concerned that our expectations differ substantially in terms of the scale and in the timing of its delivery and far more detail is required on this point 2. Essential that Tourism Fund is utilised to protect and enhance tourism assets (particularly in the North of the Island – peace, tranquillity, access to coastal path, natural attractions such as Cemlyn Bay) as well as promoting and enhancing other tourism offer (off-site) to ensure tourists are not discouraged from visiting Anglesey, before, during and after the construction phase, including during site preparation works. 3. The IACC request an updated Tourism Impact Assessment as a result of the change to the TWA strategy in order to assess the potential impacts on tourism. In the recent Scoping Report issued by PINS (3.98) it is noted that the SoS would expect potential effects on tourism to be identified and assessed in the ES. The IACC fully supports this request. 4. This lack of detail/ evidence enhances the requirement of a Community Resilience Fund to mitigate any unquantifiable or unforeseen impacts. 5. A temporary visitor facility is supported, it is considered that this would assist Horizon in maximising the tourism potential during the construction phase. 6. A Visitor and Media Reception Centre is a crucial aspect of the project. The IACC requires a clear, firm and binding commitment from Horizon with a 	

			detailed delivery programme demonstrating how the Visitor Centre will be delivered as part of this project.	
Nuclear Waste	1. Potential storage of spent fuel up to 140 years	<ol style="list-style-type: none"> 1. No change in terms of the number of years that radioactive waste could remain on the Power Station Site (up to 140 years) 2. HNP are proposing two radioactive waste storage buildings to provide safe and secure storage facilities. 	<ol style="list-style-type: none"> 1. Whilst it is understood that Horizon will store radioactive waste on the power station site for up to 140 years, this still remains a significant concern for local people due to the considerable length of time that the radioactive waste remains on site. 2. This is seen as a quantifiable issue therefore should be part of the Community Resilience Fund as a statutory benefit. 3. All matters in relation radioactive waste must adhere to the latest UK Government policy. 	
Mitigation Community Benefits	<p>Environmental</p> <ol style="list-style-type: none"> 1. An outline Code of Construction Practice will be submitted as part of the DCO application and include Environmental Management Plans <p>Traffic</p> <ol style="list-style-type: none"> 2. An Integrated Traffic and Transport Strategy includes proposals to ensure an effective transport system to reduce potential adverse effects and enhance the benefits of the traffic-related elements of the Wylfa Newydd Project, such as: <ol style="list-style-type: none"> a. travel plans and the provision of travel information to the Wylfa Newydd Project <ol style="list-style-type: none"> i. workforce; b. management of parking arrangements, including a Park and Ride facility (at Dalar Hir); c. shuttle buses on fixed routes; d. a Marine Off-Loading Facility (MOLF) to facilitate bulk material delivery during <ol style="list-style-type: none"> i. construction, and potentially operation and decommissioning too; e. maximising freight movement by sea; f. a Logistics Centre (at Parc Cybi) to control and consolidate road-based freight; and g. enhancing the opportunities for rail use. <p>Business Development Opportunities</p> <ol style="list-style-type: none"> 3. No specific commitments <p>Employment Opportunities</p> <ol style="list-style-type: none"> 4. Overall strategic approach to recruitment and training and provides information on the 	<p>Environmental</p> <ol style="list-style-type: none"> 1. Provision of a Code of Construction Practice (COCP) and a series of strategies and including Contractor Environmental Management Plans (CEMPs) <p>Traffic</p> <ol style="list-style-type: none"> 2. Travel Plan for both construction and operational phases including targets and measures if targets not met 3. Construction Traffic Management Plan (CTMP) setting out traffic flows and enforcing prescribed routes for HGVs 4. Traffic Incident Management Plan (TIMP) setting out procedures that will apply in the case of a major traffic incident including potential alternative routes or holding vehicles 5. Horizon will provide a funding package to allow IACC to deliver limited online highway improvements on the A5025 including between Wylfa and Amlwch. While this road will be used by construction workers, it is no longer a main commuting route to the site and as such it is not anticipated that this part of the road will need significant improvement solely because of the Project. <p>Education</p> <ol style="list-style-type: none"> 6. Horizon's educational strategy will create real opportunities for young people in the communities local to the Project development sites. 7. Horizon will support a capital investment programme for all five secondary schools on Anglesey to improve the science and technology facilities and related aspects to help promote the take up of STEM subjects. This funding will be available following implementation of the DCO, anticipated to occur in late 2019. 	<p>The comments below are confined to the mitigation/community benefits listed in PAC3 that are by no means comprehensive and is not accepted as being representative of what may be required.</p> <p>The IACC expects Horizon to provide the additional information requested in its PAC3 response in order to properly assess the impacts and their mitigation.</p> <p>The IACC anticipates this mitigation / community benefits to be delivered in full and in a timely manner including the period prior to FID. To this end, the IACC seeks to continue its collaboration with Horizon in working up this overall package.</p> <p>Environmental</p> <ol style="list-style-type: none"> 1. The provision of a COCP is welcome and the CEMPs will help to control impacts however, – the IACC requests that Horizon not only provides definitive information on environmental effects but also the detail of the content of the COCP and the CEMPs prior to agreeing any content of a Statement of Common Ground with Horizon. <p>Traffic</p> <ol style="list-style-type: none"> 2. The principle of providing a Travel Plan, a CTMP and a TIMP are welcome however, the PAC3 consultation provides no detail on specific measures. The ‘value’ of these important documents to manage and mitigate the impact of the development is impossible to determine – the IACC requests that Horizon not only provides definitive information on environmental and transport effects but also the detail of the content 	

	<p>recruitment, employment and training of workers for the pre-construction, main construction, commissioning and operational phases</p> <ol style="list-style-type: none"> 5. 25% of 10,720 workers drawn from 90 minutes commuting time 6. Establish a Construction Skills and Employment Working Group to guide direction and participate in decisions related to employment 7. Employment and Skills Brokerage to be established 8. 850 full time operational staff, commitment to maximising opportunities for residents in the region <p>Skills and Training</p> <ol style="list-style-type: none"> 9. Memoranda of Understanding have been established with Grŵp Llandrillo Menai (particularly Coleg Menai) and Bangor University. These provide for collaboration between Horizon and these strategic partners in areas including student and graduate employability, joint activity in the promotion of science, technology, engineering and mathematics (STEM) subjects, and career paths, sponsorships and sponsored research 10. Horizon is supportive of a future Construction Skills Training Centre located close to the Wylfa Newydd Development Area. If built, this Centre would become a key training facility for the construction workforces. 11. Horizon will also continue to discuss prospects for joint involvement (including possible joint investment) in the following: <ol style="list-style-type: none"> a. new facilities at Coleg Menai sites, including help and support toward the construction of a new Engineering Centre at Coleg Menai; b. potential for use or development of facilities at Bangor University; and c. opportunities in relation to the proposed North West Wales Science Park development <p>Schools engagement</p> <ol style="list-style-type: none"> 12. put in place an educational programme to help inspire and guide school-age children in the region, to provide them with the best chance of being able to benefit from future opportunities arising from the Wylfa Newydd Project 	<ol style="list-style-type: none"> 8. Horizon will continue to implement and maintain a scheme to promote interest in STEM subjects on Anglesey and to provide careers advice and support at key stages for the range of jobs which will be available through both the construction and operational phase of Wylfa Newydd. <p>Jobs & Supply Chain</p> <ol style="list-style-type: none"> 9. Horizon will support the creation and operation of an Employment & Skills Service initiated by the North Wales Economic Ambition Board. This will act as a brokerage for jobs available at Wylfa Newydd and signpost people from across the region to suitable training support for the jobs on offer. 10. Horizon will work with the Welsh Government and North Wales Economic Ambition Board members to fund and facilitate the timely delivery of additional training to meet the specific skills needs identified for the Project. 11. Horizon will establish a Supply Chain Action Plan which will promote the opportunities for businesses to engage in the Wylfa Newydd supply chain. This will be developed on a collaborative basis with agencies such as Welsh Government, Construction Futures Wales and Confederation of British Industry North Wales and the service will be available following implementation of the DCO, anticipated to occur in late 2019. <p>Housing Fund</p> <ol style="list-style-type: none"> 12. Horizon will provide a Housing Fund which will support the provision of new affordable homes and increase housing for rent, for example, by helping IACC to bring empty homes back into use 13. Site Campus Management Plan Horizon will deliver a management plan that will impose strict standards of behaviour on workers and ensure effective management of site facilities. The management of the campus will be undertaken in association with a Community Liaison Officer <p>Accommodation Strategy</p> <ol style="list-style-type: none"> 14. Horizon will fund the creation and operation of an accommodation service which will act as a brokerage between workers seeking accommodation and accommodation providers. This is called the WAMS (see also chapter 7). Accommodation registered with the service will be required to meet the necessary housing and safety standards and comply with building standards and any relevant planning permission. This service will be available following implementation of the DCO. 	<p>of the Travel Plan, a CTMP and a TIMP prior to agreeing any content of a Statement of Common Ground.</p> <ol style="list-style-type: none"> 3. As above, in relation to the transport implications of moving people and materials, the IACC will need to consider restrictions on the amount of movements of HGVs, Buses and Cars prior to the key elements of Associated Development being put in place. If Horizon wish for DCO not to include restrictions on the use of public roads to being in materials to site then the application will have to be assessed on a worst case basis and mitigation will need to reflect this. <p>Education</p> <ol style="list-style-type: none"> 4. The provision of funding for a capital investment programme for schools after the implementation of the DCO is fundamentally unacceptable. Given that facilities will need to be designed, consented and built before courses can begin the likelihood is that the construction will be virtually finished by the time any student is in a position to have benefited from the investment proposed. Communities will have therefore suffered the considerable impact of hosting the construction project and the only 'real' offer to children is the chance of a job during operation. The IACC requires that Horizon review their programme for investment in education and training facilities to ensure local employment targets are met. Evidence from Somerset in relation to Hinkley Point C reveals that it has taken 5 years for the benefits of an education inspire programme to show demonstrable impact on the types of courses being studied and the skills of young people at the end of their education being sufficiently good to enable them to successfully enter the workforce. 5. Careers advice is welcome but will not deliver opportunities for local young people in isolation without the opportunities being available and children being enabled to access them through appropriate training. <p>Jobs & Supply Chain</p> <ol style="list-style-type: none"> 6. The provision of a service following the implementation of the DCO is fundamentally unacceptable and far too late for any such service to enable local businesses to have any chance of playing a significant part in the supply chain. 	
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	<p><i>Sponsorship in the further and higher education sectors</i></p> <p>13. a scheme to sponsor young people from the north west Wales region wishing to study a relevant academic subject at a UK university. Undergraduate students would be offered financial support for their university studies, with a good prospect of employment with Horizon (or its partners in the north Wales supply chain) on graduation</p> <p><i>Apprenticeships</i></p> <p>14. construction stage could support around 500 new training opportunities, the majority of which are likely to be apprenticeships</p> <p>15. plan to launch our own Horizon engineering apprenticeship scheme in north Wales from late 2016, in partnership with Coleg Menai (initially 12 per year)</p> <p><i>Construction Worker Accommodation Management Portal</i></p> <p>16. portal would offer advice and services to accommodation providers and construction workers, as well as forming the route for individual construction workers to find accommodation to meet their needs, ideally as close as practicable to the Wylfa Newydd Development Area. The portal would also offer a way of ensuring that registered accommodation meets appropriate quality standards, offering bed spaces that are in accessible locations, as well as providing the ability to review real-time data and use it to regulate the distribution of the construction workforce across accommodation types and locations</p> <p><i>Tourism</i></p> <p>17. Construction Worker Accommodation Strategy has been developed to include new stock and monitoring measures</p> <p>18. support for landlords and homeowners who wish to provide accommodation to construction workers beyond the normal tourist season</p> <p><i>Statutory Community Benefits</i></p> <p>19. Statutory Community Benefits are those that would be required to make any development proposed as part of the Wylfa Newydd Project acceptable in planning terms and secured</p>	<p>15. Horizon will provide a Housing Fund to support a capital investment programme for the provision of new build social and affordable housing. Initially this will focus on increasing the housing stock in the Wylfa and Amlwch area. This service will be available following implementation of the DCO.</p> <p>16. Horizon intends to increase the available stock of housing to rent by funding a scheme to identify accommodation available for its workers and by providing funds to augment IACC's existing empty homes scheme to bring vacant properties back into use.</p> <p><i>Tourism Fund</i></p> <p>17. In acknowledgement of the importance of the tourism sector to the economy of Anglesey, Horizon will support a Tourism Fund</p> <p><i>Ecology Mitigation</i></p> <p>18. Horizon will implement an ecological management plan to mitigate and enhance biodiversity interests on Anglesey</p> <p><i>Noise</i></p> <p>19. Additional consideration is being given to the extent of the noise mitigation plan and the manner in which this will be applied</p> <p><i>Health and Well-being</i></p> <p>20. Horizon will deliver a health and welfare programme to all of its workers whether they live in the Site Campus, reside locally, or travel to Wylfa Newydd. This programme will ensure that local community health and welfare services and resources used by local residents are not adversely affected by the Project. The programme will be further developed in discussion with Betsi Cadwaladr University Health Board and other healthcare providers however its central feature will be the provision of a bespoke on-site medical centre providing the following services:</p> <p>21. occupational healthcare;</p> <p>22. occupational hygiene;</p> <p>23. GP services for those workers who will be living temporarily in the area and therefore not registered with a local GP;</p> <p>24. primary care for minor injuries; and</p> <p>25. Precautionary provision of initial trauma care facilities to cover the unlikely eventuality of major incidents occurring. Casualties would then be transferred by helicopter or ambulance to hospital.</p> <p>26. Discussions with the Welsh Ambulance Services NHS Trust are taking place to assist with planning in this area.</p>	<p>7. The IACC require Horizon to invest in a Supply Chain Investment Team <u>now</u> to enable the best possible chance for local businesses (individually and collaboratively) to successfully compete for and win work. Identifying suitable businesses, providing clear advice on the training, skills and accreditation necessary to win work, allowing the opportunity and providing funding for businesses to come to together to collaborate is essential. The equivalent service for the Hinkley Point C project was in place 5 years before the Final Investment Decision and the majority of contracts let to local firms have followed collaborative agreements.</p> <p><i>Housing Fund</i></p> <p>8. The principle of a Housing Fund is welcomed.</p> <p>9. The lead in time for the delivery of any additional accommodation (within existing stock or via new build) is significant, the IACC is aware that it has taken 3 years for the Somerset Councils to deliver around 800 bed spaces following the payment of s106 contributions. The PAC3 material indicates that the DCO is expected to be granted in 2019 and the workforce profile indicates that by the end of 2020 the workforce expected to comprise 5000 workers. The indicative phasing for the on-site campus is that it will not be operational until 2021 and then only providing 1000 bed spaces. This is unacceptable.</p> <p>10. In the absence of a significant housing fund being available until after the DCO Consent is in place, the IACC will have little option but to seek significant controls over the number of workers during the first 3 years of construction</p> <p><i>Tourism / Tourism Fund</i></p> <p>11. IACC welcome principle of a Tourism Fund, however we are concerned that our expectations differ considerably in scale from Horizon and further detail on quantum and scope is required.</p> <p><i>Ecology</i></p> <p>12. Scale and scope of ecological mitigation will need to be determined in conjunction with NRW following receipt of the detailed Environmental Assessment and Appropriate Assessment</p> <p><i>Noise</i></p>	
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	<p>through agreements under section 106 of the Town and Country Planning Act 1990, or related provisions under the Planning Act 2008 in respect of the DCO application. These are likely to relate to the additional mitigation of adverse effects predicted as likely to arise from the Wylfa Newydd Project that cannot be mitigated through design. Statutory Community Benefits must be:</p> <p>20. necessary to make the development acceptable in planning terms;</p> <p>21. directly related to the development; and</p> <p>22. fairly and reasonably related in scale and kind to the development.</p> <p>23. Statutory Community Benefits are likely to include the provision of landscape and environmental enhancements and the delivery of transport improvements. The mitigation provisions of the employment, skills, Welsh language and education strategies described could also be secured as Statutory Community Benefits.</p> <p>Voluntary Community Benefits</p> <p>24. Voluntary Community Benefits are non-statutory Community Benefits which are not linked to the statutory planning processes, and which arise from voluntary contributions (of funds, time or resources) by Horizon to local communities.</p> <p>25. There is no legal requirement on a developer to provide Voluntary Community Benefits, and they cannot be taken into account when determining an application for planning</p> <p>26. consent. In effect, they are “goodwill” contributions voluntarily brought forward by a developer for the benefit of communities. Horizon already have an established programme for delivering small grants to local community groups and initiatives, with recent examples of donations including:</p> <p>27. Cemaes Heritage Centre – providing equipment for the newly renovated building;</p> <p>28. Ysgol Parc Y Bont – to develop a wildlife garden as an outdoor teaching resource at</p> <p>29. the school, located to the south west of Llanfairpwllgwyngyll;</p>	<p>27. Horizon proposes that dentistry and pharmacy services will be provided by existing community facilities and Horizon will continue to engage with providers to facilitate any enhancement or recruitment which may be required for these facilities to be able to service the power station workforce.</p> <p>28. Healthcare for families and dependants of Horizon’s workers will be provided within the community.</p> <p>Welsh language and culture</p> <p>29. Horizon is already contributing to the vitality of the Welsh language and culture by supporting a series of local events and initiatives and also by means of incorporating the Welsh language as an important aspect of working life, education and community services.</p> <p>30. Horizon will appoint a Welsh Language and Culture Co-ordinator to develop a behavioural based programme aligned to the goals of the consultation recommendations and to act as a recognised champion for Horizon as a private organisation integral within the community.</p> <p>Tourism</p> <p>31. In recognition that the construction of Wylfa Newydd itself may become a visitor attraction in its own right, Horizon will operate a temporary construction viewing area. This is expected to be able to operate from an appropriate point in the construction programme (having regard to safety and security considerations).</p> <p>32. Horizon intends to apply for a planning permission to permit development of a permanent Visitor and Media Reception Centre at the Wylfa Newydd site for the operational phase post-2025. Horizon intends that the, design of this permanent facility will be the subject of an architectural competition.</p> <p>33. In acknowledgement of the importance of the tourism sector to the economy of Anglesey Horizon will establish a tourism fund. The operation of the fund will be developed through further consultation with local stakeholders including IACC and Welsh Government. It could be used to:</p> <p>34. Support and fund marketing initiatives such as Visit Anglesey;</p> <p>35. Develop a forum for liaising with tourism operators; and</p> <p>36. Provide skills and training, including business planning, for new entrants into the industry.</p> <p>37. Inherent Benefits are those benefits that the Wylfa Newydd Project will deliver as part of the project itself, such as the delivery of local jobs and online and</p>	<p>13. IACC welcome principle but need to see the size and scope of the fund.</p> <p>Health and Wellbeing</p> <p>14. The scope of support for the management of workers health is broadly welcomed however, there is no detail on measures and requirements on local healthcare services.</p> <p>15. The scope of the health and wellbeing information provide remains inadequate and unacceptable. Horizon are referred to the detailed comments on this topic made at PAC2 which have not been reflected in the PAC3 documents</p> <p>Welsh language and culture</p> <p>16. The provision of a co-ordinator is welcome however, the extent of support to ensure that the Welsh Language and culture is supported during the construction project is far deeper and more intrinsic.</p> <p>17. The provision required in schools to allow for the education of worker’s children in bi-lingual schools is significant</p> <p>18. The need for investment in STEM facilities at the earliest opportunity is essential to ensure our young people are best prepared to take advantage of the opportunities (hence remain on the Island).</p> <p>General Observations on approach to Benefits</p> <p>1. PAC3 clearly illustrates the fact that elements of the development are being concentrated with the majority of the project now being located in the North of the Island. Although this results a smaller number of locations the density is far higher which of itself does not mean lesser impact; particularly the cumulative impacts and the potential ‘knock-on’ effects in the six communities closest to the site. This has long been recognised by the IACC through its promotion of the Proximity Principle. This principle is based on the fact that the communities hosting the project will ‘bear the brunt’ of its impacts during its construction and over its lifetime (including decommissioning). Without appropriate mitigation and community benefits, the adverse effects will significantly outweigh the claimed ‘inherent’ benefits of the project. Intensification of the project in and</p>	
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	<p>30. Môn FM – to purchase new equipment for the community radio station; and</p> <p>31. Cylch Meithrin Amlwch – funding equipment in the Welsh-language nursery</p> <p>32. Voluntary Community Benefits Fund during construction – financial value to be finalised at Final Investment Decision – mechanism. Model to be set up for distribution</p>	<p>offline improvements to the A5025 between Valley and Wylfa Newydd</p> <p>38. Statutory Benefits are what we have called those benefits secured by requirements on the DCO, planning conditions on the grant of planning permission and in planning agreements between Horizon, IACC and possibly others. These types of benefits are likely to relate to mitigation of adverse effects from the Wylfa Newydd Project and will be informed by the environmental, Welsh language and health impact assessment work.</p> <p>39. These statutory benefits may also include a small scale fund to mitigate specific community impacts and will be designed to support potentially affected communities in order to address specific areas of concern, particularly those which arise from cumulative effects (such as the combination of noise, traffic and workers) on the Project 's nearest neighbours. IACC have referred to this as a "community impact resilience fund".</p> <p>40. Voluntary Community Benefits – non-statutory community benefits which arise from voluntary contributions (of funds, time or resources) by Horizon to the local community. Small scale voluntary community benefits are already delivered by Horizon through its Charitable Donations, Community Support & Sponsorship scheme.</p> <p>41. As these benefits are entirely voluntary, and not related to the impacts of the proposed development, they would not be legally secured in the ways identified above.</p>	<p>around the Wylfa Newydd site makes the Proximity principle even more applicable, with a corresponding increase in mitigation measures accruing to these communities to reflect these impacts. These adverse impacts will require appropriate mitigation which will form part of the total benefits package.</p> <p>2. At the same time the Proximity Principle recognises that there will be certain effects and benefits will dissipate from the north of the island to the rest of Anglesey, with some beyond onto the mainland.</p> <p>3. The IACC has welcomed the opportunity to work with Horizon and other stakeholders to develop a package of community benefits. The principles and approach to the development of this package have been agreed between the IACC and Horizon in the 'Towards a Common Approach on Community Benefits arising from the Wylfa Newydd Project' document. This approach identified three types of benefits: inherent benefits, statutory benefits and voluntary community benefits. The IACC therefore appreciates that these have been listed in the Introduction to Chapter 8 on Community Benefits. Statutory benefits include mitigation measures under the Planning processes secured by requirement or Section 106 obligations. Examples of Voluntary Community Benefit contributions to date are given in the PAC 3 documentation and these are welcomed by the IACC. These are outside the Planning system. The overall package will be a combination of the elements described above, subject of course to the robust governance processes agreed and followed by the parties given the strict separation of those benefits within and outside the planning processes.</p> <p>4. Mitigation measures therefore combine with statutory benefits and voluntary contributions to form this package, a distinction not often appreciated; hence the regular interchangeability of the terms in practice. Whilst these distinctions need to be made and followed, the importance of mitigation measures must not be diminished in any way. Hence, the attention paid by the IACC to this critical subject area in its detailed responses to PAC 3, and the concerns</p>	
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			<p>expressed about the lack of detail in the documentation to assess impacts and therefore their mitigation.</p> <p>5. The latest SOCC outlines potential benefits and effects citing examples and so therefore not exhaustive. It goes on to state that consultation will provide information on the potential community and environmental effects of the proposed changes covering a range of topics. It also states that information will be included on measures to reduce potential adverse effects and outline mitigation to reduce impacts on local communities and enhance the benefits of the project. As set out in the detailed IACC PAC 3 response such information has been lacking or is inadequate in many areas. There has been insufficient information provided to enable meaningful consideration of the potential impacts of the proposed changes, which need to be viewed 'in the round' and therefore their mitigation. An understanding of the likely measures is required to weigh up whether they reflect realistic mitigation of the impacts, and therefore support for the proposals.</p> <p>6. In the definition of Statutory Benefits in 8.1.2 reference is made to 'a small scale fund to mitigate specific community impacts and will be designed to support potentially affected communities in order to express specific areas of concern'. The IACC takes issue with Horizon making such a statement with regard to the scale of the fund required as the impacts and their mitigation have not yet been properly considered, particularly those impacts for the six host communities as a result of the intensification of the project, as highlighted above. It is seen as pre-emptive on the part of HNP and is unacceptable. The size of the fund should be at the level necessary to mitigate the specific impacts utilising an evidence based approach and drawing on the concerns and feedback from the communities affected, which should be a key consideration of the outcome of this PAC3 public consultation exercise.</p> <p>7. Furthermore, the IACC anticipates community impacts which are unquantifiable and/or unforeseen. A Community Resilience Fund</p>	
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			<p>similar to that agreed for the Hinkley C project is required to cover such impacts as part of the statutory benefits. The scale and size of the fund will need to be negotiated. This again is separate from the voluntary community benefits for hosting the project as this Fund is required to directly mitigate adverse impacts of the project.</p> <p>8. The development of a Community Benefits package is a continuing process which the IACC is keen to progress and will need to fully reflect the project changes outlined in PAC 3. As PAC3 has been the last opportunity for the public to comment on Horizon's preferred Project proposals it is incumbent on the IACC to continue with this process and seek to influence the detail of Community Benefits included in the DCO submission, and to continue up to and following acceptance of the DCO submission, and during the Hearing seeking as much agreement as possible and with a view to early agreement of Heads of Terms for Section 106 Agreements.</p> <p>9. References are made to 'funds being distributed in order to support the communities that will be hosting the project' and 'cumulative effects on the projects nearest neighbours'. These are welcomed by the IACC as they follow the 'Proximity Principle'. However, this principle recognises that certain impacts will extend to the rest of Anglesey, and onto the mainland. The overall Benefits package will therefore cover the host communities and beyond according to the effects of the project and their mitigation. Much more detail on these funds, what they will be target at, how they will be delivered and how they will be monitored is required.</p>	
SITE SPECIFIC ISSUES				
Main Power Station Site	Stage 1: Site Preparation & Clearance 1. A more extensive Site Preparation & Clearance application (TCPA) was expected in PAC2. This would include more significant site clearance and levelling, associated earthworks & drainage along with the permanent closure and diversion of the Cemlyn Bay Road.	Stage 1: Site Preparation & Clearance 1. Now propose to pursue a reduced scope of works for SP&C before the DCO grant. 2. The indicative SP&C site area has increased from approximately 270 hectares to approximately 300 hectares. 3. Topsoil would no longer be removed and placed in temporary storage mounds at this stage. 4. Rock outcrops would no longer be removed and used as a source of construction materials. 5. Haul roads associated with removing the rock outcrops and topsoil are no longer necessary.	1. The IACC have no issue in the scope of the site preparation and clearance works being reduced prior to DCO however much more clarity is needed on what works will be included in which consent and when they will be undertaken. The IACC concurs with PINS view in the scoping opinion (2017 addendum) that the scope of the works to be included in the TCPA and DCO is not clear and more detail is required. The Site Preparation and Clearance phase is still seen by the IACC as the start of the project and requires a firm and binding commitment from Horizon that	

		<ol style="list-style-type: none"> 6. A security access route inside the perimeter fence is no longer necessary. 7. Areas of contaminated land and Japanese knotweed would now be treated on-site in a dedicated compound rather than taken off-site. 8. PRow would now remain open at this stage, with activities in the vicinity controlled by marshals to ensure public safety. 9. Access to Fisherman's Car Park along the existing public road would now remain open at this stage, with traffic management control of contractor's vehicles. 	<p>the use of local people, companies and contractors will be maximised during this phase via the relevant Brokerage as part of the project mitigation.</p> <ol style="list-style-type: none"> 2. The IACC welcomes Horizon's commitment to collaboratively work with the public sector to pilot the Employment and Skills Service during these works. We would be eager to see this being rolled out further after the Site Preparation and Clearance phase. 3. The IACC requests sight of Horizon's procurement programme and contract strategy to seek clarity and confidence that local contracts are able to take advantage of the opportunities for the site preparation and clearance works. Contracts need to be achievable for local firms to apply for and the IACC would be happy to provide examples or precious contract packing approaches which have enabled smaller local and regional firms to successfully bid for works, including the A5025 online works. . 	
	Stage 2: Main Construction 1. See PAC3 changes.	Stage 2: Main Construction <ol style="list-style-type: none"> 1. Refining the open top construction method, which shortens the construction schedule by enabling parallel working. This means mechanical and electrical installation can start sooner and civil/building construction can continue once it has started. 2. Open top construction means that larger completed modules can be brought to site and installed, which has the advantages of reducing the on-site work. 3. The Main Construction stage is predicted to last approximately seven years from early 2019 to late 2025, which is a saving of approximately three months. The improved approach to the design and construction of the reactor buildings also creates a saving of 10 months within this stage. 4. Settlement ponds, drainage channels, stripping of topsoil and topsoil storage would now be provided in this stage rather than as part of the SP&C works. 	<ol style="list-style-type: none"> 1. Given the lack of detail in PAC3, the IACC have no comment at this time in relation to construction methodology. Further detail and discussion is required prior to the submission of the DCO application. 2. The principle of reducing construction time through refining and improving methodologies is supported in principle (again subject to detail). 	
	Stage 3: Commissioning & Operation N/A	Stage 3: Commissioning & Operation <ol style="list-style-type: none"> 1. There have been no material changes to the Commissioning and Operation stage since the Stage Two Pre-Application Consultation. 	<ol style="list-style-type: none"> 1. As there have been no material changes to the Commissioning and Operation the comments made by the IACC in response to PAC2 remain 	
	Stage 4: Decommissioning N/A	Stage 4: Decommissioning <ol style="list-style-type: none"> 1. There have been no material changes to the Decommissioning stage since the Stage Two Pre-Application Consultation. 	<ol style="list-style-type: none"> 1. As there have been no material changes to the Decommissioning stage the comments made by the IACC in response to PAC2 remain 	

Power Station Layout & Design		Power Station Layout & Design		
1. Larger power station site area with reactor buildings being on two independent areas further away from one another.		1. The Power Station Site area is smaller and the perimeter fence is now located further away from the A5025 and local communities.	1. The principle of 'optimisation' and the reduction in the power station footprint / development area is welcomed. Although the IACC appreciate that the perimeter fence is further away from the A5025 and the local communities, this is still a huge construction site and the impacts will be broadly similar (to PAC2 position). Horizon should not downplay the scale and impact of this construction project. Its impacts will be felt across Anglesey for the next 10-15 years and are therefore significant.	
2. Larger power station site area with reactors being on two independent areas further away from one another.		2. The reactor buildings and associated buildings are now combined on a single 'Power Island' rather than two independent areas.	2. Again, the principle of optimisation is acknowledged and has obvious benefits to Horizon in terms of cost, timescale, reduction in construction material and operational requirements. The smaller overall footprint / development area is also welcomed in principle from a landscape and visual impact perspective.	
3. Proposal consisted of two reactor buildings, two turbine buildings, two control buildings, one service building and one radioactive waste building.		3. The 'Power Island' will consist of two reactor buildings, two turbine buildings, two control buildings, one service building and one radioactive waste building.	3. In terms of the 'power island', as far as the IACC is concerned there is little change from PAC2 to PAC3 – it is still a nuclear power station with 2 reactors, generating 2,700 MW of electricity, requiring 8,000+ construction workers and 850 operational workers.	
4. Site less efficient with effectively two of everything. The PAC2 proposal was effectively two power stations on one site.		4. Some of the buildings, structures and features needed to generate power or support the Power Station have been combined to make the Power Station design and construction more efficient.	4. No comment.	
5. Two options were considered in PAC2 i) same location as the existing Magnox outfall; and, ii) further up the coast on Wylfa Head. The preferred location for the outfall was the at the same location as the existing Magnox outfall (figure 6.13 MCD).		5. The Cooling Water Structure outfall would now be in the same location as the Existing Power Station outfall. This was previously identified as one of two potential locations. This location would allow the channel already cut into the sea bed to be re-use and is Horizon's preference accordingly.	5. The IACC support the outfall being in the same location as the existing Magnox Power Station outfall.	
6. The proposed Training and Simulator building in PAC2 was proposed east of the proposed power station, adjacent to the Village of Tregele.		6. The preferred location for the Training and Simulator Building has moved from the east of the Power Station to a location to the south of the Power Station. The revised location is further from the village of Tregele.	6. The IACC support the relocation of the training and simulator building to the south of the power station, away from Tregele. However, further detail is required on its exact scale, location, design, layout etc. before a definitive comment can be provided by IACC.	
Marine Off-Loading Facility		Marine Off-Loading Facility		
1. The Eastern Breakwater was approximately 90 meters in length in PAC2.		1. The Eastern Breakwater has increased in length by up to approximately 60m and now totals up to approximately 150m.	1. No comment.	

	<p>2. Two options were being considered in PAC2 for the construction of the MOLF and cooling water intake – a wet and a semi-dry option. A semi-dry option, is where some excavation is carried out in the dry behind a cofferdam and some excavation is carried out by dredging underwater; and a wet option, where all excavation is carried out by dredging and blasting underwater.</p>	<p>2. The Western Breakwater has reduced in length by up to 50m, now totalling up to approximately 500m. This breakwater has also moved approximately 20 metres to the west (further out to sea). Dredging in front of the Porth-y-pistyll shoreline was previously proposed in one of two ways: underwater; or, using a temporary coffer-dam (semi-dry construction). The semi-dry approach is now preferred because it reduces the volume of material that needs to be excavated underwater, avoids the need for underwater blasting, and improves the safety and control of construction activities, which can be undertaken in the dry behind the cofferdam.</p>	<p>2. The IACC is supportive of the commitment to a semi-dry construction method for the MOLF. This will reduce the volume of materials which will need to be excavated underwater and will improve the water quality and turbidity which has been an issue in Cemaes Bay recently (bathing water quality). However, the IACC note that a semi-dry option will result in higher dust emissions which will need to be managed and monitored carefully. Any unacceptable environmental or social impacts will need to be mitigated appropriately.</p>	
	<p>3. MOLF proposed adjacent to the north-eastern CWS breakwater, incorporating two separate quays. One quay would allow AILs, large plant and equipment to be driven off the vessels (called a Roll-on/Roll-off quay), while the other would enable bulk materials to be lifted to the shore by crane (the bulk materials quay).</p>	<p>3. The design of the MOLF now provides two platforms (with three quays) with several mooring dolphins, rather than one long quay wall. The changes increase the cargo handling capacity of the MOLF and reduce the amount of seabed excavation required.</p>	<p>3. The IACC is supportive in principle of the changes to the MOLF to allow greater cargo handling capacity. The IACC would encourage as much material as possible to come through the MOLF to minimise as far as possible any potential impact on the highway network. However, the A5025 should not be seen as a fall-back position if there is any delay in the delivery of the MOLF unless this is fully assessed and the impacts appropriately mitigated. A fall-back position without additional mitigation package in place is unacceptable.</p>	
	<p>4. Marine vessel movements approximately 48 per month.</p>	<p>4. Marine vessel movements would increase from approximately 48 per month to approximately 55 per month.</p>	<p>4. Although this is relatively minor increase from PAC2 to PAC3, the IACC would requests further detail on vessel movements (e.g. monthly profile of vessel numbers/ movements) to ensure that the impact is appropriately managed. The IACC are the Amlwch Port Authority and Stena Line the Holyhead Port Authority. This increased activity is likely to have significant impact within a relatively small area and the IACC believe that it is essential to have a specific discussion with both parties in terms of coastal safety with a potential view of Stena becoming the Port Authority for both.</p>	
	<p>5. MOLF Construction to commence mid-2018 and completed 2020 in time for the first significant deliveries for construction.</p>	<p>5. MOLF and breakwaters construction (2 years). Anticipated start date 2019.</p>	<p>5. The IACC does have concerns that any delay in the construction and delivery of the MOLF may have a significant impact on the highway network. The IACC seek clarity and assurance from Horizon that the MOLF will be operational by 2021 in time for main construction and what mitigation measures are being considered for any delay. Further detail is also required on the amount of construction material expected to be</p>	

			delivered on to site whilst the MOLF is being constructed. Any use of the A5025 as a fall-back position is wholly unacceptable without full impact assessment and an appropriate mitigation package being agreed.	
Off-Site Power Station Facilities	MEEG, AECC & ESL	MEEG, AECC & ESL		
	1. In PAC 2 the AECC and ESL buildings were proposed at the Cefn Coch site between the existing A5025 and the new offline A5025.	1. The AECC and ESL facilities are no longer proposed to be located on the greenfield site at Cefn Coch, or the alternative site at Cylch y Garn school (the Llanrhyddlad site).	1. The IACC is supportive of the AECC and ESL not being located at the Cefn Coch site. The co-location of the AECC, ESL and MEEG at one location is a supported in principle (subject to detailed design and assessment).	
	2. The Cefn Coch site was proposed for the AECC and ESL building (i.e. both combined in one building).	2. The Cefn Coch site will still be used temporarily as a construction compound for the On-line Highways Improvements to store machinery and materials, but will thereafter be returned to a grassed area.	6. The IACC is supportive in principle of the Cefn Coch site being used temporarily as a construction compound for the A5025 on-line highway works. However further detail is required to assess the potential cumulative impacts with the construction of the new School and other activities.	
	3. The MEEG was a stand-alone building in PAC2 on the Llanfaethlu (former O R Jones site). The AECC and ESL were combined in one building on the Cefn Coch site.	3. It is now proposed to combine the MEEG and AECC facilities into a single building, with the ESL located in a separate building on the Llanfaethlu site.	7. This change is supported as the Llanfaethlu site will have a similar footprint to PAC2 and the Cefn Coch site is not used.	
	4. The MEEG was to consist of two permanent buildings. The main building is a single storey structure with the approximate maximum dimensions of 56m in length, 24m in width and 13.6m in height. There is also a light vehicle storage building with approximate maximum dimensions of 30.5m in length, 18.5m wide and a maximum of 8.5m in height;	4. The combined MEEG and AECC building remains approximately the same size as the previously proposed stand-alone MEEG building. The proposed light vehicle store is now no longer required and is replaced by the ESL.	8. This change is supported.	
	5. The ESL was combined with the AECC at the Cefn Coch site in PAC2.	5. Compared with the previous combined ESL and AECC building, the stand-alone ESL building would reduce by approximately 3 metres in height, 2 metres in width and 26 metres in length. The effect of combining the facilities onto a single site is therefore to reduce the overall volume of built development necessary.	9. This change is supported.	
	6. No overspill car park was proposed as part of PAC2.	6. Overspill parking is now located to the south of the site and provides sufficient space for 50 vehicles at any one time, for use mainly during training or in the extremely unlikely event of an incident. The site area has increased to accommodate this change.	10. The IACC have no objection in principle to the overspill carpark (subject to detailed design). Although the site area has increased as a result, the proposed re-enforced grassed parking area will reduce visual impact.	
	7. The MEEG would have an operational workforce of up to four staff and 12 drivers during training (which would happen during normal working hours approximately once a year). It was expected that two staff would be required at the ESL on a regular basis. During	7. There would be an operational workforce of approximately three staff at the ESL on a regular basis. The MEEG and the AECC would not usually be staffed. Should there be an incident or training however, there could be a combined workforce of approximately 85 working at the MEEG and AECC.	11. There is little change from PAC2 to PAC3 in terms of operational workforce. The MEEG and AECC have no operational staff (only in training or in the event of an emergency) and the ESL will have 3 staff on a regular basis. The IACC would however request further information on the training exercises and how often these would	

	<p>normal operation of the Power Station, the AECC would be expected to be in use only once per year for an annual incident exercise.</p> <p>8. Training at the AECC would take place at regular intervals, involving a small number of staff using the main AECC area for a limited period of time. Approximately once a month, maintenance would need to be carried out at the facility, which may include running a back-up generator for a short time.</p>		<p>take place, duration, how many workers, vehicle trips etc. as this may have an impact on local communities, schools etc. which could be minimised / mitigated through discussion and agreement.</p>	
	<p>9. During PAC2, it was estimated that the Annual Average Daily Traffic flows during the construction of the MEEG at the Llanfaethlu site would be approximately 140 vehicles per day (e.g. 70 vehicles in and 70 vehicles out) – although for one month during the peak of construction this would rise to approximately 270 vehicles a day (i.e. 135 vehicles in and 135 vehicles out).</p> <p>10. For the AECC/ESL site at Cefn Coch the Average Annual Daily Traffic Flows were modelled to be 270 vehicles per day (135 vehicles in and 135 vehicles out).</p> <p>11. Also in Stage Two, the proposed AECC/ESL building at Cefn Coch, or Llanrhyddlad, assumed up to 360 vehicles per day at peak construction (i.e. 180 vehicles in and 180 vehicles out) for the AECC/ESL.</p>	<p>8. During the peak construction period, up to approximately 100 vehicles would be arriving and approximately 100 vehicles would be departing the site per day (of which less than 25 of these vehicles would be HGVs). This substantial reduction from 500 vehicle movements at the previous consultation has resulted from the consolidation of the Off-site Power Station Facilities onto a single site.</p>	<p>12. The IACC welcome the substantial reduction on vehicle movements during the construction of the off-site power station facilities. The IACC would request that the construction impact is measured cumulatively with other activities to minimise disruption wherever possible (i.e. A5025 highway improvements, increased usage of the road by Wylfa Newydd construction workers, construction of the new school etc.).</p>	
	<p>12. No detail on vehicle movements per day during operation, but given that only two people were required to run the facility, this would be minimal.</p>	<p>9. The total number of vehicle movements per day during the operational stage is approximately five vehicles arriving and five vehicles departing per day. This figure will increase during an incident or training.</p>	<p>13. No comment.</p>	
	<p>13. Construction would commence post FID and would be operational by 2023.</p>	<p>10. The construction period is expected to be between 2020 and 2023. The facilities would then be operational until the Power Station is decommissioned.</p>	<p>14. As with other comments above, a number of Horizon activities will now commence post FID so need to consider cumulative impacts.</p> <p>15. The IACC requests Horizon's procurement programme, contract strategy including details on how local content (type and size of contract) will be maximised and managed to provide certainty and confidence that North Wales businesses will be able to take advantage of the opportunities available</p>	
	<p>- Legacy: In terms of a future use of the buildings and land, this is something that would be controlled as part of the decommissioning programme in relation to the overall site, where any alternative proposals beyond this period</p>	<p>11. At present, it is assumed that the MEEG, AECC and ESL buildings would be decommissioned and removed from the site around the same time as decommissioning of the Power Station commences at the end of its operational life. Any alternative</p>	<p>16. The IACC would suggest that the future use of the buildings is re-assessed after decommissioning. There may be future alternative uses to the buildings to prevent the need to remove/dismantle.</p>	

	would need to be considered and determined as part of a future planning application.	proposals for use of the building or the site beyond this period would need to be considered and determined as part of a future planning application at that time.		
Dalar Hir Park & Ride	1. Able to accommodate 2,700 cars, 55 minibuses, 94 motorbikes and 84 bicycles.	1. Now able to accommodate 1,900 cars, 35 Motorbikes and 35 bicycles.	1. The IACC maintains its position from PAC2 and Dalar Hir is not considered a suitable location for Park & Ride.	
	2. Temporary bus terminal facility building was 61m x 27m x 12m in PAC2.	2. Temporary bus terminal facility building now approximately half the size at 29m long x 12m wide and 7m high.	2. No comment until above issue is agreed.	
	3. The bus waiting pick up and drop off zone was for up to 40 buses at any one time.	3. This is now for 15 buses (with additional space for 8 buses) as the reduction in daily car parking demand has reduced the number of buses required.	3. No comment until above issue is agreed.	
	4. The maximum number of construction workers on the Park and Ride site at any one time was 120 workers.	4. The maximum number of construction workers on the Park and Ride site at any one time has reduced to 70.	4. No comment until above issue is agreed.	
	5. 40 bus drivers expected and 15 members of staff.	5. Horizon now proposes to have 15 bus drivers with 10 members of staff. How can the maximum vehicle movements per day increase from 42 to 48 with less bus drivers?	5. No comment until above issue is agreed.	
	6. Operational between early 2020's and 2026.	6. Operational between 2020 and 2027.	6. No comment until above issue is agreed.	
	7. Maximum of 42 daily return bus movements from Dalar Hir to the Wylfa Newydd site.	7. Maximum 48 daily return bus journeys from Dalar Hir to Main Power Station Site. In addition to these daily movements there would be up to five bus movements to provide transport for construction workers living at the Site Campus travelling to and from their permanent place of residence for their weekend break.	7. No comment until above issue is agreed.	
	8. Legacy use – propose to remediate site to its previous condition (agricultural land).	8. Still propose to remediate site to its previous condition (agricultural land).	8. In accordance with the principles of sustainable development (and the Wellbeing & Future Generations Act), the IACC believe that the future use of the site should be re-assessed after it is no longer required as a park & ride. 9. Horizon's approach of demolishing everything that they no longer require is very poor planning and goes completely against the principles of sustainable development.	
	9. Assumed that buses would remain on-site (Wylfa) during periods between trips to Park & Ride.	9. Buses will now return to the Park and Ride in between trips.	10. The IACC have no issue with this in principle. However, if workers who are living in TWA want to return to the Park & Ride then mini-buses will need to be made available for these journeys. Similarly, not all workers living in TWA arrive at the same time so mini buses will also be required	

			to transport these workers to and from site (from the park & ride).	
Parc Cybi Logistics Centre	1. Parc Cybi was designed to accommodate 56 HGVs, 4 MGVs and 6 LGV.	1. The site can now accommodate up to 100 HGVs. MGVs or LGVs at any one time. HGV parking is more centrally located to simplify HGV circulation. PAC2 however did state that Parc Cybi could accommodate up to 100 HGVs (paragraph 13.22 MCD).	1. The IACC believe that the design and layout of the Logistic Centre is much improved from PAC2.	
	2. During peak periods, up to 80 vehicles would be arriving and 80 vehicles departing from the facility per hour.	2. During peak periods, up to 40 vehicles would be arriving and 40 vehicles departing from the facility per hour.	2. The reduction in vehicle trips arriving and departing per hour is welcomed. The IACC would request that this is robustly monitored and measures are put in place to ensure that this peak is not exceeded.	
	3. The total number of vehicle movements per day was 150 vehicles arriving and departing per day.	3. The total of vehicle movements per day as increased to approximately 160 vehicles arriving and departing per day (i.e. in each direction).	3. The impact of this increase in HGV movement in terms of both emissions both on site and travel needs to be re-assessed and monitored.	
	4. It was proposed that smaller deliveries would be consolidated onto larger vehicles and this would happen in Parc Cybi to reduce vehicle movements.	4. Now proposed to achieve this at source through collaboration with suppliers.	4. This approach is welcomed and supported.	
	5. The welfare and security building in PAC2 was 22m long, 16m wide and 4m high	5. The welfare and security building has increased in size to 27m long, 15m wide and 4m high and is now expected to be located at the west of the site.	5. No comment.	
	6. Maximum number of construction workers to build Logistics Centre was at any one time 120.	6. The maximum number of construction workers on the site at any one time has reduced to 40.	6. Although the IACC is disappointed in the reduction in construction workers, we would request that local companies are used for this construction wherever possible. 7. However, the IACC requests for a Procurement Plan to maximise local companies participation.	
	7. Working hours at the Logistics Centre are expected to be a minimum 7.5 hours a day for five days a week to a maximum of 24 hours a day seven days a week during peak construction period.	7. The facility would be operational 24 hours per day .	8. This is a significant change from PAC2. The IACC would request further detail on vehicle movements (day / night) to ensure that impact are mitigated where possible.	
	8. Approximately 47 staff would be employed at the Logistics Centre (paragraph 13.39 MCD).	8. The Logistics Centre will now have an operational workforce of approximately 14 staff.	9. Although the IACC is again disappointed in the reduction of operational workers required, this is understandable given that loads will be consolidated off-site by the suppliers. 10. Local employment should be maximised to this end.	
	9. The Logistic Centre did contain a 1,900sqm warehouse for the consolidation of loads.	9. This has been replaced by a covered inspection bay that will be 22m long, 12m wide and 5.5m high (264sqm) as it is now proposed that deliveries would be consolidated at source where possible (and not on-site).	11. No comment.	
	10. No cycle path proposed to site.	10. A direct cycle connection from the Lon Trefignath cycle path into the site is now proposed.	12. The inclusion of a cycle path is supported.	

A5025 Highway Improvements	1. See PAC3 Changes.	1. Section 1 (A5 east of Valley Junction to north of Valley Junction (A5/A5025): The proposed roundabout junction has been relocated on-line (to be constructed as part of the existing A5 highway rather than set back from the highway and the bypass has now been moved approximately 20m further east to ensure the new highway is located outside of the extent of the 1 in 100 year (+30% climate change) flood zone. A cycling and pedestrian path to the south of the roundabout and away from the carriageway edge is now proposed to increase pedestrian and cyclist safety	1. The A5025 is supported on highway grounds in principle, however mitigation is required to help against the businesses affected. 2. As previously stated in PAC2 response (para. 8.1), the IACC welcomes the proposed online and offline works to the A5025 as they are vital to Horizon's Freight Transport Strategy. However the IACC seeks confirmation that the proposed new A5025 roundabout at Valley and A55 Junction 3 roundabout/slip road have sufficient capacity to accommodate the significant volume of traffic that will be departing Wylfa to gain access onto the A55, especially on the evening of the 11th day of a working shift period. 3. The IACC recognise the need for these modifications and are supportive.	
	2. See PAC3 Changes.	2. Section 3 (north of Llanyngghenedl to north of Llanfachraeth): The bypass continues to include an elevated viaduct across the Afon Alaw, which is approximately 5m in height to allow cattle and pedestrians to cross the highway underneath. The viaduct is approximately 25m longer to include an 8m easement between the watercourse and the abutments, as a result of further flood modelling undertaken since the Stage Two Consultation. Additional land to the east is included to allow for Great Crested Newt mitigation.	4. Supportive of this change.	
	3. See PAC3 Changes.	3. Section 5 (south of Llanfaethlu to north of Llanfaethlu): Additional land to the west is included to allow for Great Crested Newt mitigation.	5. Supportive of this change in principle. 6. The traffic flows will potentially affect the new Ysgol Rhyd y Llan and its pupil's therefore careful consideration is required to regulate traffic during school opening and closing times.	
	4. See PAC3 Changes.	4. Section 7 (north of Llanrhyddlad to north of Cefn Coch: The carriageway width has reduced from 7.3m to 6.7m at the southern end to reduce the extent of earthworks, and at the northern end so that earthworks are not required within an ancient woodland.	7. Supportive of this change.	
	5. See PAC3 Changes.	5. Modifications are now proposed to the A5025 south of Tregele to provide a new roundabout junction to connect to the proposed Power Station Access Road.	8. Supportive of this change.	