

From: [PMO](#)
To: [Wylfa Newydd](#)
Cc: [Dylan Williams](#); [Liz A. Davies](#)
Subject: IACC Deadline 3 Submissions: OFFICIAL
Date: 18 December 2018 10:59:33
Attachments: [image003.png](#)
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[image005.png](#)
[IACC Deadline 3 Submission FINAL.pdf](#)

Good morning,

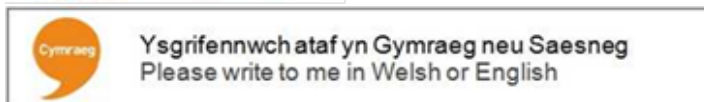
Please see attached the IACC Submission in respect of the above.

Regards,

Swyddfa Rhaglen Ynys Ynni /
Energy Island Programme Office
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Mae'r neges e-bost hon a'r ffeiliau a drosglwyddyd ynghlwm gyda hi yn gyfrinachol ac efallai bod breintiau cyfreithiol ynghlwm wrthynt. Yr unig berson sydd 'r hawl i'w darllen, eu copio a'u defnyddio yw'r person y bwriadwyd eu gyrru nhw ato. Petaech wedi derbyn y neges e-bost hon mewn camgymeriad yna, os gwelwch yn dda, rhowch wybod i'r Rheolwr Systemau yn syth gan ddefnyddio'r manylion isod, a pheidiwch datgelu na chopio'r cynnwys i neb arall.

Mae cynnwys y neges e-bost hon yn cynrychioli sylwadau'r gyrrwr yn unig ac nid o angenrheidrwydd yn cynrychioli sylwadau Cyngor Sir Ynys Môn. Mae Cyngor Sir Ynys Môn yn cadw a diogelu ei hawliau i fonitro yr holl negeseuon e-bost trwy ei rwydweithiau mewnol ac allanol.

Croeso i chi ddelio gyda'r Cyngor yn Gymraeg neu'n Saesneg. Cewch yr un safon o wasanaeth yn y ddwy iaith.

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Head of Service Regulation and Economic Development

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Ein Cyf / Our Ref: YM / EN010007
Eich Cyf / Your Ref: EN010007

Dyddiad / Date: 18.12.2018

Dear Kay,

Wylfa Newydd DCO Examination EN010007 - Deadline 3 Submissions.

Please find attached, submissions as follows:-

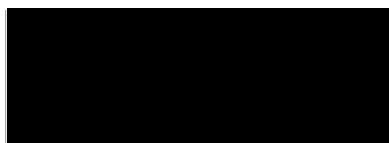
- (i) Comments on Written Representations (Annex A);
- (ii) Confirmation of Progress of SoCG discussions (Annex B);
- (iii) Comments on NRW's Response to First Set of Written Questions (Annex C);
- (iv) Comment on HNPs Response to First Set of Written Questions (Annex D).

IACC has only commented on responses where it considers that the response raises something which IACC did not cover in its own Deadline 2 submission. Many of the issues raised, both by the Examining Authority and other Interested Parties, have been addressed in the IACC's Local Impact Report or Written Representation. Where this is the case, that material has not been repeated. Where the IACC has not made any comment on this occasion it should not be taken to mean that the IACC concurs with any response; the Council maintains the position set out in detail in its Deadline 2 submissions. The IACC reserves its right to comment on any point at later deadlines should it consider that it to be necessary.

The IACC wishes to advise the Examining Authority that comments on some documents (such as the revised CoCPs and the Dalar Hir FCA Addendum (Revision 1.0)), have not been submitted as there has not been sufficient time to meaningfully review these. The IACC will make further comment on such documents once it has had an opportunity to consider these.

Welsh versions will be submitted as soon as translations are available.

Yours sincerely,



Dylan J. Williams
Head of Service
Regulation and Economic Development

ANNEX A

Comments on Written Representations

1 Horizon Nuclear Power

- 1.1 Para 2.2.3 – IACC reserves its position on the point at which mitigation is shown to be adequate and adequately secured to outweigh the adverse impacts of the scheme. Similarly the JLDP policy analysis and section 3.3.1 et seq and the SPG policy analysis at para 3.3.121 et seq also rely upon the mitigation steps referred to being demonstrated to be adequate in extent and deliverability which has not so far been shown to be the case.
- 1.2 Para 3.3.60 – IACC has already responded to Question 20.0.3 at Deadline 2 why issues associated with storage of radioactive waste at the site are material to this DCO decision.
- 1.3 References to CoCP, Sub CoCPs and the WNMPOP (e.g. 3.3.64 and 3.3.67) have already been the subject of separate submission by IACC on the adequacy of this drafting.
- 1.4 The legacy benefits listed by HNP at section 4.2 et seq are critically dependent upon the detailed mitigation needs that are contained in the LIR and which will be amplified in the Issue Specific Hearings.

2. Gwynedd County Council

- 2.1 No comment

3. Welsh Government

- 3.1 No comment

4. Natural Resources Wales

- 4.1 No comment

5. North Wales Police

- 5.1 Section 6 – CoCPs and WNMPOP. On-going negotiation of these arrangements with HNP is the appropriate direction to pursue these issues at the present time and the differing concerns of stakeholders like NWP.

6. General Comment

- 6.1 IACC has provided extensive Written Representations and Local Impact Report as well as commenting at Deadline 3 on a large number of the written responses of HNP made at Deadline 2.
- 6.2 Whilst it is clear that there are differences in emphasis and focus of concern between IACC and WG, GCC, NRW and NWP, these are matters which are felt now to be best articulated in the issue specific hearings which should allow the most important impacts to be highlighted and concentrated upon.
- 6.3 It follows that IACC has not attempted line by line commentary on all the Deadline 2 submissions. Inevitably there will be material raised, particularly in the Issue Specific Hearings which will potentially raise disagreement with elements of the other participants' Deadline 2 material that will not have been specifically raised at Deadline 3, however those points will almost certainly have been raised in previous IACC submissions. If that is not the case, explanation will be made why the point is being raised for the first time.

END.

ANNEX B

Confirmation of Progress of SoCG discussions (Annex D)

IACC and Horizon wish to update the Examining Authority on progress with the IACC Statement of Common Ground (SoCG) in respect of the additional six tables not yet submitted at Deadline 2 and generally in respect of progress on all SoCG content to the point of final agreement.

Horizon's intention had been to submit the final six tables at Deadline 3 on the same "agreed draft" basis (per para 3.2 of HNP Document APP 8.25 dated 7/12/18), however, for the reasons set out below IACC and Horizon are now in agreement that the process of Examination will be best assisted if further progress on the submitted and outstanding drafts is reserved until a later Deadline after the first round of hearings.

In advancing this suggestion Horizon and IACC would draw the Examining Authority's attention to these considerations:

1. At this point in the Examination reviewing of wording to finalise positions on anticipated impacts and mitigation measures in response is rapidly being overtaken by events, including responses to questions, Written Representations and the LIR and amendments being proposed by Horizon to control documents.
2. Meaningful progress really must follow review of the most recent submissions being made, particularly those in response to the LIR and the Examining Authority's written questions.
3. Progress now on the further six SoCGs (as with the drafts so far submitted) is likely to yield very limited areas of agreement, but likely to lead to substantial deletions of draft text which is likely to misrepresent the actual potential for agreement at this stage.
4. Horizon and IACC are continuing to discuss areas of agreement in relation to the topic based hearings of the week of the 7th January 2018, in order for these hearings to be as constructive as possible
5. Horizon and IACC will continue to work together to achieve agreement on as many matters as possible in advance of the intended final submission of SoCGs on 19th February 2018.

END

ANNEX C

COMMENTS ON NRW'S RESPONSE TO FIRST SET OF WRITTEN QUESTIONS

Q2.0.21	NRW, NWWT and RSPB	WA	Do NRW, NWWT and RSPB agree that the creation and management of species - rich grassland with a close sward and coastal heath/grassland mosaic as described in Chapter 8.16 [APP-424] paras 6.5.7 and 6.5.12 and the management of Mound A as described in 5.4.12 would be sufficient for providing optimal foraging for Chough?	NRW consider that the proposed management of habitat for chough is feasible long-term, during the operational phase of the development. NRW do not consider that creating optimal foraging habitat for chough would be feasible during the construction phase.	IACC has concerns regarding the effects of the scheme on foraging chough, principally due to loss of preferred foraging areas and visitor pressure. With regard to the proposed mitigation, habitat management on Wylfa Head may provide foraging habitat for chough, although the effectiveness of the Mound A management must be considered uncertain due to the distance of this from the principal nesting areas and the reduced foraging value of heavily worked soils.

Q2.0.24	NRW	WA	Is NRW content that reptile translocation (Chapter D9 paras 9.5.189 – 190 and para 9.5.337) could be secured through species mitigation licence, or should more detail be included in the MPSSSCoCP?	NRW do not consider that reptile translocation, based on current interpretation, is a species licensing matter. We defer to IACC in terms of advising on reptiles which are partially protected under the Wildlife and Countryside Act 1981.	IACC do not consider the reptile translocation to be a licensable activity and so delivery of this element will need to be controlled and managed through the sCoCP. However, the MPSSSCoCP [Revision 2 4th December 2018] has virtually no information or detail on the delivery of the mitigation outlined in Chapter D9 paras 9.5.189-190. For example, Para 9.5.189 states that mitigation “<i>would include a combination of trapping and translocation of individuals, phased and directional habitat manipulation to encourage reptiles to move away from the works area, sensitive removal of suitable refuge features, and supervision of works by an ECoW</i>”, whereas the sCoCP makes no reference at all to the trapping or translocation of reptiles. The sCoCP then refers loosely to the CoCP [APP-414] but only in reference to drystone walls and timing of their demolition. The CoCP [APP-414] states that “<i>Any required translocation of reptiles will take place in accordance with the Herpetofauna Groups of Britain and Ireland guidance [RD35], using artificial refuges</i>” but this is obviously a weak commitment due to lack of specificity (“<i>Any required...</i>” – how is this determined, by who, where, when?). IACC in its letter to Horizon [01/10/2018] previously stated that “<i>More details on the proposed construction mitigation measures are required (the statements in the CoCP are generally vague) – specifically, in what areas of the</i>

					site will trapping / translocation be undertaken; how many reptiles are expected in these areas; what is the precise phasing, timing, speed and direction of site clearance at a field level (i.e. the displacement programme needs to demonstrate that reptiles will not become isolated within the site, and that the rate of clearance is appropriate to the rate of species movement); what provisions are there for monitoring populations during the construction period; and what provisions there will be for intervention if the short- and medium-term measures associated with the receptor sites are not shown to be successful by monitoring?”. Whilst some of this might not be achievable until the immediate pre-construction period the mitigation proposals in the CoCPs are too vague to provide confidence that the commitments within the ES (on which the assessment of significance is based) will be kept. Furthermore, the IACC notes that sCoCP para. 1.1.8 states that “Where the requirements of construction practice are covered adequately by the Wylfa Newydd CoCP (APP-414), those controls are not repeated in this sub-CoCP. Therefore, where no site specific controls are specified here, reference should be made to the Wylfa Newydd CoCP (APP-414). If there is a conflict between the requirements of the Wylfa Newydd CoCP (APP-414) and this sub-CoCP, then those detailed in this sub-CoCP will prevail”.

					This can only lead to confusion: the sCoCP is silent on translocation proposals, but the CoCP is almost equally vague regarding the delivery of the mitigation. It is the IACC's view that substantially more detail is required within the sCoCP to be confident that the mitigation set out in the ES (and on which the assessment is based) will actually be delivered.

Q2.0.43	NRW	WF	In its RR NRW [RR-088] para 4.5.1 NRW advises that the duration of postconstruction monitoring is not satisfactory. What duration would NRW consider to be satisfactory?	Following a Statement of Common Ground meeting on 14th September to address this matter, NRW is awaiting confirmation from the Applicant on the agreed duration of post-construction monitoring. NRW expect confirmation that the duration will adhere to the following: (a) Great crested newt. • Main site – monitoring to be undertaken during years 1, 3, and 6 (monitoring would involve collection of Habitat Suitability Index information and two torch head count surveys). • A5025 – Habitat Suitability Index surveys to be undertaken annually for a minimum of 21 years. Two torch population surveys to be undertaken annually for the first 10 years then every other year for a minimum of 11 years (minimum 21 years total) (b) Bats • Main site only – 10 visits covering 15 year period (c) Water voles • Main site only – surveys to be undertaken in years 1, 3, and 6.	This refers to monitoring for selected protected species only, based on NRW's comments. The references to 'post-construction' monitoring are a little confusing as they generally refer to 'post-mitigation' monitoring associated with implementation of licences / translocations (etc.) rather than monitoring during the 'post-construction' phase (apart from bats, where the monitoring extends into the post-construction period). IACC notes that comprehensive long-term monitoring arrangements for all ecological receptors have not been set out by Horizon, and these are still required.

Q2.0.49	NRW and IACC	ADD	Do NRW and IACC agree with the assumptions made in Chapter G9 [APP312] paras 9.3.4- 9.3.8 regarding ecological receptors, as the survey data is more than two years old?	NRW consider the information to be sufficient for the purposes of demonstrating that the proposal is not likely to be detrimental to the maintenance of the favourable conservation status of local populations of European protected species provided long term issues (site security, management and surveillance) are appropriately considered.	Horizon has suggested in its response to this question that verification surveys have been undertaken. The scope, method and results of the verification surveys undertaken in 2017 and 2018 should be provided to IACC. We note our response to Question 2.0.49 (re. data age), specifically that although IACC considers it unlikely that the baseline conditions will have changed substantially for most receptors and would not consider it appropriate to apply generic data age criteria for acceptability, datasets over three survey seasons old (i.e. from before 2016) should be identified by Horizon and specific justification for their use or robustness be provided (perhaps in the context of the 2017/18 verification surveys); this is to ensure that IACC has confidence in the accuracy of the baseline, to enable it to undertake its responsibilities under the Environment Act Wales 2017.

Q5.0.44	NRW and NWWT	WF	Can NRW and NWWT confirm if, in their view, the measures proposed in the Workforce Management Strategy [APP-413] would be sufficient to avoid adverse effects on integrity from trampling and increased visitor use? If not, why not?	NRW consider that the Workforce Management Strategy may reduce effects on the site integrity of protected sites. However, there is insufficient detail to demonstrate that the Strategy will ensure that adverse effects are avoided. The Shadow HRA (table 11-1) and Shadow HRA Addendum (paragraph 4.4.1) state that the Strategy will be agreed with	IACC defers to NRW on this issue, although we should note that we also have concerns regarding the detail both with the WMS [APP-413] and the ES [APP-128] regarding the implementation and efficacy of the proposed measures. We refer to our comments in Chapter 17 of our LIR, particularly paras. 5.2.23 – 5.2.24. Concerns regarding the effects of visitor pressure on designated sites and ecological receptors is not limited to the European sites only.

Q7.0.2	NRW, IACC, GCC, Cadw, NT, VCC, LdCC, LPCC, LbCC and TAG	WF	1. Is the Applicant's approach to the landscape and visual effects of the development in relation to the Wylfa Newydd Development Area as set out in 6.4.10 ES Volume D - WNDA Development D10 - Landscape and visual [APP-129] adequate and if not how should any issues be addressed; with reference to: (a) The approach to the Study Area as described in section 10.2; including the Zones of Theoretical Visibility, the main Assessment Points and the extent of theoretical visibility of the different assessment points within the overarching study area, for the different assessment stages presented in figures D10-18 to D10- 27 of 6.4.101 ES Volume D - WNDA Development Figure Booklet - Volume D (Parts 1 and 2) [App-237 and APP-238]; (b) The summary of the landscape and visual baseline conditions within the study areas including the Value of Landscape Receptors summarised in Table D10-3; the selected Representative and Illustrative viewpoints for both daytime and night-time described in Section 3 and shown in Figures D10.14 – D10.17 of 6.4.101 ES Volume D - WNDA Development Figure Booklet - Volume D (Part 1 of 2) [APP-237 and APP-238]; (c) Design basis and activities for construction, operation and decommissioning, including Embedded	We refer you to section 7.19 of NRW's Written Representations for detailed comments in response to this question. NRW's Designated Landscape remit means that we have no comments to make on the residual landscape effects or the approach taken to the assessment of community views	IACC considers that significant effects on the special qualities of the AONB would occur up to 5km from the WNDA (rather than 3km) and also considers that further mitigation and compensation measures are necessary (see IACC LIR Chapter 17).

		and Good Practice mitigation; (d) Assessment of effects including: • evaluation of sensitivity of receptors • effects on landscape and seascape character • daytime and night-time effects • effects on landscape and seascape character • visual effects (e) Additional mitigation during construction, operation and decommissioning; Residual effects and Additional Mitigation for construction, operation and decommissioning summarised in Tables D10.43 to D10 for landscape; daytime visual; night- time visual; and (ecological compensation sites) receptors. Is the approach of using representative community views as opposed to individual viewpoints sufficient for assessing daytime and night-time visual effects on community receptors?	

Q7.0.3	NRW, IACC, NT and IPs	Q	(a) Bearing in mind the special qualities of the Isle of Anglesey AONB as set out in the AONB Management Plan (see para 2.1.30 of 8.16 Landscape and Habitat Management Strategy (Part 1 of 2) [APP424]) are the mitigation measures outlined in D10.14 of ES Volume D - WND A Development D10 - Landscape and visual [APP-129] in relation to the Isle of Anglesey AONB sufficient to meet the policy objectives of EN-1 paras. 5.9.9 to 5.9.11 and both Welsh national and local planning policies, including policies in the AONB Management Plan, as summarised in paragraphs 6.4.244 to 6.4.257 of 8.1 Planning Statement [APP-406]? (b) If not what additional measures could be taken to meet the policy objectives and how might they be secured through the dDCO?	We refer you to paragraph 7.19.6 of NRW's Written Representations. There are areas outside of the WND A where additional measures could mitigate/offset significant effects upon the AONB's special qualities to better support the conservation and enhancement of Statutory Designated Landscapes in accordance with national policy.	IACC would welcome all the additional mitigation measures suggested in para 7.19.6 of NRW's Written Representation. See also the additional mitigation and compensation measures suggested in the IACC LIR Chapter 17, Sections 2.5 and 2.6.

Q7.0.5	NRW, IACC, GCC, Cadw, NT, VCC, LdCC, LPCC, LbCC, NAP, TAG and IPs	WF	Are the photomontage views across all sites as set out in [APP-199]; [APP200]; [APP-261], [APP-378], [APP-296] and [APP-343] adequate and are you satisfied with: • The choice of selected locations; • The methodology for photomontage; • The chosen timeframes for the images? (a) Are there any additional viewpoints that would be helpful? (b) Do the images raise any issues or concerns and how might these be addressed?	We are satisfied with the photomontages. The images illustrate the significant scale and nature of change to AONB views that would occur from the power station and associated buildings within the WNDA. The WNDA and Site Campus have not been illustrated together. Photomontage Viewpoints within the AONB (7, 8, 11, 19, 24, 25, 27, 28 and 29) show the effect that building scale and massing would have upon the AONB coastal landscape and its openness. A well- considered colour scheme for the power station, associated buildings and the worker's campus is therefore important to develop to aid the combined development's visual integration. This was done successfully for the existing power station. The ES understands the importance of colour design to landscape and seascape integration and the ES includes an illustrative image for one elevation of the power station, and elevations of the worker's campus. This suggests an appropriate scheme could be developed. What is required next and needs to be enabled through a DCO Requirement is the development of detailed colour proposals for all visible components of the development seen from the AONB; that these proposals are responsive to the land and seascape colour characteristics and season change against which the development would be seen, recognising the variety of angles and	IACC agrees with all the comments made by NRW and with the request for additional photomontages to show both the Power Station and Site Campus. IACC also agrees with all the comments made by NRW regarding colour, and the need for an appropriate colour scheme to be developed, enabled by a DCO requirement.

			distances at which the development would be seen; and for the appearance of the campus building and power station to be considered together particularly within AONB views from the east. The use of colour to break up the mass of some of the larger structures is recommended. An iterative process of visual analysis, to test the success of the colour scheme from AONB views, is recommended, with the preparation of photomontage images to help demonstrate the appropriateness of the proposed scheme through a process of visual analysis.	

Q14.0.10	IACC, DCfW, NT, NAP and IPs	ADA	Do the Design and Access Statement [APP-409]; the parameter plan identified in Schedule 2, Part 4 and the Requirements in relation to Site Campus Works Work Number 3, in Schedule 3 of the dDCO [APP-029], including the maximum dimensions shown in WN20, meet the planning policy objectives in respect of achieving high quality, sustainable development for the Site Campus; with reference to: (a) Design principles; (b) Master planning strategy; (c) Environmental sustainability; (d) Hard and soft landscaping proposals – including planting proposals; (e) Building and structure footprint, height and massing; (f) Materials and colour palettes; (g) Surface treatments; (h) Lighting; (i) Boundary treatments; (j) Accessibility; (k) Community safety; (l) Maintenance regimes; and (m) Illustrative design proposals. If not what should be done about it?	Our comments relate to the appearance of the development from the AONB. We would defer to IACC for commentary on other visual impacts. We are satisfied that the AONB has been considered within the contextual analysis and the design principles. The form and scale of the development is driven by the needs of the development. Massing appears to have been planned to work within the angle of view presented within figures 28, 30 and 31 (Design and Access Statement Volume 3), however there is no comparable view from the AONB to be able to judge this aspect. We are therefore uncertain as to how this aspect of the design has addressed the AONB. The design principles for the colour palette appropriately draw from the colour of the existing landscape and the development's visual context. We consider the approach set out in Volume 3 makes a good start, but needs to be developed further in the following areas:	

				• The colour scheme needs to be reviewed from a number of angles of view including views from the AONB and Wales Coastal Path and design iteration applied based upon this contextual analysis. • The view is not static and at times the exposed coastal edge combines with woodland to give a strong sense of colour (exposed rock) and to create strong horizontal emphasis within the landscape/ seascape context of the development site. Colour, horizontal form and scale of use could therefore be better echoed in the site campus development. • To be satisfied that the AONB has been fully considered within the development's design at this stage, we recommend drawings similar to figures 30 and 31 (DAS Vol3) be submitted to confirm the development's massing and colour design within views from viewpoint 11 Llanbadrig point (Appendix D10-8 photomontage views). We advise that this information be made a requirement of the DCO and approved by the discharging authority in consultation with NRW.	IACC agrees with the points made by NRW in the 1st and 2nd bullet points. With regards to NRW's request for a view of the Site Campus from Viewpoint 11 (3rd bullet point), Figure 28 in the DAS Volume 3, Appendix 1-2 is a visualisation of the Site Campus which appears to be from a location very close to Viewpoint 11. It should be noted, however, that the construction of the Power Station including the cranes, which would be visible in this view whilst the Site Campus is in place, are not included in this visualisation.

Q14.0.13	The Applicant, IACC, DCfW and IPs	ADC	Bearing in mind its location within the Anglesey AONB, do the Design and Access Statement [APP-409, APP-410]; the parameter plans identified in Schedule 2, Part 4; the Detailed Design Plans identified in Schedule 2, Part 6 and the Requirements in relation to Logistics Centre Work Number 7 in Schedule 3 of the dDCO [APP-029] meet the planning policy objectives in respect of achieving high quality, sustainable development for the Logistics Centre at Parc Cybi; with reference to: (a) The appropriateness of the proposed use for the site; (b) Hours of operation; (c) Design principles; (d) Master planning strategy; (e) Environmental sustainability; (f) Hard and soft landscaping proposals – including planting proposals; (g) Building and structure footprint, height and massing; (h) Materials and colour palettes; (i) Surface treatments; (j) Lighting; (k) Boundary treatments; (l) Accessibility; (m) Community safety; (n) Maintenance regimes; and (o) Post-operation strategy. If not, what should be done about it?	The Parc Cybi site LDP allocation supports a major area of business development within the AONB. Attention to design, and to the existing character and appearance of the area, are important to placemaking. Whilst the development and use of the site for Wylfa Newydd is temporary, the infrastructure it puts in place is likely to remain and be reused. The physical components of the development will have a legacy and will inevitably influence the planning and design of development that will come forward in the future. We consider more could therefore be done to extend the planting strategy of native hedgerow with trees along the frontage of the site with Parc Cybi road, to provide a lasting high-quality landscape infrastructure to the site (subject to CCTV and highway sightlines). We recommend the landscape masterplan (Figure 19 DAS Vol 3 (part2/2) be amended and a commitment made in the dDCO for these proposals to be included within the detailed design.	IACC agrees that further mitigation and improvements to the layout and planting on the site should be made and a detailed design incorporating these measures should be submitted to IACC for approval

ANNEX D
IACC COMMENTS ON HNP RESPONSE TO FIRST SET OF WRITTEN QUESTIONS

ExA Ref.	Question	Horizon's Response to Question	IACC Comments/Response
Q1.0.1	With reference to paragraph 5.5.44 of Chapter D5 Air Quality [APP-124] and Figure D5-1 of APP-237, to what extent would there be flexibility for the location of the proposed packet sewage treatment plant, and has that flexibility any implications for the assessment made in relation to odour?	As discussed in paragraph 6.1.62 of appendix D1-1 Construction Method Statement [APP-136], the treated effluent from the package sewage treatment plant would be discharged via a temporary sewage discharge/outfall located at the northern end of the western breakwater. Therefore, although the location of the package plant is not fixed within the Wylfa Newydd Development Area, the proposed discharge point on the western breakwater is likely to constrain the plant to the area around Porth-y-pistyll and it would not be appropriate to locate the plant close to population centres such as Tregele, Cemaes or the Site Campus. This was the basis of the odour assessment as presented in chapter D5 Air quality (excluding emissions from traffic) [APP-124]. In any case, the plant would be specified in accordance with the comprehensive odour control measures set out in paragraphs 7.4.2, 7.4.3 and 7.4.4 of the Main Power Station Site sub-CoCP [APP- 415], which takes into account the flexibility of the package plant location. This level of good practice mitigation reduces the source odour potential of the package plant to small. Should the plant location vary from that assessed in chapter D5 Air quality (excluding emissions from traffic) and be closer to and/or downwind of any high sensitivity receptors such as residential properties, the pathway could be described as a highly effective pathway. This would result in a low risk of odour exposure and a maximum of a small adverse effect for high sensitivity receptors (see table B5-13 of chapter B5 Air quality [APP- 070]. Therefore, this would continue to represent a not significant effect which is consistent with the assessment set out in Chapter D5 Air quality (excluding emissions from traffic).	To the best of IACC's knowledge, the current sewage treatment works located to the rear of the Magnox site has not created any odour complaints since its construction (circa 1970). Therefore, IACC has not considered the issue of odour from sewage treatment works to be an adverse impact within this area. Therefore, the final location for such sewage works shall require approval from IACC before commencement of these works.
Q1.0.2	Paragraph 1.9.58 of Chapter D1 Proposed Development [APP-120] provides a conclusion on the potential for odours to be released from the proposed packet sewage treatment plant, and further context is provided by paragraphs 7.4.2 and 7.4.4 of the MPSSSCoCP [App-415]. Further details are sought of the type(s) of packet sewage treatment system that have resulted in the conclusions within paragraph 1.9.58 and that would demonstrate the suitability of the approach in the MPSSSCoCP [App-415].	The plant will be a modularised system that will be designed to effectively treat the construction-derived sewage and which can be expanded and reduced in size to accommodate the varying sewage flow/load during the construction phase. A number of different types of modularised sewage treatment systems are available on the market and any of the options taken forward will need to meet the requirements as set out in sections 7.4.2 to 7.4.4 of the Main Power Station Site sub-CoCP.	

Q1.0.3	In relation to paragraphs 1.9.57 and 1.9.58 of APP-120, and paragraphs 5.4.18 to 5.4.26 of APP-124, should the sewage treatment plant be a separate numbered 'work' item within the development?	The package sewage treatment plant referred to in Q1.0.3 is to be constructed in connection with Work No.s 1, 2, 3 and 4 and will be temporary in nature as will only be in place and operational during the construction phase of the Wylfa Newydd DCO Project. As this plant relates to, and will support a number of Work No.s it has been included within paragraph (b) of "Other Associated Development" under Schedule 1 of the Draft DCO. For this reason, Horizon does not consider that a separate numbered Work No. is required for this sewerage treatment plant.	IACC considers that the proposed temporary sewage treatment plant within the Essential Setting of Cestyll Registered Park and Garden should be a separate numbered work item and subject to appropriate controls.
Q1.0.4	Paragraph 5.4.22 of Chapter D5 Air quality [APP-124] refers to 'embedded mitigation' and other possible works in regard to the potential effects of odour from the existing Cemaes Waste Water Treatment Works ('WwTW'). How much certainty would there be in regard to the delivery of the mitigation (and other works) referred to in paragraph 5.4.22?	Paragraph 5.4.22 of Chapter D5 Air quality relates to the embedded mitigation proposed to reduce the exposure of residents of the Site Campus to odours from the existing Cemaes WwTW operated by Dŵr Cymru Welsh Water. To prevent odour effects at the Site Campus, buildings within 70m of the centre of the Cemaes WwTW would be designed to reduce the exposure of residents to odour emissions. This mitigation is secured in the Design and Access Statement Volume 3 [APP-409] (See Appendix 1-2 The Site Campus, and specifically Design Principle 3.4.38) secured by Requirement WN19 in the Draft DCO [APP-029]. Horizon has confirmed with DcWW through the Statement of Common Ground Process (SOCG) that the extension to the Cemaes WwTW will be undertaken with the proximity of the Site Campus taken into account. This commitment can be found in the draft SOCG document between Horizon and DCWW submitted at Deadline 2 (4 December 2018).	This aspect of the design should be subject to approval under the detailed design requirement in order to ensure the amenity of people residing in the campus.
Q1.0.5	ES D13 paras 13.5.14-15 state that construction derived sewage and site campus sewage would both have a maximum daily rate of discharge as 1,598m ³ . It seems unlikely that the discharges would be exactly the same. [13] Is this correct, are they both the same and is there a need for any limits to be set and controlled through a suitable mechanism? Is NRW content this could be controlled through the EP?	Both discharges have been modelled and assessed using a worst case 18.5 l/s flow rate. A flow rate of 18.5 l/s equates to a max daily discharge of 1,598m³. This flow rate was selected to match the existing consented Dŵr Cymru Welsh Water (DCWW) discharge at Wylfa Head. A discharge rate of 18.5 l/s exceeds the predicted population equivalent discharge rate at both sites. In reality they will not be the same but it was important to make assumptions that would allow the worst-case assessment to be made. Both discharges are expected to be regulated by permits issued by NRW. An application for the construction sewage is currently being determined by NRW. DCWW currently have a permit to discharge sewage via their works on Wylfa head. The sewage from the Site Campus will be regulated through this permit which may require a variation.	
Q1.0.6	With reference to Table D5-46 of Chapter D5 Air Quality [APP-124], and section 7.5 of the MPSSSCoCP [APP-415], the ExA notes that	Whilst the question is not directed to Horizon as the applicant the following has been provided at this stage:	The IACC acknowledges that the suite of CoCPs (Revision 2.0) submitted by HNP at Examination Deadline 2 now includes details of the Air Quality Monitoring Strategy. The IACC are in the process of reviewing these revised versions. From an initial review, as confirmed in the LIR, the IACC disagrees with Horizon's proposed annual compliance target for PM2.5 which aligns with the UK AQO (25 µg/m³). IACC wish to see alignment for the compliance target with the WHO guideline for PM2.5 of 10 µg/m³.

	many of these measures are yet to be fully defined/specified, including the monitoring locations and plant emission standards (see paragraph 7.5.2 of [APP-415]). IACC and NRW would also be involved in the specification of these works post-consent, and in determining any “additional modelling and assessment [that] would be undertaken to support the development of the scheme as it matures”. IACC and NRW are invited to comment on: whether they consider that it would be appropriate these matters to be deferred until later; and, whether or not sufficient certainty is provided for their delivery through the provisions of the dDCO.	Since the submission of the DCO application, Horizon has shared proposals with IACC and NRW to provide further detail in respect of the following: • Number, location and type of monitoring stations; • Monitoring data management system and web access to data; • Monitoring thresholds to act as trigger levels; • Further details of the response if a trigger level is exceeded; and • Compliance targets. These proposals are now included in Section 7 of the updated Main Power Station Site sub-CoCP and Section 7 of the updated Wylfa Newydd CoCP that have been submitted at Deadline 2 (4 December 2018). These matters are now therefore submitted for approval as part of the Draft DCO application rather than being submitted for approval by IACC at a later date. The exception to this is the detail in respect of the micro-siting of the monitoring stations which will be submitted for approval by IACC at a later date. Statement of Common Ground (SOCG) meetings have been held with IACC on these proposals and Horizon understands that there is agreement with IACC over the majority of the items now included within the Main Power Station Site sub-CoCP. The agreements with IACC around these issues can be found in the Draft SOCG with IACC submitted at Deadline 2 (4 December 2018). Whilst the proposals have also been shared with NRW, to date no further discussion has been held over the content of these proposals. In addition, in respect of plant emissions standards, Horizon has agreed to implement a non-road mobile machinery (NRMM) plant mix that is at least 90% EU Stage IV emissions standards for NRMM (EC Directive 97/68/EC) or better during construction at the Wylfa Newydd Development Area. This commitment is included in Section 7 of the updated Main Power Station Site sub-CoCP submitted at Deadline 2 (4 December 2018) [APP-414]. This level of Stage IV plant has shown to be very effective at reducing emissions from NOx from construction plant and equipment. A Technical Report will be submitted into examination at Deadline 3 (18 December 2018) demonstrating the modelling results with this level of Stage IV plant being utilised on the site. It is expected to demonstrate a reduction in effect as a result of this mitigation. Preliminary results from this report were shared with IACC in SOCG discussions. Horizon understand that IACC are satisfied by the reduction effect this mitigation had upon the modelled scenarios, and this position is reflected in the draft SOCG with IACC submitted at Deadline 2 (4 December 2018).	

		Given the provisions now included in the updated Wylfa Newydd CoCP and Main Power Station Site sub-CoCP, Horizon considers that there is sufficient definition and certainty in respect of air quality measures, including in relation to monitoring and plant emission standards.	
Q1.0.7	Paragraph 1.6.192 of the Application Reference No.: 6.4.1 ES Volume D – WNDA Development D1 – Proposed Development [REF] With regard to steam plumes from the six auxiliary boilers; how often would the larger plumes (for example, up to 100m in length) be apparent? And, how many larger plumes would be expected to occur/be visible at any one time?	The consideration of visible plumes from auxiliary boilers associated with the operation of the Power Station (as discussed in paragraph 1.6.192 of chapter D1 Proposed Development and paragraphs 10.4.32 and 10.5.233 of chapter D10 Landscape and visual [APP-129] was undertaken on a qualitative basis and adopted a worst-case assumption that the boiler plant would infrequently produce visible plumes which could be up to a maximum of 100m in length. Dispersion modelling of the auxiliary boiler plant emissions to air has been undertaken using the "Plume visibility" model option in ADMS to provide a more detailed (quantified) response to Q1.0.7. This modelling predicts that under clear-sky conditions, it is highly unlikely that any plumes from the six auxiliary boilers will be visible at all. The only weather conditions under which visible plumes might be generated would be when there was very high atmospheric humidity, that is, under overcast conditions when it is raining and potentially misty/foggy, when any plumes would be largely indistinguishable from the background cloud cover and rain or not visible through the mist and fog. However, the model predicted this would occur for only eight hours out of the 10 years of meteorological data used for the modelling (i.e. less than 0.01% of all hours).	On the basis of Horizon's dispersion modelling and response to this question, the plumes would not contribute to significant effects on visual amenity.
Q1.0.8	Please respond to the Betsi Cadwaladr University Health Board [RR-076] query on how the developer would ensure that there is no deterioration in local air quality (either short or long-term) and how this will be measured, validated and evaluated.	The predicted changes in pollutant concentrations as quantified in chapter C4 Air quality effects of traffic [APP- 091] and chapter D5 Air quality (excluding emissions from traffic) are described predominantly as negligible or small adverse, well within UK Air Quality Objectives and, through adoption of embedded, good practice and additional mitigation, the increases in pollutant concentrations are maintained to as low a level as is reasonably practicable. For many human receptors at those areas where the A5025 Off-line Highway Improvements are planned (e.g. Llanfaethlu and Llanfachraeth), the Wylfa Newydd DCO Project leads to an improvement in air quality as described in section 4.5 of chapter C4 Air quality effects of traffic. The description of adverse effects above takes account of the further development of the additional mitigation committed to in the Draft DCO submission in relation to reducing emissions of oxides of nitrogen (NOx) from construction plant and machinery (see Horizon's response to Q1.0.6 for further details, along with Section 7 of the updated Main Power Station Site sub-CoCP and Section 7 of the updated Wylfa Newydd CoCP that have been submitted at Deadline 2 (4 December 2018)). This comprises a commitment to utilise a high proportion of newer Non Road Mobile Machinery (NRMM) which emit less NOx. This reduces the predicted concentrations of nitrogen dioxide (NO₂) at all human receptors compared to those reported in section 5.5 of chapter D5 Air quality (excluding emissions from traffic). NO₂ was an area of concern in the Health Impact Assessment (HIA) Report [APP-429]. The Main Power Station Site sub-CoCP and Marine Works sub-CoCP [APP-416] set out	IACC disagree with Horizon's proposed annual compliance target for PM2.5 which aligns with the UK AQO (25 µg/m3). IACC wish to see alignment for the compliance target with the WHO guideline for PM2.5 of 10 µg/m3.

	proposals for continuous monitoring of NO₂ at up to four locations to track compliance against the air quality objectives and inform the appropriate feedback mechanisms to respond to elevated concentrations. With regard to emissions of dust and related changes in PM₁₀ and PM_{2.5} concentrations at human receptors, the air quality assessments concluded a not significant effect based on the effective application of good practice dust control measures, including an appropriate monitoring programme to monitor the effectiveness of the control measures, initiate further investigation to identify sources and apply corrective actions. The Wylfa Newydd CoCP and sub-CoCPs [APP-415, APP-416, APP-417, APP-418, APP-419 and APP-420] contain details of the dust mitigation and monitoring to be applied at each site. Further details on the commitments to mitigation and the adaptive air quality monitoring have been discussed with the IACC through the Statement of Common Ground process, and are now included in the updated Wylfa Newydd CoCP and sub-CoCPs submitted at Deadline 2 (4 December 2018). The details of how the deterioration in air quality with regard to human health will be measured, evaluated and validated in the vicinity of the Wylfa Newydd Development Area are summarised below: • Continuous monitoring of NO₂, PM₁₀ and PM_{2.5} concentrations and dust deposition monitoring will take place at six locations on or within the Wylfa Newydd Development Area boundary. NO₂ diffusion tube monitoring will also take place at a number of locations. • Trigger concentrations for NO₂ and PM₁₀ and for dust deposition are established, which will initiatedetailed responses on site if there are trigger exceedances, including visual inspections on and off-site • A procedure for complaint recording and response • The provision of an online environmental database showing measured data and alert status, which will be accessible to stakeholders and members of the public • Regular reporting (monthly) will be made to stakeholders, which will be made publicly available. Reports will contain a summary of the monitoring results and key statistics for the monitoring period, including a summary of the trigger exceedances during the monitoring period, number and type of complaints received and a summary of actions taken to resolve any issues. Reports will also include evaluation and on-going tracking of the projected annual mean concentrations of NO₂, PM₁₀ and PM_{2.5} and performance against the relevant one-hour and 24-hour average air quality objectives for NO₂ and PM₁₀, respectively • The Community Liaison Group will facilitate discussion on air quality issues if needed. Meetings will initially be held locally on a monthly basis.	

		In addition, Horizon will establish an external stakeholder group (hereafter Health and Well-being engagement sub-group) that will include members of the health and emergency services, and will include Betsi Cadwaladr University Health Board. When appropriate Horizon would facilitate bespoke analysis of routinely collected public health data (existing indicators), relevant to the Wylfa Newydd DCO Project. The information would inform discussion by the Health and Well-being Monitoring Group. If appropriate the Group will discuss the need for additional mitigation or follow-up investigation. To facilitate this process, a set of key topics and indicators will be agreed. One of the key topics is expected to be respiratory health; A similar approach to the measurement, evaluation and validation of air quality is adopted at the Associated Development sites. However, some of the aspects are not monitored at all sites e.g. NO₂, PM₁₀ and PM_{2.5} and the risk of deterioration in air quality is considerably lower than at the Wylfa Newydd Development Area. The Health and Well-being engagement sub-group is applicable to the Wylfa Newydd Development Area only.	

Q1.0.9	Please respond to the concerns expressed by representors (including RR-051, RR-52, RR-97, RR-104, RR-002, RR-018, RR-050, RR-054, RR-060 and RR-063) regarding the potential for there to be effects from noise, dust/on air quality, lighting and general 'pollution'.	Regarding the concerns expressed by representors, Horizon has undertaken an Environmental Impact Assessment (EIA) to ensure that likely significant environmental effects of the Wylfa Newydd Project are fully understood and properly considered when the DCO and Marine Licence applications are determined. The EIA is documented within the Environmental Statement (ES) and includes a description of the likely significant effects, assessment methods used and the mitigation measures proposed to prevent, reduce and offset any significant adverse effects in relation to noise, pollution, dust and lighting. Information pertaining to potential noise impacts is included within the following documents and their accompanying appendices: • Chapter C5 Effects of project-wide traffic on noise and vibration [APP-092] • Chapter D6 WNDA Development – noise and vibration [APP-125] • Chapter E6 Off-Site Power Station Facilities – noise and vibration [APP-244] • Chapter F6 Park and Ride – noise and vibration [APP-271] • Chapter G6 A5025 Off-line Highway Improvements – noise and vibration [APP-309] • Chapter H6 Logistics Centre – noise and vibration [APP-360] The conclusions of the noise and vibration assessment in Chapter D6 of the Environmental Statement finds that there are residual significant effects at the WNDA associated with the construction phase of the project. There are no anticipated significant effects from noise associated with the operation of the Wylfa Newydd Power Station. There are also significant residual effects from noise and vibration during the construction of the A5025 Off-line Highway Improvements and Off-Site Power Station Facilities as reported in Chapters G6 and E6 of the Environmental Statement. To facilitate the construction works at the WNDA and the A5025 Off-line Highway Improvements, additional traffic movements are required. The assessment of this additional traffic can be found in chapter C5 of the Environmental Statement. This assessment reports that significant noise effects from traffic are expected at all sections of the A5025 South-west. The assessments of noise and vibration for the Dalar Hir Park and Ride and the Logistics Centre at Parc Cybi find no significant effects during the construction or operation of those Associated Developments. Since the submission of the Draft DCO application, Horizon has undertaken further work on its noise insulation scheme within the Local Noise Mitigation Strategy (part of the Wylfa Newydd CoCP). As a result of Relevant Representations received, ongoing SOCG discussions and the Requests for Non-Material Change currently at consultation, Horizon has decided to increase the LNMS construction boundary plan area to incorporate all receptors anticipated to receive major adverse effects from construction noise at the WNDA. In addition, Horizon is lowering the noise level at which properties become eligible to the scheme to ensure all major	IACC recognises that Horizon has undertaken a cumulative impact assessment that includes consideration of intra-project and inter-project cumulative effects. IACC has provided a response to the assessment approach and findings and conclusions of Horizon's cumulative impact assessment at Chapter 2 of the LIR. IACC has identified that significant negative (adverse) residual impacts are predicted to occur during the prolonged construction phase of the Wylfa Newydd Project (WNP) even with additional mitigation with respect to the WNDA and the A5025 Offline Highway Improvements. Horizon has predicted that a large number of properties will be affected and IACC concurs with this conclusion. IACC notes that the spatial scope of Horizon's LNMS is to be extended and that the noise thresholds to which property eligibility shall apply will be reduced subject to confirmation via a further submission by Horizon by Deadline 4 (17 January 2019). IACC will wish to scrutinise Horizon's proposals and expects that Horizon will accurately map and identified specific properties to which the LNMS will apply. This will then allow IACC to undertake an appraisal of specific receptors that will also be subject to significant negative effects with respect to visual amenity, a deterioration in air quality and intrusion due to lighting. IACC would note that the LNMS could assist in reducing the potential for sleep disturbance but noise insulation will not mitigate or compensate for loss of amenity when residents/occupiers are seeking to enjoy their outdoor environment (e.g. spending time in their gardens).

	adverse noise effects from the Wyla Newydd DCO Project can be mitigated. Further detail about the eligibility criteria and how properties can receive noise insulation will be submitted by Deadline 4 (17 January 2018) of the DCO examination. Information pertaining to potential air pollution impacts is included within the following documents and their accompanying appendices: • C4 Effects of project-wide traffic on air quality [APP-091] • D5 WNDA Development – air quality [APP-124] • E5 Off-Site Power Station Facilities – air quality [APP-243] • F5 Park and Ride – air quality [APP-270] • G5 A5025 Off-line Highway Improvements – air quality [APP-308] • H5 Logistics Centre – air quality [APP-359] The conclusions of these assessments find that there are no anticipated significant effects upon residential receptors from the construction and operation of the Wylfa Newydd DCO Project when mitigation is implemented as specified in the chapters. The assessment of air emissions from traffic can be found in chapter C4 of the Environmental Statement. This chapter states where significant air quality effects from traffic will be found. The assessment concludes that with mitigation in place as specified in chapter C4, there will be no significant effects on human receptors from air emissions from traffic related to the Wylfa Newydd DCO Project. Information pertaining to the assessment of potential dust emissions has been undertaken for the Wylfa Newydd Development Area, Off-site Power Station Facilities and Associated Development sites. These can be found in the appendices to the air quality chapters of the Environmental Statement listed below: • Wylfa Newydd Development Area – Appendix D5-1 [APP-139] • Off-site Power Station Facilities – Appendix E5-1 [APP-251] • Park and Ride – Chapter F5 [APP-278] • Off-line Highway Improvements – Appendix G5-1 [APP-320] • Logistics Centre – Appendix H5-1 [APP-367] These appendices investigate potential sources of dust and suggest site specific mitigation to put in place to prevent the release of dust from the site.	

	Information pertaining to potential lighting impacts is included within the following documents and their accompanying appendices: • D10 WNDA Development – landscape and visual [APP-129] • Appendix D10-10 – Environmental Lighting Impact Assessment [APP-201] • Off-Site Power Station Facilities – landscape and visual [APP-248] • F10 Park and Ride – landscape and visual [APP-275] • G10 A5025 Off-line Highway Improvements – landscape and visual [APP-313] • H10 Logistics Centre – landscape and visual [APP-364] ES Volume D - WNDA Development App D10-10 - Environmental Lighting Impact Assessment sets out an assessment of lighting effects that would result from the construction, operation and decommissioning of the WNDA Development, which includes the Power Station, the Marine Works, the Site Campus and other on-site development. The lighting designs for both construction and operation would be developed using the best available technologies. Additional mitigation would be developed to address potentially significant adverse effects by achieving the following: • reduce light spill onto sensitive receptors to below thresholds where significant effects are predicted; and • limit visibility of new lighting at distant receptors. Within the Wylfa Newydd Code of Construction Practice, there is a commitment to monitor the effects of construction. Information on site specific monitoring of pollution can be found in each of the sub CoCPs listed below: • Main Power Station Site sub-CoCP [APP-415] • Marine Works sub-CoCP [APP-416] • Off-Site Power Station Facilities [APP-417] • Park and Ride sub-CoCP [APP-418] • Logistics Centre sub-CoCP [APP-419] • A5025 Off-line Highways Improvements sub-CoCP [APP-420] Regarding the concern of disturbance to residents from the construction activities, from vibration, dust/air quality, noise and light pollution issues, Horizon will take all reasonable steps to limit the adverse effects of the	

	Wylfa Newydd DCO Project as far as possible. Mitigation and good practice measures are proposed in order to avoid, reduce or compensate for adverse impacts where possible. These measures are set out in the Mitigation Route Map which sets out where these mitigation measures are secured in the submission [APP- 422]. Horizon takes its responsibility to the people and communities that neighbour the Wylfa Newydd Development Area and the Associated Development sites very seriously. The various mitigation strategies that form part of this application have been considered and designed with the interests of local people in mind. Where possible Horizon has sought to reduce the impacts on the surrounding properties and residents through measures such as: • the provision of substantial earth mounds on the Wylfa Newydd Development Area in order to mitigate noise, landscape and visual effects; • restrictions that seek to limit certain noisier activities to the extent possible during noise sensitive times; • control of traffic movements from workers and HGV movements, which will avoid peak hours and seek to minimise impacts on the local road network; • the provision of the Site Campus, which will reduce daily vehicle trips on the local road network as much as possible, mitigate impact on Welsh language and culture, and will also have the benefit of being able to provide a single, managed campus; • commitment to the Local Noise Mitigation Strategy (LNMS) which offers site-specific mitigation to properties eligible for noise insulation as set out in the Wylfa Newydd CoCP (further detail above); • the provision of blackout blinds or alternative mitigation to residents who experience unforeseen cases of sleep disturbance due to the effects of construction lighting; • the preparation of Community Safety Management Strategy which will set out how Horizon will work with existing public bodies, including IACC and the emergency services, and will include a framework of communication routes and ways of working to mitigate impact of the construction workforce within the community; • the enforcement of a worker Code of Conduct, following the principles set out in the Workforce Management Strategy; and • the establishment of a Community Liaison Group to, amongst other things, allow the community to raise concerns in relation to environmental effects. Whilst the Wylfa Newydd DCO Project will, in common with any national infrastructure project, result in residual adverse effects on the local community these (considered individually or collectively) do not outweigh the important benefits. These benefits would be delivered for the UK as a whole, including a vital role in the provision of safe and secure low carbon electricity, as well as significant local benefits including jobs creation,	

		investment in the local economy and provision of skills for the local workforce. Together these benefits have the potential to create a significant lasting positive legacy for Anglesey, north Wales and the UK. Regarding the concern that Construction works will have impacts on health and wellbeing of residents and visitors (including noise, air and visual impact and disruption to traffic). Th Drafte DCO application includes a Health Impact Assessment [APP-427 - APP-429]. This looks at the impacts of different elements of the construction works upon local residents (e.g those near the Wylfa Newydd Development Area). Appendix P sets out all the effects (individual and cumulative). The findings of the Health Impact Assessment demonstrate that the overall effect of the Wylfa Newydd DCO Project on population health would be beneficial, and that this is made up of beneficial and adverse effects across different population groups. Horizon will take all reasonable steps to limit the adverse effects of the Wylfa Newydd DCO Project as far as possible. Mitigation and good practice measures are proposed in order to avoid, reduce or compensate for adverse impacts where possible. These measures are set out in the Mitigation Route Map.	

ExA Ref.	Question	Horizon's Response to Question	
Q2.0.2	Can the Applicant explain to what extent there is confidence that the ecological baseline, primarily based on ecological surveys undertaken in or before 2016, is robust and suitable to inform the assessment of effects?	Baseline information has been gathered in line with guidance and consultation with stakeholders, as detailed within chapter B9 [APP-074]. Whilst it is acknowledged that most survey effort was undertaken during or before 2016, Horizon is confident that the information gathered to define the baseline is robust to inform the assessment of effects. Surveys have been undertaken in 2017 and 2018 to validate the habitats present on site and identify any significant changes from the earlier surveys' findings. These indicated that the majority of changes to habitat types across the Wylfa Newydd Development Area (WNDA) were associated with changes in agricultural practices (i.e. changes between pasture and arable land) and are not considered to have resulted in significant changes to the baseline assessment for habitats or species receptors. However, pre-construction surveys are proposed and secured within the Wylfa Newydd CoCP [APP-414], and the Main Power Station Site sub-CoCP [APP-415], where needed to inform mitigation strategies and protected species licences prior to construction activities taking place.	The scope, method and results of the verification surveys undertaken in 2017 and 2018 should be provided to IACC. IACC's response to question 2.0.49 (re. data age), confirmed that although the Council considers it unlikely that the baseline conditions will have changed substantially for most receptors and would not consider it appropriate to apply generic data age criteria for acceptability, datasets over three survey seasons old (i.e. from before 2016) should be identified by Horizon and specific justification for their use or robustness be provided (perhaps in the context of the 2017/18 verification surveys); this is to ensure that IACC has confidence in the accuracy of the baseline, to enable it to undertake its responsibilities under the Environment Act Wales 2017.
Q2.0.3	Chapter A2 [APP-056] para 2.6.1 states that the spent fuel storage facility would not commence until year 15. Is the Applicant proposing to undertake pre-construction surveys prior to this?	Construction of the spent fuel storage facility will be subject to the ecology mitigation measures described in section 11 of the Wylfa Newydd Code of Construction Practice, which include undertaking pre-construction surveys. Furthermore, the area will be managed in such a way prior to construction to prevent colonisation by protected species, in accordance with paragraph 7.2.1 of the Landscape and Habitat Management Strategy [APP-425] and section 12.2 of the Wylfa Newydd Code of Operational Practice [APP- 421].	
Q2.0.4	In Table 9-7, Chapter B9 [APP-074], page B9-34 the Applicant states that the mechanism to achieve water level management at Cemlyn Lagoon is still under consideration. Can the Applicant explain whether this is required to mitigate significant effects, and as Cemlyn Bay is outside of the application site, how would these measures be secured?	The assessment of effects in respect of Cemlyn Bay is documented in Chapters D8 and D9 of the Environmental Statement [APP-128] and [APP-132]. These assessments do not include consideration of change in management of water levels as a required mitigation measure, because there are no significant effects predicted in terms of water levels at Cemlyn Bay. In Table 9-7, Chapter B9, Horizon stated that it agrees that input into management of water levels in Cemlyn Bay may be useful, but that the mechanism to achieve this was still in consideration. The reference to a 'mechanism' was meant in reference to a mechanism for Horizon to provide input into water level management at Cemlyn Bay Lagoon (i.e, rather than Horizon providing the physical mechanism for controlling water levels). This came in response to a request in Friends of the Earth's Pre-Application Consultation Stage Three response for the introduction of a weir to regulate storm water flows and assist with lagoon management.	

		Whilst Horizon accepts in Table 9-7, Chapter B9, that input into water level management may be useful in a wider sense of supporting conservation of the site, such help is not necessary to support the conclusions of the assessment of effects.	
Q2.0.5	In Table 9-7 (Chapter B9, page B9-35), can the Applicant provide an update on the programme of monitoring beach profiles and water level changes within Cemlyn Bay?	Table 9-7 in 6.2.9 ES Volume B - Introduction to the environmental assessments B9 - Terrestrial and freshwater ecology presents the key issues raised during Pre-Application Consultation Stage Three, and Horizon's response to them. Following this consultation, the assessment for coastal processes and coastal geomorphology (6.4.12 ES Volume D - WNDA Development D12 - Coastal processes and coastal geomorphology [APP-131]), was completed as detailed in paragraphs 12.5.72 to 12.5.75 for the construction period, and paragraphs 12.5.118 to 12.5.121 for the operational period. The assessment concluded that the effects on beach profiles and water levels within Cemlyn Bay were negligible. Consequently, the monitoring suggested in Table 9-7 is no longer necessary.	
Q2.0.6	Are NRW/IACC content with the 15 year lease arrangements described in Chapter B9 para 9.3.8 for the ecological mitigation areas?	The Applicant notes that this question is directed to NRW and IACC. However Horizon has provided the following response at this stage: Horizon has secured the leases on the sites for proposed ecological mitigation areas for 15 years to allow sufficient time for establishment of landscaping on the completed landform surrounding the proposed Power Station Site, which includes approximately 200ha of new habitat creation, as described in the Landscape and Habitat Management Strategy [APP-424 and APP-425]. By this time, the ecological mitigation areas will have served their purpose and will no longer be required, as there will be sufficient carrying capacity for all the protected and notable species populations associated with them within the newly created habitats surrounding the proposed Power Station Site.	The IACC refers the ExA to the Council's response to this question. The Council confirmed in its response that the 15-year lease arrangements are acceptable, provided that there is provision for this to be extended depending on the results of site monitoring and the success of the restoration. Colonisation of the restored habitats by target species must be confirmed before the lease is ended; it will not be acceptable to translocate or displace species and then remove the habitat support without evidence that the restored habitats are suitable and accessible.
Q2.0.7	Chapter B9 para 9.4.27 explains that professional judgement will be applied in concluding significance. However, there appears to be some anomalies in implementing this methodology in Chapter D9 eg: · para 9.5.152 notes a small magnitude change on lichen from habitat loss and concludes a negligible effect. Lichen are identified as having 'medium' value in Table D9-5. The significance scale in Figure B1-2	The valuation of lichens at medium value relates to the feature that could be affected by a range of different impacts from the proposals and not just habitat loss to which paragraph 9.5.152 of Chapter D9 of the ES [APP-128] refers. Paragraphs 9.5.149 to 9.5.151 explain that the most notable lichen communities identified within the overall valuation of medium would not be affected by habitat loss and so professional judgement has been used to consider the value of the feature affected by the specific effect pathway. The magnitude of change of any effect is determined in the context of the baseline conditions of the feature under assessment. Although many individual invertebrates would be killed, this is assessed in the context that there are many millions of invertebrates and the species likely to be affected are all very common and widespread. The scale of effect is therefore small in relation to the baseline populations.	The EclA uses a matrix approach, and although the current CIEEM guidance discourages the use of matrices they can have some benefits, particularly around transparency and consistency in evaluation. However, the CIEEM guidance states that "If using this approach, it is very important to make a clear distinction between evidence-based and value-based judgements so that decision makers and other stakeholders are aware of the level of subjective evaluation that has been used. Spurious quantification should be avoided in which numerical scores or significance rankings/categories are used without a clear definition of the criteria and thresholds that underpin them". IACC would agree that the EclA evaluation process is not always clear, or obviously consistent between ecological receptors.

	indicates this combination should actually result in minor/moderate effects. · paras 9.5.158-159 state that many invertebrates would die from vegetation and topsoil clearance and from attraction to light. Yet this is considered to be a small magnitude of change. · Para 9.5.216 identifies the potential loss of an entire Chough breeding population, yet this is only considered to be a medium magnitude of change in para 9.5.217. · Para 9.5.359 identifies a small magnitude of change for habitat loss and fragmentation to red squirrels and concludes negligible effect. Squirrels are of 'medium' value in Table D9-5. The significance scale in Figure B1-2 indicates this combination should result in minor/moderate effects. · Para 9.5.372 notes a 'large' magnitude of change for fragmentation of hedgehog, yet para 9.5.374 subsequently downgrades the magnitude to 'small' without explanation. Can the Applicant clarify these anomalies?	In para 9.5.217 of Chapter D9 of the ES [APP-128], the magnitude of change is assessed as medium because, even in the precautionary worst case, the loss would comprise only one or two pairs in an outlier population to the main populations of this species on Anglesey. For red squirrel, the medium value is given to the species primarily for the population in habitat that would not be affected and the small change is at the lower end of the small category as the affected habitat is used by a relatively low level by the species. The assessment of significance therefore is considering the lower end of medium value and the lower end of small change. It could be argued that a minor significance is more appropriate, but this would not alter the conclusions of the assessment of effects or need for mitigation as both negligible and minor effects are considered non-significant. With regard to hedgehog, the large magnitude of change referred to in para 9.5.372 Chapter D9 relates to the unmitigated or theoretical magnitude of effects, whereas the small magnitude of change in para 9.5.374 Chapter D9 refers to the likely magnitude of change after mitigation (which is described in para 9.5.372 Chapter D9) is taken into account.	
Q2.0.8	How would the 'other areas' identified in Chapter D9 [APP-128] para 9.3.30 be secured in the MPSSSCoCP [APP-415]?	Paragraph 9.3.30 of chapter D9, relates to describing the baseline conditions of vegetation. Chapter D9 goes on to identify all significant receptors (including all sites); assess significant effects; and propose mitigation (which includes those sites that need to be maintained or enhanced (and thus secured)). The other areas referred to in paragraph 9.3.30 Chapter D9 do not appear as significant receptors in their own right, and therefore do not have specific mitigation measures secured in relation to them.	
Q2.0.9	How would the buffer zone around Dame Sylvia Crowe's Mound, described in Chapter D9 para 9.4.5, be secured?	Horizon would like to take the opportunity to clarify that as it is written in paragraph 9.4.5 of Chapter D9, the Environmental Statement contains an error associated with a 15m buffer zone around Dame Sylvia Crowe's Mound. This error will be corrected by minor amendment through errata submitted at Deadline 6.	IACC has some concerns regarding the proposals and effects on the DSC mound, particularly as (a) cumulative effects with the NGET proposals do not receive substantive consideration and (b) the DSC woodland is a critical component of the mitigation for red squirrel and bats. The uncertainties around buffer zones compound these issues, particularly in relation to cumulative effects. We are unclear why removal of the buffer zone would not alter the potential for notable mammals to be disturbed, particularly cumulatively with the NGET proposals.

		The basis of assessment used in Chapter D9 is on Dame Sylvia Crowe's Mound itself not being subject to clearance works associated with the Project. The ecological assessment has not required a buffer of retained vegetation around the Mound. However, Horizon will commit to the following 'buffer zones' in relation to Dame Sylvia Crowe's Mound: • Root protection areas in relation to trees to be retained in accordance with the recommendations in BS 5837:2012, secured by paragraphs 11.2.47 and 11.2.48 of the Wylfa Newydd Code of Construction Practice, compliance with which is secured through Requirement PW7 of the draft DCO [APP-029]. • Buffers around the bat barns, with particular regard to the Tyn-y-Maes bat barn situated on the north-east edge of Dame Sylvia Crowe's Mound, secured by the last bullet in paragraph of 11.16.1 of the Main Power Station Site sub-CoCP, compliance with which is secured through Requirement WN1 of the draft DCO. Through preparing the response to this question, Horizon has picked up an erratum in the Environmental Statement Chapter D9 in paragraph 9.5.377. Here Dame Sylvia Crowe's Mound is given as an example of an area provided with a buffer zone. Horizon confirms the reference to a buffer forming part of the mitigation for disturbance to notable mammals is an error and its removal does not change the overall assessment of effects on notable mammals.	
Q2.0.10	How would no night working during site clearance, described in Chapter D9 para 9.4.7, be secured?	Prior to notice being served under article 5 of the draft DCO, the Site Preparation and Clearance working hours works would be controlled via condition of the site preparation permission (IACC reference 38C310F/EIA/ECON). The permission requires works to be undertaken (except in emergency circumstances or where IACC has provided approval): • Weekdays between 07:00 to 19:00 (summer) and 08:00 to 16:00 (winter) • Saturdays between 07:00 to 13:00 (summer) and 08:00 to 13:00 (winter). In the event that Horizon seeks to switch from undertaking the SPC Works under the site preparation permission to under Work No.12, Requirement SPC3 provides that the Main Power Station Site sub-CoCP will control construction activities.	The IACC confirms that the working hours confirmed by HNP in their response is the working hours as proposed in the draft SPC TCPA Planning Permission. The IACC notes however that determination of this has been called in by Welsh Ministers and the working hours prescribed in any permission which may be granted by them may differ. However, the revised Main Power Station Sub-CoCP submitted at Deadline 2 includes at sub-section 4.3 information on site working hours. It states that main construction work would take place 24 hours a day 7 days a week. No mention of hours pertaining to site clearance and preparation is made other than that earthworks are identified as operating between 07.00 and 19.00. There is no reference to winter working or to different hours of operation on Saturdays or to no working on Sundays or Bank Holidays. IACC would wish to see specific reference to SPC works within sub-section 4.3 with the hours quoted consistent with those controlled via condition of the site preparation permission.
Q2.0.11	Chapter D9 para 9.4.18 refers to appendix D8-8 Summary of preliminary design for construction surface water drainage [APP-	The summary of preliminary design for construction surface water design in Appendix D8-8 was used as a basis to form the assessment within the Environmental Statement. Horizon does not consider that it would be appropriate to reference this document within the Main Power Station Site sub-CoCP as that document	IACC are in agreement with this approach - inclusion of a new requirement as part of an updated draft DCO to be submitted at Deadline 4 (17 January 2019) which will require Horizon to submit a surface water drainage design for construction works. This requirement should ensure that the preliminary drainage design prepared at the detailed design stage includes full mitigations with regards to managing water quantity, flood risk and water quality to the satisfaction of IACC in consultation with NRW.

	167]. Should this document be referenced in the MPSSSCoCP?	describes the proposed measures and criteria required to protect the water environment from pollution and to avoid an increase in flood risk; rather than design matters. Principles in respect of the final design are set in the Landscape and Habitat Management Strategy [APP-424] and the Design and Access Statements [APP-408 and APP-409], and would need to meet the proposed measures and criteria set out in the Main Power Station Site sub-CoCP. However, Horizon is committed to revising the preliminary drainage design at the detailed design stage and therefore will propose a requirement as part of an updated draft DCO to be submitted at Deadline 4 (17 January 2019) which will require Horizon to submit a surface water drainage design for construction works.	
Q2.0.12	Chapter D9 para 9.4.24 refers to pre-construction surveys detailed in the MPSSSCoCP. Can the Applicant explain where these are and how they would be secured?	Horizon assumes the intended reference in the question is to paragraph 9.2.25 in Chapter D9. Pre-construction surveys are secured through the overarching Wylfa Newydd Code of Construction Practice in paragraph 11.1.5, in accordance with protected species licences, which are also secured through the Wylfa Newydd Code of Construction Practice in the sub-sections of section 11.2 for each relevant European Protected Species. Horizon will be required to comply with this document during construction under Requirement PW7. Horizon has taken the opportunity to explicitly confirm pre-construction surveys required in Chapter 11 of the revised version of the Main Power Station Site sub-CoCP. This amendment has been included in the updated Main Power Station Site Sub-CoCP submitted at Deadline 2 (4 December 2018).	
Q2.0.13	Chapter D9 para 9.4.53 details drainage measures which are contained in the MPSSSCoCP [APP-415]. Can the Applicant confirm where these are detailed?	Further detail on the drainage measures referred to in paragraph 9.4.53 of Chapter D9 - Terrestrial and freshwater ecology of the Environmental Statement are further explained in paragraphs 8.4.62 to 8.4.72 of Chapter D8 Surface water and ground water [APP-127]. Operational drainage management measures referred to in paragraph 9.4.53 of Chapter D9 are secured through the Wylfa Newydd Code of Operational Practice (CoOP) (rather than the Main Power Station Site sub-CoCP as suggested in this First Written Question) and the design principles in the Landscape Habitat Management Strategy: • The drainage design principle of <i>surface water discharging to the sea</i> is seen on page 61 of the Landscape and Habitat Management Strategy. • Surface water drainage from all roads, car-parking areas or other areas of hardstanding where there is the potential for leaks of fuels, oils or other liquids would incorporate appropriate pollution	The IACC notes the material referenced in the Landscape and Habitat Management Strategy/WN CoOP, and within D8 and D9. The Landscape and Habitat Management Strategy needs to be clear on the differing a drainage during the construction and operational stages. For example, with regards “drainage design principle of surface water discharging to the sea” - this should be clarified this is the intention for the main part of the Power Station Site only, with drainage from landscaped areas within the WNDA being via the local streams/ditches. Even in the case of diversion of flows to the Nant Cemlyn during construction works and subsequent re-vegetation is still to a watercourse rather than the sea. IACC would wish to make further comment following the future submission of the design strategies, and Flood mitigation plans.

		treatment, such as oil separators will be compliant with the overarching pollution management principles contained within section 10.2 of the Wylfa Newydd CoOP. • The drainage design principle of the mound drainage would be converted to a passive drainage system is again seen on page 61 of the Landscape and Habitat Management Strategy. • Appropriate attenuation would be provided to prevent any increases to flood risk off-site, including swales and other features to try to match current surface water flows and groundwater recharge would be a part of the design principles found on page 61 of the Landscape and Habitat Management Strategy. In addition, Horizon's response to FWQ8.0.26 confirms that the flood mitigation plan for the operational phase of the Power Station and surrounding landscape will be submitted to the IACC and/or NRW, as is appropriate at the time it is submitted.	
Q2.0.15	NRW does not agree with the Applicant's hydrogeological modelling for Tre'r Gof and considers dewatering may cause significant damage. What is the Applicant's response?	The documents which lay out Horizon's position on hydrogeological modelling of Tre'r Gof and the assessment of any significant impact are: • ES Volume D – WNDA Development D9 – Terrestrial and Freshwater Ecology [APP-128]; • ES Volume D – WNDA Development D8 – Surface Water and Groundwater [APP-127]; • ES Volume D - WNDA Development App D8-3 - Groundwater Baseline Report (Parts 1, 2 and 3) [APP-147 –APP-149]; • ES Volume D - WNDA Development Tre'r Gof Hydroecological assessment App D8.5 - Tre'r Gof Hydroecological Assessment [APP-158]; • ES Volume D - WNDA Development App D8-7 - Surface water and groundwater modelling results (Parts 1 to 7) [APP-160 – APP-166]; • Draft Statement of Common Ground between Natural Resources Wales and Horizon submitted at Deadline 2 (4 December 2018). As described in Chapter D8, Horizon's modelling predicts a maximum drawdown at Tre'r Gof compared to baseline from dewatering of the Power Station site of up to 0.51m to 0.88m, for the wet and dry periods respectively. This is at its greatest extent during the construction period. Post construction, during the long-term operation of the Power Station, the model predicts that there is only minor drawdown on Tre'r Gof. Horizon has assessed this as a minor adverse dewatering impact. The magnitude of change of the construction works on bedrock groundwater inputs to streams that flow into the high value Tre'r Gof SSSI is considered to be small with an overall minor adverse effect, meaning it is not significant.	

		The key area where interpretation of significant impact differs between Horizon and NRW is the importance of direct bedrock groundwater influence on the qualifying interests of Tre'r Gof SSSI . Horizon continues to work with NRW in respect of this issue through the Statement of Common Ground process, and also through engagement relating to Water Abstraction Licence applications.	
Q2.0.16	What would be the effects on Tre'r Gof SSSI if the drainage system cannot be improved compared to the baseline, and can further refinements be included within the authorised development?	Tre'r Gof SSSI is a designated site of national importance and hence has a high value. Consequently, the Tre'r Gof catchment is assessed as having a high value. Chapter D8 - Surface water and groundwater [APP-217] concluded that the run-off regime post-construction will differ from the current baseline due to changes in catchment area, the steeper mounding within the catchment, the Site Campus development and groundwater dewatering. These changes could result in changes to groundwater and surface water availability and the supply of mineral enriched water which is an important supporting condition for rare plant communities within the SSSI (App D8-5 - Tre r Gof Hydroecological Assessment [APP-158]). The overall magnitude of change on the SSSI, allowing for the presence of the proposed drainage system, is assessed as small during construction and medium during operation with the resulting significance of effect being Moderate adverse and Major adverse respectively. The assessment of effects on Tre'r Gof SSSI presented in chapter D9 for ecology also concludes a major adverse effect as a precautionary approach under the circumstance where the drainage design cannot fully mitigate adverse effects on the SSSI from changes in hydrological conditions. Chapter D8 - Surface water and groundwater [APP-127] identifies the aim of the drainage system is to maintain the status quo for water availability and water quality to the Tre'r Gof SSSI and to reduce impacts from the proposed development activities. A preliminary design for construction surface water drainage was provided in Appendix D8-8 [APP-167], and requirements for the final design are set in the Main Power Station Site sub-CoCP, the Landscape and Habitat Management Strategy, and the Design and Access Statements [APP-408 and APP-409] Chapter D8 - Surface water and groundwater [APP-127] states that the drainage system will be designed to reduce construction effects of sediment loading to sensitive surface water features, prevent deterioration of surface waters and ensure baseline water quality is not exceeded. [APP-127] also identifies that Horizon will develop a passive engineered drainage system which will match flow and water quality to the baseline conditions as closely as practicable. Monitoring of the water environment will continue up to the start of construction to improve the robustness of the baseline data. These monitoring data will then be used during detailed design to refine the drainage system to reduce potential effects.	

Q2.0.17	In Chapter D9 Table D9-11 long-term botanical monitoring is proposed for Tre'r Gof SSSI. Can the Applicant provide more detail as to where the monitoring is presented?	Details of the long-term botanical monitoring proposed for Tre'r Gof SSSI are not provided in the draft DCO application documents. This information will be provided in the Tre'r Gof SSSI Habitat Management Scheme, which will be produced in accordance with Schedule 3 of the draft DCO, and the management principles set out in Section 7.2 of the Landscape and Habitat Management Strategy. These management principles include the need to seek to ensure: • The enhancement and long-term viability of retained habitats at Tre'r Gof SSSI; • That the landscape and habitats are regularly monitored to assess the efficacy of management and inform management reviews. • That the management regimes are regularly reviewed and updated as required. • That the Habitat Management Scheme will contain a section on monitoring requirements.	
Q2.0.18	Chapter D9 para 9.5.50 identifies a number of measures implemented to protect the Tre'r Gof SSSI. Can the Applicant identify where all of these are secured in the MPSSSCoCP?	Para 9.5.50 provides a list of embedded measures, implemented to protect the Tre'r Gof SSSI, which are secured in the following documents: • Construction buffer zones. Secured by paragraph 11.16.1 of the Main Power Station Site Sub- CoCP. • Sediment settlement lagoons, ditches/swales, oil interceptors, attenuation tanks and other water treatment facilities to protect surface waters from contaminated or sediment-laden discharges. Secured by paragraph 10.2.6 in the Main Power Station Site Sub-CoCP, Design Principles 3.4.50 and 3.4.51 of the Design and Access Statement, Volume 3, Appendix 1-2 the Site Campus (part 1 of 2) • Stone-filled, permeable, metal baskets set below ground for natural dispersion into the Tre'rGof SSSI to trap silt and promote vegetation growth. While the specific type of trap or is not detailed in the control documents, 'silt traps', 'silt curtains' and 'silt fences' are secured by the paragraph 10.2.6 in the Main Power Station Site Sub-CoCP). They carry the same purpose as the stone- filled metal baskets set below ground. • A permeable drainage blanket made up of inert rock material beneath Mound A to the south and east of the Tre'r Gof SSSI to maintain the quality and quantity of surface water flows via the mound. Secured by Section 4, Construction Phase Principles - Drainage in the Landscape and Habitat Management Strategy (Part 1/ 2) • Use of overflow pipes and control weirs to maintain surface water overland flow. Secured by Section 4 – Landscape and Design Principles, Construction Phase Principles - Drainage in the LHMS (Part 1/ 2). • Adherence to the Environment Alliance's PPGs. PPGs and the GPPs that replace these documents are secured Project-wide by paragraphs 10.2.6 – 10.2.8 of the Wylfa Newydd CoCP.	

		In particular 10.2.8 of the Wylfa Newydd CoCP brings in any further GPPs that replace PPGs specified. Compliance with the Wylfa Newydd CoCP, the Main Power Station Site sub-CoCP and the design principles in the Landscape and Habitat Management Strategy and Design and Access Statement are secured under Requirements PW7, WN1, WN3 and WN19 in the draft DCO [APP-029].	
Q2.0.19	In its RR para 4.4.1 [RR-088] NRW considers that there is inadequate consideration of direct mitigation at Tre'r Gof SSSI. Are there any further direct measures that NRW suggest to protect the SSSI?	Whilst the question is not directed to Horizon as the applicant, the following response is provided by Horizon at this stage: Details of the assessment of effects on Tre'r Gof SSSI and associated mitigation measures are provided in chapters D8 – Surface water and groundwater and D9 – Terrestrial and freshwater ecology. Horizon is proposing to take all reasonable steps to mitigate adverse effects on Tre'r Gof SSSI. The alternatives chapter D2 [APP-121] and Site Selection Report Volume 2 [APP-437] considers alternatives in respect of different aspects of the development within the WNDA; including in regard to effects on the Tre'r Gof SSSI. Horizon has considered impact upon the Tre'r Gof SSSI across a number of DCO application documents. For convenience, the mitigation measures to prevent effects upon the Tre'r Gof SSSI are summarised in the WFD Information to Support Article 4(7) Derogation [APP-445] at Table 5-2. A number of these measures are also referred to in Horizon's response to Q2.0.18 above.	
Q2.0.21	Do NRW, NWWT and RSPB agree that the creation and management of species - rich grassland with a close sward and coastal heath/grassland mosaic as described in Chapter 8.16 [APP-424] paras 6.5.7 and 6.5.12 and the management of Mound A as described in 5.4.12 would be sufficient for providing optimal foraging for Chough?	Whilst the question is not directed to Horizon as the applicant, the following response is provided by Horizon at this stage: As described in Chapter D9 Terrestrial and freshwater ecology, Horizon predicts a moderate adverse effect on chough, which therefore requires additional mitigation. This is due, primarily, to the loss of chough foraging habitat – areas of grassland – which will be removed as part of the Wylfa Newydd Project. The measures referred to in this question are those described in the Landscape and Habitat Management Strategy (LHMS) (Chapter 8.16 paras 6.5.7, 6.5.12 and 5.4.12. These paras describe the creation and/or management of areas of grassland habitats and coastal heath in the approximate location of the proposed Site Campus for construction workers and at Mound A, further east. These measures are complementary to the primary mitigation measure for chough, namely to increase	

		the extent of chough foraging habitat within areas of retained habitat at the Arfordir Mynydd y Wylfa - Trwyn Penrhyn Wildlife Site – because the quality of chough foraging habitat within areas of retained habitat is likely to be higher than in the newly-created habitats described in the LHMS. Following the application of additional mitigation, minor adverse residual effects are predicted for chough affected by habitat loss/fragmentation and noise and/or visual disturbance.	
Q2.0.22	Do NRW, NWWT and RSPB agree that the mitigation described in the MPSSSCoCP 8.3.3 would be sufficient to protect Chough nesting sites from construction noise?	Whilst the question is not directed to Horizon as the applicant, the following response is provided by Horizon at this stage: Section 8.3.3 of the Main Power Station Site sub-CoCP states that Horizon, when selecting the location of construction compounds, will take in to account the distance between the compound location and any chough nest sites, thereby maintaining a stand-off distance as far as is reasonably practicable. Noise modelling for the construction period, based on the proposed envelope of works within the Wylfa Newydd Development Area, has shown the chough nest site locations (there are two traditionally used nest site locations in the Wylfa Head area) will be subject to noise effects, potentially reaching 65dB in a worst case scenario. As described further in Chapter D9 – Terrestrial and freshwater ecology of the Environmental Statement, the evidence suggests chough are generally tolerant of high noise levels. Potential effects on four nesting sites were assessed. The predicted noise levels at nest site A (which is within a building which is part of the Existing Power Station) are expected to be within acceptable limits given the high levels of noise disturbance already experienced at this location and the attenuation that the building would provide from noise generated outside of it. Chough have made only one unsuccessful nesting attempt at nest site B in 2009 and so the predicted noise levels at this location are not anticipated to adversely affect nesting behaviour as chough are unlikely to be present. The predicted noise levels at Wylfa Head (nest sites C and D) are expected to be within acceptable limits given the existing background noise experienced at these locations (e.g. waves crashing on cliffs; RAF jets exceeding 85dB). As such, noise disturbance is not expected to adversely affect chough at their nesting sites. Given that the level of effects anticipated are acceptable, the mitigation provided in section 8.3.3 of the Main Power Station Site sub-CoCP is sufficient to protect Chough nesting sites from construction noise.	

Q2.0.23	Can the Applicant identify where in the Landscape and Habitat Management Strategy and the MPSSSCoCP the details are of Chough monitoring as described in Chapter D9 Table D9-10 page 133?	The reference to monitoring given on page 133 of chapter D9 relates to the objective of providing high quality chough foraging habitat. Section 7.2 of the Landscape and Habitat Management Strategy provides that Horizon will: • Re-establish "<i>high quality coastal grassland at Wylfa Head, which will support foraging chough through natural regeneration within the cooling outfall work area. If required, natural regeneration will be supported by the control of undesirable plant species and/or reseeding the area with seed harvested from Wylfa Head.</i>"; and • Regularly monitor landscape and habitats to assess efficacy of management and inform management reviews. Section 11.10.1 of the Main Power Station Site sub-CoCP also requires Horizon to develop a management scheme in accordance with the above principles in the Landscape Habitat Management Strategy with the objective of providing optimal foraging habitat for chough within the retained habitat on Wylfa Head. Horizon will consider including a specific principle relating to chough habitat management to the Management Principles in section 7 of the Landscape and Habitat Management Strategy that relates to the habitat types identified in 6.5.7 and 6.5.12 specifically intended to support chough of the Landscape and Habitat Management Strategy. Any changes would be submitted at a later deadline. Monitoring of chough foraging behaviour during the breeding and non-breeding season will be added to the Main Power Station Site sub-CoCP at Deadline 4 (17 January 2019).	
Q2.0.25	How would the measures in Chapter D9 para 9.5.247 to protect barn owl roosts be secured?	As a bird listed in Schedule 1 of the Wildlife and Countryside Act 1981, the Wylfa Newydd Code of Construction Practice provides specific protection for barn owls in paragraphs 11.2.25 and 11.2.26. Appropriate replacement roosts are confirmed in paragraph 11.13.2 of the Main Power Station Site sub- CoCP. Compliance with the Wylfa Newydd Code of Conduct and the Main Power Station Site sub-CoCP is secured through Requirements PW7 and WN1 of the draft DCO.	
Q2.0.26	How would the measures to protect bats, at Chapter D9 paras 9.5.294, 9.5.295, 9.5.313 and 9.5.317 be secured?	The measures referred to in paragraphs 9.5.313 and 9.5.317 of Chapter D9 of the ES relating to work exclusions zones (called buffer zones) and provision of a dark corridor through a 10m wide buffer zone are	

		already secured in section 11.16.1 of the Main Power Station site sub-CoCP. Compliance with the Main Power Station site sub-CoCP is secured through Requirement WN1 of the draft DCO. To ensure the mitigation around tree felling in paragraphs 9.5.294 and 9.5.25 is secured, Horizon will submit an updated Main Power Station Site sub-CoCP at Deadline 4 (17 January 2019) which will include the following paragraph: <i>"With respect to trees, pre-felling surveys will be undertaken the season prior to felling to identify known or potential tree roosts. Trees that require felling with confirmed bat roosts will be felled under the an EPSML. Trees with unconfirmed roosts, but high roost potential, would be soft felled (following an updated pre-felling survey immediately prior to felling) in the presence of an ECoW who holds the relevant bat licence to capture any bats found and remove them to one of the bat barns or pole mounted bat boxes provided as part of the EPSML. With respect to buildings, demolition works involving known roosts would be conducted using 'soft- stripping' and 'hand-demolition' techniques between the months of March and June and September and October in accordance with per good practice guidelines. These works would be supervised by an ECoW who holds the relevant bat licence, to capture any bats found and remove them to one of the bat barns or pole mounted bat boxes provided as part of the EPSML."</i>	
Q2.0.27	Chapter D9 para 9.5.326 states that all permanent culverts would be of appropriate diameter for otter and would have mammal ledges, how would this be secured?	Following a review of this proposal, Horizon considers that sizing culverts specifically to allow for the provision of a mammal ledge and safe passage for otter is not required as mitigation for the following reasons: Chapter D9 para 9.5.326 refers to the proposed temporary bridge crossing of the Afon Cafnan (Watercourse 10), which would be a clear span bridge design, thereby ensuring no fragmentation of otter habitat in this location during its installation and operation. No culverts of watercourses with otter records are therefore proposed. In addition, the Flood Consequence Assessment [APP-150], states that small bridges would be constructed over streams, and over-sized pipes (culverts) would be installed on any ditches which are typically dry. The provision of bridges rather than culverts on all but typically dry streams would allow passage of otter along the watercourse. Culverts with mammal ledges are generally employed on A-roads and motorways where there is significant risk of mortality to animals which avoid culverts during flood conditions and, instead, cross the carriageway.	

		As the culverts proposed within the WNDA are not on watercourses where otter are known to be active, and are not formed under multi-lane roads with significant traffic movement, the potential risk of mortality or injury is assessed to be negligible. It is on this basis that Horizon has concluded the sizing of culverts specifically to allow for the provision of a mammal ledge and safe passage for otter is not required to offset potential adverse effects to otter.	
Q2.0.28	Chapter D9 para 9.5.340 states that the realignment works for Nant Caerdegog Isaf (Watercourse 13) would be programmed approx. 12 months in advance of backfilling. How would this be secured in section 10.2 of the MPSSSCoCP?	To ensure this mitigation is secured, Horizon will submit an updated Main Power Station Site Sub-CoCP at Deadline 4 (17 January 2019) which will include the following paragraph in section 10.2: <i>"The realignment works will be programmed approx. 12 months in advance of any backfilling, to ensure that vegetation along the realigned route would be established, with interim control of flows, prior to full connection of diverted flows to the new route. Backfilling of the old watercourse route would not commence until the diverted route has been sufficiently established."</i>	
Q2.0.29	Chapter D9 para 9.5.350 discusses mitigation in the form of water vole translocation, how would this be secured in the MPSSSCoCP?	This mitigation is secured in paragraphs 11.2.15-11.2.16 of the Wylfa Newydd CoCP, and which Horizon must comply with under Requirement PW7 As the Wylfa Newydd CoCP applies Project-wide, there is no need to also secure this mitigation in the Main Power Station Site sub-CoCP.	
Q2.0.30	Chapter D9 para 9.5.486 details provisions to mitigate potential changes in water quality during construction. Does the Applicant propose any specific mitigation during the operational phase?	Horizon has proposed a number of measures to protect water quality during any works that may be required during the operational period of the Power Station. These measures are listed in Chapter 10 of the Wylfa Newydd Code of Operational Practice and cover: • Pollution prevention; • Flooding; • Drainage management; • Maintenance; and • Monitoring.	IACC are satisfied with the commitments provided in Chapter 10 of the Code of Operational Practice. However, the proposed arrangements for the Off-Site Power Station Facilities should be clarified to confirm full arrangements for the management/maintenance of the surface water and foul drainage systems as stated for the main Power Station (para 10.4.3 only references the swale, and not the site wide drainage system). IACC should be consulted on the final plans and policies development with regards to Pollution prevention, Flood risk, Drainage management, Maintenance and Monitoring to ensure the developed plans are sufficient robust.
Q2.0.31	Chapter D9 para 9.7.23 Cors Gwawr and Cae Canol-dydd SSSIs are identified as Ecological Compensation Sites. Has the Applicant undertaken baseline assessments of these sites to inform the likely success of the compensation measures?	The compensation site selection process, which is detailed in Appendix D9-23 [APP-190], involved evaluation of information from detailed botanical surveys; preliminary soil and hydrology surveys; and desk-based reviews of existing topography data, geology data, peat survey data, OS mapping, biological records and connectivity to designated rich-fen sites. This evaluation, which also benefited from advice provided by NRW and IACC through the SSSI Compensation Technical Advisory Group (TAG), identified Cors Gwawr (formerly known as Site 24) and Cae Canol-dydd (formerly known as Site 25, Site 26 and Caeau Talwrn SSSI) as having high potential to meet the compensation objectives.	IACC notes that Horizon are claiming significant positive effects as a result of the compensation sites. IACC suggest that the 'moderate positive' effect claimed in the ES is optimistic and very premature given the often substantial uncertainties involved in creating viable wetland habitats, and the lack of detailed hydrological (etc.) monitoring data to inform design. A significant positive effect would require that the mitigation offset the loss of the existing SSSI entirely, and then provide substantive additional enhancements over the baseline; this case cannot be made with the information provided.

		It is acknowledged that more detailed soil and hydrology data are required to validate the conclusions of Appendix D9-23 and enable development of detailed compensation designs. To this end, Horizon has undertaken further soil surveys at Cors Gwawr and Cae Canol-dydd in January and August 2018. Horizon also commenced 12 months of hydrological and hydrogeological monitoring at these sites in September 2018. The scope of the hydrological and hydrogeological monitoring is defined (with some minor differences) in Appendix D9-24 [APP-191]. Four months of hydrological and hydrogeological monitoring data will have been collected by mid-January 2019. Horizon will prepare an interim monitoring report at this stage, which will be submitted to the Examining Authority at an appropriate Examination Deadline, alongside the soil survey reports, to refine the compensation proposals. Horizon expects that it will be able to submit this information at Deadline 6 (19th February 2019). Horizon will continue to liaise with the TAG throughout the refinement of the compensation proposals as further monitoring data become available. Horizon is confident that, with additional data informing the application of a gradual, phased, adaptive approach to the design and implementation of the compensation works, the proposals will result in the establishment of high quality habitat to adequately compensate for the predicted effects on Tre'r Gof SSSI.	
Q2.0.32	Chapter D9 Table D9-10 states on p133 that "Monitoring is detailed ...within the Landscape and Habitat Management Strategy" and on p140 "Monitoring of habitats and species surveys would be undertaken ... in the Ecology and Landscape Management Strategy". Can the Applicant clarify where the strategy is presented please?	Monitoring of translocated mudsnail The reference to monitoring of habitats and species surveys given on p140 of chapter D9, relates to the proposal to translocate mud snail <i>Omphiscola glabra</i> from ponds affected by construction to the Notable Wildlife Receptor Site. Translocation of mud snail will be undertaken during the construction period in accordance with the Ecology and Landscape Management Strategy which forms part of the Main Power Station Site sub-CoCP. The translocation habitat contained in the existing wetland area within the receptor site for notable wildlife will be monitored as part of the commitment contained within in section 7 of the Landscape and Habitat Management Strategy where Horizon commits to continue assess the efficacy of mitigation provided. Finally, Horizon will conduct monitoring of the translocated mud snail population for an appropriate duration of the construction phase to understand viability. An amendment will be made to the Main Power Station Site sub-CoCP to be submitted at Deadline 4 (17 January 2019) so that this commitment is clearly secured.	What constitutes an 'appropriate duration' should be stated.

		Management of clough The reference to monitoring given on p133 of chapter D9 relates to the management of grass habitats on Wylfa Head and Mound A to provide high quality foraging habitat for chough <i>Pyrrhocorax pyrrhocorax</i>. (Refer also to Q2.0.23 which also deals with this mitigation.) The management of habitats on Wylfa Head and Mound A are long-term requirements during construction and operation and are therefore secured through the Landscape and Habitat Management Strategy, which covers both periods. Horizon will include a specific principle relating to chough habitat management to the Management Principles in the updated Landscape and Habitat Management Strategy to be submitted at Deadline 4 (17 January 2019). This new principle will relate to the habitat types identified in 6.5.7 and 6.5.12 specifically intended to support chough. Finally, a commitment to monitor of chough foraging behaviour during the breeding and non-breeding season on areas of optimal chough foraging habitat within the Wylfa Newydd Development Area for the duration of the construction phase will be included in the updated Main Site Power Station sub-CoCP. so be submitted at Deadline 4 (17 January 2019).	
Q2.0.33	Chapter D9 table D9-10 on page 136 states that the off-site enhancement area would be established prior to the commencement of start of Site Preparation and Clearance Work, how would this be secured?	The off-site notable wildlife enhancement area referred to in Table D9-10 has already been established and secured with a 15 year lease by Horizon. This measure therefore does not need to be secured through the draft DCO as establishment of the off-site enhancement area has already been completed.	IACC still consider that this commitment needs to be secured in the DCO. Without a DCO requirement, this is entirely voluntary and Horizon could decide to re-negotiate the lease and no longer provide the off-site enhancement area. Certainty over provision can only be achieved through a s106 obligation to provide this land which binds the site itself
Q2.0.34	Chapter D9 Table D9-10 p137 states that “The clearance of vegetation, topsoil stripping and removal of dry stone walls would be carried out in a directional manner to encourage movement of notable mammals”, how would this be secured?	Horizon's commitment to carry out vegetation clearance and dry-stone wall removal in a directional manner, to encourage the movement of mobile ecological receptors, is set out in paragraph 11.2.10 of the Wylfa Newydd Code of Construction Practice. Compliance with the commitments in the Wylfa Newydd Code of Construction Practice is secured through Requirement PW7 of the draft DCO. As the commitment in the Wylfa Newydd CoCP states that directional clearance would encourage movement towards the Notable Wildlife Enhancement Site and the Reptile Receptor Site, located to the west of the Wylfa Newydd Development Area, Horizon has amended this commitment to make it applicable across the Wylfa Newydd DCO Project and inserted this specific commitment within an updated Main Power Station Site sub-CoCP. These amended CoCPs have been submitted at Deadline 2 (4 December 2018).	

Q2.0.35	Chapter D9 Table D9-10 states on p140 that annual monitoring of red squirrel within Dame Sylvia Crowe's Mound would be undertaken during construction. Can the Applicant clarify where the monitoring strategy is presented?	Horizon's commitment to annual monitoring of red squirrel within Dame Sylvia Crowe's Mound during the construction period is set out in paragraph 11.9.1 of the Main Power Station Site sub-CoCP. The sub-CoCP also requires Horizon to provide a maximum of 10 artificial nest boxes within Dame Sylvia Crowe's Mound and supplementary food provision (frequency: monthly).	
Q2.0.36	The MPSSSCoOP [APP-415] at para 4.4.1 states that "Construction lighting will be designed to reduce sky glow, glare and light spill onto sensitive receptors". With the exception of Mound E, no maximum lux levels are given. Is the Applicant planning to develop a lighting strategy?	Horizon is currently preparing a Lighting Strategy which will be included as part of the updated Main Power Station Site sub-CoCP that will be submitted at Deadline 4 (17 January 2019).	
Q2.0.37	Should the SSSI compensation strategy documents (Appendices D9-23 [APP-190] and D9-24, APP-191]) be certified documents and referred to within the dDCO?	Horizon note that the content of D9-23 and D9-24 is important in outlining the proposals for compensation for the potential loss of the Tre'r Gof SSSI and set the context for assessment of effects of these proposals. As these documents form part of the Environmental Statement, they will be certified under Article 76 of the draft DCO. However, it is not considered necessary to reference them in the draft DCO. The key principles with which the detailed design of each compensation site must comply are secured through the Landscape and Habitat Management Strategy. The draft DCO includes Schedule 3 requirements ECS2 and ECS3 that require compliance with the principles of the LHMS [APP-242] for further detailed design and future management for approval by IACC. The key mitigation with which construction of the compensation sites must comply are within the Main Power Station Site Sub-CoCP and also secured through Schedule 3 requirement ECS1 and ECS4 with respect hydrological and hydrogeological monitoring.	
Q2.0.43	In its RR NRW [RR-088] para 4.5.1 NRW advises that the duration of post-construction monitoring is not satisfactory. What duration would NRW consider to be satisfactory?	Whilst the question is not directed to Horizon as the applicant, the following response is provided by Horizon at this stage: Horizon has discussed the duration of protected species monitoring with NRW at a SoCG meeting on 14/09/18. Horizon agreed to develop their monitoring proposals in-line with these discussions. This agreement by Horizon forms part of the SoCG between Horizon and NRW. The updated monitoring	This refers to monitoring for selected protected species only, based on NRW's comments. The references to 'post-construction' monitoring are a little confusing as they generally refer to 'post-mitigation' monitoring associated with implementation of licences / translocations (etc.) rather than monitoring during the 'post-construction' phase (apart from bats, where the monitoring extends into the post-construction period). IACC notes that comprehensive long-term monitoring arrangements for all ecological receptors have not been set out by Horizon.

		proposals are submitted into examination at Deadline 2 (4 December 2018), as part of the Main Power Station Site sub-CoCP update. Monitoring proposals continue to be developed, in some cases building upon what monitoring is already in place, in others new monitoring ahead of construction activities. Horizon will continue to work with stakeholders to develop appropriate monitoring, which will be documented within the CoCP(s) to commit construction contractors to those requirements.	
Q2.0.44	Chapter D7 [APP-126] para 7.4.6 states that as “if any new foul water outfalls are required during construction or operation, they would not affect any sites of geological importance”. How would this be secured?	This assumption was included as a catch-all within the environmental assessment, however there are no plans for Horizon to construct any new foul water outfalls through the geologically protected sites. Any new foul water outfalls will be constrained by a new design principle within an updated Design and Access Statement Volume 2 to be submitted at Deadline 4 (17 January 2019).	
Q2.0.45	Chapter D7 para 7.4.7 assumes that “the new discharge pipe would utilise this concrete channel as far as practicable such that any excavations into the local geology would be limited.” How would this be secured?	This mitigation measure will be secured by the Main Power Station Site CoCP when it is updated at Deadline 4.	IACC reserves its position until it has had the opportunity to review the mitigation measure referred to by Horizon
Q2.0.46	Chapter F7 [APP-272] para 7.4.21 states that pollution prevention strategies would be implemented during operation in accordance with section 10 of the Wylfa Newydd Code of Operational Practice. Should reference also be made to Section 10.3 of the Park and Ride sub-CoCP [APP-418]?	Section 10.3 of the Park and Ride sub-CoCP [APP-418] should also have been cross-referenced within the text and was omitted in error. However, this omission does not affect the outcome of the assessment.	
Q2.0.47	Chapter G7 [APP-310] para 7.4.12 assumes that topsoil and subsoil stripped from the flood compensation area would be reinstated to the area following excavation of underlying geology to lower the landform. How would this be secured?	This mitigation measure was omitted in error and will be secured in the A5025 Off-line Highway Improvements sub-CoCP [APP-420] when it is updated at Deadline 4 (17 January 2019).	IACC reserves its position until it has had the opportunity to review the mitigation measure referred to by Horizon

Q2.0.48	Chapter G7 para 7.4.13 states that the height of topsoil storage mounds would be limited to 2m. How would this be secured?	The restriction on the height of topsoil storage mounds will be secured through an amendment to the A5025 Offline Highway Works sub-CoCP to be submitted at Deadline 4.	IACC reserves its position until it has had the opportunity to review the mitigation measure referred to by Horizon
Q2.0.49	Do NRW and IACC agree with the assumptions made in Chapter G9 [APP-312] paras 9.3.4- 9.3.8 regarding ecological receptors, as the survey data is more than two years old?	The Applicant notes this question is directed to other parties. Chapter B9 details consultation meetings Horizon held with NRW and IACC where the adequacy of the baseline conditions were agreed. Baseline information has been gathered in line with guidance and consultation with stakeholders, as detailed within chapter B9. Whilst it is acknowledged that most survey effort was undertaken during or before 2016, Horizon is confident that the information gathered to define the baseline is robust to inform the assessment of effects. Surveys have been undertaken in 2017 and 2018 to validate the habitats present on site and identify any significant changes from the earlier surveys' findings. These indicated that the majority of changes to habitat types across the Wylfa Newydd Development Area (WNTDA) were associated with changes in agricultural practices (i.e. changes between pasture and arable land), and are not considered to have resulted in significant changes to the baseline assessment for habitats or species receptors. However, pre-construction surveys are proposed and secured within the Wylfa Newydd CoCP, and the Main Power Station Site sub-CoCP, where needed to inform mitigation strategies and protected species licences.	The scope, method and results of the verification surveys undertaken in 2017 and 2018 should be provided to IACC. We note our response to Question 2.0.49 (re. data age), specifically that although IACC considers it unlikely that the baseline conditions will have changed substantially for most receptors and would not consider it appropriate to apply generic data age criteria for acceptability, datasets over three survey seasons old (i.e. from before 2016) should be identified by Horizon and specific justification for their use or robustness be provided (perhaps in the context of the 2017/18 verification surveys); this is to ensure that IACC has confidence in the accuracy of the baseline, to enable it to undertake its responsibilities under the Environment Act Wales 2017.
Q2.0.50	Chapter G9 para 9.4.4 refers to site clearance information being shown on figures G1-2a to G1-2j ((Application Reference Number: 6.7.48). Should these be in the Booklet?	This reference has been reviewed and it has been identified as a cross-referencing error. The reference should be to the Site Clearance Plans in Volume 2: Plans, Sections and Drawings for each Section of the A5025 Off-line Highway Improvements. Full references are provided below. These were the drawings used to inform the assessment and which should replace the cross reference. It is not intended to include them in the Environmental Statement figure booklet referenced in Q2.0.50 [APP-353]. The full references are as follows: • Wylfa Newydd Project Volume 2: Plans, Sections and Drawings (Part 10/19) 2.7 A5025 Off-line Highway Improvements – Section 1 [APP-019] - WN0902-HZDCO-OHW-DRG-00004 A5025 OFF-LINE HIGHWAY IMPROVEMENTS, SECTION 1 - VALLEY, PROPOSED SITE CLEARANCE PLAN • Wylfa Newydd Project Volume 2: Plans, Sections and Drawings (Part 11/19) 2.8 A5025 Off-line Highway Improvements – Section 3 [APP-020] - WN0902-HZDCO-OHW-DRG-00017 A5025 OFF-LINE HIGHWAY IMPROVEMENTS, SECTION 3 - LLANFACHRAETH, PROPOSED SITE CLEARANCE PLAN, SHEET 1 - WN0902-HZDCO-OHW-DRG-00018 A5025 OFF-LINE HIGHWAY IMPROVEMENTS, SECTION 3 - LLANFACHRAETH, PROPOSED SITE CLEARANCE PLAN, SHEET 2 - WN0902-HZDCO-OHW-DRG-00019 A5025 OFF-LINE HIGHWAY IMPROVEMENTS, SECTION 3 - LLANFACHRAETH, PROPOSED SITE	

		CLEARANCE PLAN, SHEET 3 - WN0902-HZDCO-OHW-DRG-00020 A5025 OFF-LINE HIGHWAY IMPROVEMENTS, SECTION 3 - LLANFACHRAETH, PROPOSED SITE CLEARANCE PLAN, SHEET 4 • Wylfa Newydd Project Volume 2: Plans, Sections and Drawings (Part 12/19) 2.9 A5025 Off-line Highway Improvements – Section 5 [APP-021] - WN0902-HZDCO-OHW-DRG-00039 A5025 OFF-LINE HIGHWAY IMPROVEMENTS, SECTION 5 - LLANFAETHLU, PROPOSED SITE CLEARANCE PLAN, SHEET 1 - WN0902-HZDCO-OHW-DRG-00040 A5025 OFF-LINE HIGHWAY IMPROVEMENTS, SECTION 5 - LLANFAETHLU, PROPOSED SITE CLEARANCE PLAN, SHEET 2 • Wylfa Newydd Project Volume 2: Plans, Sections and Drawings (Part 13/19) 2.10 A5025 Off-line Highway Improvements – Section 7 [APP-022] - WN0902-HZDCO-OHW-DRG-00052 A5025 OFF-LINE HIGHWAY IMPROVEMENTS, SECTION 7 - CEFN COCH, PROPOSED SITE CLEARANCE PLAN, SHEET 1 - WN0902-HZDCO-OHW-DRG-00053 A5025 OFF-LINE HIGHWAY IMPROVEMENTS, SECTION 7 - CEFN COCH, PROPOSED SITE CLEARANCE PLAN, SHEET 2 • Wylfa Newydd Project Volume 2: Plans, Sections and Drawings (Part 6/19) 2.6.1 Wylfa Newydd Development Area and Power Station Site Plans (Part 2/2) [APP-015] - WN0902-HZDCO-OHW- DRG-00064 A5025 OFF-LINE HIGHWAY IMPROVEMENTS, SECTION 9 - SITE ACCESS, PROPOSED SITE CLEARANCE PLAN	
Q2.0.51	Can the Applicant clarify why in Chapter G9 Tables G9-10 and G9-11 changes in noise and vibration have been considered for bats, otter and fish during construction, but only for bats during operation?	The operational changes in noise were only considered for bats as this was the only receptor where the new road alignment was closer to sensitive habitat (roosts) than the existing alignment. Otter and fish were not considered during operation as the changes in alignment do not alter the existing environment conditions for these receptors.	
Q2.0.52	Can the Applicant confirm whether there is the potential for any combined effects to occur to ecological receptors from the A5025 works?	Combined (cumulative) effects are reported in Section 9.7 Residual Effects of chapter G9 of the Environmental Statement [APP-312]. This section identifies slight residual effects and concludes overall slight positive effects for bats and great crested newt: Triturus cristatus.	
Q2.0.53			

	Chapter G9 para 9.5.47 refers to a noise attenuation fence along the Afon Alaw crossing, can the Applicant confirm where this would be secured in the Code of Construction Practice?	The noise attenuation fence along the Afon Alaw crossing (Section 3 – Llanfachraeth), which is proposed within chapter G9, will be secured within volume 3 of the Design Assess Statement [APP-409 and APP- 410], when a revised version is submitted at Deadline 4 (17 January 2019).	IACC reserves its position until it has had the opportunity to review the revised version of the DAS that is to be submitted at Deadline 4.
Q2.0.54	In relation to vehicle collision during operation, Chapter G9 refers to “embedded measures, described in the Wylfa Newydd CoOP.... [which] would provide safe passage under the road.” (e.g. para 9.5.469.5.64). Can the Applicant confirm where this would be secured in the Code of Construction Practice?	The reference to embedded measures being described within the Wylfa Newydd CoOP, is incorrect. The securing mechanism for measures which would provide safe passage under the road is the Design and Access Statement - Volume 3. (see General design principle 2).	
Q2.0.55	Can the Applicant confirm where all of the strategies to protect protected and legally controlled species described in Appendix G9- 10 [APP-334] would be secured?	The strategies to protect protected species are set out under the Wylfa Newydd DCO Project wide requirements stated in paragraphs 11.1.5 and 11.2.1 of the Wylfa Newydd Code of Construction Practice. Measures relevant to specific legally protected species are set out in sub-sections 11.3 to 11.7 of the A5025 Off-line Highway Improvements sub-CoCP. Horizon is required to comply with these documents during construction under Requirements PW7 and OH1 of the Draft DCO [APP-029].	
Q2.0.57	Can the Applicant confirm where post-construction monitoring of bat boxes as described in Table G9-10 would be secured?	In Table G9-17 of chapter G9, it is proposed to install bat boxes to mitigate the loss of potential roost features rather than the loss of known roosts. The achievement criteria specified is the monitoring of these boxes post-construction. Horizon now consider that such post-construction monitoring would not accurately reflect the success of the mitigation measure which is designed to replace the loss of potential roosts rather than known roosts. A more appropriate achievement criteria is the successful installation and long-term maintenance of the bat boxes to ensure those potential roost features were provided. This is secured through the provisions of the A5025 Off-line Highway Improvements sub-CoCP. Post-construction monitoring described in Table G9-17, would be undertaken only as part of any bat mitigation licence requirement, should such a licence be needed, (see A5025 Off-line Highway Improvements Protected and Legally Controlled Species Report, [APP-334]. Protected species licensing requirements are secured through the provisions of the Wylfa Newydd Code of Construction Practice.	

Q2.0.58	In Chapter G9, temporary land take for sections 3, 5, and 7 is less than that taken permanently. In addition, areas of habitat lost listed in Tables G9-12 to 16 do not always add up to the permanent or temporary habitat loss detailed within the text of Chapter G9. Can the Applicant clarify the total temporary and total permanent land take for the A5025 works?	Chapter G9 assess the temporary and permanent landtake for ecological habit loss and creation in relation to ecology, these areas are smaller than the temporary and permanent landtake required to construct the scheme. To clarify the total temporary land take to construct the scheme is 12.13 Ha and the permanent landtake required is 34.59 Ha	
Q2.0.59	Can the Applicant clarify the total habitat provision for GCN in Section 3, as it is unclear whether the ponds described in Chapter G9 paras 9.6.5 and 9.6.6 are the same.	The total habitat provision for great crested newt (GCN), Triturus cristatus in Section 3 of chapter G9, is 3.5 ha. In paragraph 9.6.5, the pond described is an existing pond. The pond in paragraph 9.6.6 is a new pond to be created within the 3.5 ha of habitat provision for GCN.	
Q2.0.60	Can the Applicant clarify how the mitigation described in Chapter G9 paras 9.6.5, 9.6.6 and 9.6.10 would be secured?	The mitigation described at paragraphs 9.6.5, 9.6.6 and 9.6.10 of Chapter G9 of the Environmental Statement will be secured by Design Principle 32 of the Design and Access Statement - Volume 3 - Associated Developments and Off-Site Power Station Facilities, Part 2/2 Appendix 1-5 [APP-410]. This principle states: <i>"At Llanfaethlu, a new pond and terrestrial habitat will be created (the total area of habitat created will be approximately 1.8 ha). At Llanfachraeth, a new pond and terrestrial habitat will also be created (approximately 3.5 ha). Mitigation at both locations will also consist of planting shrubs and wet woodland species, and creating hibernacula (log piles). Horizon will follow the advice and guidelines set out in the Great Crested Newt Conservation Handbook (Langton, T. E., Beckett, C. L. & Foster, J. P., 2001. Great Crested Newt Conservation Handbook. Halesworth: Froglife)."</i>	
Q2.0.61	Can the Applicant confirm that the Landscape Plan in Appendix G10-9 [APP-344] and dDCO requirements OH9 and OH10 [APP-029] satisfy the enhancements for species and groups described in Chapter G9 paras 9.7.6 and 9.7.7, and not solely for water vole?	Horizon can confirm that the enhancements shown on the Landscape Plan in Appendix G10-9 [APP-344], have been designed specifically for water vole, but as described in chapter G9 paragraphs 9.7.6 and 9.7.7, the improved habitat compared to the existing land use would benefit the other species.	

Q2.0.63	Paragraph 4.4.3 of the MPSSSCoCP [APP- 415] states that no lighting would be used for the MUGAs after 21:00 hours during the winter months to prevent light trespass onto Tin-y-Maes bat barn and the adjacent ecological mitigation area. Given that it would get dark earlier than this during winter months do you consider the proposed 21:00 curfew appropriate or should it be earlier and if so what time?	It is noted that Q2.0.63 is for NRW. However, Horizon has taken the opportunity to review the requirement in para 4.4.3 of the Main Power Station Site Sub-CoCP. The predicted lux levels next to the MUGA are low and screening from planting would reduce levels further so that at the bat barn they would be considered to be of negligible effect to bats. In addition, a commitment is made in para 4.5.1 of the Wylfa Newydd Code of Construction Practice to develop lighting designs to reduce light spill onto sensitive receptors. This includes ecological receptors. In consideration of the above the effect would be negligible without the mitigation detailed in para. 4.4.3. It is therefore considered that para 4.4.3 of [APP-415] is no longer required. Horizon will seek to discuss and agree this position with NRW and remove this paragraph during the course of the Examination.	
Q2.0.65	Paragraph 7.6.9 of the MPSSSCoCP [APP- 415] sets out the actions that would occur should the trigger levels be exceeded. This list currently does not include a requirement to cease work – should it and if so why?	Paragraph 7.6.9 of the MPSSSCoCP includes the measure “temporary suspension of the specific activity” which is the equivalent of ceasing work. This section of the Main Power Station Site Sub-CoCP has been updated with additional detail at Deadline 2 (4 December 2018) of the draft DCO examination. It has been updated in-line with information shared with IACC and NRW through Statement of Common Ground discussions. The updated text includes the requirement to suspend the activity or activities identified through the site investigations as causing the dust emissions. These activities would continue to be suspended until the monitoring data indicates that the issue is resolved. As noted above, the suspension of activities constitutes ceasing work.	IACC are satisfied that the revised version of the Main Power Station Site Sub-CoCP shared at Deadline 2 confirms that activities would be suspended until the monitoring data indicates that the issue is resolved..

ExA Ref.	Question	Horizon's Response to Question	IACC Comments/Response
Q3.0.1	Climate change and adaptation is covered in Section 5.6 of the Sustainability Statement [APP-426], but the approach does not appear to fully comply with the requirements of EN-1 and EN-6. Section 5.6 explains how the project would help reduce climate change effects and mitigation during construction, but adaption is not so detailed. Can the Applicant demonstrate please how paras 4.8.6 - 4.8.8, 4.8.10 and 4.8.12 of EN1 would be satisfied?	The Sustainability Statement broadly assesses the sustainability performance of the Wylfa Newydd DCO Project. Paragraphs 6.3.49 to 6.3.56 of the Planning Statement [APP-406] summarise how Horizon has complied with the requirements of section 4.8 of NPS EN-1. Specific details are contained in other Draft DCO application documents, see references below according to the relevant EN-1 paragraph. Para 4.8.6 of EN-1: for the estimated lifetime of the new infrastructure take into account the potential impacts of climate change using the latest UK Climate Projections to ensure they have identified appropriate mitigation or adaptation measures. The effects of climate change on the evolution of baseline conditions have been taken into account, where appropriate, in the EIA. All of the topic assessment chapters that consider climate change have referred to the UK Climate Impacts Programme predictions, which state that the future climate is likely to consist of wetter winters and drier summers. Due to the coastal location of the Wylfa Newydd Power Station, sea-level rise and coastal erosion are key concerns. Para 1.4.76 in the Environmental Statement (ES) Chapter B1 [APP-066] states that “<i>The design has considered predicted climate change trends up to the year 2183 (the expected end of spent fuel storage and decommissioning)</i>”. Paras 1.4.78 to 1.4.84 in the ES Chapter B1 explain that climate change has been accounted for using the Met Office's 2009 UK Climate Projections Science Report. Section 9 of the ES Appendix D8-4 [APP-150] sets out flood risk with climate change during the operation of the Power Station. Section 10 presents flood risk with climate change during decommissioning. Coastal change assessment for marine facilities and the Power Station is reported in ES D12 [APP-131] specifically Table D12-15 presents the 100 year range for coastal erosion. Coastal erosion is considered in the coastal processes and geomorphology topic in the Environmental Statement, with erosion rates given as up to 0.2m per year, whilst sea level rise projections are taken from UKCP09 with a projected sea level rise of 488mm by 2090; this rise is not expected to affect the Wylfa Newydd DCO Project directly during its lifetime. However, the surface water and groundwater assessment	

	in this Environmental Statement considers an indirect effect, making reference to sea level rise as a cause for saline intrusion in coastal aquifers. The surface water and groundwater assessment has considered the potential for drier summers to lead to a reduced moisture content of soils, resulting in a shortened winter groundwater recharge season, potentially leading to a long-term decline in groundwater storage. This could potentially lead to droughts or floods. However, Para 8.4.26 of the ES [APP-073] explains that climate change scenarios are not considered in the groundwater assessment as the major effects on groundwater are anticipated to occur in the relatively near-future (during the construction works). In terms of adaptation, see response below for compliance with para 4.8.10 of EN-1. Para 4.8.7 of EN-1: should apply as a minimum, the emissions scenario that the Independent Committee on Climate Change suggests the world is currently most closely following Section 3 of the ES Appendix D12-3 [APP-218] explains that two future scenarios have been considered in the wave modelling (“reasonably foreseeable” and “credible maximum”) at 2087 (the end of power generation) and 2187 (the end of de-commissioning). Maximum credible tidal and water levels with climate change are given in para 9.1.5 and 9.1.6 in the ES Appendix D8-4. “Reasonably foreseeable” and “credible maximum” climate change allowances were considered in the pluvial and fluvial flood events, see the ES Appendix D8-7 [APP-160]. Para 4.8.8 of EN-1: No features of the infrastructure critical to its operation which may be seriously affected by more radical changes to the climate, for example by referring to additional maximum credible scenarios Para 1.4.76 in the ES Chapter B1 confirms that the Power Station site platform and Cooling Water System (the critical parts related to operation of the Power Station) have been designed so as not to be affected by sea level rise up to the year 2183 (the expected end of spent fuel storage and decommissioning). Other climate change features that have been considered during the design of the Wylfa Newydd DCO Project are the likelihood of drought; sea temperature changes; increase in precipitation; and changes in wind speed, air temperature and humidity.	

The Environment Agency informed the UK Government's Strategic Siting Assessment which concluded that, throughout its lifetime, the WND A Development and Off-Site Power Station Facilities could be protected from flood risk originating from climate change, as well as other causes, and these have been considered in the design described in chapters D1 [APP-120] and E1 [APP-239] of the Environmental Statement.

Para 4.8.10 of EN-1: Consider consequential impacts from adaptation measures in relation to the application as a whole and the impacts guidance in Part 5 of NPS EN-1

The assessments of effect in both the Sustainability Statement and the Environmental Statement are based on a parameters approach. This results in an assessment of worst case scenarios. Horizon considers that the parameters and worst case scenarios assessed encompass any effects from climate adaptation measures that could be added through detailed design.

In addition, the design of the UK ABWR is considered to contain most if not all of the climate adaptation measures likely to be required for a nuclear power station with an expected operating life of 60 years. As such, the potential for additional adaptation measures to be added through detailed design is considered to be small, with the potential for those adaptation measures to result in consequential environmental effects also considered to be small.

According to para 9.2.3 of ES Appendix D8-4, figures in Appendix D8-4-9 show marginal difference in the extent of flooding at the Power Station Site between the baseline case and the operational phase.

Para 12.5.2 of ES Appendix D8-4 states that the change in flood risk near Cemaes is principally because of the development through construction and operation on catchment areas from the landscape mounds and from the associated drainage. A drainage scheme is being developed to ensure that high risks are reduced and there is no increase in flood risk to properties and other vulnerable receptors.

The concept drainage design for the management of surface water in the landscaped areas post construction are set out in in ES Appendix D8-8 [APP-167]. This includes the use of Sustainable Drainage Systems (SuDS) with attenuation ponds that have volumes based of the 1% AEP with 20% allowance for climate change (section 1.2.3). Additional mitigation measures are not proposed for some areas (paras 12.5.3 and 12.5.4 of ES App D8- 4).

Section 12.6 of ES Appendix D8-4 explains that with embedded mitigation and additional mitigation measures, no additional residual risks are anticipated during the construction, operation and decommissioning phases from a fluvial, pluvial or groundwater flood risk perspective.

		Drainage design developed for the Park and Ride site includes underground storm water attenuation/storage for 1% AEP plus 20% allowance for climate change (item 0745 in the Mitigation Route Map [APP-422]). Para 4.8.12 of EN-1: Adaptation measures can be implemented at the time of construction or should the need arise e.g. later increasing height of sea walls The Sustainability Statement accompanying the Draft DCO application outlines the design measures that have been incorporated with regards to climate change adaptation. The design of the Wylfa Newydd DCO Project has been informed by the applicable UK Climate Projections (as set out in Chapter B1 of the ES), particularly considering potential flood risk and sea level change over the operational lifetime of the Power Station, or element within the wider Wylfa Newydd DCO Project. For example, with regards to the Power Station Site, the MOLF structure is based on present day sea levels due to its relatively short design life; the breakwater design accounts for predicted sea level rise; and the ancillary buildings have been designed to account for predicted flood risk, the coastal location and regional norms for wind and snow loading, taking account of climate change predictions for various factors including air temperature, sea level, sea temperature and rainfall. The Off-Site Power Station Facilities have been designed and arranged to reflect site-specific assessments of up to 1 in 10,000 year flood event. Section 10.5 of Wylfa Newydd CoCP [APP-414] describes Horizon's proposed mechanism of flood risk management and adaptation. The Mitigation Route Map sets out when mitigation measures will be implemented. Measures 219, 220 and 221 are most relevant. Paragraph 6.4.167 of the Planning Statement states that with the mitigation proposed during the construction and operation phases to prevent increased risk of off-site flooding, the development within the WNDA is in accordance with paragraph 3.6.13 of NPS-EN-6 paragraph 13.4.2 of PPW, policy PCYFF 3 of the JLDP and GP21 of the Wylfa SPG. Section 12.6 of Appendix D8-4 explains that with embedded mitigation and additional mitigation measures, no additional residual risks are anticipated during the construction, operation and decommissioning phases from a fluvial, pluvial or groundwater flood risk perspective.	
Q3.0.2	In the Carbon and Energy report [APP-423] Carbon Footprinting Methodology, Figure 4-4 shows that Construction includes operation of	This is an error as energy use from the operation of the Site Campus should have been included under 'Construction' in Table 4-1.	

	the Campus but Table 4-1 only includes energy use for construction plant. Figure 5-5 does include the Campus. Can the Applicant clarify where the operational impacts of the Campus have been addressed?	The operational impacts of the Site Campus (including energy use) have been addressed in the Construction phase. This is explained in Paragraphs 4.2.15 and 5.2.14 of the Carbon and Energy report.	
Q3.0.3	Can the Applicant explain how potential storm surges resulting from climate change has been addressed for the protection of the MOLF and Power Station?	Section 3 of Appendix D12-3 – Wylfa Newydd Main Site Wave Modelling Report explains that two future scenarios have been considered in the wave modelling (“reasonably foreseeable” and “credible maximum”) at 2087 (the end of power generation) and 2187 (the end of decommissioning). These levels include consideration of the potential for increased storm surges as a result of climate change. This wave modelling forms the basis of the relevant assessments in Chapter D12 - Coastal processes and coastal geomorphology and in the Flood Consequences Assessment (FCA) for the WNDA Development. With the exception of the Cooling Water System, effects of coastal inundation on the Power Station are not assessed in Chapter D12 or the FCA for the WNDA Development. This is because these elements of the Power Station are sufficiently elevated so as not to be vulnerable even in the “credible maximum” future scenario, para 1.4.76 in Chapter B1. The sensitivity of the MOLF, breakwaters, and Cooling Water System to inundation are classed as low, as these are water compatible (para 8.1.10 in. Future overtopping would not adversely affect the structures and this inundation is considered in the design (para 9.1.7 in. However, the use of the MOLF would be restricted to appropriate operating conditions to avoid exposure of people, assets or materials to unnecessary risk (para 9.1.4). The MOLF would only be used very infrequently during operation, linked to the delivery of Abnormal Indivisible Loads (likely to be less than one per year). Further, Horizon is assessing the potential impacts of all external hazards, including hazards arising from flood and coastal erosion on the power station design, operation and decommissioning. This will be assessed in the Safety Case, which forms part of the nuclear site-licencing arrangements, which is independently regulated by the Office of Nuclear Regulation (ONR).	

ExA Ref.	Question	Horizon's Response to Question	IACC Comments / Response
Q4.0.1	Article 4 - Limits of Deviation Justify the flexibility provided by this article.	Paragraphs 4.3 to 4.8 of the Explanatory Memorandum (Revision 4.0) [WN0902-CLC-PAC-REP-00005] set out the purpose and justifications for article 4. Paragraphs 4.6 and 4.7 note that: "While article 4 may appear to give Horizon an uncontrolled level of flexibility in respect of these works, vertical limits are actually controlled through a defined set of parameters under the Requirements in Schedule 3 of the Order. These parameters, to which article 4 is subject, have the practical effect of curtailing Horizon's powers under article 4 by placing controls on the location of certain buildings, structures and works (i.e. they can only be located in a defined zone), as well as imposing maximum and minimum dimensions (such as heights) of certain elements of the authorised development. The use of both limits of deviations and parameters is intended to bring greater clarity around how the construction of the authorised development will be controlled whilst still providing Horizon with a necessary, but proportionate, degree of flexibility. This degree is appropriate given the scale and complexity of the authorised development (and its individual components) as it reduces the risk that the authorised development as approved cannot later be implemented due to unforeseen engineering or geological reasons."	
Q4.0.2	Article 5 - Effect of the Order on the Site Preparation Permission Is IACC, as LPA, content with the mechanisms proposed to enable an interface between the planning permission for the site preparation works and authorisation under the DCO for Work No 12?	Whilst the question is not directed to Horizon as the applicant, the following response is provided by Horizon at this stage: In response to concerns raised by IACC at the Issue Specific Hearing on the draft DCO (24 October 2018), Horizon has made amendments to the draft DCO and Explanatory Memorandum to provide clarity on the interface between the Draft DCO and the site preparation permission: Compliance targets: - The diversion works under Work No.12 of the draft DCO have been removed and inserted within the "other associated development" in Schedule 1. This has been - done to ensure that the only difference between Work No.12 and the SPC works under the site preparation permission relates to the area of land (with the land area for Work No.12 being 10 hectares less than that under the site preparation permission, as Tre'r Gof SSSI is excluded). - Schedule 4 has been rationalized to include only those conditions under the site preparation permission that will have deemed approval or compliance under the DCO following notice being served under article 5. (Refer to updates made to the draft DCO submitted at Deadline 2 (Revision 3.0) [WN0902-HZDCO-PAC-REP-00043]).	IACC do not consider that these amendments address all of the points raised in the Written representation and maintain the objections set out in that submission.

		- A new table (Appendix 1) has been inserted into the Explanatory Memorandum submitted at Deadline 2 (4th December 2018) (Revision 4.0) [WN0902-CLC-PAC-REP-00005] which identifies the corresponding conditions and requirements and clearly specifies which will be in force following notice being served under article 5. It was more appropriate to include this within the Explanatory Memorandum, rather than as a new schedule to the DCO, as this would enable Horizon to provide more explanatory comments that it could if it was within the statutory instrument and is more aligned with the purpose of an Explanatory Memorandum. - The SPC Requirements in Schedule 3 have been updated, where necessary, to correspond to the final set of conditions under the site preparation permission (as the DCO application was based on draft conditions available at submission) as well as to ensure there is no duplication with the existing controls within the control documents. Horizon considers that these amendments will ensure that there is a clear interface and alignment between the site preparation permission and the DCO. Refer to FWQ21.0.6 below for further detail regarding the need for Work No.12 within the DCO application.	
Q4.0.3	Article 5 - Effect of the Order on the Site Preparation Permission Do the requirements set out in Schedule 3 correspond with the planning conditions?	Whilst the question is not directed to Horizon as the applicant, the following response is provided by Horizon at this stage: As noted in response to FWQ4.0.2, Schedule 3 of the draft DCO has been updated to ensure that the SPC Requirements reflect the final set of conditions under the site preparation permission and a new table has been inserted into the Explanatory Memorandum to clearly identify the corresponding condition and Requirement and identify which will be in force following notice being served under article 5. Where overlap with the control documents has been identified, the SPC requirement has been removed to ensure clarity in respect of compliance with the control documents (i.e. the Wylfa Newydd Code of Construction Practice and the sub-CoCPs). Full details of the controls within these documents have been provided in the DCO Amendment Table [WN0902-HZ-PAC-REP-00009] submitted at Deadline 2 (4 December 2018) to ensure that the Examining Authority is comfortable that these controls have not been deleted with the removal of the duplicative requirement. In addition, Schedule 4 has been rationalized to only identify those conditions that will be deemed to have been approved or complied with under the corresponding DCO Requirement. For these amendments, please refer to the updated draft DCO (Revision 3.0) [WN0902-HZDCO-PAC-REP- 00043] submitted at Deadline 2 (4 December 2018).	IACC maintains that the requirements do not provide the same level of control as the draft planning conditions and that the CoCPs require substantial amendment in order to ensure that all of the matters covered by condition are covered by the DCO.

Q4.0.4	Article 5 - Effect of the Order on the Site Preparation Permission Would there be any unintended consequences for the LPA's ability to enforce/would there be any uncertainty? – e.g. if Horizon serves notice on IACC informing it that it intends to undertake and complete the SP&C works under the DCO and therefore all conditions of the planning permission would become unenforceable, are there any conditions which need to have a life beyond the planning permission?	Whilst the question is not directed to Horizon as the applicant, the following response is provided by Horizon at this stage: In the updated draft DCO (Revision 3.0) submitted at Deadline 2 (4 December 2018) [WN0902-HZDCO-PAC- REP-00043]; Horizon amended article 5 to provide that conditions of the site preparation permission will be enforceable where the breach occurred prior to Horizon serving notice under this article: Effect of the Order on the site preparation permission 5.—(1) If the undertaker serves a notice on IACC that it intends to commence Work No.12— (a) the undertaker must cease to carry out development under the site preparation permission; and (b) the conditions of the site preparation permission will be unenforceable, <u>except in respect of any breach that occurred prior to the undertaker serving notice under article 5(1).</u> [...]	The IACC welcomes this addition.
Q4.0.5	Article 6 - Maintenance of the authorised development Justify the flexibility provided by this article.	Paragraphs 4.16 to 4.18 of the Explanatory Memorandum (Revision 4.0) [WN0902-CLC-PAC-REP-00005] set out the purpose and justifications for article 6. As noted in the Explanatory Memorandum, the purpose of the article is to enable Horizon to maintain the authorized development throughout its 60-year lifetime. It is essential that Horizon can maintain the authorized development pursuant to the DCO and not be required to seek separate consents for maintenance works. In addition, the power to maintain is not unlimited; no maintenance works can give rise to any materially new or materially different environmental effects than those identified in the ES (see article 2(1) definition of "maintain"). In response to this question, Horizon has submitted an updated Explanatory Memorandum at Deadline 1(13 November 2018) [REP1-007] which made it clear that maintenance works fall within “development forming part of the NSIP” under section 31 or “associated development” under section 115 of the 2008 Planning Act 2008.	IACC does not consider that this answer provides an appropriate justification for the very wide scope of this power and maintains its objection as set out in its Written Representation.
Q4.0.9	(a) Article 11 - Power to alter layout etc. of streets and Article 12 Street Works 11 (5) and 12 (3) Can the applicant confirm if the days referred to are working days or consecutive days? Have discussions been had, and agreement been reached with IACC, as local highway authority on deemed consent for applications after 56 days?	The days referred to in article 11(5) and 12(3) are consecutive. Deemed approval The "deemed" approval process has not been raised by IACC in discussions to date; however, as noted in paragraph 5.7 of the Explanatory Memorandum (Revision 4.0) [WN0902-CLC-PAC-REP-00005] the inclusion of deemed approval, which appears in a number of other articles in the draft DCO, is considered reasonable and aligns with the objectives and scheme of the Planning Act 2008 to ensure efficient delivery of NSIPs. Inclusion of similar timeframes for decisions followed by deemed approval in the draft DCO ensures that Horizon can deliver the Wylfa Newydd DCO Project in an efficient manner and the intention of the Planning Act 2008 is not undermined. A number of other DCOs have been granted with deemed approval provisions	IACC has set out its in principle agreement to this provision in the written representation subject to the period not reducing from 56 days. IACC agrees that 56 days means consecutive not working days.

		to prevent consenting authorities failing to provide any response within a reasonable time to an applicant's request for approvals. It is important to note that the deemed approval provision does not remove the IACC's ability to refuse the application; it just imposes a reasonable deadline by which they must exercise their statutory functions.	
Q4.0.12	Article 16 - Temporary Stopping up of Streets and Article 18 - Access to Works Is the 28 days in referred to in 16 (8) and 18(2) working days or consecutive days? Have discussions been had, and agreement been reached with IACC, as local highway authority, on deemed consent for applications after 28 days in 16(8) given this would be outside the normal statutory process? Given the definition of 'street' under Article 2 (Interpretation) what 'other public rights of way' may be temporarily stopped? Is the IACC satisfied that this would be necessary?	The days referred to in articles 16(8) and 18(2) are consecutive. Deemed approval The "deemed" approval process has not been raised by IACC in discussions to date; however, in response to Welsh Government's request at the DCO Issue Specific Hearing on 24 October 2018, Horizon amended the timeframe for deemed approvals from 28 to 56 days. This amendment was included in the updated DCO (Revision 2.0) [REP1-004] submitted at Deadline 1 (13 November 2018). Other public rights of way Inclusion of 'other public rights of way' within article 16(9) was intended to be for drafting simplicity and the avoidance of doubt. The reason for this is that the standard drafting in other DCOs (e.g. Richborough, Hinkley Point C Connection, and River Humber Gas Pipeline) is to include both streets and public rights of way in the stopping up articles, even though the definitions of "street" in those DCOs is similar to that used in the draft DCO. As Schedule 9 clearly includes both 'footpaths' and 'cycleways', for the avoidance of doubt Horizon has sought to make it clear that for the purposes of article 16 and Schedule 9 'street' includes all public rights of way.	IACC has set out its in principle agreement to this provision in the written representation subject to the period being 56 days. IACC agrees that 56 days means consecutive not working days. The IACC has made detailed submissions on this article in its Written Representation at section 5.3 and maintains that position. The IACC does not consider that the answer given demonstrates any necessity for this very wide power.
Q4.0.13	Are there any differences between the proposed restrictions and those that would apply under Road Traffic Regulations Act 1984? If so how do they compare?	Article 21 of the draft DCO provides Horizon with the power to impose temporary and permanent traffic regulation orders ("TRO") to control traffic flows on roads specified in Schedule 10 and other roads within the Order Limits. This provides Horizon with the power to (through a TRO): • require traffic to proceed in a specified direction (a corresponding power is provided under section 2 of Part I of the Road Traffic Regulations Act 1984 ("1984 Act")) • vary/control speed limits (see section 84 of Part IV of the 1984 Act); • restrict or permit waiting, loading or unloading of vehicles, stopping and parking (see section 2 of Part I, section 61 of Part IV of the 1984 Act); • prohibit or permit vehicular access to identified roads (see section 2 of Part I and section 14 of Part II of the 1984 Act); and • revoke, amend or suspend any other order made that conflicts with the powers under article 21 (Schedule 9, Part IV of the 1984 Act). The 1984 Act provides a range of other matters that can be included in a TRO (including prohibiting or restricting overtaking; specifying parts of the carriageway to be used by certain traffic; restrictions on	The IACC do not consider that Horizon's reposnse answers the questions. In particular, they omit to note that TROs made by a highway authority are subject to public consutlion and that they have not provided for this or that temporary TROs made unde the highways act are limited in duration to periods consderatrblly less than they are seeking. Horizon submits that it must be able to ensure that traffic restitions are in place in a timely manner for their purposes. This lacks any regard to the needs of the public. IACC as highway authority have a statutory duty to manage its highway network which this takes no account of in seeking powers to revoke, amend and suspend ordes which have been made by the Council without consent.

		pedestrian access prohibiting or restricting the certain types of vehicles; or specifying routes to be used). Article 21 of the draft DCO only incorporates those powers that it considers necessary for the construction and operation of the authorised development. It is important that Horizon has certainty on the timely delivery of these traffic restrictions and that it is able, therefore, to rely on its own powers.	
Q4.0.14	Article 17 - Use of Private Roads for Construction 17 – What private roads are intended to be used within the order limits during construction and have discussions been had, and agreement been reached with the owners of these roads regarding their use? Can the applicant confirm that there would be severance/access issues?	Horizon has sought to limit the number of private roads to the greatest extent possible through the design of the A5025 Off-Line Highway Improvement Works and associated site access; however, where it has been unable to, it has sought voluntary agreements with landowners to enable the use of these private roads. As required under article 17 of the draft DCO, where private roads are used for construction purposes, Horizon must compensate the person responsible for the repair of the road for any loss or damage suffered. Where access is affected, Horizon will provide alternative access arrangements to affected parties. In the event that Horizon is unable to reach agreement with landowners and the private road is the only practicable access option, Horizon will look to use its powers under article 17. There may be other private roads (e.g. farm tracks) that Horizon has not identified and so this article will also to ensure that Horizon has power to access these private roads if necessary for construction, in the event voluntary agreement cannot be reached with the relevant landowner.	
Q4.0.15	Article 19 - Construction and Maintenance of new and altered streets 19 –Have discussions been had, and agreement reached over the proposed 12-month post completion maintenance proposals?	Whilst the question is not directed to Horizon as the applicant, the following response is provided by Horizon at this stage: The maintenance period in respect of any new or altered streets has not been raised by IACC in discussions to date; however, 12 months is a standard maintenance period under other DCOs and the draft highway protective provisions provided by IACC also include a 12-month maintenance period.	IACC agree that 12 months maintainace periods would be normal.
Q4.0.16	In relation to Compulsory Acquisition and with reference to the representation from Magnox Limited [RR-013], has any potential conflict been identified with the Nuclear Site Licence issued under the Nuclear Installations Act?	Prior to submission of the Wylfa Newydd DCO application, Horizon informed Magnox Limited (and the Nuclear Decommissioning Authority) that it was proposing to seek a Class 1 interest in respect of certain parcels of land in the Wylfa Newydd Development Area that it had interests in (Book of Reference [APP-034/035/036]. This was on the basis that the existing Power Station site would be delicensed in advance of these compulsory acquisition powers being exercised. It is now understood that this is unlikely to be the case. As such, Horizon has been actively engaging with Magnox to enter into a voluntary agreement in respect of this land. The parties intend that the relationship between Magnox, Horizon and their respective sites and activities will be managed through this agreement to avoid any potential conflicts.	

		As Horizon does not require the land where Magnox's site is located until after it has been delicensed, Horizon is seeking to agree a lease with Magnox for this interim period. The parties continue to engage on this matter. Once a final agreement has been reached, Horizon will be in a position to review and update the Book of Reference accordingly. Horizon is happy to provide updates to the Examining Authority on the progress of negotiations at appropriate deadlines in Examination.	
Q4.0.17	With reference to the representation from SP Energy Networks [RR-014], provide an update on negotiations in regard to the proposed protective provisions within Schedule 15. This to include updates in respect of negotiations with SP Energy Networks and any other parties. In doing so, please confirm any proposed amendments to the draft protective provisions within Schedule 15.	SP Energy Networks are currently reviewing the draft model protective provisions that were provided by Horizon. Horizon is also negotiating protective provisions with a number of statutory undertakers. A summary of the current status, and any proposed amendments, will be submitted at Deadline 4 (17 January 2019) (as requested by the Examining Authority in its Rule 8 Letter [PD-010]).	
Q4.0.18	Respond to the matters raised in relation to compulsory acquisition by Davis Meade Property Consultants on behalf of MW, EW, & M Harper [RR- 048].	MW, EW and M Harper own Plots 516, 517, 519, 520, 575, 576 (refer to Land Plans [APP-010] and Book of Reference [APP-034/035/036]). These plots have been identified as required for the construction and operation of the Wylfa Newydd DCO Project. Specifically, these plots are located at the site of the proposed section 3 (Llanfachraeth) of the A5025 Off-Line Highways Improvements. Horizon is seeking powers to acquire the following rights and interest in these plots as detailed in the Book of Reference: • Plots 519 and 520 have been classified as Class 1 (acquisition of all interests and rights in land). The two plots consist of: ○ Plot 519: 3250 sqm of scrubland and watercourse (Afon Alaw); and ○ Plot 520: 2 sqm of half width of watercourse to the east of A5025, Llanfachraeth. • Plots 516, 517, 575 and 576 have been classified as Class 2 (acquisition of rights by the creation of new rights or the imposition of restrictive covenants). The extent of the areas in which these rights are sought are as follows: ○ Plot 516: 125 sqm of width of unnamed watercourse, east of A5025, Llanfachraeth; ○ Plot 517: 5546 sqm of agricultural land to the east of A5025, Llanfachraeth; ○ Plot 575: 5546 sqm of land to the east of Pont yr Arw; and	

		Plot 576: 5546 sqm of land to the east of Pont yr Arw. These plots are required for the drainage plans for Section 3, which follow a SuDS strategy, as shown on figures within A5025 Off-line Highway Improvements – Section 3 Llanfachraeth Plans [APP-020]. Horizon remains committed to seeking to acquire these interests voluntarily.	
Q4.0.19	Respond to the matters raised in relation to compulsory acquisition by Davis Meade Property Consultants on behalf of Messrs. G & I Hughes [RR- 122].	G & I Hughes in their relevant representation [RR-122] raise concerns about the nature and extent of the interests being sought by Horizon in respect of land that they farm at Valley, Anglesey. Horizon understands their concerns to be in respect of Plots 434 and 435. Plots 434 and 435 have been identified as required for the construction and operation of the Wylfa Newydd DCO Project. Specifically, these plots are located at the site of the proposed Section 1 (Valley) of the A5025 Off-Line Highways Improvements. Horizon is seeking powers to acquire the following rights and interest in these plots as detailed in the Book of Reference: - Plot 434, being 5197 sqm of agricultural land to the east of the A5025, Valley, has been classified as Class 3 (temporary possession of land). The land is proposed to be used for a temporary working and construction compound. - Plot 435, being 2408 sqm of agricultural land to the east of the A5025, Valley, has been classified as Class 1 (acquisition of all interests and rights in land). The land is proposed to be used for the construction of new highways. See the Land Plans for further detail regarding the nature and extent of the interests Horizon is seeking in respect of this land. It is noted that, as detailed in the Book of Reference (Part 3 of 3) [APP-036], these plots are owned by the Llynnon Estate. Messrs G & I Hughes occupy the land on the basis of a short-term tenancy. As such, Messrs G & I Hughes have not been party to negotiations that Horizon has been having with the owners of this land.	
Q4.0.20	Respond to matters raised in the representation from the National Trust [RR-053], regarding National Trust land and proposed Compulsory Acquisition. Signpost where in the application, information is	Horizon understands that National Trust's concerns in respect of compulsory acquisition as set out in [RR-053] relate to Plots 61, 63, 64 and 65.	

	provided as to as whether National Trust land is the subject of proposed Compulsory Acquisition. "The application documents are unclear as to whether National Trust land will be subject to compulsory acquisition and, to the extent that any land in which the National Trust has an interest will be acquired, the National Trust objects. "	The Book of Reference (Part 1 of 3) [APP-034] and the Statement of Reasons [APP-032] detail National Trust's interest in these plots as well as the nature of the interests that Horizon is seeking in respect of them. This is summarised below. Plot 61 Plot 61 includes a watercourse to the north of Cafnan where there is a rebuttable presumption that half of the bed of the stream is owned by the National Trust. The Special Category Land Plan (WN0902-HZDCO-LPN- DRG-00015 Wylfa Newydd Development Area, Special Category Land Plan) shows its location. Although the stream is within the Order Limits, Horizon has no intention to carry out works on Plot 61 or exercise compulsory acquisition powers over it. As such, this land has been categorised as Class 6 (land that is not subject to powers of acquisition) in the Book of Reference and Land Plans and there are no work areas identified over this plot in the Work Plans [APP-012]. However, Horizon appreciates National Trust's concerns regarding this plot and is therefore considering how the Order Limits may be shifted to exclude this plot completely. Horizon is proposing that it will move the Order Limits to exclude Plot 61 at an appropriate time during Examination. Plot 63, 64 and 65 The National Trust also has the benefit of a right to enter for the purposes of inspecting, maintaining, repairing and renewing a disused mill that is situated on their adjoining retained land (Plots 63, 64, 65). However, these rights do not constitute land belonging to the National Trust which is held by the National Trust inalienably for the purposes of section 130 of the Planning Act 2008. Plots 63 and 65 have been classified as class 1 (acquisition of all interests and rights in land); and Plot 64 has been classified as Class 4 (Extinguishment or discharge of all private rights and restrictive covenants). Horizon has been working with National Trust through the Statement of Common Ground process to address National Trusts concerns in this respect. The parties are currently exploring Horizon providing for a private right of access in favour of National Trust that would ensure access across these plots to both the disused mill and Cestyll Garden is maintained following compulsory acquisition. To this end, it has been agreed in principle that the parties will enter into a voluntary agreement to move the existing rights of access over Plots 63, 64 and 65 to an alternative route alongside Valley Garden. However, the details of this private right of access including the final route are still to be finalised. Horizon is happy to provide updates to the Examining Authority on the progress of negotiations at appropriate deadlines in Examination.	

Q4.0.21	Respond to the matters raised by Welsh Government [RR-092] in regard to the identification of Crown Land and the land referred to within the representation.	In its relevant representation, the Welsh Government stated that land belonging to the Welsh Ministers or the National Assembly of Wales had not been identified as Crown land in the Land Plans or Book of Reference [APP-034/035/036]. It then referred to section 85(2) of the Government of Wales Act 2006 and noted that under s135 of the Planning Act 2008 Horizon has not made a formal approach seeking Welsh Ministers consent for these rights. Horizon has identified in the Book of Reference that there are three entities (National Assembly for Wales, Welsh Ministers and Secretary of State for Wales) which own, occupy or have rights in plots located at Parc Cybi, Dalar Hir and the A5025 Off-Line Highway Improvements Section 1 (Valley). Horizon wrote to the Welsh Government on 2 November 2018 seeking confirmation as to the Welsh Government entities affected and status of this land; these discussions are ongoing. In the interim, and in accordance with the Examining Authority's direction in its Rule 8 letter [PD-010], Horizon has also prepared and submitted at Deadline 2 (4 December 2018) a schedule of all Crown land and interests and how Horizon intends to comply with section 135 of the Planning Act 2008 [WN0902-HZDCO-PAC-REP- 00049]. For completeness, this schedule provisionally includes all land and interests held by the three entities identified (National Assembly for Wales, Welsh Ministers and Secretary of State for Wales) while this issue is outstanding. This schedule shall be further refined as Horizon and Welsh Government resolve this issue. Horizon is committed to ensuring that its DCO application documents reflect the nature of the Welsh Government's interests and obtaining Welsh Government consent where necessary.	
Q4.0.22	Respond to the matters raised by Network Rail [RR-089] in regard to the proposed Compulsory Acquisition of the rights/land referred to within the representation.	Extent of acquisition Network Rail own Plots 407, 408 and 409. These plots have been identified as required for the construction and operation of the Wylfa Newydd DCO Project. Specifically, these plots are located at the site of the proposed Section 1 (Valley) of the A5025 Off-Line Highways Improvements. The works proposed at these plots relate to the provision of a new roundabout at Section 1. (Refer to the Land Plans for more detail.) Horizon is seeking powers to acquire the following rights and interest in these plots as detailed in the Book of Reference [APP-034/035/036]: • Plots 407 and 408 have been classified as Class 1 (acquisition of all rights and interests in land). The two plots consist of: ○ Plot 407: 436 sqm of land forming part of highway known as A5, Holyhead Road, Valley; and ○ Plot 408: 84 sqm of hardstanding forming access splay, south of the A5, Valley.	

		Plot 409, being 285 sqm of land forming part of Valley nuclear loading facility, has been classified as Class 3 (temporary possession of land). Engagement with Direct Rail Services Plots 407, 408 and 409 include land that is leased to Direct Rail Services for use as a nuclear loading facility and land which is public highway. Heads of Terms have been agreed with Direct Rail Services, subject to Network Rail approval as landlord. This has included reviewing swept path analysis to demonstrate that access to site is not affected by the final design. Protective Provisions Horizon and Network Rail are also working together to develop protective provisions in respect of Network Rail's infrastructure. Discussions are ongoing; however, Horizon will provide an update on the progress of the protective provisions at Deadline 4 (17 January 2019) (as requested by the Examining Authority in its Rule 8 Letter [PD-010]).	
Q4.0.23	In regard to the Book of Reference [Application Reference Number 4.3 Parts 1, 2 and 3], the Applicant is requested to provide a completed Compulsory Acquisition Objections Schedule. (See Annex A of this document)	Horizon has prepared Compulsory Acquisition Objections Schedule [WN0902-HZDCO-PAC-REP-00050] in the form requested and has submitted this for Deadline 2 (4 December 2018).	
Q4.0.24	For Compulsory Acquisition to be included in a DCO, s.122 of the 2008 Act states that the conditions in s.122 (2) and (3) must be met. Please clarify the missing reference (currently stated to be "Error! Reference source not found") at paragraph 9.2.4 of Statement of Reasons (APP-032).	References to "Error! Reference source not found" in paragraphs 9.2.4, 9.9.7 and 9.9.11 in the Statement of Reasons should be references to paragraph 9.4. This errata will be corrected in a revised Statement of Reasons to be submitted at Deadline 6 (19 February 2019).	
Q4.0.25	Regulation 6(2) of Statutory Instrument 2015 No.462 ("The Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015") states that compulsory acquisition must be implemented within 5 years through the serving of a 'notice to treat' under section 5 of the Compulsory Purchase Act 1965. Provide details of how the applicant would meet the	The Funding Statement [APP-033], submitted as part of Horizon's draft DCO application, sets out Horizon's ability to meet the costs of any compulsory acquisition during the Wylfa Newydd DCO Project. (Refer to sections 2.3 and 3.1 of this document.)	

	cost of the proposed compulsory acquisition within that timeframe.		
Q4.0.26	Article 28(2) states that “..., nothing in this paragraph prevents the undertaker remaining in possession of land after the end of that period, if...”. Provide further clarity around the purpose and intent of this provision.	As noted in paragraphs 7.15 to 7.16 of the Explanatory Memorandum (Revision 4.0) [WN0902-CLC-PAC- REP-00005] , article 28(2) makes it clear that Horizon may remain on land it has temporarily possessed under article 35 (Temporary use of land for carrying out authorised development) beyond the five-year period in article 28(1) provided it has taken possession of such land prior to the expiry of this period. The purpose of this article is to ensure that the temporary possession powers under the draft DCO are not subject to the same 5-year limitation as the other compulsory acquisition powers and Horizon can remain on land beyond this period in DCO to complete works associated with authorised development.	
Q4.0.27	Confirm the purpose of, and reason for, including Article 29 (6)(a).	Article 29 applies to all private rights in land acquired and restrictive covenants imposed over land under the DCO. This is the key article within Part 5 of the draft DCO which sets out when third party rights will be extinguished, suspended or discharged as well as setting out the right to compensation for anyone who is affected by an acquisition. The purpose and reason for article 29(6)(a) is to provide for the situation where Horizon does not want or need to extinguish, suspend or discharge rights upon acquisition, entry onto, or temporary possession of the land. In such event, article 29(6)(a) provides that Horizon must serve a notice or reach agreement with the rights holder prior to the acquisition, entry or temporary possession of the land that it will not affect such rights. Where such notice has been served or agreement reached, paragraphs (1), (2) and (3) of article 29 will not apply. The updated Explanatory Memorandum (Revision 3.0) submitted at Deadline 1 (13 November 2018) sets out this additional detail on the need for article 29(6)(a) – refer to paragraphs 7.17 to 7.22 of Explanatory Memorandum (Revision 3.0) [REP1-007].	
Q4.0.28	The Explanatory Memorandum sets out the purpose of Article 31. Does this provide sufficient certainty for those who would be the subject of compulsory acquisition?. If not, why not?	Horizon considers that landowners will have sufficient certainty over what land would be subject to compulsory acquisition as the notice of treat or vesting declaration will clearly specify what part of the land or right Horizon is seeking to take. The benefit of article 31 is that it provides Horizon with the ability to just acquire a right in the subsoil, where it does not require the entire parcel of land. (For example, where it is necessary to run a cable below ground, it may be possible to acquire only subsoil rights to construct, operate and maintain that cable such that the acquisition of land and/or rights from landowners can be minimized. This also ensures that Horizon exercises a proportionate use of its compulsory acquisition powers.)	IACC considers that this explanation is disingenuous as the notices referred to will not be served until acquisition is to be taken some time after any DCO is granted. Landowners should be given as much detail as possible in the BoR as to what rights will be acquired so that landowners can participate fully in the examination. Horizon should be restricting the compulsory powers to only those rights required and not seeking wide powers justified on a vague intention to narrow use of those.

Q4.0.29	Articles 31 & 32 are limited to 'subsoil', and the term is used elsewhere in the draft DCO. Should 'subsoil' be defined under Article 2?. If 'subsoil' is the soil lying immediately under the surface soil (or topsoil), is there certainty regarding the material below plot 88 and in other locations? If not, should the drafting include '...rock and/or subsoil...'?	As subsoil has not been defined in legislation (including the Planning Act 2008) or previous development consent orders, the updated draft DCO submitted at Deadline 2 (Revision 3.0) [WN0902-HZDCO-PAC-REP- 00043], modified the definition of "subsoil" in the updated DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004]: "Subsoil" means any stratum of land that is below the surface of the ground. This amended definition reflects how Horizon has used the term within the draft DCO and would apply widely to include subsoil at depth (which may include rock or other materials in respect of plots like Plot 88 which is located under the Dŵr Cymru Welsh Water water treatment plant).	
Q4.0.30	Provide further details, within the context of the Explanatory Memorandum, for the approach set out within Articles 33(6)&(9) and the potential implications of such a decision for the delivery of the proposed development.	Counter-notice process where part of a property is acquired In the original draft DCO (Revision 1.0) [APP-029], Horizon had proposed a bespoke process for dealing with counter-notices served by landowners where Horizon was acquiring land or an interest in part of a property. This approach has been adopted in a number of other DCOs. However, following the amendments made by the Housing and Planning Act 2016, Horizon has reviewed this article and determined to apply the counter- notice process under section 8 and Schedule 2A of the Compulsory Purchase Act 1965. For this reason, the updated DCO (Revision 3.0) submitted at Deadline 2 (4 December 2018) [WN0902- HZDCO-PAC-REP-00043] replaced article 33 with a new article to deal with modifications to the 1965 Act (to refer to the DCO) and amended Schedule 12 to ensure that section 8 and Schedule 2A of the 1965 Act applied to instances where Horizon sought to acquire a right or impose a restrictive covenant. A full description of the changes to the compulsory acquisition articles to accommodate this amendment is set out in the DCO Amendment Table submitted for Deadline 2 (4 December 2018) [WN0902-HZ-PAC-REP-00009] The Explanatory Memorandum (Revision 4.0) submitted at Deadline 2 (4 December 2018) [WN0902-CLC-PAC- REP-00005] has also been updated to reflect these changes. Implications for the Project of an adverse determination As all land that has been identified as subject to compulsory acquisition is required to facilitate the delivery of the Wylfa Newydd DCO Project, any determination that prevents Horizon acquiring land would have implications for the delivery of the Project. In such instance, Horizon would need to consider whether designs could be modified to avoid the relevant land or may be forced to acquire the entirety of the land outright. However, while undesirable, it is not considered that this would undermine the overall ability to deliver the Wylfa Newydd DCO Project.	

		As noted in the Statement of Reasons Horizon is seeking voluntary agreements with landowners where possible, and so compulsory acquisition powers (and the Schedule 2A process) are provided as a last resort in the event that agreement cannot be reached.	
Q4.0.31	Article 35(4) includes the following “...the undertaker must either acquire the land under paragraph 1(a) or,...”. Clarify the context and the nature of the acquisition referred to.	Article 35(4) provides that before the end of its possession, Horizon must decide whether it wants to acquire the land that it has been temporarily possessing. The extent of the interest that Horizon can acquire under this paragraph will depend on the type of land in question: • If the land is land that has been identified in Schedule 14 (Land of which only temporary possession may be taken), then Horizon can only compulsorily acquire a right in the land – whether that be an existing right, the creation of a new right, the imposition of a restrictive covenant, or powers of entry (article 35(6)). It cannot acquire the land outright. • If the land is Order Land which has not been subject to a notice to treat or vesting declaration (paragraph (1)(a)(ii)), then Horizon can either acquire the land or acquire a right in the land under articles 25, 27 or 31. Where Horizon chooses not to acquire the land, it must remove all temporary works and restore the land to the reasonable satisfaction of the owner (unless other arrangements are agreed to). The updated Explanatory Memorandum (Revision 3.0) submitted at Deadline 1 (13 November 2018) [REP1- 007] provided this clarification in respect of rights under article 35(4).	
Q4.0.32	Article 39 – Clarify the article number referred to in the text “...which article 3838 (Apparatus and rights of statutory undertakers in stopped- up streets) or Part 3 of the 1991 Act applies...”. Is it article 38 as stated in the relevant part of the Explanatory Memorandum?	This is a cross-referencing error and should refer to article 38. This was amended in the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004].	
Q4.0.33	Paragraph 2(3)(b) of draft DCO Schedule 12 contains proposed replacement text for section 58 of the Land and Compensation Act 1973. The proposed replacement text appears to have the effect of introducing a restriction that would cause the last paragraph of section 58 to be only applicable to section 58(1) b. Please justify this or provide alternative drafting so that 51 (a) is still effective.	The intention of this amendment was that the last paragraph would apply to both section 58(1)(a) and (b). However, as section 58 of the Land and Compensation Act 1973 was disapplied in relation to section 8 of the Compulsory Purchase Act 1965, Horizon has removed paragraph 2(3)(b) of Schedule 12 in the the updated DCO (Revision 3.0) submitted at Deadline 2 (4 December 2018) [WN0902-HZDCO-PAC-REP-00043]. Further details of the other consequential changes to the compulsory acquisition articles is set out in response to FWQ4.0.30 above and in the DCO Amendment Table submitted for Deadline 2 (4 December 2018) [WN0902-HZ-PAC-REP-00009].	
Q4.0.34			

	Paragraph 3(2)(b) makes reference to "...paragraph 10 of Schedule 13 to the Wylfa Newydd (Nuclear Generating Station) Order...". Does this reference need to be corrected as there appears to be no paragraph 10 in Schedule 13?	This is an incorrect reference. Paragraph 3(2)(b) should refer to paragraph 10, Schedule 12 as this is the paragraph that modifies Schedule 2A in the Compulsory Purchase Act 1965. This error has been amended in the updated draft DCO (Revision 3.0) submitted at Deadline 2 (4 December 2018) [WN0902-HZDCO-PAC-REP-00043] alongside the other amendments to compulsory acquisition articles as noted above in response to FWQ4.0.30 above.	
Q4.0.35	Paragraph 10.21 of the Explanatory Memorandum (Application Reference Number 3.3 Rev 2.0) notes Schedule 12 to contain modifications to extend compensation provisions and create of new rights and impose restrictive covenants. Please summarise these modifications and provide greater detail on their effects, including those within paragraph 6 of the proposed Schedule 12 in relation to substitute section 8.	The 1965 Act predates the concept of creating and acquiring new rights or imposition of restrictive covenants and only relates to the compulsory acquisition of land. Article 27 and Schedule 12 of the draft DCO, which are modelled on other granted DCOs (and identical in some cases), provide for the compulsory acquisition of rights which extend to new rights and the imposition of restrictive covenants. The amendments to the 1965 Act and the 1973 Act in Schedule 12 ensure that landowners and occupiers are compensated where they suffer a loss as a result of new right acquired or restricted covenant imposed. For example, paragraph 1 makes it clear that any compensation legislation will apply to acquisition of a right by the creation of a new right or the imposition of a restrictive covenant by ensuring that these rights are "read" into the legislation. As noted above in response to FWQ4.0.30 above, paragraph 6 has been deleted as Horizon is no longer replacing a substitute section 8 in respect of the acquisition of rights or imposition of restrictive covenants.	
Q4.0.36	Article 43 – Incorporation of the 1847 Act Explain the practical effect of not incorporating sections 3A to 34, 36, 40 to 50, 59, 60, 67, 71-72, 77 to 82, 85, 89, 91 to 99, 101, 102, and 104 of the 1847 Act into the DCO article 43 (1)	Horizon does not expect there to be any practical effect in terms of the carrying out of the Marine Works or the operation of the harbour as a result of not incorporating these sections of the 1847 Act into the draft DCO. The updated Explanatory Memorandum (Revision 3.0) submitted at Deadline 1 (13 November 2018) [REP1- 007] clarified this position at paragraph 8.7.	
Q4.0.37	Article 43 – Incorporation of the 1847 Act Provide the text of sections 35, 37, 39 and 69 of the 1847 Act as amended by article 43 (2) to (5)	A copy of the text of these sections of the 1847 Act as amended by articles 43(2) to (5) is set out has been submitted as Appendix 4a.	
Q4.0.38	Article 43 – Incorporation of the 1847 Act Explain the practical effect of construing certain definitions in the 1847 Act in accordance with article 43 (6)	The purpose of construing certain definitions in the 1847 Act in accordance with article 43(6) is to ensure that those definitions are appropriately applicable to the 1847 Act and the powers and rights conferred under it. The updated Explanatory Memorandum (Revision 3.0) at Deadline 1 (13 November 2018) [REP1-007] provided this confirmation at paragraph 8.8.	
Q4.0.39	Article 43 – Incorporation of the 1847 Act		

	Explain further what fines and forfeitures might be recoverable, how and by whom (article 43 (7))	Paragraph 8.6 of the updated Explanatory Memorandum (Revision 3.0) at Deadline 1 (13 November 2018) [REP1-007] sets out the sections of the 1847 Act which have been incorporated into the draft DCO including the penalty provisions and paragraph 8.9 confirms that the relevant fines and forfeitures may be recovered summarily.	
Q4.0.40	Article 49 Maintenance of marine works Provide further justification for the power to 'maintain' the marine works – given the meaning of "maintain" as set out in Article 2:	Given the definition of the term "maintain" in article 2 as well as the maintenance power in article 6 of the draft DCO, Horizon deleted article 49 in the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004].	
Q4.0.41	Article 50 – Subsidiary works Please confirm whether the subsidiary works are identified in Schedule 1 (authorised development) and are therefore subject to requirements and caught by the proviso that such other works "necessary or convenient" must not give rise to any materially new or materially different environmental effects from those assessed as set out in the Environmental Statement.	Horizon acknowledges the overlap between article 50 and Schedule 1 of the draft DCO in relation to subsidiary marine works and has deleted article 50 in the updated draft DCO (Revision 3.0) submitted at Deadline 2 (4 December 2018) [WN0902-HZDCO-PAC-REP-00043].	
Q4.0.42	Article 50 – Subsidiary works Provide justification as to why it is "necessary and convenient" to have the power to carry out each of the works identified in Article 50.	Given the overlap between article 50 and Schedule 1 of the draft DCO, Horizon does not consider that the power under article 50 is necessary and so has deleted it in the updated draft DCO (Revision 3.0) submitted at Deadline 2 (4 December 2018) [WN0902-HZDCO-PAC-REP-00043].	
Q4.0.43	Article 53 Power to dredge The applicant explains that: Article 53 gives Horizon the right to dredge within the harbour limits for the purpose of constructing, maintaining and operating the Marine Works. These powers are subject to the requirements set out under the Marine and Coastal Access Act 2009 to obtain marine licences. In addition, the approval of NRW is required to deposit any dredging below mean high water	Whilst the question is not directed to Horizon as the applicant, the following response has been provided by Horizon at this stage: Paragraph 8.33 of the updated Explanatory Memorandum (Revision 3.0) submitted at Deadline 1 (13 th November 2018) confirms that Horizon is applying for a marine licence from NRW in relation to both the construction of the Marine Works and the dredging of the harbour and disposal of the dredged material at Holyhead North. That application has been made and is being considered by NRW in the usual way in accordance with the Marine and Coastal Access Act 2009.	

	springs, and this approval can be given subject to conditions and restrictions. What is the additional approval to deposit referred to by the applicant and what does NRW need to consider before providing this approval? Having regard to the matters relevant to determining a marine licence (section 69 of the Marine and Coastal Access Act) is NRW content that sufficient conditions and restrictions on the power to dredge can be provided in the marine licence (and any other consent to deposit) and that no further controls are required in the DCO in relation to dredging?		
Q4.0.44	Articles 56, 57,58,59,71 Is Trinity House content with the drafting and purpose of Articles 56, 57, 58, 59 and 71? If not, why not?	Whilst the question is not directed to Horizon as the applicant, the following response has been provided by Horizon at this stage: During preparation of the draft DCO (Revision 1.0), Horizon consulted with Trinity House in relation to the drafting of the marine and harbour powers. Trinity House confirmed that it had only minor comments on the wording in the draft DCO which has been incorporated. Correspondence with Trinity House on the drafting of the DCO is attached at Appendix 4b.	
Q4.0.45	Article 59 - Safety of Navigation Is the MCA content with the drafting and purpose of Articles 59? If not, why not?	Whilst the question is not directed to Horizon as the applicant, the following response has been provided by Horizon at this stage: During preparation of the draft DCO (Revision 1.0), Horizon consulted with the Maritime and Coastguard Agency in relation to the drafting of the marine and harbour powers. The Maritime and Coastguard Agency confirmed that it had no comments on the wording in the draft DCO. Correspondence with the Maritime and Coastguard Agency on this point is attached at Appendix 4c.	
Q4.0.46	Article 61 - Byelaws Is it the intention to allow all of the vessels referred to in sub-paragraph (i) to operate in the harbour?	Paragraph 8.50 of the updated Explanatory Memorandum (Revision 3.0) submitted at Deadline 1 (13 November 2018) [REP1-007] confirms that article 61 is based on article 69 of the Hinkley Point C (Nuclear Generating Station) Order 2013 as well as article 4 of the London Gateway Port Harbour Empowerment Order 2008.	

		Horizon intends to have an exclusion zone in place to prevent any leisure vessels operating in certain parts of the harbour, except in emergency situations when exemptions will be provided to vessels in distress.	
Q4.0.47	Article 72: Explain and justify why, given the substantial archaeological investigation that has been carried out, it is necessary to introduce a special procedure for the removal of human remains? Identify any locations where there is a thought to be potential for the discovery of human remains that have not yet been identified.	As set out in paragraphs 9.1 to 9.6 of the Explanatory Memorandum (Revision 4.0) [WN0902-CLC-PAC-REP- 00005], this article has been included on a precautionary basis to provide a process in the event that any other human remains are discovered during construction works. To date, Horizon has undertaken a significant amount of archaeological investigations in areas identified with the potential for the discovery of human remains. This clause is a standard insertion within development consent orders. In the event that any remains are discovered, Horizon will comply with the archaeological mitigation strategy under the Wylfa Newydd Code of Construction Practice [APP-414]. This strategy will be further amended to provide further measures in respect of such finds and has been submitted at Deadline 4 (17 January 2019).	
Q4.0.48	Article 73: Explain why it is necessary to "safeguard any agreement entered into by Horizon pursuant to its rights under article 9(1)(b) (consent to transfer the benefit of Order) so that no other enactment or rule of law may modify or frustrate the rights and obligations of the parties under any such lease or agreement". In what circumstances might it be applied?	This article is intended to deal with any unknown future change of legislation or case law that might prejudice an agreement entered into by Horizon for (say) the construction, operation or maintenance of part of the Wylfa Newydd DCO Project. Therefore, if Horizon granted a lease of part of the site to a company for a period of years, (say) in relation to the provision of welfare services to construction workers, it would be important that some future change in the law relating to landlord and tenant did not prevent Horizon from determining that lease at the end of its term in accordance with its terms. It is important to Horizon that it should have certainty surrounding the commercial arrangements it enters.	
Q4.0.49	Article 74: Explain by way of justification the possible circumstances in which it might be necessary to carry out 'permitted' development within the Order Land on land defined as 'operational' under the powers of the Town and Country Planning (General Permitted Development) Order 1995 in respect of Class B (harbour undertaking) and Class G (electricity undertakers) under Part B of the GDPO. Why is it necessary to seek permitted development rights and why will this potential development not be granted through the DCO?	Paragraph (o) of other associated development in Schedule 1 of the draft DCO enables Horizon to undertake any works as may be necessary or expedient for the purposes of or in connection with the construction, operation and maintenance of the authorised development, provided such works do not give rise to any materially new or materially different environmental effects from those assessed in the ES. (Note: paragraph (o) has been renumbered as paragraph (p) in the updated draft DCO (Revision 3.0) submitted at Deadline 2 (4 December 2018) due to an inclusion within the Schedule in response to FWQ4.02 above.) There may, in future, be works that were not contemplated by the ES but fall within the scope of permitted development rights under Part B of the Town and Country Planning General Permitted Development order 1995/418 in respect of harbour and electricity undertakers. For these types of works Horizon considers it should be in the same position as any other statutory undertakers that has been granted a specific planning permission but still has the benefit of the permitted development rights for operational land under section 264 of the Town and Country Planning Act 1990.	

Q4.0.51	Article 75: is the local planning authority content with the disapplication of the Hedgerow Regulations 1997 as proposed?	Whilst the question is not directed to Horizon as the applicant, the following response has been provided by Horizon at this stage: Horizon considers that the disapplication of the Hedgerow Regulations is appropriate as consent to remove hedgerows is already provided for under article 75 of the draft DCO. Regulation 6(1)(e) of the Hedgerow Regulations provides that hedgerows can be removed for the purposes of carrying out development for which a planning permission is granted; however, a development consent does not fall within the definition of "planning permission" under the Regulations and so Horizon would need to seek consent. Conversely, article 75 of the draft DCO enables the removal of any hedgerow within the Order Limits, and the specified 'important hedgerows' identified in Schedule 17, without the need to seek additional consents. Horizon considers that the disapplication is entirely appropriate as it would otherwise be duplicative of the powers already provided under the draft DCO.	The IACC has confirmed in its response to this question that it is considered that Article 75 should be more specific.
Q4.0.52	Article 76: (a) clarify that all four volumes of the Design and Access Statement are included for certification; and (b) correct the duplication of 'Wylfa Newydd CoCP'.	In the updated draft DCO submitted at Deadline 1 (Revision 2.0) [REP1-004], Horizon made amendments to article 76 (certification of plans, etc.) and inserted a new Schedule 18 (Certified Documents) to ensure the final versions of all documents to be certified are clearly identified. Only the three English volumes of the Design and Access Statement ("DAS") have been identified within this Schedule 18. The reason for this is the fourth volume is actually a Welsh translation of Volume 1 of the DAS. No amendment was proposed in relation to the Wylfa Newydd CoCP as there is no duplication; the other reference is to the Wylfa Code of Operational Practice. Full details of the amendments made to article 76 and Schedule 18 are set out in the DCO Amendment Table [REP1-009] submitted with the updated draft DCO at Deadline 1 (13 November 2018).	
Q4.0.54	Is IACC satisfied that the approved plans listed in Schedule 2 are correct and reflect any changes or amendments that may have occurred since the application was submitted?	Whilst the question is not directed to Horizon as the applicant, the following response has been provided by Horizon at this stage: Schedule 2 has been updated to reflect the latest version of the Land Plans (Revision 2.0) [AS-009] that were submitted following submission in response to the Planning Inspectorate's section 51 Advice [PD-002]. These amendments have been included in Schedule 2 of the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004].	

Q4.0.55	Explain how each requirement satisfies the tests for planning conditions (namely that they should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects).	This question appears to contemplate that Horizon gives an explanation in relation to each requirement in Schedule 3 as to how it complies with the tests for 'planning condition'. In view of the large number of requirements in Schedule 3 and the volume of questions that has been asked by the Examining Authority for Deadline 2 (4 December 2018), Horizon does not have the resources to comply with this request by Deadline 2 (4 December 2018). Horizon has, therefore, set out below an overall explanation as to how its requirements comply with the tests for planning conditions. Horizon would be willing, however, to respond to questions about individual requirements if the Examining Authority had specific concerns. As noted in the Planning Inspectorate's <i>Advice Note 15: Drafting Development Consent Orders</i> (July 2018), DCO requirements must be precise, enforceable, necessary, relevant to the development, relevant to planning and reasonable in all other respects. Each of these criteria are set out below: • <i>Necessary:</i> All of the requirements have been included to ensure that the mitigation referred to in the ES is secured. Horizon has sought to keep the requirements to a minimum and rely on control documents to provide the necessary detail on mitigation measures (e.g. Requirement PW7 (Wylfa Newydd CoCP)). The benefit of this approach is that it enables Horizon to provide more detail in relation to the mitigation than would ordinarily be able to be included in a Statutory Instrument. In addition, it avoids the need for numerous requirements which could create ambiguity and potentially conflict with each other, thereby undermining Horizon's ability to comply with the requirements. Where requirements duplicate detail within control documents (for example, Requirement PW6 and the CoCPs) Horizon has proposed to remove the requirement and rely on the control documents to secure this mitigation. This ensures that only necessary requirements are contained in the draft DCO. Bespoke requirements have been inserted to deal with specific issues that are not dealt with within control documents (e.g. Requirements SPC6 (demolition of alternative emergency control centre/district survey laboratory); PW10 (Wylfa Newydd Decommissioning Strategy); WN13 (Reptile Receptor Site)). • <i>Relevant to planning and the development:</i> All requirements have been identified because they fairly and reasonably relate to the construction, operation and maintenance of the authorised development – both the NSIP and associated development. (e.g. Requirements WN3 and WN9 which relate to the design of the Power Station Site or PW2 (Phasing of the authorised development). All requirements are justified by the nature of the development and due to the effects of the development on surrounding receptors (e.g. Requirements OH9	The IACC does not consider that any of the requirements do not meet the tests for planning conditions. However, the IACC maintains its position that more detail in the existing requirements and the addition of further requirements are necessary before the requirements as a whole are fit for purpose.

		(Water vole enhancement areas: Valley); PW7: Wylfa Newydd CoCP); WN18 (Site Campus health facility)) • <i>Enforceable</i>: All requirements are clear as to what is required to comply with the requirement, for example: ○ by specifying what control documents must be complied with; ○ stating that certain activities (i.e. site clearance or occupation) cannot occur prior to a certain event; or ○ identifying clear triggers when the requirement must be discharged. For these reasons, the requirements are considered enforceable in respect of section 161 of the Planning Act 2008 (breach of terms of order granting development consent) and Horizon will be able to comply with them. For requirements which could be difficult to detect a breach (e.g. Requirement WN27 (Operation and use of the Marine Off-Loading Facility), the requirement requires Horizon to submit monitoring details to IACC to enable IACC to detect a breach of this requirement. • <i>Precise</i>: The Requirements include clear triggers when certain activities should be undertaken, who consent is required from, the process for preparing and submitting revised designs and control documents, and what control documents must be complied with. The interpretation section in paragraph 1 of Schedule 3 of the draft DCO also provides clarity around the implementation of amended plans, discharging authority approval, interpretation of the parameters and the scope of any amendments permitted under the tailpieces (see FWQ4.05.56 below) • <i>Reasonable</i>: The Requirements are all considered reasonable as they can be discharged by Horizon in accordance with the development consent and are not reliant on approvals or activities of third parties who are not identified as the discharging authority.	
Q4.0.56	3 (4) attempts to limit the extent to which a tailpiece (or other drafting) might permit changes to the approved scheme to only those minor or immaterial changes which have been subject to EIA. The applicant's attention is drawn to: Section 17 of Advice Note 15 https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2014/10/advice_note_15_version_1.pdf	Validity of Tailpieces A number of the requirements in the draft DCO include tailpiece wording “unless otherwise approved by the relevant planning authority”. The purpose of this wording is to enable a level of flexibility in the discharge of certain requirements within the DCO. Such flexibility is helpful to enable the most effective design solution/methods to be applied at the stage the Requirement is discharged, which at present may be unknown and/or the detail of which will be established much later in the Wylfa Newydd DCO Project. Although the cases cited were in the context of the Town and Country Planning Act 1990, and not a statutory instrument like the draft DCO, they illustrate that the Courts have accepted that tailpieces are acceptable provided they include sufficient limitations. As noted in the <i>Hurbert and Midcounties Co-operative</i> cases referred to (as well as <i>R (Butler) v East Dorset District Council</i> [2016] EWHC 1527 (Admin)), the Courts have	IACC accepts that some flexibility is required and that tailpieces can provide that however this goes too far in allowing deviation from CoCPs which are to be certified documents. Allowing changes to these documents would mean that the ExA can have no certainty that the development will be carried out in the manner considered by it or that the mitigations considered during examination will be delivered.

	R. (on the application of Hubert) v Carmarthenshire CC Queen's Bench Division (Administrative Court), 05 August 2015 R. (on the application of Midcounties Co-operative Ltd) v Wyre Forest DC Queen's Bench Division (Administrative Court) 27 March 2009 Having regard to the above, provide commentary for each requirement which provides flexibility in relation to approving and varying final details whether or not by use of a tailpiece (for example PR3 which would appear to have the same effect as a tailpiece in that it would allow the applicant to amend/alter the design and layout of the proposed park and ride facility at a later stage). This commentary should justify why the flexibility is necessary and confirm that it would not have the effect of allowing the LPA to permit materially different development from that assessed in the ES and fixed by the parameters of the DCO in the detailed design drawings (thereby bypassing the need to seek authorisation for a change through section 153 of the Planning Act 2008) or to dispense altogether with the need for any scheme. The applicant is also asked to have regard to Regulations 18 to 19 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 and the definition of "subsequent application" and to consider whether any drafting in the DCO (e.g. Article 79 and Schedule 18) and requirements needs to be changed as a consequence.	been willing to accept tailpieces that are limited so that material changes to the scope of a development or environmental effects beyond that which has been assessed by the Local Planning Authority cannot be allowed. The Planning Inspectorate, in its Advice Note 15, has also confirmed that provided that the tailpiece is limited in such a way that ensures the scope of the consented Authorised Development remains the same and cannot be dispensed with, tailpieces may be appropriate within DCO requirements. The general approach that has been taken in a number of other DCOs (such as the Hinkley Point C, North London Heat and Power and Thames Tideway Tunnel DCOs) has been to limit the application of tailpiece by providing a separate interpretation clause that clarifies that the tailpiece provision can only be used to approve variations which are non-material and are unlikely to give rise to any materially new or materially different effects from those assessed in the environmental statement. The draft DCO adopts this approach by including an interpretation clause (Schedule 3, paragraph 1(4)) which is identical to the provision to Hinkley (and subsequent DCOs) and confirms that approvals can only be given for minor, non-material changes that are unlikely to give rise to new or materially different environmental effects from those assessed in the ES: [...] "(4) Where an approval of details or other document is required under the terms of any Requirement or where compliance with a document contains the wording "unless otherwise agreed" by the discharging authority, such approval of details or of any other document (including any subsequent amendments or revisions) or agreement by the discharging authority is not to be given except in relation to minor or immaterial changes or deviations where it has been demonstrated to the satisfaction of the discharging authority that the subject matter of the approval or agreement sought does not give rise to any materially new or materially different environmental effects to those assessed in the Environmental Statement." In this respect, the tailpieces within the draft DCO Requirements are sufficiently limited in that any potential variations to the requirement must still fall within the effects assessed in the ES. For these reasons, the use of tailpieces within the draft DCO Requirements is considered to be appropriate and lawful. Infrastructure Planning (Environmental Impact Assessment) Regulations Horizon does not consider Regulations 18 and 19 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 are relevant as these regulations would only apply in instances where it has	

		become clear that the original ES is not adequate to assess the environmental effects of the development sought in the subsequent application. The use of the tailpiece does not enable Horizon to amend approved plans or seek change to approved controls that would enable it to undertake development which has not already been assessed as part of the ES submitted with the DCO application. The interpretation clause in Schedule 3, paragraph (4) of the draft DCO ensures that the use of tailpieces is restricted.	
Q4.0.58	1 (5) How are vents, chimney stacks and flues dealt with in Article 3 (1) (5) – are they included or excluded from the envelope of the building?	Chimney stacks and flues would not be included within Schedule 3 paragraph 1 (5) of the draft DCO and would be subject to other relevant parameters in Schedule 3 (for example, stacks have their own parameters in Table WN4B). Minor vents that are associated with air conditioning units or other mechanical plant are "mechanical plant" within Schedule 3 paragraph 1 (5) and would not be within the building envelope.	
Q4.0.59	PW6 - specifically provides protection of breeding wild birds. Why are the same protections not proposed for other protected species such as Great Crested Newts, Bats etc.	The approach that Horizon has taken to the draft DCO Requirements is to require compliance with control documents which set out all the detailed controls on Horizon during construction and operation of the Wylfa Newydd DCO Project. Therefore, the Wylfa Newydd Code of Construction Practice ("CoCP") sets out the various controls/protections in relation to protected species (e.g. bats, water voles, Great Crested Newts, red squirrels, otters, and notable mammals) as well as other species such as hedgehogs and invertebrates. The CoCP also includes measures relating to breeding wild birds (refer to sections 11.2.23 to 11.2.27 of the updated CoCP submitted at Deadline 2 (4th December 2018) [WN0902-JAC-PAC-REP-00007]). Requirement PW6 was inserted in response to particular concerns raised by stakeholders; however, as it replicates the protections within the Wylfa Newydd CoCP, Horizon proposes to remove this requirement as part of this updated DCO submitted at Deadline 2 (4th December 2018) (WN0902-CLC-PAC-REP-00004). This will ensure certainty on enforcement and compliance as Horizon will only have to refer to one document in understanding its obligations during construction. (Refer to the DCO Amendment Table submitted for Deadline 2 (4 December 2018) [WN0902-HZ-PAC-REP- 00009] for details of controls within the CoCPs in respect of breeding birds.)	

Q4.0.60	PW8 - the Wylfa Newydd Code of Conduct would appear not to need to be submitted to or approved by IACC. Has this been discussed and agreement reached between the Applicant and IACC? If not, why not?	Agreement has not been reached with IACC on this approach. The justification for providing that Horizon only has to provide a copy of the Wylfa Newydd Code of Conduct to IACC for information only is that the Code of Conduct would need to be prepared in accordance with the principles set out in the Workforce Management Strategy [APP-413]. These principles are subject to scrutiny during the examination and would be approved in any granted DCO as a certified document. Horizon is considering what amendments can be made to the Workforce Management Strategy so that the principles provide more certainty to IACC on the behavior that will be required of the workforce and Horizon's construction partners. Horizon will submit an updated version of the Workforce Management Strategy at Deadline 4 (17 January 2019).	
Q4.0.61	PW9 –provide a justification as to why (1) one month and (2) three months would be appropriate timescales?	In the original draft DCO, Requirement PW9 required Horizon to give notice of the date of final commissioning and permanent cessation of electricity generation "as soon as reasonably practicable". This Requirement was amended in the updated draft DCO submitted at Deadline 1 (13th November 2018) (Revision 1.0) to refer to the "Unit 1 Commissioning Date" and "Unit 2 Commissioning Date" as these have now been defined in response to FWQ4.0.68 below. The requirement to provide the notice either one month (for Commissioning Dates and the commencement of the operational period) or three months (for cessation of generating activities) after these events occur have been provided as a backstop to ensure that there is a clear deadline by which Horizon must provide these notices. Horizon considers these dates are reasonable and acknowledges that there is still the option to provide the notices as soon as reasonable practicable.	Revision 3 of the DCO submitted at deadline 2 provides only that PW9 Date of commissioning and cessation (1) The undertaker must notify IACC of the Unit 1 Commissioning Date and Unit 2 Commissioning Date and operational period of each Unit as soon as reasonably practicable. Contrary to the answer given this does not provide any backstop at all. The IACC objects to this maintains that as the obligation is only to notify, five working days would be appropriate.
Q4.0.62	SPC4 – applies to European Protected Species. Should other protected species have similar requirements? If not, why not?	The approach that Horizon has taken to the draft DCO Requirements is to require compliance with control documents which set out all the detailed controls on Horizon during construction and operation of the Wylfa Newydd DCO Project. Therefore, the Wylfa Newydd Code of Construction Practice ("CoCP") sets out the various controls/protections in relation to the protection of European Protected Species and other protected species (e.g. bats, water voles, Great Crested Newts, red squirrels, otters, and notable mammals) as well as other species such as hedgehogs and invertebrates. On review of this Requirement, Horizon has identified a duplication between the pre-commencement controls for European Protected Species in the requirement and the Wylfa Newydd CoCP and other CoCPs. To avoid duplication and confusion, Horizon has removed this requirement in the updated draft DCO (Revision 3.0) submitted at Deadline 2 (4 December 2018) [WN0902-HZDCO-PAC-REP-00043] so that pre-commencement controls for all relevant species are set out in the CoCPs. This will ensure certainty on enforcement and	HNPs response is noted.

		compliance as Horizon will only have to refer to one document in understanding its obligations during construction. (Refer to the DCO Amendment Table submitted for Deadline 2 (4 December 2018) [WN0902-HZ-PAC-REP- 00009] for details of controls within the CoCPs in respect of pre-commencement surveys and vegetation clearance.)	
Q4.0.63	SPC5 –provide the information that is currently omitted and shown as [*].	As noted above in respect of FWQ4.0.59 and 4.0.63, Horizon considers that key controls should be secured in the control documents. For this reason, Horizon has deleted Requirement SPC5 in the updated draft DCO (Revision 3.0) submitted at Deadline 2 (4 December 2018) [WN0902-HZDCO-PAC-REP-00043] and made an amendment to the updated Main Site Power Station sub-CoCP (Revision 2.0) [WN0902-JAC-PAC-REP- 00019] to ensure that controls are included within the sub-CoCP.	IACC notes that the revised Main Site Sub CoCP submitted at Deadline 2 states at paragraph 11.4.1 that: <i>Works associated with Works No.12 in the draft DCO [APP-029] may not be undertaken on land to the west of Afon Cafnan and bound by the Order limits during the period 7th March – 15th August unless otherwise agreed with IACC in consultation with NRW.</i>
Q4.0.64	SP6 –why is this requirement necessary?	This Requirement, which replicates draft condition 26 of the site preparation permission, has been inserted following discussions with Magnox as provision of an alternative emergency control centre and district survey laboratory is a requirement under its nuclear site licence and so demolition of the existing facilities can only occur once new facilities have been provided and are operational. This requirement ensures that Magnox will not be in breach of its nuclear site licence.	The IACC confirms that this replicated the draft condition of the SP&C TCPA.
Q4.0.65	SPC12 – given the size of the proposed construction vehicles, is the proposed 8 meters setback for gates sufficient to ensure that waiting vehicles would be clear of the highway?	The 8m set back is a standard set-back distance proposed by the IACC County Highways Officer. It is intended to ensure that there is a solid access onto, and from, the public highway to minimise the potential for tracking issues, not to accommodate the entire length of a longest vehicle.	The IACC confirms that this is in accordance with what was requested as part of the SPC TCPA application. However, it should be noted that the IACC would also seek adequate wheel washing facilities to be provided at each access point.
Q4.0.66	WN4A –why under the maximum parameter are there two columns for height – H (m) and H (m AOD) and why is there only H (m) for the minimum parameter?	Table WN4A sets out the parameters that apply to the buildings within the WNDA. In respect of height parameters, maximum and minimum heights are given: • maximum height of the building in metres above finished ground level (m); and • maximum height of the building in metres Above Ordnance Datum (m AOD). Minimum height is only provided in respect of metres above finished ground level. The reason for providing two maximum building height parameter heights is because of the use of platform parameters (Requirement WN5) which enable Horizon to construct the finished ground level within a maximum and minimum range.	IACC has requested that both heights are provided in order to allow meaningful assessment of the parameters and would submit that this increases the clarity and legibility of the DCO for the planning authority and should be retained.

		The buildings listed in Table WN4A, and the noise sources for which they provide screening are all located within Parameter Zone 1A which has a minimum platform height of +6 (m AOD) and a maximum platform height of +22 (m AOD) under Requirement WN5. The noise screening provided by the buildings depends principally on the height of the building relative to the noise source. For noise screening, it is the maximum height that is relevant and so only the height of the building above ground that is required to define the minimum parameter. A number of other FWQs have raised queries regarding height measurements. In the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004], Horizon inserted a new interpretation clause in Schedule 3 paragraph 1(8): "Unless otherwise stated, all maximum and minimum heights are to be measured from above finished ground level."	
Q4.0.67	WN7 – why is H (m above finished ground level) used here rather than AOD?	Requirement WN7 sets out the parameters that apply to the conductor containment and support structures for the Grid Connection. As noted in Table WN7, only a maximum height in meters above finished ground level has been provided. The reason for this is that the Conductor containment support is an engineering driven structure and unlike other buildings within the Power Station Site it will need to be constructed up to the maximum parameter irrespective of the finished ground level. For simplicity, only a maximum parameter above finished ground level is provided. Where the structure passes through Zone 1A the maximum height AOD can be determined using Table WN5. Due to the amendment noted in FWQ4.0.66 above, Requirement WN7 was also amended in the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004] to remove reference to “above finished ground level” as this is now taken as read within the Requirements (as per Schedule 3, paragraph 1(8) in draft DCO).	
Q4.0.68	WN9 (1) – What is meant by ‘commissioned’ and should this be included in Article 2 - Interpretation? Is IACC satisfied with this as a trigger for the submission of the final landscape and habitat scheme? WN9 (2) Should this be reworded to include but not limited to details of? Should the list be expanded to include hard landscaping details;	WN9(1) - Definition of “commissioned” In the original draft DCO, Requirement WN9 provided that within 12 months prior to Unit 2 being commissioned, Horizon will be required to submit its final Landscape and Habitat Scheme to IACC for approval. In the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004], Horizon amended this requirement to provide more certainty on when this document would be submitted. This has resulted in the following definitions being included or amended in Schedule 3 of the draft DCO:	Without prejudice to the IACCs deadline 2 responses that these triggers are too late (which objections are maintained), if the ExA accepts the Horizon amendments, IACC would request that the ExA seek clarity on how the new dates referred to in the definition (ie: the date on which first nuclear fuel assembly enters...) are independently established and also adds a requirement on Horizon to give notice of their occurrence to the IACC.

	lighting; street furniture and signage; boundary treatment etc.? WN9 (4) as worded this seems to place the onus on IACC to identify seriously damaged or diseased trees and shrubs during the 5 year aftercare period. If this is the case, does IACC have the resource and expertise to undertake this requirement and if not, why not?	• "Unit 1 Commissioning Date" means the date on which first nuclear fuel assembly enters Unit 1; • "Unit 2 Commissioning Date" means the date on which first nuclear fuel assembly enters Unit 2; • "Unit 1" or "Unit 2" means one of the twin unit nuclear reactors described in Work No.1A of Schedule 1 of this Order (Authorised development) and reference to "Unit" is to be construed as either unit; With these new definitions, Requirement WN9 now requires the final Landscape and Habitat Scheme to be submitted to IACC for approval prior to the anticipated Unit 2 Commissioning Date (refer to the updated draft DCO (Revision 2.0)). WN9(2) – Without limitation Requirement WN9(2) provides that the final landscape and habitat scheme for the WNDA must be prepared in accordance with the principles in the Landscape and Habitat Management Scheme and include a number of matters listed. Article 2(10) provides that where the expression "includes" is used within the draft DCO, it is to be construed without limitation. However, for the avoidance of doubt, Horizon amended this clause in the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13th November 2018) so it is clear that this interpretation also applies to "include". WN9(2) – Additional matters In the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13th November), Horizon amended Requirement WN9(2)(h) to include these additional matters. In order to ensure that there were principles applying to these additional matters (lighting), Horizon will also consider whether to amend the Landscape and Habitat Management Strategy. WN9(4) – Damaged or diseased trees Under Requirement WN9(4) it is Horizon's obligation to ensure that all planting is established and maintained over a 5-year period, although it may seek confirmation from IACC where a tree is seriously damaged or diseased before it seeks to remove it. This is considered appropriate as IACC has more expertise to make this determination than Horizon and it ensures that there are appropriate safeguards on when trees can be removed. Horizon considers that IACC has the necessary expertise and resources to undertake this role. To note, that where a management plan is submitted and approved under Requirement WN11, Horizon would undertake management of that landscape or habitat in accordance with the approved scheme.	

Q4.0.70	WN13 (1) should 'Reptile Receptor Site has been...' be replaced with 'Reptile Receptor Site must be...'? If not, why not?	Requirement WN13(1) requires that within 12 months of the authorised development commencing, a management scheme for the Reptile Receptor Site will be submitted. In the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004], Horizon inserted "must be" into this Requirement WN13(1). This aligns the language to the Requirement WN12 (Notable Wildlife Enhancement Area).	HNPs response is noted.
Q4.0.71	WN14 (1) should 'Great Crested Newt Receptor Site has been...' be replaced with 'Great Crested Newt Receptor Site must be...'? If not, why not?	Requirment WN14(1) requires that within 12 months of the authorized development commencing, a management scheme for the Great Crested Newt Receptor Site will be submitted. In the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004], Horizon inserted "must be" into this Requirement WN14(1). This aligns the language to the Requirement WN12 (Notable Wildlife Enhancement Area).	HNPs response is noted.
Q4.0.72	WN15 and WN16 – These requirements control the number of parking spaces proposed during construction and operation. Can the Applicant: explain why this is worded as a maximum rather than a specific number? Explain why there is no minimum number? indicate where in the DCO, the design and layout of the car parking,(including provision of disabled parking spaces; electric vehicle charging points; lighting; drainage; provision of petrol/oil interceptors or other methods of pollution control etc.) is detailed and secured?? Is IACC, as Local Highways Authority, content that this refers only to a maximum number of spaces rather than a specific number of spaces? Is IACC, as Local Highways Authority, satisfied that there is a mechanism by which it will be able to ensure approval of the design and layout of the car parking? If so, how?	Maximum provision In respect of car parking provisions, unless otherwise agreed with IACC: - Requirement WN15 specifies a maximum of 1,900 car parking space within the WNDA during the construction of the Wylfa Newydd DCO Project; and - Requirement WN16 specifies a maximum of 700 permanent car parking spaces during the operation of the Wylfa Newydd DCO Project, and 1,000 temporary spaces for outage events (as amended by the draft DCO (Revision 3.0) submitted at Deadline 2 (4 December 2018) [WN0902-HZDCO-PAC-REP-00043]. The number of car parks required is based on the trip generation analysis, which is explained in Appendix C2-4 - DCO Transport Assessment [APP-101]. The actual number of car parks provided at a given time will be phased according to the demand at that point of the construction and operational timetable (for example, operational parking requirements will increase during outage testing). As such, Horizon does not consider that minimum requirements are necessary, as it is directly in Horizon's interest in terms efficient construction delivery and operational requirements to ensure that there is adequate provision of parking at any point in time. Design Details For construction, Horizon is not proposing to submit detailed design drawings for car parking as these will be temporary facilities only. However, Requirement WN15 requires Horizon to ensure that parking provision does not exceed 1,900 on site.	The IACC does not accept that Horizon's response provides any comfort that suitable levels of parking provision will be provided. Stating that it is in Horizon's interest to provide these gives no enforceable level of provision which the IACC can rely upon and provision cannot be considered to be secured.

		For operation, details of operational car parking would be provided as part of the detailed design drawings submitted to IACC for approval under Requirement WN3. Designs submitted under Requirement WN3 must be prepared in accordance with the principles in the Design and Access Statement (Volume 2 – Power Station Site) [APP-408] which includes principles relating to: • lighting design; • drainage; • location of car parking; and • electric vehicle charging points.	
Q4.0.74	Table WN20 – no point from which height is to be measured is given – should this be AOD?	The maximum and minimum heights for the Site Campus stated in Table WN20 are from above finished ground level. As noted above at FWQ4.0.66, the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004] now includes an interpretation clause that clarifies that, unless stated otherwise, all references to "m" in relation to parameter heights should be taken to mean above finished ground level. (Refer to Schedule 3, paragraph 1(8) of the updated draft DCO (Revision 2.0).)	IACC has requested that both heights are provided in order to allow meaningful assessment of the parameters and would submit that this increases the clarity and legibility of the DCO for the planning authority and should be retained
Q4.0.75	(b) WN21(2) (a) should this list be prefaced with “include but not limited to”? Should (e) include a reference to hedges? Should the list be expanded to include means of enclosure; external and street lighting; street furniture and signage? Does IACC have the resource and expertise to undertake this requirement and if not, why not?	WN21(2) – Without limitation Requirement WN21(2) provides that the detailed landscape design for the Site Campus must be prepared in accordance with the principles in the Design and Access Statement [APP-407/408/409] and include a number of matters listed. Article 2(10) provides that where the expression “includes” is used within the draft DCO, it is to be construed without limitation. However, for the avoidance of doubt, Horizon amended this clause in the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004] so it is clear that this interpretation also applies to “include”. WN21(2) – Additional matters In the updated draft DCO submitted at Deadline 1 (13th November 2018), Horizon amended WN21(2)(e) and (f) to include a reference to hedges and these additional matters within the detailed landscape design provided under this Requirement. In order to ensure that there were principles applying to these additional matters (signage, street furniture and means of enclosure) Horizon will consider whether to amend the Design and Access Statement (Volume 3 (Part 1) [APP-409]. WN21(4) – Damaged or diseased trees Under Requirement WN21(4) it is Horizon's obligation to ensure that all is established and maintained over a 5-year period, although it may seek confirmation from IACC where a tree is seriously damaged or diseased	Article 2(10): IACC recommends that Article 2(10) be amended so that it is clear that this interpretation applies to “includes”, “include” and “including”. WN21(2) – see IACC response to Q4.0.75, which states that WN21(2e) should refer to hedges and also scrub, grasslands, cloddiau and stone walls. DAS Volume 3 Part 1 should be revised to provide design principles for these additional matters. See IACC response to ExA Q4.0.75 regarding amendments to WN21(4).

		before it seeks to remove it. This is considered appropriate as IACC has more expertise to make this determination than Horizon and it ensures that there are appropriate safeguards on when trees can be removed. Horizon considers that IACC has the necessary expertise and resources undertake this role. In the original draft DCO (Revision 1.0), Requirement WN23 required Horizon to submit a decommissioning strategy for the Site Campus no later than six months prior to any decommissioning works commencing. In the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004], Horizon amended Requirement WN23 to provide a clear deadline for submission of three months prior to the anticipated Unit 2 Commissioning Date: WN23 Site Campus decommissioning strategy (1) Decommissioning of the Site Campus must not commence until a decommissioning strategy has been submitted to ~~and approved by~~ <u>IACC for approval.</u> (2) A decommissioning strategy submitted under sub-paragraph (1) must be submitted to IACC <u>for approval no later than six three months prior to the anticipated Unit 2 Commissioning Date</u> ~~any decommissioning works~~, unless otherwise agreed with IACC, and must include details of— (a) the timeframes and phasing of decommissioning, removal and restoration works; and (b) works to restore the site to agricultural use. (3) <u>Any decommissioning strategy submitted under sub-paragraph (2) must be in general accordance with the Wylfa Newydd CoCP and the Power Station Main Site sub-CoCP.</u> (4) ~~The demolition and removal~~ <u>Decommissioning</u> of the Site Campus and restoration of the site must be undertaken in accordance with the decommissioning strategy approved under sub-paragraph (1), unless otherwise approved by IACC The justifications for all amendments have been set out in the DCO Amendment Table [REP1-009] submitted at Deadline 1 (13 November 2018). In particular, the following reference has been inserted to align with other decommissioning requirements: - Reference has been inserted to the Wylfa Newydd CoCP and the Power Station Main Site CoCP as paragraph (3). - The timeframes for submission have been reduced to three months prior to commissioning. - A new definition of "Unit 2 Commissioning Date" has been inserted in Schedule 3 (refer to response to FWQ4.0.68). Use of AOD	IACC considers that other measurement which more readily allow for impact assessment (such as MLW) would be more appropriate. IACC notes that further definitions have been added at revision 2 but don't consider that these are particularly helpful.
Q4.0.76	WN23 - this does not appear to provide a trigger date/activity for the submission of the decommissioning strategy and therefore as currently worded, could the site campus facility be permanently retained? As the site campus is defined as a temporary facility, how should the requirement be amended to include a trigger for the submission of these details?		
Q4.0.78	WN26 (a), (b), (c) and (d) - is AOD the correct point of reference or would Above Chart Datum (ACD), Mean High Water (MHW) or		

	Mean Low Water (MLW) be more appropriate? Should definitions be provided for crest and roundhead in Table WN26a?	Tables WN26A, B, C and D all refer to AOD when giving the maximum and minimum heights of the marine works. AOD is the correct reference point for the land based or above sea level structures comprising the Marine Works. It is arguable that ACD could have been used for dredging within Table WN26B; however, in practice AOD is appropriate. In addition, use of AOD ensures alignment between the DCO drawings and the Marine Licence Drawings. Definitions of crest and roundhead In the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004], Horizon included the following definitions: • "Base" means the base of the breakwater measured at the interface with the finished seabed; • "Crest" means the nominal level top of the breakwater; Roundhead was deleted from the table, as crest was considered to be a more appropriate measurement point. To give effect to these new definitions, Table WN26A was then amended in the updated draft DCO (Revision 2.0): Table WN26A <table><tr><th rowspan="2">Breakwater</th><th rowspan="2">Parameter Zone</th><th colspan="3">Maximum Parameter (Crest)</th><th colspan="3">Minimum (Crest)</th></tr><tr><th><u>L (Crest)</u> (m)</th><th><u>W (Base)</u> (m)</th><th><u>Height at roundhead (Crest)</u> (m)</th><th><u>L (Crest)</u> (m)</th><th><u>W (Base)</u> (m)</th><th><u>Height at roundhead AOD</u> (m AOD)</th></tr><tr><td>West Breakwater</td><td>1F-4</td><td>402</td><td>130</td><td>14</td><td>398</td><td>-</td><td>10</td></tr><tr><td>East Breakwater and Shore Protection</td><td>1F-5</td><td>240</td><td>100</td><td>13</td><td>150</td><td>-</td><td>9</td></tr></table>	Breakwater	Parameter Zone	Maximum Parameter (Crest)			Minimum (Crest)			<u>L (Crest)</u> (m)	<u>W (Base)</u> (m)	<u>Height at roundhead (Crest)</u> (m)	<u>L (Crest)</u> (m)	<u>W (Base)</u> (m)	<u>Height at roundhead AOD</u> (m AOD)	West Breakwater	1F-4	402	130	14	398	-	10	East Breakwater and Shore Protection	1F-5	240	100	13	150	-	9	
Breakwater	Parameter Zone	Maximum Parameter (Crest)			Minimum (Crest)																												
		<u>L (Crest)</u> (m)	<u>W (Base)</u> (m)	<u>Height at roundhead (Crest)</u> (m)	<u>L (Crest)</u> (m)	<u>W (Base)</u> (m)	<u>Height at roundhead AOD</u> (m AOD)																										
West Breakwater	1F-4	402	130	14	398	-	10																										
East Breakwater and Shore Protection	1F-5	240	100	13	150	-	9																										
Q4.0.79	WN 28 - What is the relationship between this requirement and the consents required (by NRW) for depositing as set out in Article 53? Is the flexibility under the requirement “unless otherwise agreed with NRW” consistent with	Horizon is applying for a marine licence from NRW in relation to the dredging for the harbour and disposal of the dredged material at Holyhead North, which is the work described in the Requirement WN28. The tailpiece added to this requirement "unless otherwise agreed with NRW" allows Horizon to retain flexibility and account for any variation of the marine licence without the need to make equivalent amendment to the draft DCO.																															

	the need to secure a variation of any such consents? WN28 Disposal of Dredged Material Any surplus dredged material arising from the authorised development that cannot be re- used must be disposed of at Holyhead North, unless otherwise agreed with NRW.		
Q4.0.80	OPSF2 – Is IACC satisfied that the requirement would adequately secure the proposed facilities including for example: drainage, noise from plant, archaeological implications and management, car park design and layout, refuse collection, cycle storage etc.? (4) How would the landscaping details that would be managed by (4) submitted/approved? Should this be a separate requirement? Does IACC have the resource and expertise to undertake this requirement and if not, why not?	Securing design principles Horizon has not submitted any detailed designs for the Off-Site Power Station Facilities to be approved under the draft DCO. Under Requirement OPSF2, no construction can commence until Horizon submit detailed designs for all buildings and structures comprising the Off-Site Power Station Facilities to IACC for approval, and that approval is subsequently granted. These designs must be in accordance with the principles set out in section 3 of the Design and Access Statement (Volume 3 (Part 1)) which include principles relating to: • landscaping design; • positioning and screening of buildings to mitigate and reduce noise impacts on nearby receptors; • drainage treatment; • integration with the surrounding landscape and existing heritage features; • layout and design of the carpark (including location of staff car parks, turning requirements and use of permeable materials); • location and design of refuse; and • lighting design. This ensures that Horizon must ensure that key design requirements (which give effect to mitigation in the ES) are secured and that IACC must approve the design of the Off-Site Power Station Facilities before Horizon can undertake any construction on the site. OPSF2(4) – Maintenance of landscaping The details of the landscaping to be maintained under OPSF2(4) would be approved as part of the designs submitted for IACC approval under Requirement OPSF2(1). Given the size of the site and the anticipated landscaping, Horizon does not consider it necessary to have a separate requirement or scheme for the maintenance of landscape planting.	

		Under Requirement OPSF2(4) it is Horizon's obligation to ensure that all planting is established and maintained over a 5-year period, although it may seek confirmation from IACC where a tree is seriously damaged or diseased before it seeks to remove it. This is considered appropriate as IACC has more expertise and resources to make this determination than Horizon and it ensures that there are appropriate safeguards on when trees can be removed. Horizon considers that IACC has the necessary expertise and resources to undertake this role.	
Q4.0.81	Table OPSF3 – no point from which height is to be measured is given – should this be AOD?	The maximum and minimum heights for the Park and Ride facility stated in Table PR4 are from above finished ground level. As noted above FWQ4.0.66, the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004] now includes an interpretation clause that clarifies that, unless stated otherwise, all references to "m" in relation to parameter heights should be taken to mean above finished ground level.	IACC has requested that both finished heights and a maximum/minimum AOD for the finished ground level are provided in order to allow meaningful assessment of the parameters and would submit that this increases the clarity and legibility of the DCO for the planning authority.
Q4.0.82	OPSF5 - is entitled operational car and cycle parking but the requirement only refers to parking spaces –does the requirement need to encompass cycle parking? Emergencies does not appear to be defined in order to meet the enforceability test for requirements should it be? The car parking is stated as a maximum rather than a specific number, is this acceptable to the IACC/Highway Authority? Unless details are provided as part of OPSF2 the design/layout of the parking including drainage, lighting, disabled parking spaces and electric vehicle charging points etc. is not required to be submitted and approved – is this acceptable to the IACC/Highways Authority?	Title of OPSF5 This is an error in the title and reference to cycle parking has been removed from the title of Requirement OPSF5 as part of the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1- 004]. Definition of emergency In response to this question, Horizon inserted the following definition of "emergency" into Requirement OPSF5 in the updated draft DCO (Revision 2.0): <u>(2) For the purposes of this requirement, an "emergency" means an event where the Off-site Power Station Facilities will be operational due to an emergency event occurring at the Power Station Site, which makes the primary emergency response facilities at the Power Station Site inoperable or in use to support the emergency response on the Power Station Site and/or prevents access to the Power Station Site.</u> This definition is considered appropriate to deal with the situation where the Off-Site Power Station Facilities must be brought into full operational effect to deal with an incident at the Power Station – either to support the emergency response facilities at the Power Station, or because these emergency facilities are rendered inoperable. Maximum provision	IACC is of the opinion that cycle parking should be provided

		In respect of car parking provisions, Requirement OPSF5 specifies a maximum of 67 car parks during the operation of the site. The number of car parks required is based on the trip generation analysis, which is explained in Appendix C2-4 - DCO Transport Assessment. As such, Horizon does not consider that minimum requirements are necessary, as it is directly in Horizon's interest in terms of operational requirements to ensure that there is adequate provision of parking at any point in time. Securing design Horizon has not submitted any detailed designs for the Off-Site Power Station Facilities to be approved under the draft DCO. Therefore, in order to undertake any construction on the site, Horizon must submit detailed designs for all buildings and structures comprising the Off-site Power Station Facilities to IACC for approval (Requirement OPSF2). These designs must be in accordance with the principles in the set out in section 3 of the Design and Access Statement (Volume 3 (Part 1)) which include principles relating to: • Landscaping design; • Drainage treatment; • Layout and design of the carpark (including location of staff car parks, turning requirements and use of permeable materials); and • Lighting design. Provision of electric charging points have not been included due to the size of the site and the nature of the vehicles that would be located there. It is also relevant that IACC does not currently have a policy requirement for charging points to be provided. Design principles for other sites, such as the Park and Ride facility, do include the requirement to provide electric car charging points due to the large scale of that facility and its proposed use. Requirement OPSF2 therefore ensures that the key design requirements (including layout and design, drainage and lighting of the car park) must be incorporated in the detailed designs that Horizon bring forward. These detailed designs must then be approved by IACC.	The IACC does not accept that Horizon's response provides any comfort that suitable levels of parking provision will be provided. Stating that it is in Horizon's interest to provide these gives no enforceable level of provision which the IACC can rely upon and provision cannot be considered to be secured. IACC is of the opinion that charging points for electric vehicles should be provided in view of the UK Government's recent "Road to Zero Strategy" (July 2018) and the likelihood that some employees at, and visitors to, the Off-Site Power Station Facilities site will have
Q4.0.83	Signpost where in the application a decommissioning strategy for the off- site power station facilities is secured.	Decommissioning of the Off-Site Power Station Facilities is included as part of the Overarching Decommissioning Strategy required under Requirement PW10. Requirement PW10 applies to the Power Station (Work No.1), Grid Connection (Work No.4) and Off-Site Power Station Facilities (Work No.5).	Horizon have neglected to clarify that the plans in Schedule 2 do not included any <u>detailed</u> landscape schemes, only outlines. The IACC would like two additional requirements to be added to the DCO to that require detailed landscape and restoration schemes to be submitted to IACC for its approval

Q4.0.84	Confirm whether the detailed drawings relating to the park and ride facility in Schedule 2 of the draft DCO include details of landscaping and a maintenance regime given that there currently appears to be no requirement, apart from maintenance, regarding landscaping for the park and ride facility? IACC may wish to comment?	As part of the DCO application, Horizon submitted landscape plans for the Dalar Hir Park and Ride facility (refer to WN0902-HZDCO-ADV-DRG-00035) [APP-023]. These plans are marked as for approval as part of the DCO and show areas of retained areas of trees, shrubs, and hedgerow, new hedgerow, native tree and shrub and grassland planning and retained or new stone walls. Under Requirement PR2, Horizon must undertake construction of the Park and Ride facility in accordance with the detailed design drawings identified in Schedule 2 of the draft DCO. (Note that updated plans have been submitted as part of Deadline 2 (4 December 2018) [WN0902-HZDCO-PAC-REP-00043] to accommodate flood mitigation). Horizon acknowledges that Requirement PR2 does not contain a corresponding requirement to maintain the planting as has been included in Requirement PR3 (i.e. where Horizon seeks to submit new detailed design drawings to IACC for approval). (This is also the case for Requirement LC3 relating to the Logistics Centre.) In the updated draft DCO submitted at Deadline 2 (Revision 3.0) submitted at Deadline 2 (4 December 2018) [WN0902-HZDCO-PAC-REP-00043], Horizon inserted a new Requirement PR3(2) and LC2(2) which incorporates this obligation.	
Q4.0.85	PR3 (4) explain how the landscaping details for any amended scheme that would be managed by (4) would be submitted/approved. Should this be a separate requirement? Does IACC have the resource and expertise to undertake this requirement and if not, why not?	PR3(4) – Maintenance of landscaping The details of the landscaping to be maintained under Requirement PR3(4) would be approved as part of the designs submitted for IACC approval under Requirement PR3(1). Given the size of the site and the anticipated landscaping, Horizon does not consider it necessary to have a separate requirement or scheme for the maintenance of landscape planting (given the relatively small size of the site and the anticipated planting). Under Requirement PR3(4) it is Horizon's obligation to ensure that all planting is established and maintained over a 5-year period, although it may seek confirmation from IACC where a tree is seriously damaged or diseased before it seeks to remove it. This is considered appropriate as IACC has more expertise to make this determination than Horizon and it ensures that there are appropriate safeguards on when trees can be removed. Horizon considers that IACC has the necessary expertise and resources to undertake this role.	
Q4.0.86	PR4 – no point from which height is to be measured is given – should this be AOD?	The maximum and minimum heights for the Park and Ride facility stated in Table PR4 are from above finished ground level.	IACC has requested that both finished heights and a maximum/minimum AOD for the finished ground level are provided in order to allow meaningful assessment of the parameters and would submit that this increases the clarity and legibility of the DCO for the planning authority

		As noted above at FWQ.4.066 , the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004] now includes an interpretation clause that clarifies that, unless stated otherwise, all references to "m" in relation to parameter heights should be taken to mean above finished ground level.	
Q4.0.87	PR5 Operational parking –includes cycle parking – should this be retitled operational car and cycle parking? The parking spaces are stated as a maximum rather than a specific number, is this acceptable to the IACC/Highway Authority? Should a minimum number be defined? The maximum figure given is 1,900 – however the Planning Statement [8.1] (paragraph 4.3.16) states that it would provide parking for 1,900 cars, 55 minibuses and 35 motorcycles –clarify whether the number of parking spaces proposed includes or excludes the parking for minibuses and motorcycles? Unless details are provided as part of either PR2 or PR3 the design/layout of the parking including drainage, lighting, disabled parking spaces and electric vehicle charging points does not appear to need to be submitted and approved by IACC. Does IACC as Local Highways Authority, wish to comment?	Title of Requirement PR5 This is an error in the title and reference to cycle parking has been inserted into the title of Requirement PR5 as part of the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004]. Maximum provision In respect of car parking provisions, Requirement PR5 specifies a maximum of 1,900 car parks (including spaces allocated for disabled operational staff). The number of car parks required is based on the trip generation analysis, which is explained in Appendix C2-4 - DCO Transport Assessment. The actual number of car parks provided at a given time will be phased according to the demand at that point of the construction timetable. As such, Horizon does not consider that minimum requirements are necessary, as it is directly in Horizon's interest in terms efficient construction delivery to ensure that there is adequate provision of parking at any point in time. Further, workers will be required to utilize transport facilities provided through the Wylfa Newydd DCO Project through the Workforce Management Strategy and the Code of Conduct. Clarification of parking provision The parking figures provided in the Planning Statement [APP-406] are correct. An amendment to PR5(1) has been inserted into the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1- 004]: PR5 Operational car and cycle parking (1) The number of <u>car</u> parking spaces to be provided and available during the operation of the Park and Ride facility must not exceed 1,900 including spaces allocated for disabled operational staff <u>but excluding spaces for minibuses and motorcycles</u>, unless otherwise approved by IACC. Approach to design <i>Construction in accordance with approved plans under the DCO (Requirement PR2)</i>	The IACC does not accept that Horizon's response provides any comfort that suitable levels of parking provision will be provided. Stating that it is in Horizon's interest to provide these gives no enforceable level of provision which the IACC can rely upon and provision cannot be considered to be secured.

		As part of the draft DCO application, Horizon submitted site layout, lighting and drainage plans for the Dalar Hir Park and Ride facility (see WN0902-HZDCO-ADV-DRG-00033 to 00038. These plans are marked as for approval as part of the draft DCO and show: • the layout of the parking areas, locations of charging points and proposed surfacing; • landscaping designs; • pedestrian areas; • building locations and designs; • lighting plans (locations and lux levels); • connections from the site to the public highway; • surface and foul water drainage; and • connections to existing infrastructure. Under Requirement PR2, Horizon must undertake construction of the Park and Ride facility in accordance with the detailed design drawings identified in Schedule 2 of the draft DCO. (As noted above at FWQ4.0.84, updated plans have been submitted at Deadline 2 (4 December 2018) [WN0902-HZDCO-PAC-REP-00043]) Horizon considers that it is appropriate that IACC does not need to approve these plans as they have been approved through the DCO process; however, IACC would have approval rights in respect of any amended or new plans under Requirements PR3 and PR4. <i>Construction in accordance with plans approved by IACC (Requirements PR3 and PR4)</i> Under Requirement PR3, Horizon must, prior to any construction commencing, submit detailed designs for all buildings and structures comprising the Park and Ride facility to IACC for approval. These designs must be in accordance with the principles in the set out in section 3 of the Design and Access Statement (Volume 3 (Part 2)) which include principles relating to: • layout and design of the carpark (including direction of vehicles, location of staff parking and pedestrian areas, avoidance of watercourses and use of permeable materials); • landscaping and building design; • drainage treatment; • incorporating low energy design into the Park and Ride facility; and • lighting design. Requirement PR3 therefore ensures that the keydesign requirements (including layout and design, drainage and lighting of the car park) must be incorporated in the detailed designs that Horizon bring forward. These detailed designs must then be approved by IACC.	
Q4.0.88			

	PR6 - does not appear to provide a trigger date/activity for the submission of the decommissioning strategy and therefore as currently worded the park and ride facility could potentially be permanently retained. As the park and ride is defined as a temporary facility, how should the requirement be amended to include a trigger for the submission of these details? Is IACC satisfied with the list of details as to what the decommissioning strategy should include as set out in (2)?	In the original draft DCO (Revision 1.0), Requirement PR6 required Horizon to submit a decommissioning strategy for the Park and Ride facility no later than six months prior to any decommissioning works commencing. In the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004], Horizon amended PR6 to provide a clear deadline for submission of three months prior to the anticipated Unit 2 Commissioning Date: PR6 Park and Ride facility decommissioning strategy (1) Decommissioning of the Park and Ride facility must not commence until a decommissioning strategy has been ~~submitted to and~~ approved by IACC. (2) A decommissioning strategy ~~submitted~~ under sub-paragraph (1) must be submitted <u>to IACC for approval</u> no later than ~~six~~ <u>three</u> months prior to the anticipated Unit 2 Commissioning Date ~~any decommissioning works~~, unless otherwise agreed with IACC, and <u>must</u> include details of— (a) the timeframes for decommissioning, removal, restoration and maintenance works; (b) restoration and maintenance of structures to remain within watercourse; (c) reinstatement of habitats affected by the Park and Ride facility; (d) proposed works to return the land to agricultural use; and (e) the handover environmental management plan agreed with IACC. (3) Any decommissioning strategy submitted under sub-paragraph (1~~2~~) must be in general accordance with the Wylfa Newydd CoCP and the Park and Ride facility sub-CoCP. (4) ~~The demolition and removal~~ <u>Decommissioning</u> of the Park and Ride facility and restoration of the site must be undertaken in accordance with the decommissioning strategy approved under sub- paragraph (1), unless otherwise approved by IACC. (5) <u>A decommissioning strategy will not be required to be submitted under sub-paragraph (2) where IACC has granted, or resolved to grant, a planning permission for the ongoing use of the Park and Ride facility.</u> The justifications for all amendments have been set out in the DCO Amendment Table [REP1-009] submitted at Deadline 1 (13 November 2018). In particular, a new paragraph (5) has been inserted to provide that the decommissioning strategy does not need to be submitted where IACC has granted, or has resolved to grant, planning permission for the ongoing use of the Park and Ride facility. This is to provide for the situation where IACC or another party may wish to continue to use the Park and Ride facility for other purposes following construction. The timeframes for submission have also been reduced to three months prior to commissioning to align with other decommissioning requirements.	The IACC does not consider that the amendments made to this requirement address the objections set out at deadline 2.

Q4.0.89	LC3 (4) - explain how the landscaping details for any amended scheme that would be managed by (4) be submitted/approved – should this be a separate requirement? Does IACC have the resource and expertise to undertake this requirement and if not, why not?	LC3(4) – Maintenance of landscaping The details of the landscaping to be maintained under Requirement LC3(4) would be approved as part of the designs submitted for IACC approval under Requirement LC3(1). Given the size of the site and the anticipated landscaping, Horizon does not consider it necessary to have a separate requirement or scheme for the maintenance of landscape planting (given the relatively small size of the site and the anticipated planting). Under Requirement LC3(4) it is Horizon's obligation to ensure that all planting is established and maintained over a 5-year period, although it may seek confirmation from IACC where a tree is seriously damaged or diseased before it seeks to remove it. This is considered appropriate as IACC has more expertise to make this determination than Horizon and it ensures that there are appropriate safeguards on when trees can be removed. Horizon considers that IACC has the necessary expertise and resources to undertake this role.	The IACC does not accept that this site is small and that these details are not required. Boundary landscaping and planting is an important factor in managing the visual impact of this facility.
Q4.0.90	PR2 requires the submission and approval of the detailed design of the logistics centre. This appears to be the only requirement that provides any control over the design /provision of the logistics centre. Is IACC satisfied that, with particular reference to drainage (management and control); hours of use of use; external lighting etc., the requirement adequately secures these matters? If not, why not?	Whilst the question is not directed to Horizon as the applicant, the following response is provided by Horizon at this stage: For clarification, it is Requirement PR3 that requires the submission and approval of the detailed design of the Logistics Centre; Requirement PR2 provides that Horizon can undertake construction of the Logistics Centre in accordance with the approved plans submitted as part of the DCO Application and identified in Schedule 2 (Approved Plans) of the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004].	
Q4.0.91	LC4 - no point from which height is to be measured is given – should this be AOD?	The maximum and minimum heights for the Logistics Centre stated in Table LC4 are from above finished ground level. As noted above at FWQ4.0.66, the updated draft DCO now includes an interpretation clause that clarifies that, unless stated otherwise, all references to m in relation to parameter heights should be taken to mean above finished ground level.	IACC has requested that both finished heights and a maximum/minimum AOD for the finished ground level are provided in order to allow meaningful assessment of the parameters and would submit that this increases the clarity and legibility of the DCO for the planning authority.
Q4.0.92	LC6 – can the applicant provide details of what search and screening facilities, waiting and inspection mean? How many vehicles at any	Facilities at the Logistics Centre Upon entry into the Logistics Centre, all HGVs will be subject to search, inspection and screening processes.	Regarding the definition of emergencies, IACC would request that that Horizon's proposed amendment is widened beyond reference to the A5025. IACC sees a scenario when there may be a requirement to hold vehicles at the logistics site due to the closure of the Britannia Bridge. Vehicles should be held either at the main site or logistics site as opposed to being allowed to park on the public highway. Regarding the reference to a maximum number of spaces it is the position of IACC that if Horizon's own trip generation analysis arrives at a figure of 100 spaces then this must be provided. Therefore this must be specified as a minimum as opposed to a maximum number.

	one time are likely to be undertaking these activities? Emergencies does not appear to be defined in order to meet the enforceability test for requirements should it be? The parking is stated as a maximum rather than a specific number, is this acceptable to IACC, as Local Highway Authority?	Originally Horizon proposed that HGVs would also be subject to a security check at the Logistics Centre; however, given the distance from the WNDA, it determined that the purpose of the inspections at the Logistics Centre would be to check registration details (driver details, HGV registration and expected load) and complete basic security screening in order to reduce the extent of checks that would be undertaken at the entry to the WNDA (therefore avoiding backlog at the access to the WNDA). If threat levels were increased, the Logistics Centre could be used to undertake more detailed security checks. All these activities will be undertaken in a dedicated area within the Logistics Centre site. Although detailed designs are still to be prepared, Chapter H1 (Logistics Centre) of the ES (Volume H) [APP-355] outlines that these facilities will comprise a covered inspection bay, site entrance kiosk and security building. Illustrative site layouts have also been shown on WN0902-HZDCO-ADV-DRG-00016 [APP-024]. In terms of waiting facilities, this would be the 100 parking spaces that will be provided on site for HGVs. This will enable HGVs to wait on site until they are released by Horizon to continue their journey up to the WNDA. Horizon anticipates that 40 HGVs per hour will be able to be processed and held on the site and this is what has been assessed as part of the Environmental Assessment. Definition of emergencies In response to this question, Horizon inserted a definition of "emergency" was included in Requirement LC6(2) in the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004]. This has since been modified in the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004] as it was recognised that some HGVs would be travelling to sites other than WNDA: LC6 Operational HGV parking [...] (2) For the purposes of this requirement, an emergency would be an event that prevents or seriously impacts on HGV movements <u>on the A5025</u> ~~to or from the Wylfa Newydd Development Area~~ and results in HGVs remaining at the Logistics Centre until deliveries or movements can be resumed. This definition is considered necessary to deal with situations where Horizon cannot make deliveries to the site or HGVs cannot return from the WNDA or other sites due to weather, traffic or infrastructure issues. Maximum provision In respect of car parking provisions, Requirement LC6 specifies a maximum of 100 car parks for HGVs. The number of car parks required is based on the trip generation analysis, which is explained in Appendix C2-4 - DCO Transport Assessment.	The IACC does not accept that Horizon's response provides any comfort that suitable levels of parking provision will be provided. Stating that it is in Horizon's interest to provide these gives no enforceable level of provision which the IACC can rely upon and provision cannot be considered to be secured.

Q4.0.93	LC7 as currently worded appears not to provide a trigger date/activity for the submission of the decommissioning strategy and therefore as currently worded the logistics centre could potentially be permanently retained. Given this is meant to be a temporary facility can the applicant reword the requirement to include a trigger for the submission of these details? Is IACC satisfied with the list of details as to what the decommissioning strategy should include as set out in (2)?	As such, Horizon does not consider that minimum requirements are necessary, as it is directly in Horizon's interest in terms of operational requirements to ensure that there is adequate provision of parking at any point in time. In the original draft DCO (Revision 1.0), Requirement LC7 required Horizon to submit a decommissioning strategy for the Logistics Centre no later than three months prior to any decommissioning works commencing. In the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004], Horizon amended Requirement LC7 to provide a clear deadline for submission of three months prior to the anticipated Unit 2 Commissioning Date: LC7 Logistics <u>Centre</u> decommissioning strategy (1) Decommissioning of the Logistics Centre must not commence until a decommissioning strategy has been ~~submitted to and~~ approved by IACC. (2) A decommissioning strategy ~~submitted~~ under sub-paragraph (1) must be submitted <u>to IACC for approval</u> no later than three months prior to <u>the anticipated Unit 2 Commissioning Date</u> ~~any decommissioning works~~, unless otherwise agreed with IACC, and must include details of— (a) the timeframes and hours of decommissioning, removal and restoration works for legacy use; (b) retention of views between the Ty Mawr Standing Stone and the Trefignath Burial Chamber Scheduled Monuments; and (c) the retention of any buildings or structures, where appropriate; and (d) the retention of any existing landscaping works and features. (3) Any decommissioning strategy submitted under sub-paragraph ~~(12)~~ must be in general accordance with the Wylfa Newydd CoCP and Parc Cybi Logistics Centre sub-CoCP. (4) ~~The demolition and removal~~ <u>Decommissioning</u> of the Logistics Centre and restoration of the site must be undertaken in accordance with the decommissioning strategy approved under sub-paragraph ~~(12)~~, unless otherwise approved by IACC. (5) ~~A decommissioning strategy will not be required to be submitted under sub-paragraph (2) where IACC has granted, or resolved to grant, a planning permission for the ongoing use or redevelopment of the Logistics Centre.~~ The justifications for all amendments have been set out in the DCO Amendment Table [REP1-009] submitted at Deadline 1 (13th November 2018). In particular, a new paragraph (5) has been inserted to provide that the decommissioning strategy does not need to be submitted where IACC has granted, or has resolved to grant,	The IACC does not consider that the amendments made to this requirement address the objections set out at deadline 2.

		planning permission for the redevelopment of the Logistics Centre. This is to provide for the situation where IACC or another party may wish to continue to redevelop or use the Logistics Centre for other purposes following construction (which may result in some of the facilities being retained).	
Q4.0.94	OH6 - no point from which height is to be measured is given – should this be AOD?	Table OH6 provides the parameters for viaducts, overbridges and underpasses forming part of the Off-Line Highway Improvement Works. Due to the nature of these works, the measurement of maximum and minimum height should be taken from “above finished highway levels”, rather than AOD. In the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004], Horizon amended Table OH6 to make this clear.	IACC agrees that above finished level is appropriate provided that heights are given for the finished highway level so that overall heights and landscape impacts are known.
Q4.0.95	OH8 (2) should lighting be included in this list? (4) Does IACC have the resource and expertise to undertake this requirement and if not, why not?	Requirement OH8(2) – Additional matters In the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004],, Horizon amended Requirement OH8(2)(f) to refer to lighting, street furniture and signage. In order to ensure that there were principles applying to these additional matters Horizon is considering amending the Design and Access Statement (Volume 3 (Part 2) [APP-410]) which will be submitted into examination at a later date. Requirement OH8(4) – Damaged or diseased trees Under Requirement OH8(4) it is Horizon's obligation to ensure that all planting is established and maintained over a 5-year period, although it may seek confirmation from IACC where a tree is seriously damaged or diseased before it seeks to remove it. This is considered appropriate as IACC has more expertise to make this determination than Horizon and it ensures that there are appropriate safeguards on when trees can be removed. Horizon considers that IACC has the necessary expertise and resources to undertake this role.	
Q4.0.96	OH9 (1) and OH10 (1) should this read ‘prior to completion’? Is this the right trigger for the submission of these details or should the information be submitted at the same time as the details for work No 8? Given that the works relate to a water vole enhancement area would they require clearance from NRW as well as IACC?	In the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004],, Horizon amended Requirements OH9(1) and OH9 to replace "will" with "must".	Horizon does not appear to have answered the question posed by the ExA.

Q4.0.98	ECS3 (1) should “will” be replaced with “must” in the last line?	In the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004], Horizon amended Requirement ECS3 to replace "will" with "must".	
Q4.0.10 1	Schedule 18 (Article 79): Provide a full explanation and justification for the departure from the standard drafting in relation to Procedure in relation to certain approvals set out in Appendix 1 of PINS Advice Note Number 15 (rev. 2) Drafting Development Consent Orders published in July 2018.	The principle reason why Schedule 18 (now Schedule 19 under the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004]) departs from the standard drafting in Appendix 1 of the Planning Inspectorate's <i>Advice Note 15: Drafting Development Consent Orders</i> is because this appendix was not included in the Advice Note at the time the draft DCO application was submitted on 1 June 2018. It was included as part of the July 2018 updates to the Advice Note. For this reason, Schedule 19 has been based on the approval and appeal procedures set out in the Thames Water Utilities Limited (Thames Tideway Tunnel) Order 2014, North London Heat and Power Generating Station Order 2017/215 and the Hinkley Point C (Nuclear Generating Station) Order 2013 which were considered projects of similar scale and complexity. Furthermore we note that the Planning Inspectorate's website does make clear that “Advice notes which deal with the PA2008 process are non-statutory. They are published to provide advice and information on a range of issues arising throughout the whole life of the application process. Although in many cases they include recommendations from the Planning Inspectorate about the approach to particular matters of process, which applicants and others are encouraged to consider carefully, it is not a requirement for applicants or others to have regard to the content of advice notes.” We have now been able to give careful consideration to the Appendix to PINS Advice Note and we have set out below a commentary on the differences between our drafting in Schedule 19, which is based on other DCOs made by the Secretary of State, and that in the Appendix. A track change version of Schedule 19 against Appendix 1 of Advice Note 15 has been provided as Appendix 4d. In summary, Schedule 19 differs as follows from the suggested text in the Appendix to PINS Advice Note 15: • The title to Schedule 19 has been drafted to include “consents and appeals” as these are also dealt with in the schedule. • Paragraph 1 has been drafted to distinguish between major detailed requirements and minor detailed requirements as these should have different approval timeframes due to their scope and nature. Advice Note 15 provided a six-week period for approvals; Schedule 19 provides: ○ 56 days for major detailed requirements (design and management approvals for key Project elements – i.e. the Power Station Site or the Site Campus);	

- 35 days for minor detailed requirements (revisions to approved documents or minor or discrete works – e.g. Ecological Compensation Sites).

Major and minor detailed requirements have been defined in clause 5 of schedule 19.

- Paragraph 1(3) has been drafted to include "deemed approvals" within the discharging process. This is considered appropriate to enable Horizon to efficiently undertake the Wylfa Newydd DCO Project and to ensure the intention of the Planning Act 2008 is not frustrated. This clause provides that if no response has been provided by the discharging authority, it will be taken to have granted all parts of the application; the discharging authority still has the power to refuse to grant approval or to grant subject to conditions.
- Paragraph 1(4) has been inserted to make it clear that if IACC wants to consult with Requirement consultees (e.g. NRW) in making any approvals or determinations under this Schedule, Horizon will provide all relevant materials to the Requirement consultee to assist in its consultation role.
- Paragraph 2(2) has been drafted to provide timeframes for requests for further information. Timeframes differ depending on whether a Requirement consultee (defined as NRW) is involved. The timeframe for receiving requests for further information where no Requirement consultee is involved, has been reduced to 7 business days; however, in the updated draft DCO (Revision 3.0) submitted at Deadline 2 (4 December 2018) [WN0902-HZDCO-PAC- REP-00043] , Horizon amended this to be 10 business days.
- Paragraph 2(3) provides time extensions for requests for further information where a Requirement consultee is involved. This is considered appropriate to ensure clarity about the applicable timescales where there is a consultee.
- Paragraph 3 has been drafted to recognize the different costs involved in discharging the different types of requirements. The fee schedule in Paragraph 3 is based on Town and Country Planning Act (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2017 (which apply in Wales)). These Regulations have been used to set fee charges in other development consent orders such as Thames Tideway, Hinkley and North London and Horizon considers them appropriate.
- Paragraph 3(3) provides that fees paid can be credited towards future approvals where agreed between the parties.
- Paragraph 4 has been drafted to reflect the processes under the draft DCO and to address the "deemed approval" provisions in paragraph 1(3). Paragraph 4(11) has also been updated to refer to the latest planning guidance on appeals.
- Paragraph 5 has been drafted to reflect the new definitions included in Schedule 18 as a result of the amendments noted above.

Q4.0.10 5	With reference to Schedule 19 Part 1 (Article 80). (a) Identify why each of the provisions in Part 3 of the 1991 Act have been disapplied, i.e. by virtue of being not relevant, or managed through DCO powers (in which case stating the relevant power), or managed through protective provisions relating to apparatus owned by statutory undertakers (in which case identifying the relevant protective provision) or addressed through the Wylfa Newydd CoCP, Wylfa Newydd CoOP and/or relevant sub-CoCPs (in which case identifying the specific control in these documents). Why is it necessary “for the avoidance of doubt” to apply section 239 (Use and development of burial grounds)? Section 42 of the Local Government (Miscellaneous Provisions) Act 1976 provides as follows: 42.— Certain future local Acts etc. to be subject to the planning enactments etc. except as otherwise provided. An Act or order to which this section applies shall have effect subject to— the provisions of the enactments relating to town and country planning; the provisions of the enactments relating to historic buildings and ancient monuments; except so far as the Act or order expressly provides otherwise. This section applies to an Act or order which is— a local Act passed after or in the same Session as this Act; a provisional order confirmed by an Act so passed; or	Disapplication of 1991 Act A number of provisions in Part 3 of the 1991 Act have been disapplied by clause 4 of Schedule 19 (now Schedule 20 in the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004] and will not apply where Horizon is carrying out street or highway works under the DCO. While Horizon has set out each of the provisions to be disapplied (and the reason) the key reason why they have been disapplied is because the works relate to the development of an NSIP; rather than minor street works or roading project. For these reasons, it is essential that Horizon is able to exercise its powers under the DCO in a timely and efficient manner. The relevant provisions that have been disapplied are as follows: • Section 56(1) and (1A) (Power to give directions as to timing of street works): This has been disapplied as it could prevent Horizon undertaking works under the draft DCO as it provides the street authority with the power to direct when street works should be undertaken. • Section 56A (Power to give directions as to the placing of apparatus): This article has been disapplied as it provides the street authority with the power to direct the undertaker to not place apparatus in an identified location. This power would impact on Horizon's agreement with statutory undertakers under articles 38 of the draft DCO on the relocation of their apparatus. • Sections 61(1), 62(2), 62(4) relate to restrictions on placing apparatus in protected streets. This has been disapplied as this would interfere with the articles in the DCO relating to the relocation of statutory undertakers' apparatus under article 38 of the draft DCO. • Sections 63(1) and 64 (traffic sensitive streets and street with special engineering difficulties) have been disapplied as these sections enable restrictions to be placed on particular streets which could impact on the ability of Horizon to undertake works on streets within the Order Limits. • Section 66 (Avoidance of unnecessary delay or obstruction): this section makes it a criminal offence where the undertaker fails to complete works as soon as reasonably practicable. This is considered unnecessary as Horizon is committed to completing the A5025 Off-Line Highway Improvement Works by a certain time under the Phasing Strategy [APP-447] and Requirement PW2, and would create inconsistency with enforcement of the Requirements and the offence provisions under the Planning Act 2008. • Sections 74 and 74A have also been disapplied as these relate to changes imposed where the undertaker has not completed works within a reasonable period. • Sections 71 to 73F relate to standard of reinstatement works. This has been disapplied as article 19(2) of the DCO provides that where a street is altered by the undertaker it will be completed to the reasonable satisfaction of the street authority and maintained by the undertaker for a period of 12 months.

	(c) an order which is made in the exercise of powers conferred by an Act and comes into force after the passing of this Act or in the same Session as this Act, and which authorises the carrying out on land specified in the Act or order of works of a kind so specified. Except so far as the Act or order expressly provides otherwise. (1) On what basis is the DCO is considered to be a 'local Act' within the meaning of Section 42? (2) Provide greater justification for disapplying section 42.	• Sections 77 and 78 require the undertaker to indemnify the highway authority for any strengthening works or making good any damage in respect of diverted routes and provide that the Secretary of State can make regulations requiring the undertaker to contribute to resurfacing or reconstruction costs. These sections are not considered necessary as article 14(2)(b) requires Horizon to maintain any temporary alternative routes to the satisfaction of the street authority until it is no longer required for diverted traffic. • Sections 82(1) (Liability for damage or loss caused) has been disapplied as Horizon will have obligations to indemnify statutory undertakers under the DCO protective provisions where damage is caused. • Sections 87 (Prospectively maintainable highway): This section has been disapplied as it has been replaced by the maintenance provisions under article 19 of the draft DCO. • Sections 83 to 93 (which relate to statutory undertakers and apparatus) have been disapplied as these will be replaced by article 38 and the protective provisions in Schedule 15 of the draft DCO. • Section 94 (power of street authority to undertake street works) has been disapplied as article 20 of the draft DCO enables Horizon to enter into an agreement with the street authority to undertake works under Part 3 of the DCO. • Sections 95 to 106 (which set out various offences, negates certain agreements, definitions, application of legislation) have been disapplied so that there is no inconsistency with the articles of the DCO, enforcement of the Requirements, and the offence provisions under the Planning Act 2008. • Schedule 3A to the 1991 Act (restriction on works following substantial street works) has been modified so that it does not apply to works carried out as part of the authorised development. Section 239 of Town and Country Planning Act Section 239 of the Town and Country Planning Act ("TCPA") provides that where land, that consists of burial grounds or part of a burial grounds, has been acquired or appropriated for planning purposes, any enactment relating to burial grounds or restrictions or obligations under ecclesiastical law are overridden. Paragraph 5(3) in Schedule 20 modifies section 239 to make it clear that it will apply to any land or right in land acquired, or land temporarily possessed, under the DCO for the purposes of the construction, operation or maintenance of the authorised development. This has been included for the avoidance of doubt in the event that unknown burial grounds are discovered within the Order Limits. The modification in Schedule 20 is necessary as section 239 refers to use of the land in accordance with a planning permission which is defined as a permission granted under Part III of the TCPA. As this would not include a DCO, this section has been modified so the rights under section 239 also apply to use of land in	

		accordance with the DCO. Appropriate safeguards have been put in place through article 72 in the event that human remains are discovered. Section 42 of the Local Government (Miscellaneous Provisions) Act 1976 Section 42 of the Local Government (Miscellaneous Provisions) Act 1976 ("1976 Act") provides that local Acts or 'orders' that authorize the carrying out of work on specified land will have effect subject to the provisions of any enactment relating to town and country planning or to historic buildings or monuments, "except to the extent that the Act or order provides otherwise". Thus section 42(1) itself contemplates that orders will disapply its effects. The DCO would fall under article 42(2)(c) as an order which is made under the Planning Act 2008 and authorises the carrying out of works on specified land. Paragraph 7 of Schedule 20 modifies the 1976 Act (as anticipated in section 42(1)) to ensure that any future planning enactments do not interfere with Horizon's rights and powers under the DCO in relation to the construction, operation and maintenance of the authorized development. This clause has been included in a number of other granted DCOs including Thames Tideway Tunnel. It is clearly important for horizon to have certainty about the powers granted to it by the DCO.	
Q4.0.10 6	Why are Work 1I (Simulator and Training Building) and Work 1K (Vehicle Inspection Bay) not included in the list of works covered by the Power Station Works Requirement (4) despite being referenced in WN4A of the Draft DCO [APP-029] [RR-021] questions the ability of DCO Requirements to ensure high levels of site campus occupancy and thus, reduce pressures on other areas. Would the draft DCO ensure high levels of campus occupancy and why?	In the updated draft DCO submitted at Deadline 1 (13th November 2018) (Revision 2.0), Horizon amended the title to the Power Station Works Requirements (WN1 to WN16) to insert reference to Work No.s 1I and 1K. This aligns to the definition of "Power Station Works" in Schedule 3(1) includes "Work No.s 1A-D, 1I-O, 2 and 4 described in Schedule 1". The Workforce Accommodation Strategy [APP-412] states within paragraph 9.1.6 that <i>"Horizon will also commit to maintaining high levels of occupancy in the Site Campus."</i> The key driver for seeking to ensure a high occupancy of the Site Campus is to ensure that Horizon remains within its ES, which is based on no more than 3,000 workers residing in the community. Therefore, high occupancy of Site Campus will ensure that it is utilised effectively and the impact on the local community is minimised. Horizon will secure high levels of occupancy by ensuring that the Site Campus fully meets the needs and expectations of a modern construction workforce. These needs will be met through provision of purpose-built high-quality accommodation and a range of on-site facilities and amenities. Alongside the proximity of the Site Campus to the rest of the WNDA, thereby reducing the need and time to travel, the Site Campus will be an attractive location for construction workers to live.	

Q4.0.10 7	[RR-021] questions the ability of DCO Requirements to ensure high levels of site campus occupancy and thus, reduce pressures on other areas. Would the draft DCO ensure high levels of campus occupancy and why? Draft DCO Schedule 3 requirement PW7 seeks to address the Wylfa Newydd Code of Construction Practice ('CoCP'). Would the CoCP sufficiently address potential impacts of the proposed development on soils and geology, and from soils and geology on local communities (including in regard to contamination)?	The Workforce Accommodation Strategy states within paragraph 9.1.6 that <i>“Horizon will also commit to maintaining high levels of occupancy in the Site Campus.”</i> The key driver for seeking to ensure a high occupancy of the Site Campus is to ensure that Horizon remains within its ES, which is based on no more than 3,000 workers residing in the community. Therefore, high occupancy of Site Campus will ensure that it is utilised effectively and the impact on the local community is minimised. Horizon will secure high levels of occupancy by ensuring that the Site Campus fully meets the needs and expectations of a modern construction workforce. These needs will be met through provision of purpose-built high-quality accommodation and a range of on-site facilities and amenities. Alongside the proximity of the Site Campus to the rest of the WNDA, thereby reducing the need and time to travel, the Site Campus will be an attractive location for construction workers to live. Mitigation measures related to the remediation strategy of known areas of land contamination presented in the Land Contamination Risk Assessment and Remediation Strategy [APP-144] should have been included within the Power Station Main Site sub-CoCP but were omitted in error [APP-415]. They are included in the updated Main Power Station Site sub-CoCP (Revision 2.0) submitted at Deadline 2 (4 December 2018) [WN0902-JAC-PAC-REP-00019]. Section 9.4 of the Wylfa Newydd Code of Construction Practice describes Horizon's commitment to assess and manage land contamination in accordance with the <i>Model Procedures for the Management of Land Contamination (April 2016)</i>. These commitments include the minimum processes and procedures for any unexpected contamination on site, ensuring the potential environmental impacts surrounding soils and geology, and from soils and geology on local communities (including regarding contamination) are managed.	The IACC confirmed in its response that there is no mechanism in the DCO to ensure that the site campus is fully delivered or that it is occupied at all. The IACC has expanded on these points in the Site Campus Chapter of the LIR. The IACC considers it necessary that the completion of the site campus is delivered earlier (i.e. 4,000 bed spaces), maintained throughout the build and that the accommodation and facilities are not just suitable for but attractive to workers so that the occupancy is kept high through demand. To ensure this the design and quality of accommodation as well as pricing must be developed to ensure that this facility is preferred option by the requisite number of workers.
Q4.0.10 8	Draft DCO Schedule 3 requirement PW7 seeks to address the Wylfa Newydd Code of Construction Practice ('CoCP'). Would the CoCP sufficiently address potential impacts of the proposed development on soils and geology, and from soils and geology on local communities (including in regard to contamination)? Paragraph 7.4.62 of the Planning Statement states that the Accommodation and Tourism services would stay in place for the first two years of operation can the	Mitigation measures related to the remediation strategy of known areas of land contamination presented in the Land Contamination Risk Assessment and Remediation Strategy should have been included within the Power Station Main Site sub-CoCP, but were omitted in error. They are included in the updated Main Power Station Site sub-CoCP (Revision 2.0) submitted at Deadline 2 (4 December 2018)[WN0902-JAC-PAC-REP-00019]. Section 9.4 of the Wylfa Newydd Code of Construction Practice describes Horizon's commitment to assess and manage land contamination in accordance with the <i>Model Procedures for the Management of Land Contamination (April 2016)</i>. These commitments include the minimum processes and procedures for any unexpected contamination on site, ensuring the potential environmental impacts surrounding soils and geology, and from soils and geology on local communities (including regarding contamination) are managed.	IACC has reviewed the updated Main Power Station Site sub-CoCP (Revision 2.0) submitted at Deadline 2 (4 December 2018) [WN0902-JAC-PAC-REP-00019] and the additional information taken from the remediation strategy and contained within the sub-CoCP is welcomed. However IACC's position remains as stated in the LIR, that the remediation strategy identifies that there are further measures and plans that are required for its delivery, in particular those to address unexpected contamination, implementation of the remediation and verification. As noted in the LIR, HNP states that it “will assess and manage land contamination in accordance with guidance within the Model Procedures for the Management of Land Contamination”. Minimal detail on how land contamination is to be managed is provided.”

	applicant: (a) Confirm if this is operation of the first or second reactor? (b) Why two years is considered an appropriate time period Can the IACC confirm if they consider two years would be an acceptable time period and if not can they outline how long they think would be necessary and why?	The Accommodation and Tourism services referred to in paragraph 7.4.62 of the Planning Statement the Tourism Fund which will be provided by Horizon under the Draft DCO s.106 agreement to be agreed with IACC. This fund will be available during the construction period and two years following the commissioning of Unit 1 (i.e. the first two years of operation of Unit 1). Horizon is continuing progress the drafting and negotiation of the Draft DCO s.106 agreement with IACC and provide an update on progress at the appropriate deadlines.	
Q4.0.109	Paragraph 7.4.62 of the Planning Statement states that the Accommodation and Tourism services would stay in place for the first two years of operation can the applicant: (a) Confirm if this is operation of the first or second reactor? (b) Why two years is considered an appropriate time period Can the IACC confirm if they consider two years would be an acceptable time period and if not can they outline how long they think would be necessary and why? Provide a copy of the draft Heads of Terms for the s106 under discussion for the DCO application?	The Accommodation and Tourism services referred to in paragraph 7.4.62 of the Planning Statement is the Tourism Fund which will be provided by Horizon under the DCO s.106 agreement to be agreed with IACC. This fund will be available during the construction period and two years following the commissioning of Unit 1 (i.e. the first two years of operation of Unit 1). Horizon is continuing progress the drafting and negotiation of the Draft DCO s.106 with IACC and provide an update on progress at the appropriate deadlines. The proposed Heads of Terms for the DCO planning obligations are set out in section 7.4 of the Planning Statement submitted with the application for development consent. A Status Note on the 5. Draft DCO s.106 was submitted by Horizon at Deadline 1 (13 November 2018) [REP1-010]. This included a summary of the Draft DCO s.106 obligations, as well as a schedule of engagement which shows how Horizon will work with IACC and Welsh Government to provide drafts of the agreement throughout the examination process, enabling a finalised Draft DCO s.106 to be submitted to the Examining Authority at Deadline 8 (25 March 2019). It is proposed that status update papers would also be provided alongside the Draft DCO s.106 submitted at Deadlines 3 (17 January 2019) and 5 (12 February 2019), to assist the Examining Authority in understanding progress between the parties.	The IACC confirmed in its response that 2 years post construction of the second reactor to be acceptable.
Q4.0.110	Provide a copy of the draft Heads of Terms for the s106 under discussion for the DCO application? Section 7.4 of the Planning Statement [APP- 406] deals with Planning obligations and outlines the proposed heads of terms. Please set out how the proposals would meet with the tests for planning obligations.	The proposed Heads of Terms for the DCO planning obligations are set out in section 7.4 of the Planning Statement submitted with the application for development consent. A Status Note on the Draft DCO s.106 was submitted by Horizon at Deadline 1 (13 November 2018) [REP1- 010]. This included a summary of the Draft DCO s.106 obligations, as well as a schedule of engagement which shows how Horizon will work with IACC and Welsh Government to provide drafts of the agreement throughout the examination process, enabling a finalised Draft DCO s.106 to be submitted to the Examining Authority at Deadline 8 (25 March 2019).	

	It is proposed that status update papers would also be provided alongside the draft of the Draft DCO s.106 submitted at Deadlines 3 (17 January 2019) and 5 (12 February 2019), to assist the Examining Authority in understanding progress between the parties. The proposed Heads of Terms (HoT) for the planning obligations are set out in section 7.4 of the Planning Statement. These include mitigation measures to address the impacts identified in the Environmental Statement, to ensure that the development complies with policy in the National Policy Statement and is generally acceptable in planning terms. These measures relate to the following topics and are also identified in the Mitigation Route Map [APP-422]: • Historic Environment; • Construction Noise; • Public Right of Way; • Welsh Language and Culture; • Health and Wellbeing; • Emergency Services; • Education and Skills; • Accommodation; • Tourism; and • Community Impact. In addition, the developing Draft DCO s.106 includes additional commitments in relation to leisure, supply chain, transport, community involvement officers, implementation and monitoring, as well as developing the initial draft heads of terms further. Horizon has had regard to the guidance set out in NPS EN-1 in relation to the above topics and considers that the measures in the proposed HoT (and emerging Draft DCO s.106) meet the statutory tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010 and the National Planning Policy Framework in that they are: • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development. The measures in the proposed HoT have been informed through discussions with stakeholders in focus groups and one-to-one sessions through the Statement of Common Ground process. Discussions regarding the proposed planning obligations are ongoing with IACC, Welsh Government, NRW and other relevant stakeholders. Through engagement with this process, Horizon will ensure that all involved with the draft DCO	

s.106 will seek to ensure that that the scale of the obligations and any financial contributions are proportionate and meet the above statutory tests.

A Status Note on the Draft DCO s.106 was submitted by the Applicant at Deadline 1 (13 November 2018) [REP1-010].

The table below is an extract from Table 1-1 Heads of Terms and Emerging Obligations in section 1.3 of the Status Note with an additional 'CIL complaint' column which sets out whether or not the emerging obligation is considered to meet the statutory tests.

Sch	Topics	Emerging obligations (financial and non-financial)	CIL compliant
1	Welsh language [7.4.17 to 7.4.37]	Refer to Sch 1 in Table 1-1 in the Status Note.	Yes The various Welsh language measures and contributions are needed for the promotion, protection and enhancement of the Welsh language and have been put in place in respect of each phase of the Development. They are informed by the Welsh Language Impact Assessment (APP-43) and are based upon the anticipated number of workers occupying the development. They are therefore necessary to make the Development acceptable in planning terms, fairly and reasonably related in scale and kind and directly related to the Development.
2	Leisure [7.4.68]	Refer to Sch 2 in Table 1-1 in the Status Note.	Yes The contributions for upgrades to existing leisure facilities are required to mitigate the impact on leisure and sports capacity from the anticipated increase in population resulting from the Development. They are therefore necessary to make the development acceptable in planning terms, fairly and reasonably related in scale and kind and directly related to the Development.
3	Tourism [7.4.61 – 7.4.65]	Refer to Sch 3 in Table 1-1 in the Status Note.	Yes The measures and contributions towards tourism are based upon an identified need to ensure that the Development is fully integrated with Anglesey's tourism

				industry and are required to mitigate any adverse impacts on the tourism industry arising from the occupation of the Development. They are therefore necessary to make the development acceptable in planning terms, fairly and reasonably related in scale and kind and directly related to the Development.	
		4	Employment and Skills and Supply Chain [7.4.50 to 7.4.55 and 7.4.57/7.4.58 and 7.4.73 – 7.4.83]	Refer to Sch 4 in Table 1-1 in the Status Note. Yes The measures and contributions in respect of employment and skills and Supply Chain are based on assessments undertaken by Horizon which identified the need to secure various measures to meet the demand for improved social and economic standards in the local community and to boost the local economy through support for local employment and supply chains as a result of the Development. They are therefore necessary to make the development acceptable in planning terms, fairly and reasonably related in scale and kind and directly related to the Development.	
		5	Accommodation [7.4.59/7.4.60]	Refer to Sch 5 in Table 1-1 in the Status Note. Yes The measures and contributions are required to offset the potential impact of the increase in population on existing housing and tourist accommodation during the construction period for example establishing the Workforce Accommodation Management Service (WAMS). They are therefore necessary to make the development acceptable in planning terms, fairly and reasonably related in scale and kind and directly related to the Development.	
		6	Education [7.4.56]	Refer to Sch 6 in Table 1-1 in the Status Note. Yes The measures and contributions are required to offset the potential impacts of the increase in population in terms of pressure on schools or nurseries as a result of the Development. They are therefore necessary to make the development acceptable in planning terms, fairly and reasonably related in scale and kind and directly related to the Development.	

7	Transport	Refer to Sch 7 in Table 1-1 in the Status Note.	Yes The measures and contributions are required to offset potential transport impacts and to fund monitoring of potential impacts. They are therefore necessary to make the development acceptable in planning terms, fairly and reasonably related in scale and kind and directly related to the Development.
8	Health and Wellbeing [7.4.38/7.4.39]	Refer to Sch 8 in Table 1-1 in the Status Note.	Yes The measures and contributions towards medical/health services are required to mitigate the potential impacts on health facilities before and after the provision of the site campus medical facility as a result of the anticipated increase in population from the Development. . They are therefore necessary to make the development acceptable in planning terms, fairly and reasonably related in scale and kind and directly related to the Development.
9	Emergency Services (fire, ambulance and police) [7.4.49]	Refer to Sch 9 in Table 1-1 in the Status Note.	Yes The emergency services contributions are required by reference to a number of assessments provided by the relevant service providers which identified the need to secure the contributions towards the cost of meeting additional demand on the emergency services and mitigating the impact on the emergency services capacity as a result of the increase in population arising from the Development. They are therefore necessary to make the development acceptable in planning terms, fairly and reasonably related in scale and kind and directly related to the Development.
10	Construction Noise Mitigation [7.4.12/7.4.13]	Refer to Sch 10 in Table 1-1	Yes The financial contributions towards sound insulation mitigation at Camaes Primary school and Eglwys Sant Padrig church are required to offset the potential significant residual effects resulting from construction noise from the main Power Station site. They are therefore necessary to make the development acceptable in planning terms, fairly and reasonably related in scale and kind and directly related to the Development.

11	Environment and Historic Heritage [7.4.11]	Refer to first bullet in Sch 11 in Table 1-1 in the Status Note.	No The financial contributions towards (a) ecological enhancement projects, (b) Cemlyn Lagoon resilience projects and part-funding of a NWWT tern warden and IACC ecological officer were originally intended as being a means of delivering a legacy of offsite environmental benefits which would be relevant to, but not necessary mitigation for, impacts associated with the Project. These measures originally sat outside the DCO process as a voluntary offering but were recently brought into the S106 as a means of securing their delivery. Given these are voluntary as opposed to necessary enhancements, they are not considered to be CIL complaint because they are not necessary to make the development acceptable in planning terms however their delivery is required to be secured by a S106 agreement.
11	Environment and Historic Heritage [7.4.11]	Refer to second bullet in Sch 11 in Table 1-1 in the Status Note.	Yes The financial contribution to the NDA to deliver a management plan for Cestyll Gardens is required to offset the potential impact in respect of the loss of some of the remains of the kitchen garden at Cestyll Gardens as a result of the location of the construction laydown area. Therefore this measure is necessary to make the development acceptable in planning terms, fairly and reasonably related in scale and kind and directly related to the Development.
12	Community Fund [7.4.66-7.4.68]	Refer to Sch 12 in Table 1-1 in the Status Note.	Yes The measures and contributions are required to offset the potential impacts of the project on the community during its construction and operation. They are therefore necessary to make the development acceptable in planning terms, fairly and reasonably related in scale and kind and directly related to the Development.
13	Public Rights of Way [7.4.15/7.4.16]	Refer to Sch 13 in Table 1-1 in the Status Note.	Yes The financial contributions towards provision of new Public Rights of Way (PRoWs) and upgrading existing PRoW, maintenance and improved signage are required to

			mitigate the identified effects of the Power Station on PROWs. They are therefore necessary to make the development acceptable in planning terms, fairly and reasonably related in scale and kind and directly related to the Development.
14	Community Involvement Officers [7.4.40/7.4.41]	Refer to Sch 14 in Table 1-1 in the Status Note.	Yes The funding and employment of a Community Involvement Officer (CIO) are considered necessary as the CIO would be a key interface between the local community, key stakeholders and Horizon Management and would be involved with the implementation of HIA measures as well as the relevant ES, WLIA and Equality Impact Assessment Mitigation. They are therefore necessary to make the development acceptable in planning terms, fairly and reasonably related in scale and kind and directly related to the Development.
15	Funding IACC monitoring for (a) contribution and (b) the operational life of the Project (60 years)	Refer to Sch 15 in Table 1-1 in the Status Note.	Yes The financial contribution towards IACC monitoring is considered necessary to support monitoring and enforcement of the Project for example in respect of the various S106 obligations and the discharge of Requirements post-DCO. They are therefore necessary to make the development acceptable in planning terms, fairly and reasonably related in scale and kind and directly related to the Development.
16	WNMPOP Operation and Terms of Reference and Release and Reporting on Contingency Funds	Refer to Sch 16 in Table 1-1 in the Status Note.	Yes These measures and contributions in respect of the Wylfa Newydd Major Permissions Oversight Panel (WNMPOP) are considered necessary to provide topic based contingency funds that will be available if/when significant adverse effects arise as a result of the Project. They are therefore necessary to make the development acceptable in planning terms, fairly and reasonably related in scale and kind and directly related to the Development.

Q4.0.11 1	Section 7.4 of the Planning Statement [APP- 406] deals with Planning obligations and outlines the proposed heads of terms. Please set out how the proposals would meet with the tests for planning obligations. Can you confirm whether document 3.4 Draft Heads of Terms for Planning Obligations referred to in the Guide to the Application [APP-004] and in the Mitigation Route Map [APP-422] has been submitted or is intended to be submitted? If it has not been submitted or is not intended to be submitted can you confirm whether Section 7 of the Planning Statement [APP- 406] is the relevant document regarding the draft Heads of Terms and if this is correct can the application documentation be amended to correct the references to document 3.4?	The proposed Heads of Terms (HoT) for the planning obligations are set out in section 7.4 of the Planning Statement. These include mitigation measures to address the impacts identified in the Environmental Statement, to ensure that the development complies with policy in the National Policy Statement and is generally acceptable in planning terms. These measures relate to the following topics and are also identified in the Mitigation Route Map: • Historic Environment; • Construction Noise; • Public Right of Way; • Welsh Language and Culture; • Health and Wellbeing; • Emergency Services; • Education and Skills; • Accommodation; • Tourism; and • Community Impact. In addition, the developing Draft DCO s.106 includes additional commitments in relation to leisure, supply chain, transport, community involvement officers, implementation and monitoring, as well as developing the initial draft heads of terms further. Horizon has had regard to the guidance set out in NPS EN-1 in relation to the above topics and considers that the measures in the proposed HoT (and Draft DCO s.106) meet the statutory tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010 and the National Planning Policy Framework in that they are: • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development. The measures in the proposed HoT have been informed through discussions with stakeholders in focus groups and one-to-one sessions through the Statement of Common Ground process. Discussions regarding the proposed planning obligations are ongoing with IACC, Welsh Government, NRW and other relevant stakeholders. Through engagement with this process, Horizon will ensure that all involved with the draft DCO s.106 will seek to ensure that that the scale of the obligations and any financial contributions are proportionate and meet the above statutory tests.

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13	Public Rights of Way [7.4.15/7.4.16]	Refer to Sch 13 in Table 1-1 in the Status Note.	Yes The financial contributions towards provision of new Public Rights of Way (PRoWs) and upgrading existing PRoW, maintenance and improved signage are required to mitigate the identified effects of the Power Station on PRoWs. They are therefore necessary to make the development acceptable in planning terms, fairly and reasonably related in scale and kind and directly related to the Development.
14	Community Involvement Officers [7.4.40/7.4.41]	Refer to Sch 14 in Table 1-1 in the Status Note.	Yes The funding and employment of a Community Involvement Officer (CIO) are considered necessary as the CIO would be a key interface between the local community, key stakeholders and Horizon Management and would be involved with the implementation of HIA measures as well as the relevant ES, WLIA and Equality Impact Assessment Mitigation. They are therefore necessary to make the development acceptable in planning terms, fairly and reasonably related in scale and kind and directly related to the Development.
15	Funding IACC monitoring for (a) contribution and (b) the operational life of the Project (60 years)	Refer to Sch 15 in Table 1-1 in the Status Note.	Yes The financial contribution towards IACC monitoring is considered necessary to support monitoring and enforcement of the Project for example in respect of the various S106 obligations and the discharge of Requirements post-DCO. They are therefore necessary to make the development acceptable in planning terms, fairly and reasonably related in scale and kind and directly related to the Development.
16	WNMPOP Operation and Terms of Reference and Release and Reporting on Contingency	Refer to Sch 16 in Table 1-1 in the Status Note.	Yes These measures and contributions in respect of the Wylfa Newydd Major Permissions Oversight Panel (WNMPOP) are considered necessary to provide topic based contingency funds that will be available if/when significant adverse effects arise as a result of the Project.

		<table> <tr> <td></td><td>Funds</td><td></td><td>They are therefore necessary to make the development acceptable in planning terms, fairly and reasonably related in scale and kind and directly related to the Development.</td></tr> </table>		Funds		They are therefore necessary to make the development acceptable in planning terms, fairly and reasonably related in scale and kind and directly related to the Development.	
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		References to the draft Heads of Terms ("HoT") for the DCO planning obligations in the Guide to the Application [APP-004] and the Mitigation Route Map were incorrect as this document was not submitted but instead was set out in section 7.4 of the Planning Statement. The Guide to the Application submitted at Deadline 1 (13th November 2018) was amended to remove reference to the HoT and the error in the Mitigation Route Map will be added to a DCO errata document for submission to the Planning Inspectorate. A Status Note on the Draft DCO s.106 was submitted by Horizon at Deadline 1 (13 November 2018) [REP1- 010]. This also included a schedule of engagement which shows how Horizon will work with IACC and Welsh Government to provide drafts of the agreement throughout the examination process, enabling a finalised Draft DCO s.106 to be submitted to the Examining Authority at Deadline 8 (25 March 2019). In conclusion, the HoT details contained within section 7 of the Planning Statement remain to be correct and the subsequent Status Note provides an update to as to how the draft HoT have been translated into obligations as set out in the First Draft Agreement.					
Q4.0.11 2	Can you confirm whether document 3.4 Draft Heads of Terms for Planning Obligations referred to in the Guide to the Application [APP-004] and in the Mitigation Route Map [APP-422] has been submitted or is intended to be submitted? If it has not been submitted or is not intended to be submitted can you confirm whether Section 7 of the Planning Statement [APP- 406] is the relevant document regarding the draft Heads of Terms and if this is correct can the application documentation be amended to correct the references to document 3.4? The Applicant has provided a Mitigation Route Map (APP-422) indicating the different pathways through which mitigation would be secured. The Applicant is requested to provide an updated Mitigation Route Map /Schedule of Mitigation which includes:	References to the draft Heads of Terms ("HoT") for the DCO planning obligations in the Guide to the Application and the Mitigation Route Map were incorrect as this document was not submitted but instead was set out in section 7.4 of the Planning Statement. The Guide to the Application submitted at Deadline 1 (13th November 2018) was amended to remove reference to the HoT and the error in the Mitigation Route Map will be added to a DCO errata document for submission to the Planning Inspectorate. A Status Note on the Draft DCO s.106 was submitted by Horizon at Deadline 1 (13 November 2018) [REP1- 010]. This also included a schedule of engagement which shows how Horizon will work with IACC and Welsh Government to provide drafts of the agreement throughout the examination process, enabling a finalised section 106 to be submitted to the Examining Authority at Deadline 8 (25 March 2019). In conclusion, the HoT details contained within section 7 of the Planning Statement remain to be correct and the subsequent Status Note provides an update to as to how the draft HoT have been translated into obligations as set out in the First Draft Agreement. Horizon has noted the question and understands the need for a more specific Mitigation Route Map. Horizon proposes to submit these two versions of the Schedule of Mitigation at Deadline 5 (12 February 2019) so that it can incorporate comments from the Local Impact Reports and Written Representations.					

· An update to the ‘Securing Mechanism’ column indicating by reference to specific paragraphs where the mitigation has been included; · A new column indicating the state of progress in relation to whether the mitigation proposed has been secured and if not why not; and · Deletion of mitigation that would be secured via a s106 Agreement. The Applicant is requested to provide a second Mitigation Route Map /Schedule of Mitigation which sets out: · The mitigation that is proposed to be provided by way of a s106 Agreement and the source of that mitigation; · A column providing clear reference to where that mitigation is included in the s106 Agreement; and · A separate column indicating what would happen to that mitigation in the absence of a s106 Agreement.	In order to assist the Examiners, Horizon will submit an excel version of the MRM at Deadline 2 (4 December 2018) [WN0902-JAC-PAC-REP-00009] This excel version can be filtered by control document and geographical area; making this much more navigable and easier to understand. In respect of the specific requests for these Schedules, Horizon has the following comments: • <i>Paragraph references:</i> Horizon considers that paragraph references should not be included within the Schedule of Mitigation at this stage. The reason for this is that the control documents will continue to evolve during Examination as a result of the questions from the Examining Authority and the written representations from relevant stakeholders. Horizon would like to take the opportunity to consolidate its mitigation position by Deadline 4 (17th January 2019). An comprehensive update of the Mitigation Route Map would be provided at Deadline 5 (12 February 2019). Giving specific paragraph numbers based on changing control documents at this stage would render these references obsolete very quickly. It is also likely to create confusion and ambiguity. Horizon will provide final cross-references in the final version of the MRM by the end of Examination. • <i>State of progress:</i> The MRM already contains a column which clearly indicates how mitigation measures listed in the MRM are secured, with reference to the relevant control document or or other appropriate securing mechanisms. As only mitigation under the draft DCO s.106 is currently unsecured (as that agreement is still in draft form). Horizon proposes that this column will only relate to draft DCO s.106 mitigation. • <i>Deletion of S106 mitigation:</i> The excel version of the MRM can be filtered to remove all draft DCO s.106 mitigation which will assist in the interim until the updated and separate Schedules are provided at Deadline 5 (12 February 2019). As stated above, the excel version of the MRM can be filtered on column 6 to provide a clear list of all mitigation measures to be secured via the draft DCO s.106 agreement. A separate column will be included to show what would happen to that mitigation in the absence of a Draft DCO s.106 Agreement. This information will be submitted at Deadline 5 (12 February 2019). However in summary, it is considered that: • the core financial obligations (as set out in appendix 1 of [REP1-010]) can appropriately be secured by Horizon delivering a unilateral undertaking to IACC. • Horizon can continue to oblige itself in a unilateral undertaking to make payments direct to a third party. However, it is conceivable that some of these would instead be directed to IACC, for it to distribute. • The allocation of the payments identified as contingency payments could continue to be allocated via an oversight panel (i.e. the Wylfa Newydd Main Permissions Oversight Panel),	

		however the mechanism for establishing the panel may instead be secured under DCO Requirement, or agreement outside of the Draft DCO s.106 remit. • A decision would be taken whether the non-financial obligations would best sit in a unilateral undertaking or in a separate “social obligations” document secured by DCO Requirement. However, Horizon considers either option would appropriately ensure their delivery	
Q4.0.11 3	The Applicant has provided a Mitigation Route Map (APP-422) indicating the different pathways through which mitigation would be secured. The Applicant is requested to provide an updated Mitigation Route Map /Schedule of Mitigation which includes: · An update to the ‘Securing Mechanism’ column indicating by reference to specific paragraphs where the mitigation has been included; · A new column indicating the state of progress in relation to whether the mitigation proposed has been secured and if not why not; and · Deletion of mitigation that would be secured via a s106 Agreement. The Applicant is requested to provide a second Mitigation Route Map /Schedule of Mitigation which sets out: · The mitigation that is proposed to be provided by way of a s106 Agreement and the source of that mitigation; · A column providing clear reference to where that mitigation is included in the s106 Agreement; and · A separate column indicating what would happen to that mitigation in the absence of a s106 Agreement. A Programme Board would be responsible for setting and reviewing the monitoring programme and having an oversight of the funding from the Section 106.	Horizon has noted the question and understands the need for a more specific Mitigation Route Map. Horizon proposes to submit these two versions of the Schedule of Mitigation at Deadline 5 (12 February 2019) so that it can incorporate comments from the Local Impact Reports and Written Representations. In order to assist the Examiners, Horizon will submit an excel version of the MRM at Deadline 2 (4 December 2018) [WN0902-JAC-PAC-REP-00009] This excel version can be filtered by control document and geographical area; making this much more navigable and easier to understand. In respect of the specific requests for these Schedules, Horizon has the following comments: • <i>Paragraph references:</i> Horizon considers that paragraph references should not be included within the Schedule of Mitigation at this stage. The reason for this is that the control documents will continue to evolve during Examination as a result of the questions from the Examining Authority and the written representations from relevant stakeholders. Horizon would like to take the opportunity to consolidate its mitigation position by Deadline 4 (17th January 2019) . An comprehensive update of the Mitigation Route Map would be provided at Deadline 5 (12 February 2019). Giving specific paragraph numbers based on changing control documents at this stage would render these references obsolete very quickly. It is also likely to create confusion and ambiguity. Horizon will provide final cross-references in the final version of the MRM by the end of Examination. • <i>State of progress:</i> The MRM already contains a column which clearly indicates how mitigation measures listed in the MRM are secured, with reference to the relevant control document or or other appropriate securing mechanisms. As only mitigation under the draft DCO s.106 is currently unsecured (as that agreement is still in draft form). Horizon proposes that this column will only relate to draft DCO s.106 mitigation. • <i>Deletion of S106 mitigation:</i> The excel version of the MRM can be filtered to remove all draft DCO s.106 mitigation which will assist in the interim until the updated and separate Schedules are provided at Deadline 5 (12 February 2019). As stated above, the excel version of the MRM can be filtered on column 6 to provide a clear list of all mitigation measures to be secured via the Draft DCO s.106 agreement.	

	Can further details be provided as to how this would work in particular what process/mechanism would be put in place in the event of a dispute?	A separate column will be included to show what would happen to that mitigation in the absence of a Draft DCO s.106. This information will be submitted at Deadline 5 (12 February 2019). However in summary, it is considered that: - the core financial obligations (as set out in appendix 1 of [REP1-010]) can appropriately be secured by Horizon delivering a unilateral undertaking to IACC. - Horizon can continue to oblige itself in a unilateral undertaking to make payments direct to a third party. However, it is conceivable that some of these would instead be directed to IACC, for it to distribute. - The allocation of the payments identified as contingency payments could continue to be allocated via an oversight panel (i.e. the Wylfa Newydd Main Permissions Oversight Panel), however the mechanism for establishing the panel may instead be secured under DCO Requirement, or agreement outside of the Draft DCO s.106 remit. - A decision would be taken whether the non-financial obligations would best sit in a unilateral undertaking or in a separate “social obligations” document secured by DCO Requirement. However, Horizon considers either option would appropriately ensure their delivery The draft terms of reference set out the proposed governance process for the Wylfa Newydd Main Permissions Oversight Panel (“WNMPOP”). The final agreed terms of reference will be annexed to the Draft DCO s.106. The draft terms of reference for the WNMPOP make it clear that the WNMPOP will only has decision making powers in relation to the contingency funds in the Draft DCO s.106, not in relation to upfront, early or annualised payments. Furthermore, the redacted Draft DCO s.106 states in each Schedule where there is a fund with a proposed contingency element the terms under which the WNMPOP would be able to release the contingency fund. This varies by topic, but have been included to ensure that the funds would be used for the purpose that they are intended and to mitigate the impacts of the Wylfa Newydd DCO Project. The mechanism in respect of any disputes is still being considered as part of the discussion on the draft terms of reference for the WNMPOP. One way in which this could be resolved in having an Independent Chair, who would have a casting vote over decisions where there was no majority. The WNMPOP's role in relation to monitoring is still under discussion with IACC and Welsh Government. The WNMPOP would only make decisions in relation to monitoring frequency and approach where this is not otherwise secured by the Draft DCO s.106 or elsewhere in the draft DCO.	

Q4.0.1.1 4	A Programme Board would be responsible for setting and reviewing the monitoring programme and having an oversight of the funding from the Section 106. Can further details be provided as to how this would work in particular what process/mechanism would be put in place in the event of a dispute?	The draft terms of reference set out the proposed governance process for the Wylfa Newydd Main Permissions Oversight Panel ("WNMPOP"). The final agreed terms of reference will be annexed to the Draft DCO s.106 agreement. The draft terms of reference for the WNMPOP make it clear that the WNMPOP will only has decision making powers in relation to the contingency funds in the Draft DCO s.106, not in relation to upfront, early or annualised payments. Furthermore, the redacted Draft DCO s.106 states in each Schedule where there is a fund with a proposed contingency element the terms under which the WNMPOP would be able to release the contingency fund. This varies by topic, but have been included to ensure that the funds would be used for the purpose that they are intended and to mitigate the impacts of the Wylfa Newydd DCO Project. The mechanism in respect of any disputes is still being considered as part of the discussion on the draft terms of reference for the WNMPOP. One way in which this could be resolved in having an Independent Chair, who would have a casting vote over decisions where there was no majority. The WNMPOP's role in relation to monitoring is still under discussion with IACC and Welsh Government. The WNMPOP would only make decisions in relation to monitoring frequency and approach where this is not otherwise secured by the Draft DCO s.106 or elsewhere in the Draft DCO.	

ExA Ref.	Question	Horizon's Response to Question	IACC Comments/Response
Q5.0.1	Chapter D9 para 9.5.451 [APP-128] states that geomorphological monitoring is proposed during operation to identify any changes in baseline conditions at Cemlyn Bay SSSI and SAC. Can the Applicant confirm that this is the marine programme referred to in Section 14 of the CoCP?	The proposed Marine monitoring programme outlined in section 14.4.1 of the Wylfa Newydd Code of Operational Practice (CoOP), [APP-421] is not proposed to include any geomorphological monitoring. Following a further review and comparison of the assessment conclusions detailed in chapter D12 Coastal processes and coastal geomorphology of the ES [APP-131] and chapter D9 of the ES [APP-128], Horizon now considers that the geomorphological monitoring proposed to identify any changes in baseline conditions at Cemlyn Bay SSSI and SAC during operation is no longer required, given the negligible to minor effects predicted to occur. Coastal process modelling was discussed with NRW from January 2015 onwards. A monitoring scheme was proposed as a precaution due to the absence of complete wave and hydrodynamic modelling results (including changes in wave height and the worst-case scenario winter storm). At a NRW consultation meeting on 10 January 2018 the more complete results had been obtained and were presented. The modelling showed that the changes to coastal processes were small and consequent effects on coastal geomorphology receptors ranging from negligible to minor. This modelling work provided confidence to be able to discount the need for monitoring. Subsequent modelling undertaken since draft DCO application submission has further confirmed this conclusion. In response to the Relevant Representation submitted by NRW [RR-088] a technical memo was produced to provide this post submission modelling. This was then discussed at a meeting with NRW on 27 September 2018. The work included coupled wave-bed shear stress modelling of a north-west 99th percentile storm event. These results show that the re-suspension of bottom sediments, swash processes (that could modify ridge morphology) and cross-shore sediment transport during and following the construction of the marine structures would not change significantly from the baseline situation. Therefore, for Esgair Gemlyn, changes to bed shear stress and coastal processes would be negligible compared to the baseline. The post submission modelling work is set out in the technical memo 'Q5.0.5 <i>Supplementary Information on coastal processes to support Wylfa Newydd EIA and Shadow HRA</i>' submitted at Examination Deadline 2 (4 December 2018). The same technical memo is also referred to in the responses to FWQ5.0.5 and FWQ12.0.5.	IACC remain concerned at the potential for affects to Esgair Gemlyn and Cemlyn lagoon. IACC require confirmation that the scope of Horizon's final proposals for geomorphological monitoring during the construction phase are acceptable to NRW.

Q5.0.4	In para 4.3.7 of its RR NRW considers that adverse effects on the site integrity of the Dee Estuary SPA cannot be ruled out. Can the Applicant comment?	Horizon understands that NRW's view is that some Sandwich terns that breed at Cemlyn also form part of the passage Sandwich tern feature of the Dee Estuary SPA. In NRW's view, abandonment of the Cemlyn population could, therefore, adversely affect the Dee Estuary SPA conservation objective to maintain the population of passage Sandwich terns. Horizon has not determined that an adverse effect on the integrity of the Morwenoliaid Ynys Môn/Anglesey Terns SPA would arise due to the Wylfa Newydd Project. However, if the Examining Authority reaches the conclusion that an adverse effect on the integrity of the Cemlyn population could arise (vis-à-vis abandonment or other population scale effects), then Horizon would agree that the potential for an adverse effect on the integrity of the Dee Estuary SPA to arise cannot be excluded. In such an instance, provided that effects on the Morwenoliaid Ynys Môn/Anglesey Terns SPA can be mitigated or (if required) compensated, any risk of an adverse effect on the Dee Estuary SPA would be removed. This issue was discussed with NRW at a meeting on 17 October 2018 and NRW agreed with Horizon's position, as set out above.	
Q5.0.5	In para 4.3.9 of its RR NRW requests additional information on coastal processes modelling to assess adverse effects on Esgair Gmlyn. Can the Applicant provide this?	In response to the relevant representation [RR-088] issued by NRW, a technical memo was produced to provide the additional information requested. This memo was then discussed at a meeting with NRW on 27 September 2018 and subsequently updated. The post submission modelling work is set out in the technical memo '<i>Supplementary Information on coastal processes to support Wylfa Newydd EIA and Shadow HRA</i>' submitted at Examination Deadline 2 (4 December 2018). The same technical memo is also referred to in the responses to FWQ5.0.1 and FWQ12.0.5. Coupled wave-bed shear stress modelling Coupled wave-bed shear stress modelling of a north-west 99th percentile storm event has been undertaken and the results were presented to NRW on 27 September 2018. They show that the resuspension of bottom sediments, swash processes (that could modify gravel ridge morphology) and cross-shore sediment transport associated with the north-west 99th percentile storm event during and following the construction of the marine structures would not change significantly from the baseline situation. That is, for Esgair Gmlyn, any changes to bed shear stress and coastal processes compared to the baseline would be negligible. This is set out in '<i>FWQ.5.0.5 Supplementary Information on coastal processes to support Wylfa Newydd EIA and Shadow HRA</i>' technical note prepared by Jacobs.	

		Sediment data The Jacobs technical note referred to above also considers NRW's request for further sediment data for Cemlyn Bay and concludes that, because the evidence shows that the development and operation of Wylfa Newydd DCO Project would not significantly affect the coastal processes and geomorphology of Cemlyn Bay or Esgair Gemlyn, the collection of additional sediment data for the purposes of this assessment would be unwarranted (see section 4 of <i>Supplementary Information on coastal processes to support Wylfa Newydd EIA and Shadow HRA</i>). Waste water outfall protective structures The design and location of the protective structure proposed to surround the waste water outfall pipe during the construction phase (in the Marine Licence application) is still under consideration. However, it is a minor structure, no more than 1m in height, adjacent to the breakwater and of a scale that the coastal process model grid resolution cannot pick up. To this end, its influence on coastal processes in Cemlyn Bay and Esgair Gemlyn is expected to be insignificant in comparison to the breakwater (the effects of which have been modelled and found to be negligible). This matter was discussed with NRW at a meeting on 27 September 2018. References: <i>Supplementary Information on coastal processes to support Wylfa Newydd EIA and Shadow HRA.</i>	
Q5.0.6	In para 4.3.10 of its RR NRW requires further clarity in relation to the mitigation measures detailed in 7.4.5 of the Shadow HRA and in relation to the drainage proposed on and around Mound E. Can the Applicant provide this clarity?	Further discussions were held with NRW on this point in October 2018. The following provides further clarification of Horizon's proposals. The next paragraph and bullets in italics represent a proposed amendment to paragraph 10.2.10 of the Main Power Station Site sub-CoCP [APP- 415]. Horizon has submitted this amendment into Examination at Deadline 2 (4th December 2018) (WN0902- JAC-PAC-REP-00020): <i>"For the Nant Cemlyn (which drains to the Cemlyn Lagoon), specific measures to manage the discharge of sediment will be undertaken during construction of Mound E. Flow would be diverted into the Afon Cafnan until vegetation establishes and risk of sediment discharge (as agreed with NRW) would be low.</i> <i>From the point of commencement of earthworks on the west of Mound E onwards, no water will be discharged via discharge point E1 into Nant Cemlyn (which drains to the Cemlyn Lagoon) until vegetation has re-established and the risk of sediment runoff is agreed (in writing) with NRW to be low.</i>	IACC are in agreement with adoption of the approach set out by NRW. IACC would wish to be included in the discussions around a) proposed monitoring scheme; b) submitted baseline date report and its recommendations; and c) the decision to return diverted flows to the Nant Cemlyn

	• <i>A written scheme of baseline water quality monitoring in Nant Cemlyn will be agreed with NRW to inform understanding of the background variability in suspended sediment concentrations and, therefore, agreement on the state of the water quality it will be appropriate to discharge into Nant Cemlyn from the western face of Mound E. This monitoring will commence at an appropriate time prior to the works commencing. Discharge will only be returned to the Nant Cemlyn when an agreed water quality threshold has been met.</i> • <i>After establishment of vegetation, if there are any additional bulk earthworks on the west of Mound E resulting in a risk of sediment run-off, no water will be discharged into Nant Cemlyn until vegetation re-establishment has occurred and the proposal to discharge has been agreed with NRW.</i> • <i>During these periods, all water collected in the drainage network on the west side of Mound E will be diverted and discharged to Afon Cefnau via discharge E2.</i> • <i>When discharges are made to Nant Cemlyn, no polyelectrolyte dosing will be employed.”</i> Further explanation of the expected scheme of baseline water quality monitoring (as outlined in the second bullet point above) to be delivered post DCO grant is provided below. It is not proposed that this text would be secured through the Wylfa Newydd CoCP [APP-414]. Horizon intends to produce a baseline water quality data set that is representative of the full flow regime for both Mound E and Nant Cemlyn before and during the earthworks to define the point in time or threshold at which it is appropriate to return water to the Nant Cemlyn. In outline, the water quality monitoring proposals (before and during the earthworks) include: • Continuous flow discharge and turbidity monitoring (to allow sediment load and instantaneous concentration to be calculated) with additional storm event triggered auto- samplers; • Monthly spot sampling of suspended sediment, turbidity and a range of chemical determinands (principally nutrients and metals) for a period of one year before the start of and during the Construction phase; • Event-based sampling, prior to the Construction phase to better characterise the sediment and hydrological regime (range of measured parameters as per the previous bullet); and, • Flow monitoring and targeted river walkover (e.g. to determine whether field and road drains are discharging and consider sediment inputs) at the same frequency as spot sampling (above). The following additional information would also be recorded (where practicable):	

		- Flow and turbidity monitoring elsewhere within the drainage network; and - Volumes pumped during the diversion, and the timing of pumping, so that the hydrological characteristics of the drainage can be accurately described. As stated above, the decision to return flow to the Nant Cemlyn will be taken with NRW. If possible, this will be agreed before the start of earthworks on Mound E. To define the point in time or threshold at which it is appropriate to return water to the Nant Cemlyn the following will be considered: - The suspended sediment load value should demonstrate that the risk of sediment run-off is low; - The threshold should match, or better, ambient levels of suspended sediment start; - When comparing data collected for Mound E and Nant Cemlyn, the relative performance of the two systems will need to be compared for both specific events and across the wider flow regime (seasonal variations in performance may also need to be considered); and - Ultimately a qualitative assessment may need to be made, taking into account water quality data and the extent and development of re-established vegetation on the Mound.	
Q5.0.7	In para 4.4.7 of its RR NRW is not able to conclude that the proposed compensation package for Tre'r Gof SSSI will deliver adequate quantity or quality of replacement habitat. Can the Applicant comment?	The compensation site selection process, which is detailed in Appendix D9-23 [APP-190] has identified a compensation package with high potential to meet the compensation objectives through the provision of more than 10ha of rich-fen habitat creation and a further 20ha of enhancement of existing fen/mire habitats, as well as improving habitat connectivity between units of the Anglesey Fens SAC. It is acknowledged that more detailed soil and hydrology data are required to validate the conclusions of Appendix D9-23 and enable development of detailed compensation designs. To this end, Horizon has undertaken further soil surveys at two of the proposed compensation sites (Cors Gwawr and Cae Canol- dydd) in January and August 2018. Horizon also commenced 12 months of hydrological and hydrogeological monitoring at these sites in September 2018. The scope of the hydrological and hydrogeological monitoring is defined (with some minor differences) in Appendix D9-24 [APP-191]. Four months of hydrological and hydrogeological monitoring data will have been collected by mid-January 2019. Horizon will prepare an interim monitoring report at this stage, which will be available, alongside the soil survey reports, to refine the compensation proposals and inform the draft DCO examination. Horizon expects that it will be able to submit this information at Deadline 6 (19 February 2019). Horizon will continue to liaise with the SSSI Compensation Technical Advisory Group throughout the refinement of the compensation proposals as further monitoring data become available.	

		Horizon is confident that, with additional data informing the application of a gradual, phased, adaptive approach to the design and implementation of the compensation works, the proposals will result in the establishment of high quality habitat to adequately compensate for the predicted effects on Tre'r Gof SSSI.	
Q5.0.8	In para 4.4.9 of its RR NRW states that chapter D9 does not fully address how mitigation measures will offset the air quality exceedances identified at Cae Gwyn SSSI. Can the Applicant provide further clarification?	Chapter D9 – Terrestrial and Freshwater Ecology of the ES identified potential air quality effects on Cae Gwyn SSSI. Taken together, the changes in air quality were predicted to lead to very small measurable changes in the interest features and quality of Cae Gwyn SSSI, which would represent a small magnitude of change and a minor adverse effect in the medium term, which is anticipated to reduce as changes reduced towards baseline conditions. Since the submission of the draft DCO application, Horizon has shared proposals with IACC and NRW to include further detail in the mitigation measures regarding air quality monitoring and triggers to initiate action on site, as well as using newer construction plant with lower oxides of nitrogen (NOx) emissions. These measures are now included in Section 7 of the updated Main Power Station Site sub-CoCP and Section 7 of the updated Wylfa Newydd CoCP that have been submitted at Deadline 2 (4 December 2018). Please see Horizon's response to FWQ1.0.6, which gives a further explanation of these measures. Of particular relevance, Horizon has committed to additional mitigation regarding reducing the emissions of NOx from construction plant from that assessed in the draft DCO application at the time of submission. This will act to reduce adverse air quality effects at all ecological receptors. A Technical Report will be submitted into examination at Deadline 3 (18 December 2018) detailing the modelling results with this lower emitting plant being utilised on the site and providing updated assessments. The revised air quality assessment screens out Cae Gwyn SSSI from requiring further ecological assessment in all aspects except nitrogen deposition, which is only above the criteria for requiring further consideration during construction year 2 (peak earthworks and marine works), and the increase represents only 2% of the critical load value. At present, Horizon has no right of access to Cae Gwyn SSSI so is unable to commit to any enhanced management of the site which would mitigate for any adverse effects as a result of air quality changes (e.g. cutting and removal of biomass as proposed at Tre'r Gof SSSI).	
Q5.0.9	Can the Applicant justify why the worst case scenarios given in Table 2.2 of the Shadow HRA [APP-050] were chosen and explain what the reasons are for those scenarios which differ from those used in the ES?	The worst-case scenarios that were chosen for the Shadow HRA are aligned with those assessed in the EIA, unless indicated otherwise in table 2-2 of the Shadow Habitats Regulations Assessment Report (Part 1 of 2) [APP-050]. The worst-case scenarios are based on the maximum design parameter envelope (e.g. for the treated sewage discharge rate and total suspended solids, deep excavation and cofferdam dewatering, earthworks design and drainage, disposal of dredged material and cooling water abstraction rate).	

		The ES [APP-078 and APP-226] and Shadow HRA used different base cases for the assessment of the effects of thermal and total residual oxidant (TRO) discharge. In agreement with NRW, the hydrodynamic modelling used to inform both the Shadow HRA and EIA was based on a number of scenarios in order to look at the effects of season, wind and waves on the behaviour of the cooling water discharge over spring – neap tidal cycles (the results of which are presented in WNDA Development App D13-8 - Marine Hydrodynamic Modelling Report - Wylfa Newydd Development Area [APP-226]). In the EIA a worst case annual base case scenario, and appropriate input data reflective of each season, was used to illustrate how the cooling water discharge would behave over an annual cycle. This is considered to represent best practice for presenting temperature and TRO resulting from operation and aligns with water quality reporting standards; that use annual averages. The Shadow HRA, by contrast, assessed the seasonal base case which extends over the greatest spatial extent of the modelled seasonal cases (i.e. the autumn base case for the thermal discharge and the summer base case for TRO). These base cases were taken as the bounding cases for assessment purposes in the Shadow HRA. The Shadow HRA adopted this approach to ensure that the whole envelope of potential effect was used as the basis of assessment for all receptors. For example, the assessment of potential effects on Sandwich tern foraging identified the percentage of foraging attempts made by Sandwich tern within the spatial extent of thermal discharge (autumn base case).	
Q5.0.10	Can the Applicant explain why the ExA should be confident that all the relevant bird species and associated European sites have been identified, given the absence of survey data for certain areas affected by the Proposed Development as stated in para 4.7.2?	The Shadow HRA identifies three elements of the Wylfa Newydd DCO Project which occur in areas out with those encompassed by the ornithology surveys. These are: • The Disposal Site. • Parc Cybi Logistics Centre). • The road network associated with the Wylfa Newydd Project. In relation to the latter two elements listed above, there are no SPAs (or Ramsar sites) which overlap, or have connectivity, with the areas affected by these Wylfa Newydd DCO Project elements. The lack of connectivity with SPAs is determined based upon distance to any SPAs and the absence of suitable habitat (e.g. in the case of Parc Cybi (Logistics Centre) and its potential connectivity with SPAs for chough – [APP- 181]. It is noted that the Disposal Site does not form part of the DCO Order Limits, but is part of the associated Marine Licence and that the Shadow HRA prepared relates to both the draft DCO and the Marine Licence applications. In relation to the Disposal Site, there is clearly connectivity with the Anglesey Terns SPA, given the site's partial overlap with this SPA (and relevant consideration has been given to the potential impacts of the Disposal Site on the qualifying features of this SPA within the Shadow HRA). However, the Disposal	

		Site also has potential connectivity to other, more distant, breeding seabird SPAs (or Ramsar sites), as it could possibly provide an important foraging area for certain qualifying features of such SPAs (which may use foraging areas far from their breeding colony SPAs). Following the approach agreed with NRW (and as recommended in SNH guidance – SNH, 2014 [Shadow HRA reference RD298]), the potential connectivity of breeding seabird species from other SPAs (or Ramsar sites) with the Disposal Site was established using foraging range information for the species in question (most commonly the mean maximum foraging range, as given in Thaxter <i>et al.</i>, 2012 [RD330]). <u>All</u> breeding seabird species that were qualifying features of SPAs were included in the assessment undertaken in the Shadow HRA if they were identified as having connectivity to the Disposal Site on the basis of foraging range. Therefore, the inclusion of breeding seabird species in the Shadow HRA was independent of the survey data collection (although it should be noted that breeding season seabird survey data were accessed for (part of) the Disposal Site and the associated Project Zone of Influence (ZOI)). The Disposal Site was not considered to be relevant to passage or wintering seabird populations that were SPA (or Ramsar site) qualifying features. This was because the Disposal Site (and associated Project ZOI): • Did not overlap with any SPAs for wintering seabirds, and it was considered likely that wintering seabirds would forage largely within the SPAs (or Ramsar sites), given that site boundaries have been determined to encompass the key concentrations of these species (and NRW agreed with this position). • For passage populations of the two SPAs considered to have potential connectivity with the Project, it was considered unlikely that the Disposal Site would be important given that it (and the associated Project ZOI) encompassed a relatively small area of offshore habitat and that the data which were accessed for part of the Disposal Site and associated ZOI indicated very small numbers of the relevant qualifying features during the passage periods	
Q5.0.1 2	Can the Applicant provide summaries of raw data for the Minesto survey of seabirds in the vicinity of the disposal site referred to in the Shadow HRA [APP-050] para 6.5.35?	The Minesto seabird survey data that were accessed for the purposes of the Shadow HRA are presented in summary form within the Shadow HRA for those SPA qualifying features considered to have connectivity to the Disposal Site. These summaries are presented in Figures 6-36 to 6-42. Presentation of further details from these data is limited by the conditions under which they were purchased from Minesto.	

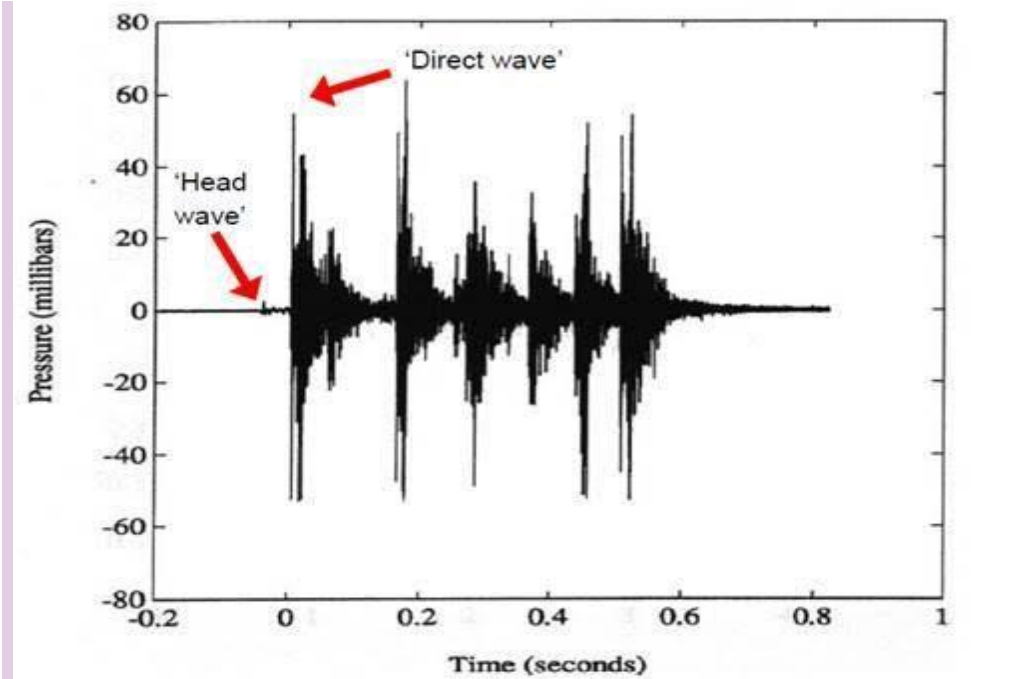
Q5.0.1 3	Can the Applicant explain why the ExA should be confident that the data is representative of the whole area of the Disposal Site and its associated Zone of Influence, given that paragraph 6.5.35 of the Shadow HRA states that the surveys only covered the southern part of the Disposal Site and Zone of Influence?	The area of the Disposal Site and its associated Zone of Influence (ZOI) that is encompassed by the Minesto seabird survey data is shown in Figures 6-36 to 6-42 of the Shadow HRA. As is apparent from these figures, the Minesto seabird survey area encompasses most of the southern half of the Disposal Site and much of the southern part of its associated ZOI (accounting for c.40% of the Disposal Site area and c.25% of the area of the associated ZOI). As such, the surveys sample a reasonably large part of the area in question. Although this sample is restricted to the southern half of the Disposal Site (and associated ZOI), there is little reason to expect a strong south to north gradient in seabird abundance within the area of the Disposal Site (or associated ZOI). This is because both the northern and southern halves of this area overlie deep water, and there is no strong 'distance to shore' gradient, except where the south eastern part of the ZOI abuts Holy Island. Bathymetry and proximity to shore are two of the strongest, broad-scale, gradients affecting the densities of seabirds at sea (with densities often higher in shallower, near-shore, waters). Therefore, it is very likely that the Minesto seabird survey data are representative of the entire Disposal Site and associated ZOI. Moreover, the Minesto seabird survey data were used to provide contextual information only and they are not used in any explicit way to determine the conclusions of the assessments for the SPA qualifying features that are presented in the Shadow HRA. In considering the Minesto survey data and their importance to the conclusions of the Shadow HRA, it is important to bear in mind the findings from the apportionment exercise (which does not rely upon the survey data – see paragraph 6.5.64 of [APP-050]. These findings indicated that for the vast majority of SPA populations with connectivity to the Disposal Site, the population (of the species of interest) within the Disposal Site (and associated ZOI) represents less than a fraction of 1% of the respective population of each European Designated Site. The exceptions to this were: • The qualifying features of the Anglesey Terns SPA. • The Aberdaron Coast Bardsey Island SPA population of Manx shearwater. In the case of the qualifying features of the Anglesey Terns SPA (which overlaps with the Disposal Site), data other than the Minesto seabird survey data were relied upon to assess usage of the Disposal Site (and the associated ZOI) by the qualifying features of the SPA (most notably the JNCC modelling of the usage of the marine environment by the different tern species at the different SPA colonies (Wilson <i>et al.</i> 2014 [RD362]), and the RSPB tracking data for Arctic terns breeding at the Skerries colony). In the case of the Aberdaron Coast Bardsey Island SPA Manx shearwater population, a precautionary assumption was made that the Disposal Site (and associated ZOI) may be used by significant numbers of the SPA population, and the assessment in the Shadow HRA was undertaken on this basis.	

		Therefore, although there is a reasonable basis for assuming that the Minesto seabird survey data are likely to be representative of the Disposal Site (and its associated ZOI), it is also the case that these survey data are not critical to the conclusions of the Shadow HRA. This is because: • The apportionment exercise demonstrates that the Disposal Site (and associated ZOI) is unlikely to be important to the vast majority of the SPA populations with connectivity to the Disposal Site (and associated ZOI). • The assessment of impacts from the Disposal Site on the Anglesey terns SPA relies on other data which inform usage of this area by the SPA qualifying features. • The assessment of impacts from the Disposal Site on the Aberdaron Coast Bardsey Island SPA Manx shearwater population assumes that there is significant use of the Disposal Site by this qualifying feature.	
Q5.0.1 5	Can the Applicant and NRW comment on the decision to exclude in- combination air quality effects where the process contribution from the Proposed Development is less than 1% of the critical load in light of the judgement in Wealden v SSCLG [2017] EWHC 351 (Admin)?	As stated in paragraph 5.4.2 of chapter B5 [APP-070] of the ES, the air quality modelling and assessment methodology is described in the Air Quality Modelling and Assessment Methodology - Non-Radiological Emissions report [RD16]. This included the relevant technical aspects of the modelling methodologies and assessment criteria. The first draft of the methodology report was provided to the IACC and NRW in November 2014 and has been updated and revised throughout pre-application consultation with both stakeholders. The latest revision of the report (Revision 2.0) was issued to the IACC and NRW in May 2017 for comment and discussed further in a meeting with the IACC and NRW in July 2017. The report sets out the assessment criteria adopted for the consideration of the modelled changes to concentrations of oxides of nitrogen (NO_x), nitrogen deposition and acid deposition at ecological receptors within the relevant study areas, which was based on advice provided by NRW during the pre-application discussions and development of the methodology report. The methodology report includes the following with regard to the use of the 1% criterion: <i>"Where the process contribution is less than 1% of the relevant critical level or critical load, the emission is not likely to have a significant effect alone or in combination irrespective of the existing concentrations or deposition rates."</i> It was on this basis that the decision to exclude in-combination effects where the process contribution is less than 1% of the critical level/load was made, in light of the judgement in Wealden v SSCLG [2017] EWHC 351 (Admin) which was made March 2017.	
Q5.0.1 7	In the light of the 'People Over Wind and Sweetman v Coillte Teoranta' judgement from the European Court of Justice (C-323/17), can	As set out in Requirement PW10 of the draft DCO, the Wylfa Newydd Decommissioning Strategy is to include specific controls relating to effects on sensitive receptors, flooding, landscaping, restoration and so on. However, the Shadow HRA does not rely on (or take into account) the development and implementation	

	the Applicant advise to what extent the decommissioning strategy secured through Requirement PW10 of the dDCO, constitutes a measure to avoid or reduce effects on European sites?	of the Decommissioning Strategy in assessing the potential for likely significant effects (LSE) during the decommissioning phase. The approach adopted to the assessment of decommissioning in the Shadow HRA was to set out a series of assumptions (in table 5-6 of the Shadow HRA) regarding the nature of the works likely to be required during decommissioning for each screening category and draw conclusions as to whether or not LSE could be excluded on that basis. The assumptions set out in table 5-6 of [APP-050] are the anticipated main features and characteristics of the decommissioning works (appreciating that these works will occur circa 60 years in the future) and align with the controls intended to be included in the decommissioning strategy (e.g. scheduling works to avoid the tern breeding season and siting temporary land take to avoid sensitive habitats). That is, they describe the fundamental characteristics of how the works would be undertaken, their scale and location, which are inseparable parts of the decommissioning works, rather than additional "measures" to avoid or reduce effects. Given that the decommissioning works will take place around 60 years in the future, and will necessarily be defined further going forward (including because they will require further EIA - as described in paragraph 5.6.1 of the Shadow HRA) it is appropriate to assume that the decommissioning works can and will be designed from the outset to avoid effects on European Designated Sites.	
Q5.0.1 8	For discharges to the marine environment from dewatering, para 7.4.12 of the Shadow HRA, can the Applicant explain where the discharge points would be? How have 'normal' rainfall levels been defined? What suspended sediment levels would be expected when these normal rainfall levels do not apply?	The discharge locations for dewatering are shown in figure D13-23 of the WNDA Development Figure Booklet - Volume D (Part 1 of 2) [APP-237]. The outfall cofferdam and main cofferdam (to include intake) are shown as OCD and MCD respectively. The cooling water tunnel dewatering is discharged at point OCD, and the deep excavation dewatering is discharged at PB and PC. In the context of the modelling work that supports the Shadow HRA and D13 of the Environmental Statement [APP-132], the 'normal' rainfall conditions have been modelled as a 1 in 2 year rainfall event; i.e. a rainfall event that would be expected once every two years. The use of a 1 in 2 year rainfall event provides a worst case for the purpose of the modelling. Full details of the modelling undertaken for dewatering discharges is provided in table 35 of appendix D13-8 of the draft DCO application. The modelling run completed uses a scenario in which the base flow is taken as a 1 in 2 year event with the inclusion of a 24 hour storm event using 1 in 30 year rainfall and flow. During the storm period the suspended solids concentration is assumed to be 300mg/l (table 39 of [APP-226]). The approach taken for modelling was discussed with National Resources Wales through various Environmental Permit meetings.	

Q5.0.2 0	Can the Applicant explain how the Minesto survey of the Shadow HRA have been calculated?	The estimates of effect on salinity presented in table 7-4 are based on the predicted net change in freshwater discharge during the construction phase (with and without the diversion of flow from the western side of Mound E to the Afon Cafnan). The methodology used to calculate the estimate of salinity change is best explained via a worked example, set out below. The volume of Cemlyn lagoon is calculated as 720,000m³ (based on an area of approximately 24ha and a conservative estimated average depth of 0.3m). The modelled effect of the construction phase under (for example) low flow range conditions (Q90 to Q100), not including diversion of flow from the western side of Mound E, is a decrease in the freshwater discharge of 4.7m³day⁻¹. Over 15 days, this equates to a decrease of 70.5m³. As noted in paragraph 7.4.48 of the Shadow HRA, the effect over a 15-day period is predicted because this is the approximate interval between the peaks in salinity observed during the water quality monitoring (reported in paragraphs 6.2.14 to 6.2.20 of the Shadow HRA). The effect of the change in freshwater flow on salinity is calculated as follows: $\text{Estimated effect on salinity} = (\text{Existing salinity [e.g. 30 psu]} * 720,000 [\text{lagoon volume in m}^3] / 1000) / (720,000 - 70.5 [\text{predicted decrease in inflow volume}]) * 1000 = 30.0029 \text{ psu (or 0.01\% change; in this example, an increase in salinity due to the modelled decrease in freshwater input).}$ The calculation is not sensitive to the assumed existing salinity (30 psu in the above example), because the change is calculated as a percentage.	
Q5.0.2 1	What evidence has the Applicant relied on in reaching the conclusion, in Table 7-29 of the Shadow HRA, that effects from the Visitor and Media Centre and the North Wales Connection can be managed and mitigated to result in no significant in-combination effects on Cemlyn Bay SAC?	In the absence of detailed design and environmental assessment of this proposed development, the conclusion is a judgement based on the likely non-complex/standard nature of the Visitor and Media Centre and the fact that it would be located over 2km from the Bae Cemlyn/Cemlyn Bay SAC. It is highly unlikely, therefore, that there would be a pathway for an effect on water quality within the Bae Cemlyn/Cemlyn Bay SAC due to the construction of the Centre. For the North Wales Connection project, the Shadow HRA (for the Wylfa Newydd DCO Project) relied on the findings of the Preliminary Environmental Information Report (PEIR) (National Grid, 2016; referred to in the Shadow HRA as RD219). At the time of submission of the draft DCO application for the Wylfa Newydd Project, the PEIR was the most comprehensive source of environmental assessment information available. For the potential effects of the North Wales Connection project relevant to the in-combination assessment referred to in table 7-29 of the Shadow HRA (i.e. potential effect on terrestrial and marine water quality, surface and groundwater hydrology and air quality), the PEIR concludes that no potentially significant effects are predicted and (for water quality and surface hydrology) no bespoke mitigation is required. For hydrogeology and air quality, standard good site practice and management is proposed with the result that	

		no significant impact is predicted. On this basis, it is reasonable to conclude that that there is no potential for a significant in-combination effect to arise.	
Q5.0.2 2	The predicted ambient noise levels during construction used for the assessment of effects on marine mammals does not include blasting (Shadow HRA para 8.3.116). Can the Applicant explain why the noise from blasting has not been considered and what effect would including blasting have on the conclusion of no adverse effects on integrity?	As noted in chapter D13 of the ES (e.g. paragraphs 13.5.3, 13.5.33, 13.5.34 and 13.6.398), blasting would not be conducted underwater and therefore the only potential effects on marine mammals would be due to airborne noise for any seals that are hauled out. As outlined in table 4-2 of the Shadow HRA, the air overpressure modelling predicts that 60dB would be generated at a distance of 1.5km from a blast site using the largest maximum instantaneous charge proposed of 150kg. Therefore, the seal haul-out sites (as outlined in Shadow HRA para 8.3.114) are beyond the distance where there would be any potential significant effects. Although airborne noise has the potential to temporally disturb a relatively small number of seals hauled in the vicinity (1.5km) of the Wylfa Newydd Development Area, there is no potential for any adverse effects on the integrity of any of the European Designated Sites where grey seal or harbour seal are a qualifying feature. This conclusion is unaltered as a result of the Request for Non-Material Change in relation to the blasting strategy [AS-012]. The noise assessment determined that the effects of noise on marine species from noise sources located on land would not be significant. This is due to the barrier effect that occurs at the boundaries between media along the path that airborne noise and ground borne vibration takes from source to receiver; in this case air to water, and ground to water. The reason for ruling out an effect on marine mammals (except seals that are hauled out) from terrestrial noise sources is because these transmissions between different media substantially reduce the noise level as it propagates. Noise sources that produce a significant effect tend to be from sources located in the water, but as soon as the source is removed from the water the noise level that enters the water is substantially reduced. The boundary between rock and water, and air and water, allows very little sound to penetrate. The following image demonstrates the difference in magnitude that can be expected as a result of the ground/water interface:	



This image shows a series of impulses produced by delayed charges detonating underwater and the sound waves that pass the receiver, a hydrophone situated in the water column. Of key importance is the 'head wave' denoted near the start of the trace. This is caused by sound radiated from the underlying rock into the water, which reaches the receiver slightly earlier than the 'direct wave' because of the faster speed of sound in the rock. The magnitude of this head wave is very small, typically of the order of 5% to 20% of the direct wave, and in situations where the source of noise is not in the water, the direct wave is largely eliminated as there is no direct path. The reduction caused by the transmission between air and water is even greater. It is for this reason that an effect in the water, where the source of noise is on land, especially where the source is transient, is not considered to be significant. Therefore, consideration of the effects of blasting will have not influence of the conclusion that an adverse effect of the integrity of marine mammals will not arise.

Q5.0.2 3	For in-combination effects on the designated marine mammal features of SACs, where the conclusions rely on the delivery of adequate mitigation by other projects, can the Applicant explain where it is relying on mitigation secured through consents and where it is relying on mitigation which it is assuming will be delivered?	To reduce the risk of potential auditory injury to marine mammals, or collision risk with tidal devices, the other projects considered in the in-combination assessment are expected to implement appropriate mitigation (in line with good practice), which should be secured through the project consents. The other projects considered in the in-combination assessment for marine mammals were: Wylfa Decommissioning, Anglesey Eco Park, Amlwch LNG plant, Minesto Holyhead Deep 10MW Tidal Kite, Mentor Môn (Morlais) West Anglesey Marine Energy Demonstration Zone, Gwynt y Môn Offshore Wind Farm, the North West Coast Connection Project and the NuGen Moorside Project. With the exception of the Wylfa Decommissioning, for which consent has been obtained and the mitigation measures secured, all of the other projects had not progressed to consent at the time of drafting the Shadow HRA [APP-051] and, therefore, the in-combination assessment relies on mitigation that it is assumed will be delivered. This is, however, a reasonable assumption, either because there were no assessment details to base any other assumption on, or, the assessments that have been undertaken demonstrate that the project effects are either predicted to be of low or negligible significance (e.g. the Tidal Kite). Therefore, although the Shadow HRA relies on the delivery of adequate mitigation by other projects in reaching its conclusions, this is a standard approach to assessing potential in-combination effects with other plans and projects which have not progressed to consent when the assessment is undertaken. This approach was adopted for the Hinkley Point C DCO and the York Potash Harbour DCO in-combination assessments.	
Q5.0.2 4	For in-combination effects on the designated marine mammal features of SACs, where the conclusions rely on the assumption that underwater noise disturbance will be limited to a small area (for instance the effects from the tankers associated with the Amlwch Liquefied Natural Gas referred to in Table 8-55), can the Applicant identify the evidence that these conclusions are based on?	The assumptions made in the Shadow HRA are based on recorded and modelled impacts from similar projects and activities. For example, in the case of the tankers associated with the Amlwch Liquefied Natural Gas referred to in table 8-55, potential disturbance would be similar to that modelled for large vessels in the Shadow HRA assessment (e.g. up to 60m for harbour porpoise; Shadow HRA table 8-26).	
Q5.0.2 5	For in-combination effects on the designated marine mammal features of SACs, where the conclusions rely on the assumption that changes in turbidity or suspended sediment would only occur over a limited distance, can the Applicant identify the evidence that these conclusions are based on?	The assumptions made in the Shadow HRA are based on recorded and modelled impacts from similar projects and activities. However, as outlined in paragraphs 8.5.64 and 8.5.66 of [APP-050], none of the other projects screened in have the potential to have any in-combination effects with respect to changes in marine water quality, including changes in turbidity or suspended sediment, during the construction and operation of the Wylfa Newydd DCO Project.	

Q5.0.2 6	As LSE was identified for airborne noise on marine mammals and the potential for adverse effects on integrity are considered in the Shadow HRA, can the Applicant explain why in- combination effects can be excluded (para 8.4.4 of Shadow HRA)?	LSE for airborne noise on marine mammals (specifically grey and harbour seals) was determined in Stage 1 of the HRA process on a very precautionary basis only, because the <i>possibility</i> of effect pathways for sites with 200km of the application site (see Shadow HRA) paragraphs 5.4.37 and 5.4.40) was identified. The nearest European Designated Site for grey seal is 48km from the Wylfa Newydd Development Area and the nearest for harbour seal is approximately 118km away. Therefore, the potential noise effect pathway only relates to individual seals ranging beyond the boundaries of these designations. Given this, the Stage 2 ‘appropriate assessment’ considered records of seal activity within the identified zone of influence for potential airborne noise effects (approx. 500m) and concluded that, due to a very small number of individual seals using the zone of influence (and the distance to their relevant designated sites), there was “<i>.no potential for adverse effects on the integrity of the European Designated Sites where these species are a qualifying feature</i>” (Shadow HRA) paragraph 8.3.117, A2). It is not unusual for an effect for which a potential LSE is identified at Stage 1 (on a precautionary basis) to be excluded as a result of further examination at Stage 2 of the process. Therefore, as outlined in Shadow HRA) paragraph 8.4.4, the conclusion that the potential for adverse effects can be discounted altogether (based on an assessment of seal distribution and distance from European Designated Sites) means that there is no potential for any in-combination effects with other projects to arise due to airborne noise during construction. That is, there is no effect for the influence of others project to combine with.	
Q5.0.2 7	In para 10.3.44 of the Shadow HRA, can the Applicant explain what other feasible and reasonable measures can be used to reduce noise levels?	It is Horizon’s position that there are no other feasible measures in addition to those set out below that can be used to further reduce the noise levels to be encountered at the tern colony that would meet the Wylfa Newydd DCO Project need and objectives – this process has been extensively considered and a precautionary set of controls has been put forward. The outcome of Horizon’s assessment and the Shadow HRA [APP-050 and APP-051] is that the noise levels that are predicted will be experienced (which are based on highly precautionary modelling assumptions), will not disturb the breeding terns (based on the 2017 and 2018 noise disturbance surveys undertaken at the colony, relevant scientific literature and expert advice). Nevertheless, Horizon has worked iteratively to develop a robust and precautionary set of controls to constrain the noise levels reaching the colony as far as possible. This suite of controls is set out in section 11.4 of the Main Power Station Site sub-CoCP and is duplicated in section 8.3 of the Marine Works sub- CoCP [APP-416]. They require that during the tern breeding season: • Blasting on the site will only be undertaken when, accounting for wind factors, noise shielding and other mitigation, the predicted blast noise at the colony will be less than 60	

dB or ambient noise at the colony (whichever is higher). This may require blast sizes to be reduced in certain weather conditions.

- Day-time construction noise at the colony will not exceed 59 dB LAeq, 1-hour.
- Night-time construction noise at the colony will not exceed 43 dB LAeq, 1-hour.

In addition, during the tern breeding establishment periods that occur during the Project's construction phase the following further constraints will be applied:

- Blasting on the site will only be undertaken when, accounting for wind factors, noise shielding and other mitigation, the predicted blast noise at the colony will be less than 55 dB dB LAF,max or the ambient noise at the colony (whichever is higher).
- Day-time construction noise at the colony will not exceed 55 dB LAeq, 1-hour or the ambient noise at the colony (whichever is higher).

Following further discussions with NRW regarding this mitigation, the refinements set out below to the monitoring and response elements of the mitigation have also been proposed. These will be secured in the revised Main Power Station Site sub-CoCP to be submitted at Deadline 4 (17 January 2019).

During the black-headed gull and tern breeding seasons that occur in the Wylfa Newydd Project's construction phase, noise levels will be measured at the tern colony either through direct monitoring on the islands or extrapolated calculations based on monitoring at nearby locations. These noise levels will be monitored against action thresholds (amber and red - breach); and where monitored noise levels (based on hourly averages) reach the amber action threshold, the following actions will be implemented:

- A review of the real-time monitoring data will be undertaken to confirm that the monitored levels are not being impacted by other noise or vibration sources (not connected to the development).
- Once confirmed, the onsite management team (the Construction Manager) will be notified that an action level has or is about to be exceeded and an action plan agreed.
- The appropriate managers will review the works and working strategy in the areas likely to be causing the breach and consider any possible/viable mitigation actions.
- Mitigation measures will be identified to reduce the noise to the acceptable specified level at the receptors and may include: plant/equipment substitution, adjusting the scheduling of the works, adjusting the intensity of the works, adopting alternative construction methodologies, and temporary relocation of certain activities. The decision-making process on the mitigation measures to be applied will be guided by safety considerations, amongst others, as well as the availability of equipment and potential impacts on other environmental receptors, and overall construction programme.

		- The appropriate managers will ensure that the selected mitigation measures are implemented, noting that, for any construction activity to be halted, an assessment first needs to be undertaken regarding whether the works are stable, and it is safe to do so (i.e. some works may need to be completed before they can be stopped); this will affect the time taken to alter working practices. - Monitoring will continue to verify that the control measures have reduced the noise levels to an acceptable level at the relevant receptors.	
Q5.0.2 8	Can the Applicant indicate the likely duration and frequency of surface blasting at the main power station site during construction, and how frequently would noise levels be reached which would lead to 'fly ups' by Terns at the Cemlyn Bay colony?	It is proposed that rock removal will be undertaken by the most efficient means practical. Key areas of proposed rock removal are for the deep excavations, the cooling water intake and outfall, and levelling the bedrock to create the site platforms. The single largest element of this will be in the deep excavations. So- called "surface blasting" is proposed when unfractured bedrock is encountered, making mechanical ripping inefficient. This would be employed for site levelling work and also in preparation for deeper rock removal, which will then typically take the form of 'bench blasting' (as undertaken in quarries). The vast majority of blasting will be during the main earthworks phase (approximately 2 years), with most surface blasting probably being in the earlier stages of this phase. The size of each blast will be specifically designed depending on the rock strength and location of the blast, to ensure that the proposed blasting vibration limits are not exceeded (as set out in Section 8.2 of the Main Power Station Site sub-CoCP). Noise monitoring will be conducted to demonstrate compliance at the tern nesting islands and, if this records a potential risk of the precautionary threshold being exceeded, the blasting design will be revisited. Minerals Planning Policy (Wales) Minerals Technical Advice Note 1: <i>Aggregates</i> states that "careful blast design should be able to resolve excessive levels of air overpressure".	Horizon has not sought to provide information concerning the frequency of surface blasting. No indication has been provided as to how many times per day blasting may occur. Other relevant submission documents have suggested up to 3 blasts per day. This would also depend on the rate of "mucking out" after each blast, i.e. the rate at which blasted material can be removed from the area and new holes drilled, surveyed, loaded and fired. The design of each individual blast should be standard practice on site. Reference should be made to the peer review of the proposed Air Overpressure Prediction (AOP) Methodology undertaken by Amec FW and commissioned by Horizon and provided to IACC and NRW. Its initial recommendation was to monitor ground vibration and AOP at varying distances from a realistic test blast. Such an exercise would enable a site specific regression line to be produced, from which maximum instantaneous charge weights (MICs) for both residential and infrastructure receptors would be chosen to ensure that the relevant blasting criteria would be met. Subsequent monitoring would add to the site database to enable the regression analysis to be frequently up dated. All blasting should be undertaken based on "well confined" blast designs as this is the most efficient in terms of producing stone, reducing the environmental effects (lower ground vibration and Air Over Pressure levels) and in addition will reduce the financial burden of drilling and blasting which can be very expensive. IACC is of the opinion that AOP is inherently difficult to predict hence the need to take a precautionary approach when considering effects upon the tern colony. IACC remains unclear as to what the difference is between 'unconstrained' blasts and 'highly confined blasts'. As stated above, all blasting should be undertaken using well designed blasts which include good stemming to confine the explosive charge. As above, Horizon should provide further definition on the use of the phrase 'confined blasts'. All blasts should be well designed to be as confined as possible – there should never be any unconfined blasting undertaken. The associated air overpressures would be minimised accordingly by good design. Appendix A of the peer review of the proposed Air Overpressure Prediction Methodology provides several recommendations to minimise AOP (and ground vibration) from blasting operations. Determining levels of AOP is inherently unpredictable. Test blasting can only act as a proxy if it adequately replicates specific conditions on site. IACC would ask that Horizon confirms that it has taken into consideration all of the recommendations made by the peer review, including Appendix A (Measures to control vibration and air overpressure levels from blasting) and the trial blast report

		Significantly, it is planned to only undertake ‘well confined’ blasting during the tern breeding season. Well confined blasts are generally the most efficient for winning rock, and therefore achieving highly constrained blasts is important for schedule and costs reasons as well as the protection of the terns. As detailed in Section 11.4 of the Main Power Station Site CoCP, all blasting during this season will be restricted to those situations where the predicted blast noise at the colony will be less than 60dB L_{AF,max} or the ambient noise (whichever is the higher), having taken account of wind factors, noise shielding and other mitigation. Based upon the predicted noise levels from unconstrained and highly confined blasts presented in the Shadow HRA, this would preclude unconstrained blasts, which are predicted to result in noise levels of over 78 dB L_{AF,max}, even at distances of 2km from the colony when using maximum instantaneous charges of 100 – 150 kg (see table 10-3 in the Shadow HRA). Therefore, during the tern breeding season, only confined blasts will be undertaken and this will minimise the risk of ‘fly up’ responses by the terns (because the predicted noise levels for these blasts will be below the levels expected to cause ‘fly up’ responses, based upon evidence from the published scientific literature	

		together with that from the site-specific surveys at the Cemlyn colony – see paragraphs 10.3.24 to 10.3.37 of the Shadow HRA). The possibility remains that, on rare occasions, blasts may behave differently to expectations, resulting in higher than predicted noise emissions (which may exceed 60 dB $L_{AF,max}$ or the ambient noise threshold). However, it is considered that such circumstances would occur rarely and, following any such events, the contractor would adapt the method used for blasting based on learning from any such events, as well as from the blasting programme overall. Given the above, even in conjunction with the cumulative modelling of noise levels from construction plant and machinery, it is expected that noise levels that would result in ‘fly up’ responses by the terns would only occur rarely at the Cemlyn colony (if at all). It is not possible to guarantee that noise levels sufficient to cause ‘fly ups’ would never be reached, nor to state with certainty how frequently ‘fly ups’ may occur (it can only be stated that the available evidence suggests this is likely to be, at most, rare and infrequent). Nevertheless, should ‘fly ups’ occur as a result of noise disturbance, the mitigation should act to ensure that (wherever possible) appropriate action is taken to address the cause. It is also relevant to note that the noise modelling took a conservative approach to predicting blast noise (e.g. accounting for wind conditions). It is on the basis of the results of this conservative modelling that the proposed mitigation for disturbance to terns during blasting has been defined. The conservatism in the modelling provides further confidence regarding the ability of the Contractor to meet predicted levels and avoid blast related fly ups.	
Q5.0.2 9	Can the Applicant explain why the ExA should be confident that the noise levels reported for the trial blasting in Chapter 9 Appendix D13-13 [APP-231] represent the noise levels likely to be experienced at the Cemlyn Bay Tern colony from surface blasting during construction?	To clarify, it is not suggested that the noise levels reported for trial blasting represent the noise levels to be experienced due to surface blasting during construction. A methodology was developed to predict the A-weighted noise levels due to blasting at any distance, and then the trial blasting was undertaken to see how well the methodology worked on site given the particular physical conditions present. A comparison of the measured A-weighted noise from the surface blasts with the predictions showed that in all but one case the measured levels were below the predicted level (when a 10dB downwind correction was applied to the predictions for those blasts undertaken under downwind conditions). Therefore, the Examining Authority can be confident that the methodology developed can accurately predict the noise levels that would be associated with surface blasting during construction.	IACC is aware that while the peer review of the AOP methodology which is referred to in the previous answer was based on logical methods it used data that was not site specific to Wylfa and must be updated by a realistic test blast before normal production blasting commences. The test blast undertaken was not a realistic example of the type of blasting envisaged on site. The methodology should be constantly updated based on the latest data collected from production blasting on site.
Q5.0.3 0	The Shadow HRA, at para 10.3.79 -10.3.81, refers to modelling of light spill from the MOLF. Can the Applicant clarify in which document this modelling is presented?	The details of the modelling are contained in technical note (<i>Illustrative Lighting Spill Note</i> ; reference WN0902-RH-PAC-REP-00003). This note contains commercially sensitive information, and as such a redacted version will be submitted at a later examination deadline.	

Q5.0.3 1	Can the Applicant confirm whether the calculation of numbers of fish likely to be entrained/impinged in the cooling water intake (paras10.3.228 – 10.3.234 of the Shadow HRA) takes into account the use of the acoustic fish deterrent?	The calculation of numbers of fish likely to be entrained/impinged does not take into account the use of the acoustic fish deterrent. Therefore, it represents a worst-case assessment.	
Q5.0.3 5	Para 10.3.40 of the Shadow HRA concludes that there would be no adverse effect on the integrity of the Anglesey Terns SPA as a result of intra-project effects during construction but it is not clear to the ExA why these minor effects would not combine to have an adverse effect on the integrity of the SPA. The Applicant is requested to provide a detailed explanation, with supporting justification/evidence where necessary, as to why the effects from construction identified in paragraph 10.3.40 would not undermine the conservation objectives of the SPA.	Paragraph 10.3.40 of the Shadow HRA discusses the precautionary nature of the predicted noise levels during the construction phase. It is, therefore, assumed that this question relates to the statements and conclusions reached in paragraphs 10.3.240 and 10.3.241 of the Shadow HRA; which deal with intra-project effects. In terms of the intra-project effects during construction, these essentially fall into two categories (as described in paragraphs 10.3.239 and 10.3.240), that is: • Noise and visual disturbance potentially affecting the birds when they are present at the colony (e.g. when attending nests and chicks). • Noise and visual disturbance potentially affecting birds when they are commuting and foraging within the marine environment. For these effects to combine and be additive, it is necessary for them to lead to reductions in one, or more, demographic rate (e.g. breeding success), and for the effects on the demographic rates to be sufficient to cause a reduction in population size, and/or to cause birds to desert the colony (e.g. due to experiencing poor breeding success or high mortality risks). In relation to the first of these (disturbance at the colony), the Shadow HRA concludes that the levels of noise predicted to arise during the construction period are highly unlikely to cause 'fly up' responses amongst the breeding terns; and this is also the conclusion in relation to potential visual disturbance at the colony. These conclusions are based upon a combination of evidence from the published, scientific, literature and site-specific surveys on the responses of terns at the Cemlyn Bay colony to disturbance events (under baseline conditions). In relation to noise disturbance, the evidence from the published literature derives from studies on wintering waterbirds in the UK and on nesting crested terns in Australia. These studies suggest that wintering waterbirds show low to (at most) moderate degrees of behavioural response to noise events of 60dB or less, including from sources of impulsive noise (RD371, RD63 and RD64). The effects of experimentally generated noise (simulating overhead aircraft) was determined on nesting crested terns. Crested terns showed increases in scan or alert behaviours at the lowest levels of noise generation (65 – 70dB) but the	

higher level responses of ‘startle’ (involving a momentary movement away from the nest) or ‘escape’ (involving birds flying up from the nest) occurred only at exposures to noise levels of 90 – 95dB, and even at the highest generated noise levels fewer than 20% of birds showed such responses (RD32).

The baseline disturbance surveys at the Cemlyn Bay colony found that ‘fly up’ responses by the terns were associated with anthropogenic noise disturbance in three instances only, with noise levels ranging from 73.4

– 88.8 dB in these instances. However, approximately 50 other events associated with potential anthropogenic noise disturbance produced no ‘fly up’ responses by the terns, with the associated noise levels for these events ranging from 50.1 – 83.5dB (see paragraphs 10.3.31 – 10.3.37 of the Shadow HRA).

Predictions (based upon precautionary assumptions) are that daytime noise levels at the Cemlyn Bay colony for non-impulsive noise from construction plant and machinery remain below 58.6dB, whilst during night- time hours they will be substantially lower. For impulsive noise, predicted levels resulting from construction plant range between 47.0 and 58.4 dB $L_{AF,max}$, with the highest value being attributable to mobile plant in zone E (i.e. the closest working zone to the colony).

In addition to noise from construction plant and machinery, the noise from blasting has also been predicted. Blasts in confined situations are predicted to produce noise levels of 60dB $L_{AF,max}$ or less at distances beyond 1.5km. The Cemlyn Bay colony is beyond 1.5km of the locations at which blasting is required, except in the case of Port-y-pistyll where blasting sites are 1.1km from the colony (giving predicted noise levels of 62.9 dB $L_{AF,max}$ for a 150kg charge. Unconstrained blasts are predicted to generate considerably higher noise levels, and these would remain above 80dB $L_{AF,max}$ in the majority of cases at distances within 1.5km.

In light of the evidence from the published, scientific, literature and site-specific surveys on the responses of terns to anthropogenic noise disturbance (summarised above), the predicted noise levels from construction plant and machinery (i.e. below 60 dB), the Shadow HRA concludes that terns at the breeding colony are highly unlikely to exhibit responses involving any temporary departure from their nests or chicks.

In relation to visual disturbance, a number of studies of disturbance effects on terns and gulls informed the assessment of potential effects on the Cemlyn lagoon breeding terns. These studies largely assess visual disturbance caused by walkers, vehicles and motor boats and, on the basis of the findings of such studies, buffer distances can be defined for conservation/protection purposes beyond which significant behavioural responses would not be expected. Evidence from the scientific literature suggests that buffer distances rarely exceed 200m (RD28, RD93, RD283, RD282), although RD93 recommended distances of up to 200m to 300m during the early part of the season.

The baseline disturbance surveys at the Cemlyn Bay colony recorded events that could potentially result in disturbance to terns due to visual stimuli. Seven of the 10 responses that were attributed to visual disturbance involved people and/or dogs at distances of 0 to 50m from the colony. By contrast, the closest

approach distances to the colony recorded for people and/or dogs in each of the 34 instances where there was no 'fly up' response ranged from 50 – 550m, averaging 74m.

Passing road vehicles at distances of approximately 150m from the colony were associated with 'fly up' responses in three instances, whereas no response was elicited from this potential disturbance source at distances from 150m to 875m.

As noted at paragraph 10.3.66 of the Shadow HRA, given that the WNDA boundary is in excess of 500m at its closest from the islands in Cemlyn Lagoon on which the vast majority of the SPOA terns nest, it is considered highly unlikely that visual disturbance from construction activities will cause 'fly up' responses from terns attending the colony.

The proposed mitigation for noise and visual disturbance will further ensure that the risk of effects arising from noise and visual disturbance is extremely low. In the unlikely event that construction noise and visual disturbance do cause occasional 'fly up' responses, this will cause a small increase only in the frequency of such responses from 'baseline' conditions (25.5 'fly ups' per day from the on-site survey data – see paragraph 10.3.55 in the Shadow HRA).

'Fly up' responses by terns are typically of short duration and at the Cemlyn colony usually extend over a 35 to 45 second period only (based on the on-site surveys – see paragraph 10.3.55). During 'fly up' responses the terns are absent from their nests or chicks for a short time, but the possibility exists that opportunistic predators (e.g. gulls) could exploit these events to predate eggs or chicks. Consequently, any increase in 'fly up' responses as a result of noise and visual disturbance at the colony could be associated with a reduction in breeding success at the colony (due to increased predation of eggs and chicks). However, the extent of any such reduction in breeding success will be small (because few, if any, 'fly ups' are expected to occur due to disturbance at the colony and this will only represent a small addition to the existing level of 'fly up' responses under baseline conditions).

It is conceivable that there may be other subtler effects due to construction noise disturbance on terns present at the colony, which are not apparent from visible behavioural responses from the terns (e.g. 'fly ups'). Disturbance can cause physiological stress responses in birds, which could affect breeding success. For example, decreased nesting success in kittiwakes and guillemots, associated with human disturbance from visitors to the breeding colonies, has been observed [RD15]. This possibility is therefore considered within the Shadow HRA (see paragraph 10.3.57) but it is concluded that any such effects on breeding success resulting from construction noise disturbance are likely to be, at most, small. This is because such physiological stress responses have been demonstrated in relation to disturbance from the direct presence of people (RD15, RD5) and not to construction noise or other causes. This is because people are likely to be perceived as potential predators by birds, and as such are more likely to cause such responses.

		In relation to the second category of intra-project effects during construction (disturbance in the marine environment), the Shadow HRA adopts a highly precautionary approach and assumes that commuting and foraging terns will completely avoid the area of sea within which noise from construction plant and machinery is predicted (on a precautionary basis) to be 65dB(A) or higher. Within the Shadow HRA, this area is termed the offshore noise ZOI and it encompasses the offshore extent of the Development Area as well as the area within which it is considered that visual disturbance from construction may occur (extending 500m out from the offshore extent of the Development Area). The reason that the above approach is considered precautionary is the evidence from the literature suggests that Sandwich terns are relatively insensitive to anthropogenic disturbance in the offshore environment (RD117, RD115). Further studies in connection with the construction of an offshore wind farm demonstrated that the numbers of Sandwich terns recorded in surveys undertaken during piling operations were higher than those during pre- or post-piling surveys on the same day. Furthermore, the distance of birds to the piling rigs did not differ according to whether they were operating or not [RD84]. Observations of tern flight behaviour were also undertaken in relation to the offshore ground investigation works in the Porth-y-pistyll area. Very limited flight avoidance behaviour by Sandwich terns was noted. This offshore noise ZOI covers a small extent of the foraging range available to the SPA terns only (including for those birds breeding at the Cemlyn Bay colony). Furthermore, the tern tracking data presented in the Shadow HRA show a small proportion of recorded foraging locations (<2.5% for Sandwich tern) occurring within the offshore noise ZOI; whilst calculations (based on estimates of the increase in daily energy expenditure derived from modelling energetic costs associated with avoidance of offshore wind farms by breeding birds; RD204) suggest that the energetic costs of circumventing the offshore noise ZOI when undertaking flights to and from the Cemlyn colony will also be small (<1–2% of daily energy expenditure). Given the evidence summarised above and the adoption of a precautionary approach to the assessment (where this is warranted), it is reasonable to conclude that the effects of noise and visual disturbance from construction activities on terns commuting and foraging in the marine environment would not result in any significant effects on breeding success. The conclusions described above suggest that the effects of construction activities on the SPA terns are unlikely to be of sufficient scale or magnitude to lead to subsequent effects on breeding success, or indeed other demographic rates (e.g. annual survival rates). Any effects on breeding success that do occur are likely to be minor and will remain so when combined across the different intra-project effects. As such, it is considered that the intra-project effects during construction will not lead to adverse effect on the integrity of the wider Morwenoliaid Ynys Môn/Anglesey Terns SPA.	

Q5.0.3 6	Table 10-12 of the Shadow HRA concludes that there would be no adverse in-combination noise and visual effects between the Proposed Development and Wylfa Decommissioning on the Sandwich Tern population of the Anglesey Terns SPA. Can the Applicant explain how the requirement for some of the Wylfa Decommissioning works to be carried out in the non- breeding season has been secured? Which works would be covered by this restriction? Given that the disturbance impact to birds from the Wylfa Decommissioning is reported as ranging from slight to moderate, why should the ExA be confident that adverse in-combination effects could be avoided?	The mitigation related to the decommissioning of the existing Wylfa power station (Existing Power Station) has been secured via conditions attached to the consent (dated 25 September 2013). Condition 2 requires the preparation and implementation of an environmental management plan. Condition 3a requires that the mitigation measures that are already identified in the environmental statement are listed. The works that the ES for the decommissioning of the Existing Power Station (reference [RD198] of the Shadow HRA) refers to as being undertaken outside of the bird breeding season are (i) construction of a coffer dam at the Outfall Gatehouse location and (ii) demolition of the Cooling Water Outlet Culverts, Outfall Gatehouse and offshore structures. The environmental management plan (Issue 6, December 2017) captures this mitigation measure and, therefore, it is secured under the conditions of the consent for the decommissioning of the Existing Power Station. To clarify the text in table 10-12 of the Shadow HRA, the conclusion of the ES for the decommissioning of the Existing Power Station is that an effect of a “<i>slight to moderate magnitude</i>” <u>could arise, not significance</u>. This assessment encompassed all birds, including a gull colony in Laydown Area 1 (for the decommissioning works). Given this conclusion and the fact that it encompassed consideration of a gull colony that would be directly affected by the decommissioning works, Horizon’s view is that the conclusion drawn in table 10-12 is valid. To confirm, the Shadow HRA conclusion is based on the commitment that the Wylfa decommissioning works with potential to generate high levels of noise and visual disturbance to the SPA tern populations will occur outside of the breeding season and that any potential noise and visual disturbance from the Wylfa decommissioning works will not add significantly to levels predicted from the Wylfa Newydd DCO Project alone.	

Q5.0.3 7	Can the Applicant explain what evidence it has relied on in table 10-23 in reaching the conclusion that there would be no adverse effects on the integrity of the Anglesey Terns SPA from in-combination effects of the Proposed Development with the Anglesey Eco Park, the North Wales Connection, the Holyhead Deep 10MW Tidal kite installation, the Demonstration Zone, the Amlwch Liquid Natural Gas and West Anglesey the Wylfa Visitor and Media Reception Centre?	It is assumed that this question relates to table 10-12, which assesses potential in-combination effects on the Morwenoliaid Ynys Môn/Anglesey Terns SPA Sandwich tern population (and which is also used as the basis for the conclusions reached for in-combination effects on the Morwenoliaid Ynys Môn/Anglesey Terns SPA common tern and Arctic tern populations). Table 10-23 is concerned with the in-combination assessment for the Glannau Ynys Gybi/Holy Island Coast SPA cthough population. The evidence relied upon in table 10-12 to reach a conclusion of no adverse effects on the integrity of the Morwenoliaid Ynys Môn/Anglesey Terns SPA was the evidence available during drafting of the submission, as agreed with the IACC and NRW (it is standard practice to agree a cut-off date in this context, otherwise in-combination assessment would never be complete). Further details and links to the on-line evidence available are given in Appendix B of Shadow HRA Part 2 of 2. The evidence used in the Shadow HRA was as follows for each of the (proposed) developments identified in the question: • <u>Anglesey Eco Park:</u> At the time of writing the Shadow HRA, no Environmental Statement or HRA was available for this development. Therefore, no ‘evidence’ was available to inform the in-combination assessment. As such, it was assumed that the construction and operation of the development can be managed and mitigated in such a way as to ensure that it does not have an adverse effect on the Morwenoliaid Ynys Môn/ Anglesey Terns SPA and, therefore, that no adverse in-combination effects would arise This assumption is a reasonable one and is standard practice in in-combination assessments, as the avoidance or offsetting of adverse effects will be a requirement of any Planning consent. • <u>North Wales Connection Project:</u> At the time of writing the Shadow HRA, only the Scoping Report was available for this development, with no Environmental Statement or HRA yet produced. The Scoping Report only identified general pathways for effects and so did not provide ‘evidence’ to inform the in-combination assessment. As such, it was assumed (in line with standard practice) that the construction and operation of the development can be managed and mitigated in such a way as to ensure that it does not have an adverse effect on the Morwenoliaid Ynys Môn/ Anglesey Terns SPA alone or in-combination. • <u>Holyhead Deep 10MW Tidal Kite Installation:</u> At the time of writing the Shadow HRA, the HRA for this development was available, although planning consent had not yet been granted. The HRA identified no LSE in relation to the Morwenoliaid Ynys Môn/ Anglesey Terns SPA and, on this basis, it was concluded that the development would not contribute in any significant way to the in-combination effects on this SPA. • <u>West Anglesey Demonstration Zone:</u> At the time of writing the Shadow HRA, no application for marine and land planning had been submitted by this development. Hence there was no ‘evidence’ (as such) available to inform the in-combination assessment and it was assumed (in line with standard practice) that the construction and operation of the development can be managed and mitigated in such a way as to ensure that it does not

Q5.0.3 8	For the resilience measures described in section 11.3 of the Shadow HRA, can the Applicant explain why an incident response plan to address adverse effects from increased sediment loads discharging to Cemlyn lagoon during storm events would not constitute a mitigation measure?	have an adverse effect on the Morwenoliaid Ynys Môn/ Anglesey Terns SPA alone or in- combination. • <u>Almwch Liquid Natural Gas:</u> At the time of writing the Shadow HRA, no Environmental Statement for this development was available. Therefore, no 'evidence' could be accessed to inform the in-combination assessment. As such, it was assumed that the construction and operation of the development can be managed and mitigated in such a way as to ensure that it would not have an adverse effect on the Anglesey Terns SPA alone or in- combination. • <u>Visitor and Media Reception Centre (Horizon):</u> Horizon's current position is that this development will be progressed once the Wylfa Newydd DCO Project is operational. As such, it does not have the potential to contribute to an in-combination effect on the Morwenoliaid Ynys Môn/Anglesey Terns SPA with the construction activities of the Wylfa Newydd DCO Project. This resilience measure is proposed to deal with background/ongoing issues associated with increased sediment loads entering the lagoon during storm events (as suggested during consultation) and is not connected with the effects of the Wylfa Newydd Project. If it is implemented, Horizon would not have direct control on this resilience measure and makes no reliance on it in any assessment of conclusions. For this reason, this measure does not represent mitigation.	
Q5.0.4 0	Can the Applicant confirm if they are developing a package of compensatory measures for effects on the Anglesey Terns SPA? What measures are they considering?	Horizon's position is that there will not be an adverse effect on the integrity (AEOI) on the Morwenoliaid Ynys Môn/Anglesey Terns SPA. However, on a precautionary basis, in light of NRW's stance that an AEOI on the Morwenoliaid Ynys Môn/Anglesey Terns SPA cannot be excluded, Horizon has undertaken a feasibility and concept design study to investigate the measures that would be required to deliver appropriate compensation habitat. Horizon has investigated five short-listed locations to determine their suitability (and availability) as compensation sites. Currently, four of these sites are being studied in further detail and outline design is ongoing. The sites that have been short-listed are areas that already contain some suitable habitat for common, Arctic and Sandwich tern nesting. Habitat management would include the deposit of suitable nest-building substrate (shingle and/or cockle shells) and the planting or maintenance of shelter-providing vegetation, such as dune grassland species. Tape lures and tern decoys would be used to encourage tern nesting.	

		The key threat to the success of any tern nesting habitat creation would be its accessibility to mammalian predators. Therefore, electric fencing would be positioned around the areas above the level of mean high water spring (MHWS) tides. The provision of wardening is also proposed as an important measure in ensuring the creation of successful nesting habitat through deterring predation and anthropogenic disturbance pressures. Wardening would also assist in managing threats from avian predation. It is reiterated, however, that the Shadow HRA has concluded that no effects on site integrity would arise from the project; consequently, Horizon would not intend to bring the compensation measures forward unless the Examining Authority concludes that it agrees with NRW's position.	
Q5.0.4 2	In Table 11-1 of the Shadow HRA, can the Applicant explain why mitigation would not be secured directly through the dDCO, rather than through a number of certified documents, which would give more certainty that adverse effects would be avoided?	Table 11-1 of the Shadow HRA sets out a schedule of mitigation measures relevant to the HRA. The table includes various measures, ranging from those in respect of construction dust and combustion emissions from plant, to measures relating to disturbance at the breeding tern colony from noise and visual stimuli, and measures to manage worker behaviour and interaction with the environment. The measures listed in Table 11-1 would be secured through various control documents, including through the Wylfa Newydd Code of Construction Practice (CoCP) and sub-CoCPs [APP-415 to APP-420], the Wylfa Newydd Code of Operational Practice, the Design and Access Statement [APP-407 to APP-410], and the Workforce Management Strategy [APP-413]. Schedule 3 of the Draft DCO [APP-029] requires Horizon to comply with these documents when undertaking construction and operation of the Wylfa Newydd DCO Project. The approach taken by Horizon in the draft DCO has been to secure all mitigation within the control documents and to avoid the need for numerous requirements in Schedule 3 of the draft DCO. This approach enables Horizon to provide more detail in relation to the mitigation than would ordinarily be able to be included in a Statutory Instrument. In addition, it avoids the need for numerous requirements which could create ambiguity and potentially conflict with each other, thereby undermining Horizon's ability to comply with the requirements. As noted above, compliance with control documents is secured through the Requirements in Schedule 3 of the draft DCO and for this reason Horizon does not consider that there is any reduced certainty, or ability to enforce, in securing mitigation measures through the control documents. Horizon's position on the use of tailpieces in Schedule 3 is set out in its response to FWQ.4.0.56. Furthermore, Horizon does not consider that HRA related mitigation should be treated differently to other key mitigation. The measures listed in Table 11-1 are more appropriately dealt with in control documents alongside the other measures that are similar in nature. For example, construction dust measures that are	

		relevant to the HRA are best dealt with in the Wylfa Newydd CoCP, and sub-CoCPs, alongside the other construction dust related measures included in those control documents.	
Q5.0.4 3	Measures to protect Cemlyn Bay SAC from the impact of increased visitor numbers during construction rely on the implementation of the Workforce Management Strategy [APP-413] via the Code of Conduct. Implementation and enforcement of a Code of Conduct (dDCO requirement PW8) will be the responsibility of contractors, can the Applicant explain why the ExA should be confident that the delivery of these measures would be adequately secured?	Horizon is the company responsible for the delivery of the Wylfa Newydd DCO Project, in whom the powers of the DCO would be vested. The Workforce Management Strategy describes the key principles that Horizon and its partners, will utilise to manage the construction workforce. These key principles will inform the development of the Code of Conduct which will guide workforce conduct and behaviours during the construction of the Wylfa Newydd DCO Project. Owing to the key principles of the Workforce Management Strategy being secured by way of DCO Requirement PW8, Horizon will ensure enforcement of standards and procedures within the Code of Conduct and will provide support to the community and relevant stakeholders (including environmental NGOs) to avoid foreseeable problems. Horizon will not directly employ all personnel involved in the construction of the Wylfa Newydd DCO Project and compliance with the Code of Conduct will be secured through contractual agreements between contractors and their employees. Horizon will ensure that each contractor agrees to comply (and require its employees through their individual contracts to comply) with the Code of Conduct for the duration of the construction period. The Examining Authority has highlighted that measures to protect Cemlyn Bay SAC from the impact of increased visitor numbers during construction rely on the implementation of the Workforce Management Strategy specifically via the Code of Conduct. Since submission of the draft DCO application, Horizon proposes to revise the principle relating to sensitive ecological receptors to the following in a Deadline 4 (19 February 2019) update to the WMS: <i>“All personnel must be aware of nearby sensitive ecological receptors and their legal protection, which requires compliance with the Conservation of Habitats and Species Regulations 2017 and Wildlife and Countryside Act 1981 (that is, the Wylfa Head, Tre'r Gof and Cemlyn SSSIs, the Cemlyn Bay (lagoon) SAC and other local nature reserves). Personnel will be strongly encouraged – through inception meetings, tool box talks and appropriate signage – to avoid damage or interference of any kind to these areas by, for example:</i> • <i>Keeping to defined paths and behind barrier fencing at all times;</i> • <i>Refraining from littering;</i> • <i>Refraining from removing or damaging vegetation, habitats, nests and eggs; and</i> • <i>Not impacting (damaging, picking, collecting or harming) any species within these areas (particularly nesting species).</i>	

		<i>Horizon will support this by employing or providing the funding for a warden to monitor these sensitive areas and support landowners to fence off their land at key times (e.g. during breeding periods) during the construction phase – funding will be secured by DCO s.106 [REP1-010] agreement. In addition, gardening of the tern nesting sites in the lagoon will be enhanced during these breeding seasons. This will be emphasized in induction talks, along with the importance of not disturbing breeding terns and respecting advice from the site wardens. During the tern breeding season wardens will be present in close proximity to the lagoon and relevant restrictions in place.</i> <i>Disciplinary procedures will be taken against any employee who breaches this principle, through contractual arrangements.”</i>	
Q5.0.4 6	Can the Applicant and NRW review the recent judgement Case C-164/17: Reference for a preliminary ruling from Supreme Court (Ireland) made on 3 April 2017 — Edel Grace, Peter Sweetman v An Bord Pleanala and advise on any implications they think the judgement has for the Appropriate Assessment of the Proposed Development?	Horizon considered this case when it was issued and is of the view that the recent European Court ruling (C-164/17) does not have any implications for the Appropriate Assessment of the Wylfa Newydd DCO Project. This is because Horizon has not included measures that could be considered compensation measures (e.g. habitat creation) in drawing its conclusions regarding the predicted effects on the integrity of European Designated Sites.	
Q5.0.4 7	ES D13 para 13.5.70 is somewhat contradictory with regards to the discharge point for the fish recovery and return system. It first states that the location has yet to be determined but is stated to be located 'to the north of the eastern breakwater in the region of the -6.0m contour'. It subsequently states the discharge point would be fixed to the northern face of the eastern breakwater. Can the Applicant clarify?	It is true that the exact location of the discharge point for the fish return and recovery system is still to be determined by Horizon and confirmed with National Resources Wales through the Operational Water Discharge Environmental Permit. However, chapter D13 of the Environmental Statement included an indicative discharge point located off the northern side (i.e. outer edge) of the eastern breakwater, positioned in the subtidal in the region of the -6m AOD contour. The indicative location on the northern side of the eastern breakwater offers a longer release window, sheltered release point, limited risk of re-impingement and the possibility of an overland route for the conduits.	

ExA Ref.	Question	Horizon's Response to Question	IACC Comments/ Response
Q6.0.2	With reference to 6.2.11 ES Volume B - Introduction to the environmental assessments B11 - Cultural heritage [APP-076] are you content with the Applicant's methodologies; assessment criteria; measures of magnitude of change and impact and conclusions for Cultural Heritage across the project in relation to: (a) Planning Inspectorate Scoping Opinion particularly in relation to the 'action taken'; (a) Statutory and non-statutory consultations carried out by the Applicant; (b) Topic specific methodologies and assessment criteria; particularly: i. Assessment of parameters ii. Identification of study areas iii. Identification of receptors iv. Identification of baseline conditions v. Assessment of effects vi. Limitations If not outline your concerns and explain how the issues might be resolved.	Although this question is directed to IACC and Cadw Horizon would like to make the following comments at this stage. The method and assessment criteria including definition and rational for study areas, identification of receptors, identification of baseline conditions, assessment of effects and limitations for the cultural heritage is presented in chapter B1 of the Environmental Statement - Introduction to the assessment process [APP- 066]. The approach was developed based on legislation, the Overarching National Policy Statement for Energy (NPS EN-1; of relevance see paragraphs 5.8.8, 5.8.9 and 5.8.10) and good practice guidance. In addition, and as detailed in paragraph 11.3.3 of chapter B11 of the ES [APP-076], the approach to the assessment was also informed by Wylfa Newydd DCO Project EIA Scoping Report, Addendum and the subsequent Scoping Opinions. The key issues raised, and the action taken by Horizon in response to these is identified in Table B11-4 in chapter B11 of the ES [APP-076]. In accordance with paragraph 5.8.8 of NPS EN-1 Horizon provided a description of the significance (value) the heritage assets affected by the proposed development and the contribution of their setting to that significance. This information is summarised in the following chapters of the Environmental Statement: - chapter D11 (Cultural heritage) [APP-130] for the WNDA Development; - chapter E11 (Cultural heritage) [APP-249] for the Off-Site Power Station Facilities; - chapter F11 (Cultural heritage) [APP-276] for the Park and Ride; - chapter G11 (Cultural heritage) [APP-314] for the A5025 Off-Line Highway Improvements; and - chapter H11 (Cultural heritage) [APP-365] for the Logistics Centre. Additional detailed information is presented in following appendices: - appendix D11-1 Wylfa Newydd Proposed New Nuclear Power Station Cultural Heritage Baseline Report (APP-202 and APP-203); - appendix D11-2a Wylfa Newydd Isle of Anglesey – Archaeological Trial Trenching Vol. 1 to 3 [APP-204 and APP-205]; - appendix D11-2b Wylfa Newydd Proposed New Nuclear Power Station: Archaeological Trial Trenching - Post-Excavation Assessment and Updated Project Design [APP-206]; - appendix D11-3a Wylfa Newydd Proposed New Nuclear Power Station Marine Archaeology Baseline Report Revision 2 [APP-207]; - appendix D11-3b Wylfa Newydd Proposed New Nuclear Power Station Marine Archaeological Survey Report [APP-208];	The HNP response to this question does not address the concerns raised in the IACC response to this question. We therefore refer the ExA to the response of the Council to this question and LIR Chapters (specifically Chapter 17, 19, 20, 21, 22 which provides details of our issues with the applicant's assessment.

- appendix D11-4 Wylfa Newydd Proposed New Nuclear Power Station Assessment of the Significance of Cestyll (Grade II) Registered Historic Park and Gardens Final Report [APP- 211];
- appendix D11-5 Assessment of Significance of Dame Sylvia Crowe’s Landscape Design at the Existing Power Station [APP-212];
- appendix D11-7 Assessment of the Significance of the Impact of Development on the Historic Landscape for the Wylfa Newydd Power Station (ASIDOHL2) [APP- 214];
- appendix E11-1 Off-Site Power Station Facilities: AECC ESL and MEEG - Gazetteer of heritage assets [APP-262];
- appendix F11-1 Dalar Hir Ynys Mon Archaeological Baseline Assessment [APP- 297];
- appendix F11-2 - Land at Dalar Hir Near Junction 4 of the A55 Geophysical Survey [APP- 298];
- appendix F11-3 Land at Dalar Hir: Archaeological Trial Trenching [APP-299];
- appendix F11-4 Park and Ride - Gazetteer of heritage assets [APP-300];
- appendix G11-1 A5025 On-line and Off-line Highway Improvements Anglesey: Cultural Heritage Desk-Based Survey and Walk-Over Survey Report [APP-345 and APP-346];
- appendix G11-2 Wylfa Newydd A5025 Highway Improvements Anglesey Geophysical Survey [APP-347 and APP-348];
- appendix G11-3 Wylfa Newydd: A5025 Highway Improvements Isle of Anglesey: Evaluation report [APP-349];
- appendix G11-4 A5025 Off-line Highway Improvements - Gazetteer of heritage assets [APP- 350]; and
- appendix H11-1 Logistics Centre - Gazetteer of heritage assets (Appendix [APP- 380]).

As identified in chapter B11 paragraph 11.4.10 [APP-076], the cultural heritage baseline was established through desk-based surveys and walkover surveys, non-invasive investigations and invasive investigations (field evaluation) and a summary of these investigations is provided in Table B11-10. In this way the approach taken in the Environmental Statement aligns with paragraph 5.8.9 of NPS EN-1 which states that:

“Where a development site includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation.”

Where field evaluation was required (see table B11-10), this was undertaken in accordance with Written Schemes of Investigation (WSI) which were agreed with Gwynedd Archaeological Planning Service (GAPS), who also monitored the works (see chapter B11, paragraph 11.3.12).

		Where effects are identified to have potential to be significant these are presented and discussed in detail in the following chapters of the Environmental Statement: D11; E11; F11; G11 and H11. An assessment of magnitude and unmitigated significance of effect is presented in these chapters, along with mitigation (presented on a heritage asset by heritage asset basis), and an assessment of residual magnitude and significance of effect. Where effects are identified not to be significant these are not discussed in chapters D11, E11, F11, G11 and H11 but an assessment, along with mitigation, and an assessment of residual magnitude and significance of effect, is presented in the following appendices: • appendix D11-6 (Effects on heritage assets) [APP-213] for the WNDA Development; • appendix E11-2 (Effects on heritage assets) [APP-263] for the Off-Site Power Station Facilities; • appendix F11-5 (Effects on heritage assets) [APP-301] for the Park and Ride; • appendix G11-5 (Effects on heritage assets) [APP-351] for the A5025 Off-Line Highway Improvements; and • appendix H11-2 (Effects on heritage assets) [APP-381] for the Logistics Centre. The approach summarised above ensured that the extent of the impact of the proposed development on the significance of any heritage assets affected could be adequately understood, in line with the requirement of paragraph 5.8.10 of EN-1. With regards to the limitations of ongoing investigations on site, Horizon continues to engage with IACC/GAPS/Cadw providing on site access to investigation areas (Weekly/Monthly). On completion of the investigation areas, Horizon will be submitting Archaeological Summary Reports for review to confirm there has been no change to the baseline assessed within the ES. Other limitations, relating to the identification of study areas, trial trench reports which Horizon relied on have not been fully reviewed and signed off by GAPS. However, GAPS were fully integrated into the decision making of the methodologies which lead to the planning / phasing / and implementation of the archaeological investigations.	
Q6.0.3	Referring to Table B11-14 DMRB criteria for establishing the value of heritage assets of 6.2.11 ES Volume B - Introduction to the environmental assessments B11 - Cultural heritage [APP-076]:	(a) As detailed in chapter B11 (ES Volume B - Introduction to the environmental assessments B11 - Cultural heritage) the assessment of effects on cultural heritage assets that could result from the construction and operation of the A5025 Off-Line Highways Improvements was undertaken based on the guidance provided by the Design Manual for Road and Bridges (DMRB) Volume 11 Section 3 Part 2 'Cultural Heritage'.	IACC is concerned that the way in which the DMRB methodology has been used is not entirely compatible with the policy provisions set out in NPS EN-1. These concerns are as outlined in IACC's response to this question. Specific concerns over valuations of identified heritage assets are as set out in IACC's responses to the the First Written Questions and in the Local Impact Report. (b) in addition to concerns set out in the LIR regarding the influence of using DMRB valuation criteria on mitigation, where an asset is considered to be high value instead of very high, then (assuming the same magnitude) the significance of effect is lower which, on the basis of Horizon's explanation, also means that the mitigation required to reduce the residual impacts to less than moderate would also be less. Therefore, under-valuing an asset could mean that less than optimal mitigation may be offered.

	(a) Explain why Scheduled Monuments and Grade I and Grade II* buildings are not valued as 'very high'? (b) Does a value of 'high' result in less than optimal mitigation?	As detailed in paragraphs 5.10.9 and 6.10.3 of this guidance, the "<i>Very High value category is intended for sites of international concern or status</i>" (for example World Heritage Sites) and "<i>is expected to be invoked only rarely</i>". This is reflected in the criteria presented in Table B11-14 for the assessment of value which were designed to be a guide to the professional judgement of the cultural heritage specialist who undertook the environmental impact assessment. (b) The purpose of mitigation is to reduce the residual significance of effects on a cultural heritage asset i.e. in this case to less than moderate. The need for, nature, and scope of mitigation was determined on an asset by asset basis by a cultural heritage specialist. This assessment was informed by the significance of effect which, as identified paragraph 11.4.26 of chapter B11, was determined as a combination of the value of the asset and the magnitude of impact, using professional judgement informed by the matrix illustrated in table B11-17. The identified mitigation also took into account the results of consultation with statutory consultees. As such, the mitigation identified for each cultural heritage asset is the most optimal mitigation using the method for the assessment of value.	
Q6.0.4	With reference to para. 5.8.13 of EN-1 explain, with examples, how the significance, the contribution of their settings and the positive contributions heritage assets can make to sustainable communities and economic vitality has been sustained or enhanced across the project.	Archaeology and Cultural Heritage is assessed in the Environmental Statement (ES). Building on the Sustainability Statement [APP-426], which is based on the ES findings, has, through Objective 12, assessed the sustainability implications of cultural heritage.	IACC considers that the contribution of the historic environment to sustainability and place-making has not been adequately set out and that opportunities to make positive enhancements have not been appropriately identified. Suggested opportunities for this type of enhancement and placemaking are set out in the IACC LIR.
Q6.0.7	List those Scheduled Monuments, Listed Buildings, Conservation Areas and Registered Historic Landscapes and Parks and Gardens assessed as subject to substantial harm or total loss of significance as a consequence of the project in all of its phases and across all sites and in each case outline the reasons why the substantial harm or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm;	As identified in paragraph 11.7.11 of chapter D11 of the Environmental Statement (Cultural heritage) the major adverse residual effect on Cestyll Garden (HLT 2) during construction has been assessed to constitute substantial harm as described by the Overarching National Policy Statement for Energy (EN-1) [RD1] as this would result in a permanent and substantial loss of the value (significance) of this heritage asset. As stated in paragraph 11.7.12 of chapter D11 no other effects have been assessed to constitute substantial harm. The justification for substantial harm to Cestyll Garden is based on: i) The substantial public benefits of the scheme outweighing the substantial harm to Cestyll Garden; and ii) Lack of feasible alternative locations for the components of the Wylfa Newydd Development that contribute to the substantial harm to Cestyll Garden.	IACC notes the justification provided for the location of the MOLF and associated Components. In view of the substantial harm that would be caused to this heritage asset and the corn mill at Felin Gafnan, IACC expects HNP to set out more comprehensive and effective mitigation proposals in a Conservation Management Plan (CMP) to be secured as a requirement of the DCO and which sets out detailed steps to conserve the significance of Cestyll Garden and associated heritage assets during the construction and operation of the proposed development. IACC are concerned that no justification for the substantial harm caused to non-designated archaeological remains of equivalent significance to scheduled monuments within the Main Development site is provided. Further detail is provided in the WNDA LIR Chapter 17 – Historic Environment Section.

	and the steps taken to mitigate the harm and/or loss of significance.	These justifications are considered in more detail below. Substantial public benefits outweigh substantial harm There is strong legislative and policy support for new nuclear power in the UK and specifically at Wylfa including: • “Meeting the Energy Challenge - A White Paper on Nuclear Power” [RD1] announced that nuclear should have a role to play in the generation of electricity, alongside other low carbon technologies. • NPS EN-1 [RD2] which establishes the urgent need for new energy infrastructure (see paragraphs 3.3.15, 3.3.22, 3.5 and 3.5.9) to meet energy security and carbon reduction objectives, to replace closing electricity generating capacity, and to support an increased supply from renewables and future increases in electricity demand. • NPS EN-6 [RD3] which sets out the Government’s policy on the urgent need for nuclear power. NPS EN-6 included Wylfa as a potentially suitable site for the deployment of a new nuclear facility before the end of 2025, subject to certain matters that require further consideration through a DCO application. The UK Government (in including Wylfa in the NPS EN-6) concluded that none of these factors were sufficient to prevent the site from being considered potentially suitable. • Clean Growth Strategy [RD4] confirmed the Government’s continued support for growing low carbon sources of electricity, specifically including a continued commitment to nuclear energy. • “Consultation on Siting and Process” published on 7 December 2017 by BEIS [RD5] states that, subject to the outcome of the consultation, the Government propose to carry forward the sites listed in NPS EN-6 including Wylfa, that have not applied for DCO into the new NPS. • The Statement on Energy Infrastructure [RD6] identifies that Government continues to give its strong in principle support to project proposals at those sites listed in NPS EN-6, including at Wylfa. In addition to the strong legislative and policy support for new nuclear power in the UK and specifically at Wylfa, the Oxera Report commissioned by Horizon and appended to the Planning Statement [APP-406] clearly identified that due to an expected increase in electricity demand, retirement of electricity generating plant capacity, the lack of proven alternatives to nuclear power generation, and the constraints imposed by emission reduction obligations, the need for new nuclear remains urgent. The Wylfa Newydd DCO Project is therefore a nationally significant electricity infrastructure project required to meet the national need for electricity.	

	Lack of feasible alternative locations As identified in chapter D11 of the Environmental Statement (Cultural heritage), substantial harm to Cestyll Garden would result primarily from: i) removal of the kitchen garden, the plot of land where Cestyll House formerly stood, and part of its Essential Setting by a construction laydown area. ii) Construction of the temporary causeway, proposed breakwaters and the MOLF would introducing a source of noise and visual intrusion into the valley garden. iii) The continued presence of the Power Station as a dominant feature in the setting of Cestyll Garden (HLT 2; high value), and of the breakwater as a dominant feature in the Significant View from the valley garden. <i>Removal of the kitchen garden, the plot of land where Cestyll House formerly stood, and part of its Essential Setting.</i> Volume 2 of the Site Selection Report [APP-437] sets out Horizon’s reasoned approach to determining the location of the main temporary and permanent components to be accommodated within the Wylfa Newydd Development Area, including in relation to Cestyll Garden. Horizon’s approach to locating the Power Station has been largely driven by the need to deliver and operate it in a timely, safe and efficient manner. As a result, many of the key permanent components are limited in terms of where they can be located, particularly the main plant. This requirement has in some respects resulted in limited options when locating other components within the Wylfa Newydd Development Area, on the basis that for engineering, space and safety reasons the position of the Power Station and other key components has determined the location of supporting components, such as construction laydown areas. The consideration of alternatives in regard to Cestyll Garden should therefore not be viewed in isolation from other components in the Wylfa Newydd Development Area. The construction laydown area would require removal of the kitchen garden. It has not been possible to locate the laydown area in an alternative location as a result of the following: • The area is required to provide access to the western breakwater and allow surface water and treated effluent discharge. The surface water and treated effluent discharge are located here as it is the nearest point next to the sea prior to discharge and where minimal change occurs throughout construction. While the treatment plants could be located in another area where a significant amount of change occurs during construction, this relation is likely to disrupt the works and increase safety risks.	The scheme as currently designed would also result in the construction of a temporary waste water treatment plant (WWTP) within the Essential Setting, would remove the Gardener’s Cottage and the original driveway, could result in increased flows in the Afon Cafnan (and consequential erosion and loss of soil and plants) and would introduce views of the proposed breakwaters into the Significant Views from both the Valley Garden and House Plot, all of which would also contribute to the substantial harm predicted. In IACC’s opinion, this substantial harm would occur during construction and would endure for the full duration of the operational period. Volume 2 of the Site Selection Report does not provide sufficient reasoned justification for the permanent encroachment on Cestyll Garden. Cestyll Garden is referred to in only three locations: • In para 5.2.1 Cestyll Garden is described as a constraint (but, in reality, only the Valley Garden has been treated as a constraint). • In para 5.5.11 it is stated that Mounds D and E have been located so as not to encroach directly into Cestyll Garden or its setting (however, Mound D does encroach directly into the Essential Setting of Cestyll Garden and over the original driveway). • In paras 6.2.5 – 6.5.7 it is stated that the laydown area to the south of Porth-y-pistyll bay would contribute to direct and indirect impacts on Cestyll Garden by the removal of the Kitchen Garden and impact on the Essential Setting. Three reasons for locating the laydown area in this location are given (these are expanded upon by Horizon in its response to the left). However, the WWTP could be located elsewhere and, in view of the size of the WNDA, “a lack of available space elsewhere” is not sufficient justification. No justification is given for the loss of the original driveway beneath the edge of Mound D (which could be avoided, see the Council’s LIR, Chapter 17, para 4.2.25). No reference is made to the loss of the Gardener’s Cottage or the Significant View from the House Plot. No justification is given for not reinstating the Kitchen Garden, Gardener’s Cottage, House Plot and driveway once the temporary structures and activities are removed at the end of the construction phase. IACC considers that restoration of these areas must be a key element of any CMP.

		• The area is the only available space in close proximity to the western breakwater, as other areas adjacent to Porth- y- pistyll bay are required to support other components (e.g. the MOLF); and • Repositioning the laydown area further away from Cestyll Gardens would require other laydown areas within the Wylfa Newydd Development Area to be repositioned, meaning that it may be necessary to encroach on the Tre'r Gof SSSI. The above is as a result of the lack of available space within the Wylfa Newydd Development Area. <i>Construction of the temporary causeway, proposed breakwaters and the MOLF, and the continued presence of the Power Station in the setting of Cestyll Garden (HLT 2) and of the breakwater as a dominant feature in the Significant View from the valley garden</i> Need of the MOLF and location of the MOLF A summary of the case for the need for the MOLF and for the location of the MOLF is provided below: • Due to the nature of the Wylfa Newydd DCO Project there is a need to import bulk materials and Abnormal Indivisible Loads (AILs). • For transporting AILs, it is Government policy to avoid road transport as far as possible by using alternative transport modes, such as water. • Potential alternative methods of transporting construction materials were reviewed (appendix 10-1 of the Integrated Travel and Transport Strategy) [APP-107], including sea and rail via Holyhead, then by road to site. The review identified that: ○ Transporting raw bulk materials by rail would require up to three trains per day during peak construction. A lack of existing rail infrastructure in the vicinity of Wylfa Newydd would also require onward transport to the Wylfa Newydd Development Area via road (paragraph 10-1.1.8 of the Integrated Traffic and Transport Strategy). ○ Transporting bulk materials by road would add substantial volumes of lorries to the road network; it is estimated that around 238,000 HGV deliveries would be required over the duration of the Wylfa Newydd DCO Project to deliver the equivalent of the materials that could be delivered to the MOLF, once the MOLF is complete (paragraph 10-1.1.9 of the Integrated Traffic and Transport Strategy). ○ Due to proposals by Network Rail to increase passenger services (trains per hour), night time deliveries would be relied upon, which could result in an increase in noise levels for unloading and transporting of material (paragraph 10-1.1.15 of the Integrated Traffic and Transport Strategy).	

		In addition, not all AILs would fit on the roads, so redesign would be necessary and more time to build up modules on site, as well as the provision of sufficient space. This alternative method for importing bulk materials and AILs would result in a longer construction programme, which could prolong construction effects on local communities. As identified in paragraphs 2.3.41 to 2.3.45 of chapter D2 (Alternatives and design evolution) in the Environmental Statement [APP-121] three alternative locations to Port-y-pistyll (site 1) for the location of the MOLF were considered: • Site 2 – at Porth-y-Gwartheg, to the west of the Existing Power Station; • Site 3 – at Porth yr Ogof to the east of Wylfa Head; and • Site 4 – at Porth Wylfa, approximately 500m to the east of Porth yr Ogof. These alternative locations are shown on figure D2-5 of the WNDA Development Figure Booklet – Volume D [APP-237]. As noted in Chapter D2 (paragraph 2.3.44), site 2 was discounted on the basis of its exposed nature and the considerable engineering required to make it workable and acceptable. Site 4 was discounted on the basis of its exposed nature and its narrow inlet channel making it unsuitable for delivery of AILs. The preferred location for a MOLF were therefore at site 1 or at site 3, both of which offered good levels of availability due to the shelter provided by natural topography. Port-y-pistyll (site 1) was identified as the preferred location for the MOLF rather than Porth yr Ogof to the east of Wylfa Head (site 3) because: • Locating the MOLF at site 3 would require the construction of a 50m wide heavy haul route from the MOLF to the construction site, a distance of approximately 1km. This heavy haul route and particularly its use during construction could affect both the Tre'r Gof SSSI and Dame Sylvia Crowe's Landscaping. • Site 3 would require re-routing of the existing 400kV overhead transmission lines – at best the requirement would be to raise the pylons along one short stretch to provide a crossing point. While this could be part of National Grid's infrastructure upgrades it would require their DCO to tie in with the Project, adding complexity and increasing consenting risk, thus delaying the start of construction (at least 2 years) and adding another year to the construction schedule, which could prolong construction effects on local communities. • Site 3 would require traffic to cross the Existing Power Station's access road during construction, potentially increasing health and safety risks.	

		• Site 3 would require the exclusion of the public from the Wales Coast Path and restricting public access to Wylfa Head. • Increase visual impact from many parts of the Wales Coast Path around Cemaes Bay and out to Llanbadrig Point. • Could impact sensitive sea bird colonies on Wylfa Head. Scale of the MOLF It is not considered possible to reduce the scale of the MOLF as smaller MOLF could only support smaller vessels which would be more would require more trips to transport materials, and which would extend the construction schedule, potentially prolonging effects on local communities, and increasing marine disturbance and delaying the start of operation. Cooling Water Intake There is a need for a breakwater structure to protect the cooling water intake from wave surges. As identified in paragraphs 2.3.55 to 2.3.58 of chapter D2 (Alternatives and design evolution) in the Environmental Statement a number of alternative locations for the cooling water intake were considered. These alternative locations were shown on D2-5. A number of these alternative locations were screened out due to the following considerations: • Longer biocide exposure times for entrained organisms. • Long tunnels (up to 1,250m) underneath the seabed introduce significantly increased health and safety risks during construction (fire hazards in confined spaces) and maintenance (due to working offshore). • The possible presence of major structural features and/or poorer quality ground that could affect tunnel design. • Effects on Regionally Important Geodiversity Sites (RIGS). In addition, if an offshore intake location was chosen then the construction schedule would be extended by more than 12 months due to sub-sea construction and complex offshore geology, which could potentially prolong effects on local communities. While the effects on Cestyll Garden are acknowledged, as identified in paragraphs 2.3.55 to 2.3.58 of chapter D2 (Alternatives and design evolution) in the Environmental Statement the onshore cooling water option at Porth-y-pistyll was identified as the preferred location for the reasons identified below:	

		• No or limited marine tunnels and no requirement to install and maintain intake structures; resulting in reduced seabed footprint, limited seaward construction activities, reduced construction cost and programme, and reduced health and safety risks. • Due to the absence of long intake tunnels there would be a reduced requirement to biocide extensive offshore sections of the system, resulting in increased survival of entrapped fish and other marine species. • Greater opportunity to control intake velocities to limit the entrapment of fish and other marine species. • An onshore intake would reduce transit times before water is returned to the sea, result in limited pressure changes and reduced exposure of cooling water to biocides. The result would be the increased survival of organisms (typically zooplankton, including fish larvae, and phytoplankton) entrapped by the system. • Mitigation measures used such as acoustic or other fish deterrent systems and strobe lighting could be effectively tested and maintained over the life of the Power Station. • Offshore seabed intake structures and tunnels would be difficult to maintain through the life of the Power Station. • There are quantifiable impacts of fish entrapment using extensive data collected from the onshore intake at the Existing Power Station. Fish entrapment at the Existing Power Station is extremely low. • An offshore intake would be associated with increased health and safety risks during construction and operation and increased construction costs. As identified in paragraph 2.3.62 of chapter D2 (Alternatives and design evolution) in the Environmental Statement the location of the breakwaters is defined by the position of the cooling water intake, in that they must be designed and positioned to provide optimum protection. The use of a rubble for construction of the western breakwater would allow the reuse of suitable material excavated within the Wylfa Newydd Development Area, reducing the requirement for importing construction materials and waste material. This could reduce traffic movements and effects on local communities from noise and vibration and changes in air quality. There is therefore a lack of feasible alternative locations for the components of the Wylfa Newydd Development that result in substantial harm to Cestyll Garden and that this substantial harm is justified due to the substantial public benefits that will result from the development.	

	Steps taken to mitigate the harm and/or loss of significance Chapter D11 of the Environmental Statement details the embedded and good practice mitigation identified in respect of Cestyll Garden. The following additional mitigation measures have also been identified to mitigate the construction effects on Cestyll Garden. These will be secured by the Wylfa Newydd Code of Construction Practice [APP-414] and Wylfa Newydd Main Site sub-CoCP [APP-415]: • A level 2 topographic and historic landscape survey. • Archaeological earthwork survey of any surviving remains of Cestyll House, Former Site of (Asset 132). • Historic England Level 2 historic building recording of surviving structures. • A photographic survey to provide a permanent visual record of the garden in its current form and condition and Significant Views and provide a detailed visual record of the garden, providing a comprehensive record of its existing form, appearance, setting and key views. This would include the former site of Cestyll House. • Translocation of ‘Lady’s Finger of Lancaster’ apple trees from Cestyll Garden kitchen garden. • Consult with the landowner to implement appropriate monitoring of soil pH and a visual inspection of the condition of plants during the bulk earthworks of the construction period. Further mitigation is proposed for the operational period of the Power Station to offset operational effects on Cestyll Garden (HLT 2). This mitigation will be secured by the Draft DCO s.106 and includes an obligation on Horizon to use reasonable endeavours to enter into a Deed of Covenant with the Nuclear Decommissioning Authority as the landowner of Cestyll Garden (or its successor in title), prior to the operation period, to develop and deliver a management plan for Cestyll Garden which will comprise restoration works, installation of interpretation boards, a programme of maintenance during the operational period and enhanced public access to the Cestyll Gardens.	The additional mitigation measures identified in Chapter D11 also include the following which should also be secured by way of the CoCPs and Conservation Management Plan: • Agree with National Trust, Cadw and GAPS the design of appropriate landscape measures to restore and/or enhance the former location of the kitchen garden. As explained in the Council’s LIR Chapter 17, it should be feasible for the Kitchen Garden and Gardener’s Cottage to be restored/reinstated. See IACC response to ExA Q6.0.11 and the IACC LIR Chapter 17 for further additional mitigation measures that should be incorporated into the design, constructon and operation of the Wylfa Newydd Project in order to reduce, mitigate and compensate for the substantial harm to the significance of Cestyll Garden. IACC understand that the NDA owns the Valley Garden, National Trust own Felin Gafnan and Horizon own the remainder of Cestyll Garden and its Essential Setting. The CMP needs to be for the entire garden (ie the Registered Areas and Essential Setting plus Felin Gafnan which is to be included in the Statutory Area).

		<table><tr><th>ID</th><th>Reference</th></tr><tr><td>RD1</td><td>Department for Business, Enterprise & Regulatory Reform. 2008. <i>Meeting the Energy Challenge – A White Paper on Nuclear Power</i>. January 2008.</td></tr><tr><td>RD2</td><td>Department of Energy and Climate Change. 2011. <i>Overarching National Policy Statement for Energy (EN-1)</i>. London: The Stationery Office.</td></tr><tr><td>RD3</td><td>Department of Energy and Climate Change. 2011b. National Policy Statement for Nuclear Power Generation (EN-6). Volume I and Volume II. London: The Stationery Office.</td></tr><tr><td>RD4</td><td>Department for Business, Energy & Industrial Strategy. 2017a. <i>The Clean Growth Strategy</i>. October 2017</td></tr><tr><td>RD5</td><td>Department for Business, Energy & Industrial Strategy. 2017b. Consultation on the siting criteria and process for a new National Policy Statement for nuclear power with single reactor capacity over 1 gigawatt beyond 2025. December 2017.</td></tr><tr><td>RD6</td><td>Secretary of State for Business, Energy and Industrial Strategy. 2017. <i>Statement on Energy Infrastructure: Written statement – HLWS316</i>. 7 December 2017.</td></tr><tr><td>RD7</td><td>Highways England. 2016. Water preferred policy guidelines for the movement of abnormal indivisible loads. January 2016.</td></tr></table>	ID	Reference	RD1	Department for Business, Enterprise & Regulatory Reform. 2008. <i>Meeting the Energy Challenge – A White Paper on Nuclear Power</i> . January 2008.	RD2	Department of Energy and Climate Change. 2011. <i>Overarching National Policy Statement for Energy (EN-1)</i> . London: The Stationery Office.	RD3	Department of Energy and Climate Change. 2011b. National Policy Statement for Nuclear Power Generation (EN-6). Volume I and Volume II. London: The Stationery Office.	RD4	Department for Business, Energy & Industrial Strategy. 2017a. <i>The Clean Growth Strategy</i> . October 2017	RD5	Department for Business, Energy & Industrial Strategy. 2017b. Consultation on the siting criteria and process for a new National Policy Statement for nuclear power with single reactor capacity over 1 gigawatt beyond 2025. December 2017.	RD6	Secretary of State for Business, Energy and Industrial Strategy. 2017. <i>Statement on Energy Infrastructure: Written statement – HLWS316</i> . 7 December 2017.	RD7	Highways England. 2016. Water preferred policy guidelines for the movement of abnormal indivisible loads. January 2016.	
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RD7	Highways England. 2016. Water preferred policy guidelines for the movement of abnormal indivisible loads. January 2016.																		
Q6.0.8	Are the proposals for delivering a Cultural Heritage Management Strategy set out in section 12 of the relevant Code of Construction Practice and sub-Codes of Construction Practice [APP-414 to APP-420] adequate to effectively plan, manage and control all construction activities in relation to Cultural Heritage and deliver acceptable outcomes that meet the criteria set out in EN- 1Part 5.8 (Historic Environment) and heritage policies at national (Wales) and local levels? Indicate where there might be deficiencies and the action that might be taken to remedy them.	The national and local policy context that applies to matters of cultural heritage is set out in Part 6.4 of the Planning Statement under "<i>Historic Environment</i>". Of particular relevance, it summarises the key cultural heritage policies from NPS EN-1, Planning Policy Wales (PPW) and the Joint Local Development Plan (JLDP) between Gwynedd County Council and IACC. NPS EN-1 at section 5.8 recognises that the construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic environment. It provides that any harmful impacts on the significance of designated heritage assets should be “...<i>weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss</i>”. PPW identifies a number of objectives for conserving and enhancing the historic environment. It states that the greater the significance and/or impact on the historic environment, then the greater the benefit needed to justify any harm. The JLDP confirms that development will be supported where it is consistent with its sustainable development principles, including preserving and enhancing the quality of the built and historic environment assets including their setting. The environmental impact of development within the WNDA on historic environment matters has been assessed in light of this relevant policy context. This assessment is set out in detail in chapter D11 of the	The HNP response to this question does not address the concerns raised in the IACC response and LIR and does not add to the information presented in the DCO application. the CoCP sets out a piecemeal and ad-hoc approach that does not appear to address all of the measures that will be necessary to mitigate adverse effects on the historic environment. The CHMS does not address mitigation measures other than archaeological recording of at-risk heritage assets.																

	Environmental Statement). It identifies the programme of embedded and good practice mitigation measures to reduce the effects on the historic environment. These mitigation measures inform Horizon's Cultural Heritage Management Strategy which is set out in the Wylfa Newydd Code of Construction Practice (WN CoCP) and the site-specific sub-CoCPs [APP-415-420]. The Cultural Heritage Management Strategy in the WN CoCP sets out the controls that will apply for cultural heritage management project across all aspects of the Wylfa Newydd DCO Project. Additional site specific mitigation controls to be implemented for cultural heritage are described in the relevant sub-CoCPs. These controls are presented in the WN CoCP and sub-CoCPs according to three sub-topics: archaeological remains, historic buildings, and the historic landscape. For each sub-topic, the WN CoCP describes the type and level of mitigation which will be applied and how the works will be secured and controlled on site. For example, in respect of archaeological remains, the WN CoCP provides that if significant archaeological remains are discovered and it is determined by Horizon's archaeological consultant, in liaison with the Gwynedd Archaeological Planning Service (GAPS) Senior planning archaeologist, that the planning construction works may affect those remains, Horizon will cease works in that area. The potential remains will then be assessed and appropriate mitigation measures developed in consultation between Horizon and GAPS. The WN CoCP identifies the type of mitigation that may be appropriate including, for example: • Palaeoenvironmental assessment followed by palaeoenvironmental assessment if required; • Archaeological excavations; • Strip, map and sample; and • Targeted watching briefs. It further provides that archaeological reporting will be undertaken with relevant guidance provided by the Chartered Institute for Archaeologists and Written Schemes of Investigation (WSI) agreed with GAPS. All archaeological recording would include a programme of assessment, reporting, analysis, publication and dissemination commensurate with the value of the archaeological remains removed, submission of reports to the Historic Environment Record and National Monument Record of Wales, and the preparation of an ordered archive which would be submitted to an appropriate repository. To mitigate possible effects on historic buildings, the WN CoCP requires archaeological building recording and reporting to be undertaken in accordance with relevant good practice guidance and Written Schemes of Investigation (WSI) agreed with GAPS. The level of this recording and reporting which will be commensurate to the value of the historic building or landscape affected. Horizon considers that these controls within the Cultural Heritage Management Strategy of the WN CoCP and sub-CoCPs give the necessary assurance that arrangements are in place to protect cultural and historic	

		heritage throughout the construction period of the Wylfa Newydd DCO Project and to ensure that any necessary further action including full archaeological investigations and evaluations, recording, reporting and dissemination will be undertaken. Horizon has developed, consulted and implemented a robust method of assessing the impact in agreement with GAPS Senior planning archaeologist (the curator), Cadw and Welsh Government to ensure mitigation proposed for effects on cultural heritage assets has been proportionate, following all relevant legislation and best practice. Further information on the methods applied can be found in Volume B – Introduction to the Environmental Assessment B11. B11 describes in detail how the assessment had regard to Overarching National Policy Statement for Energy (EN-1) and other key heritage policies and legislation including the Historic Environment (Wales) Act 2016.	
Q6.0.9	Referring to Effects on Heritage Assets on all sites – D11-6 [APP-213], E11-2 [APP-263], F11-5 [APP-301], G11-5 [APP-351] and H11-2 [APP-381]: (a) Explain the processes and timetables through which each of the additional mitigation measures proposed in respect of archaeological remains; historic buildings; and historic landscape types during construction, operation and decommissioning will be designed, approved by the competent authorities and undertaken on site;	(a) Horizon’s approach to cultural heritage management is based on the controls set out in Section 12 of the Wylfa Newydd Code of Construction Practice (CoCP) whilst cultural heritage asset specific additional mitigation is presented within Section 12 of the relevant sub-CoCPs [APP-415 to APP-420]. Section 12 of Wylfa Newydd CoCP also identifies the procedure in the event of the discovery of unknown archaeological remains. As identified in the sub-CoCPs [APP-415 to APP-420] the mitigation will be undertaken in accordance with the relevant standards and good practice guidance from the Chartered Institute for Archaeologists, and Written Schemes of Investigation (WSI) which will be developed in consultation and agreed with the appropriate authority i.e. Gwynedd Archaeological Planning Service. In addition to identifying the approach to fieldwork, the WSI will also identify the approach to post-fieldwork assessment, reporting, analysis, publication, other forms of dissemination and archiving. Timescales for the completion of the fieldwork, and programmes for subsequent post-fieldwork assessment, reporting, analysis, publication, other forms of dissemination and archiving. will be identified in the WSIs. The development of the WSIs, in consultation with relevant stakeholders, will determine subsequent timing of activities. As detailed in chapter D11 of the Environmental Statement, no additional mitigation was identified for archaeological remains or historic buildings during operation. Additional mitigation is however proposed to offset operational effects on Cestyll Garden. This additional mitigation includes restoration works, installation of interpretation boards, a programme of maintenance during the operational period and enhanced public	The HNP response does not address issues of timetabling and sequencing which will be particularly important to the successful delivery of the proposed mitigation (b) IACC considers that mitigation should be secured through the DCO. It is accepted that funding for elements of the works set out in the CMP for Cestyll, the Woodland Management Plan (WMP) for the Dame Sylvia Crowe landscaping and any heritage outreach may be secured through an s106 agreement or similar obligation, but the principle that these works are required should be secured within the DCO. (c) This response considers the supply chain for archaeological works appropriately. It does not, however, address the requirement for specialist landscape and arboricultural support in delivering mitigation works at Cestyll and the Dame Sylvia Crowe Landscaping or support for heritage outreach.

		access to the Cestyll Gardens. The Wylfa Newydd Code of Operational Practice (WN CoOP) [APP-421] further provides that should any earthworks be required during operation, works will proceed in accordance with the measures set out in section 12 of the WN CoCP and relevant sections of any relevant sub-CoCP. No additional mitigation is proposed for archaeological remains, historic buildings or historic landscape types during decommissioning.	
	(b) How will they be secured through the dDCO [APP-029] and relevant Code and Sub-codes of Construction Practice;	(b) The controls provided for in the Wylfa Newydd CoCP the various site-specific sub-CoCPs and the WN CoOP will be secured by the Development Consent Order. The requirements in Schedule 3 of the Draft Development Consent Order [APP-029] state that the construction of the Wylfa Newydd Project, as described in Schedule 1 of the Draft Development Consent Order, must be carried out in accordance with this CoCP and the relevant sub-CoCP applying to a specific site. They also provide that the operation and maintenance of the Power Station Works must be carried out in accordance with the WN CoOP. The additional mitigation proposed in respect of Cestyll Garden during operation will be secured through the Draft DCO s.106 which includes an obligation on Horizon to, prior to the operational period, use reasonable endeavours to enter into a Deed of Covenant with the Nuclear Decommissioning Authority as landowner of Cestyll Garden (or its successor in title) to develop and deliver a management plan for Cestyll Garden which will comprise restoration works, installation of interpretation boards, a programme of maintenance during the operational period and enhanced public access to the Cestyll Gardens.	
	(c) What measures will be taken to create the necessary partnerships and provide adequate resources to agree and implement these works and how can these be secured through the dDCO?	(c) Horizon has a number of existing partnerships with archaeological contractors who are currently engaged and delivering investigation works on site as part of the early preparatory works for the Wylfa Newydd Project. The suppliers for the current archaeology investigation works were selected after a competitive tender process in June 2018 with two suppliers selected based on capability and the ability to secure the resources necessary to undertake the works safely and respectful of the archaeology required to be excavated. During this tender process Horizon selected a consultant which could support and oversee main site development activities allowing for a smooth transition and retention of resources from the initial investigation phase. Horizon will therefore utilise these existing relationships throughout the construction period. Any additional partnerships and/or resourcing needs required for archaeological works throughout construction will be sought via the Supply Chain Portal, in accordance with the Supply Chain Action Plan which seeks to maximise supply chain opportunities throughout Wales. These services i.e. the Supply Chain Action Plan and the Supply Chain Portal will be secured through obligations in the Draft DCO s.106. Horizon will follow the principles that are to be described in the Supply Chain Action Plan for securing future work packages, each package will be reviewed against the scope of works required to be undertaken and consideration as to whom (Employer / Contractors) is best placed to manage and mitigate the associated risks attributed to the specific packages of works.	

		Horizon will ensure Works Information, specifications, and associated WSI/Method Statements have been developed in agreement with GAPS in advance of contract awards.	
Q6.0.10	Outline in tabular form the programme for implementing the various measures of mitigation set out in section 12 of the relevant Code of Construction Practice and sub-Codes of Construction Practice [APP-414 to APP-420] to enable the ExA to understand the sequence of activity in relation to heritage assets for each development site; the order of events; their broad timing and the length of period allowed for their implementation.	Horizon's approach to cultural heritage management during construction is based on the controls set out in section 12 of the Wylfa Newydd Code of Construction Practice (CoCP) whilst cultural heritage asset specific additional mitigation is presented within Section 12 of the relevant sub-CoCPs [APP-415 to APP-420]. This additional mitigation was identified as part of the environmental impact assessment undertaken in respect of cultural heritage to mitigate or offset effects on heritage assets where an effect was predicted. This assessment is detailed in chapter D11 of the Environmental Statement (Cultural heritage). The programme for implementing these mitigation measures is yet to be determined but will be heavily influenced by the construction programme. This detail will continue to be developed in consultation with relevant stakeholders, including IACC / Gwynedd Archaeological Planning Service (GAPS) / Welsh Government and Cadw. The Written Schemes of Investigation which are required to be undertaken pursuant to the WN CoCP are to be developed in agreement with GAPS and will detail the timescales for the completion of the fieldwork, and programmes for subsequent post-fieldwork assessment, reporting, analysis, publication, other forms of dissemination and archiving.	This response does not address the key issues of timetabling and sequencing which are required to understand the effectiveness of the proposed mitigation.
Q6.0.12	Respond to the Welsh Government's comments in its relevant representation [RR-092] in relation to Cestyll registered historic park and garden and its setting that: (a) Greater detail should be provided on how the design of the proposed landscaping (mounding, tree planting, restoration of field boundaries) within the current essential setting has been informed by the impact on the registered park and garden. (b) Visualisations are requested to show how the power station will appear in views adjacent to the southern extent of the Cestyll and would inform a landscaping scheme for this area.	(a) The detail of the proposed landscape design will be submitted and approved following any grant of DCO. The draft DCO includes two DCO Requirements WN9: Final Landscape and Habitat Scheme and WN11: Landscape and Habitat Management Scheme which require the details to be submitted and approved by IACC. Under both DCO Requirements the details submitted would need to accord with the principles contained in the Landscape and Habitat Management Strategy [APP-424/425] These principles are contained in section 4 of the strategy and secure measures such as ensuring that the detailed landscaping design takes into account cultural heritage considerations and a specific principle securing new woodland planting between the Power Station and Cestyll Valley Gardens. On the basis of the safeguards provided by the DCO Requirements in the draft DCO and principles in the Landscape and Habitat Management Strategy, it is not considered necessary to provide any further detail on landscape design at this stage. (b) Horizon continue to engage with the Welsh Government through the SoCG process. Matters related to potential impacts on Cestyll garden have and continue to be discussed through the SOCG. Any agreed requests for further information such as visualisations will be reported through the SoCG process and formally submitted into examination for consideration by the Examining Authority at an appropriate deadline.	The 'safeguards provided by the DCO Requirements' as proposed by HNP are currently inadequate to effectively mitigate harm. IACC consider that the agreement of a CMP to be included as a DCO requirement is the only way to effectively secure, manage and effectively deliver the complex and extensive mitigation required to provide an effective response to the harm which would arise to Cestyll Garden.

	(c) Further clarification is required on how the valley garden will be accessed if the historic access is removed through the proposed landscaping mound/bank.	(c) During the construction phase, Horizon will relocate the current sole private means of access for the landowner to enable them to maintain private access to the garden. This is shown on for approval DRG WN0902-HZDCO-ROW-DRG-00020 [APP-012]. In respect of the operational phase Horizon intends to retain the private means of access as shown on illustrative DRG WN0902-HZDCO-ROW-DRG-000205. There is no existing or proposed means of public access.	
Q6.0.13	With reference to: · Felin Gafnan Corn Mill (Grade II* Listed Building); · Mill House at Felin Gafnan (Grade II* Listed Building); and · The Corn-drying House at Felin Gafnan (Grade II Listed Building); (a) Do you agree with the Applicant's assessment of effects; proposals for additional mitigation; and the analysis of the significance of residual effect during construction, operation and decommissioning, set out in 6.4.11 ES Volume D - WNDA Development D11 - Cultural heritage [APP-130]?	Felin Gafnan Corn Mill, corn-drying house and mill house are identified in chapter D11 (Cultural heritage) as Assets 137, 141 and 144 respectively. Please note that the mill house is a Grade II Listed Building. A summary of baseline information is provided in section 11.3 and further baseline information is provided in Appendix D11-1 Wylfa Newydd Proposed New Nuclear Power Station Cultural Heritage Baseline Report, including a description of the setting and key elements of the setting that contribute to the value of these assets. Felin Gafnan Corn Mill (Asset 137) was assessed to be of high value while the corn-drying house (Asset 141) and mill house (Asset 144) were both assessed to be of medium value. (a) Effects during construction Potential effects on Felin Gafnan Corn Mill (Asset 137) during construction are presented in paragraphs 11.5.21 and 11.5.22 of D11 (Cultural heritage). As identified in paragraph 11.5.21 a potential effect was identified from vibration. Supporting information for the basis of this assessment is presented in paragraphs 6.5.33 and 6.5.37 of chapter D6 (Noise and vibration) [APP-125]. Before mitigation the magnitude of change was assessed to be of large magnitude and the significance of effect was assessed to be major adverse. In addition, as stated in paragraph 11.5.22 of D11 (Cultural heritage), construction of Power Station and the Marine Works would introduce noise and visual intrusion into the setting of Felin Gafnan Corn Mill (Asset 137), introducing intrusion into the views of the mill from Cestyll Garden (HLT 2, high value) and the Wales Coast Path. This assessment is supported by the noise assessment presented in D6 (Noise and vibration) (see specially figures D6-3 to D6-10). The magnitude of these short-term effects was assessed to be large and the significance major adverse. As stated in paragraph 11.5.25 of chapter D11 (Cultural heritage), construction of the Power Station would also introduce new large-scale elements of infrastructure, as well as lighting, noise and visual intrusion from construction works into the setting and the associated corn drying house and mill house (Assets 141 and 144; medium value). It would also change the character of the setting of these heritage assets and would be prominent in views of these heritage assets from the Wales Coast Path. This assessment is supported by the noise assessment presented in D6 (noise and vibration) (see specially figures D6-3 to D6-10). While	The HNP response to this question does not address the concerns raised in the IACC response and does not add to the information presented in the DCO application.

	elements of modern infrastructure associated with the Existing Power Station already forms part of the setting of these buildings, there would be no physical effects, and the relationship between these buildings, and Felin Gafnan Corn Mill (Asset 137) would be maintained, the magnitude of these short-term effects were assessed to be medium and the significance moderate adverse. Effects during operation As identified in paragraph 11.5.49 of chapter D11 (Cultural heritage), potential effects on Felin Gafnan Corn Mill (Asset 137; high value), and the associated corn-drying house and mill house (Assets 141 and 144; medium value) during operation are predicted to result from the continued presence of the Power Station during operation, and the marine breakwaters and the MOLF. However, the relationship between these three historic buildings would be maintained. As such the magnitude of this effect was assessed to be medium and the significance of effect moderate adverse. As stated in paragraph 11.5.49 of chapter D11 (Cultural heritage) and illustrated by the photomontage from Viewpoint 15 (see appendix D10-8, [APP-199]) the Power Station would be a dominant feature in the setting of Cestyll Garden (HLT 2; high value), while the breakwater would be a continued presence in the Significant View from the valley garden. The magnitude of this effect was assessed to be large and the significance of effect to be major adverse (b) Effects during decommissioning As identified in paragraph 11.5.59 of chapter D11 (cultural heritage), decommissioning activities would result in noise and visual intrusion within the setting of Felin Gafnan Corn Mill (Asset 137; high value), the associated corn drying house and mill house (Assets 141 and 144). Decommissioning activities such as the operation of plant, the removal of Power Station structures and restoration of the site would dominate the setting of the assets and result in intrusion in views of the mill from Cestyll Garden (HLT2; high value), and in views from the principal elevation of the mill house. The magnitude of these changes was assessed to be medium and the significance of effect has been assessed to be moderate adverse. Mitigation To mitigate the effects from construction on Felin Gafnan Corn Mill, the following additional mitigation is proposed and will be secured by the Wylfa Newydd Code of Construction Practice and Wylfa Newydd Main Site sub-CoCP:	

		- a vibration risk assessment will be undertaken as part of the section 61 application for any construction activity involving vibratory or impact equipment to be used on the Wylfa Newydd Development Area. This will establish the safe working distances for receptors in relation to construction vibration. to establish working practices to avoid effects from vibration. This would be informed by vibration monitoring. - Photographic survey to document the existing setting of this heritage asset. Photographic surveys will be undertaken to document the existing setting of Mill House and the Corn-drying House at Felin Gafnan to provide a permanent visual record of the current conditions of these historic buildings and their settings as set out in the Wylfa Newydd Main Site sub-CoCP. As identified in paragraph 11.7.4 of chapter D11 (Cultural heritage) during construction, after the application of additional mitigation the permanent residual effects for Felin Gafnan Corn Mill, Porth y Felin (Asset 137) has been assessed to be of moderate adverse significance. A short-term effect on this historic building resulting from noise and visual intrusion has been assessed to be major adverse. The significance of residual effect during operation and decommissioning for this historic building has been assessed to be moderate adverse. As identified in paragraph 11.7.6 of chapter D11 (Cultural heritage). During construction, after the application of additional mitigation the permanent residual effects during construction on the Corn-drying house at Felin Gafnan (Asset 141) and Mill house at Felin Gafnan, Cylch-y-Garn (Asset 144) have been assessed to remain moderate adverse. While photographic survey would make a permanent record of the setting of these historic buildings, it is not considered that this would reduce the significance of effect. As identified in paragraph 11.7.6 of chapter D11 (Cultural heritage) during operation and decommissioning the significance of residual effects for these historic buildings has been assessed to be moderate adverse. An assessment of these effects against policy was set out in the Planning Statement. Horizon considers that the assessment undertaken is appropriate and proportionate to the nature and level of the significance of these assets (as required by paragraph 5.8.20 of EN-1). The mitigation proposed is considered to be proportionate nature and significance of effect.	
Q6.0.15	Respond in detail to the National Trust relevant representation [RR-053] in	Felin Gafnan Corn Mill, corn-drying house and mill house are identified in chapter D11 of the Environmental Statement (Cultural heritage) as Assets 137, 141 and 144 respectively. A summary of baseline information is provided in section 11.3 of chapter D11 and further baseline information is provided in Appendix D11-1 Wylfa	The HNP response to this question does not address the concerns raised in the IACC response to Q6.0.13 and LIR and does not add to the information presented in the DCO application.

	which it states that it ‘has responsibility for three listed buildings which adjoin the proposed harbour, including Felin Gafnan a Grade II* mill. The application lacks detail in order to assess fully the impact of the proposal. The application does not give sufficient weight to the heritage assets and an inadequate level of mitigation and compensation is proposed.’	Newydd Proposed New Nuclear Power Station Cultural Heritage Baseline Report [APP-202 and APP-203]. This includes a description of the setting and key elements of the setting that contribute to the value of these assets. Felin Gafnan Corn Mill (Asset 137) was assessed to be of high value while the corn-drying house (Asset 141) and mill house (Asset 144) were both assessed to be of medium value. Effects during construction Potential effects on Felin Gafnan Corn Mill (Asset 137) during construction are presented in paragraphs 11.5.21 and 11.5.22 of D11 (Cultural heritage) taking into account embedded and good practice mitigation. As identified in paragraph 11.5.21 a potential effect was identified from vibration. Supporting information for the basis of this assessment is presented in paragraphs 6.5.33 and 6.5.37 of chapter D6 (Noise and vibration). Before mitigation the magnitude of change was assessed to be of large magnitude and the significance of effect was assessed to be major adverse. In addition, as stated in paragraph 11.5.22 of D11 (Cultural heritage), construction of Power Station and the Marine Works would introduce noise and visual intrusion into the setting of Felin Gafnan Corn Mill (Asset 137) as well as intrusion into the views of the mill from Cestyll Garden (HLT 2, high value) and the Wales Coast Path. This assessment is supported by the noise assessment presented in D6 (Noise and vibration) (see specially figures D6-3 to D6-10). The magnitude of these short-term effects was assessed to be large and the significance major adverse. As stated in paragraph 11.5.25 of chapter D11 (Cultural heritage), construction of the Power Station would also introduce new large-scale elements of infrastructure, as well as lighting, noise and visual intrusion from construction works into the setting and the associated corn drying house and mill house (Assets 141 and 144; medium value). This assessment is supported by the noise assessment presented in D6 (noise and vibration) (see specially figures D6-3 to D6-10). While elements of modern infrastructure associated with the Existing Power Station already forms part of the setting of these buildings, there would be no physical effects, and the relationship between these buildings, and Felin Gafnan Corn Mill (Asset 137) would be maintained, the magnitude of these short-term effects were assessed to be medium and the significance moderate adverse. To mitigate the effects from construction on Felin Gafnan Corn Mill, the following additional mitigation is proposed and will be secured by the Wylfa Newydd Code of Construction Practice and Wylfa Newydd Main Site sub-CoCP: • a vibration risk assessment will be undertaken as part of the section 61 prior consent application (see Details of Other Consents, Licenses and Agreements document (APP-053) for any construction activity involving vibratory or impact equipment to be used on the Wylfa Newydd Development Area. This will establish the safe working distances for receptors in	

		relation to construction vibration. to establish working practices to avoid effects from vibration. This would be informed by vibration monitoring. • Photographic survey to document the existing setting of this heritage asset. Photographic surveys will be undertaken to document the existing setting of Mill House and the Corn-drying House at Felin Gafnan to provide a permanent visual record of the current conditions of these historic buildings and their settings as set out in the Wylfa Newydd Main Site sub-CoCP. Effects during operation Mitigation in the form of final landscaping and landform schemes would be secured by Requirements WN9: Final Landscape and Habitat Scheme and WN11: Landscape and Habitat Management Schemes as set in the draft DCO. The schemes must accord with the overarching and operational principles contained in Chapter 5, and the management principles contained in Chapter 7 of the Landscape and Habitat Management Strategy [APP-424]. Taking into account this mitigation, potential effects on Felin Gafnan Corn Mill (Asset 137; high value), and the associated corn-drying house and mill house (Assets 141 and 144; medium value) during operation are predicted to result from the continued presence of the Power Station during operation, and the marine breakwaters and the MOLF (see chapter D11 of the Environmental Statement). However, the relationship between these three historic buildings would be maintained. As such the magnitude of this effect was assessed to be medium and the significance of effect moderate adverse. As stated in paragraph 11.5.49 of chapter D11 (Cultural heritage and illustrated by the photomontage from Viewpoint 15 (see appendix D10-8) the Power Station would be a dominant feature in the setting of Cestyll Garden (HLT 2; high value), while the breakwater would be a continued presence in the Significant View from the valley garden. The magnitude of this effect was assessed to be large and the significance of effect to be major adverse. No additional mitigation is proposed for archaeological remains or historic buildings during operation. Effects during decommissioning As identified in paragraph 11.5.59 of chapter D11 (cultural heritage, decommissioning activities would result in noise and visual intrusion within the setting of Felin Gafnan Corn Mill (Asset 137; high value), the associated corn drying house and mill house (Assets 141 and 144). Decommissioning activities such as the operation of plant, the removal of Power Station structures and restoration of the site would dominate the setting of the assets and result in intrusion in views of the mill from Cestyll Garden (HLT2; high value), and in views from	

		the principal elevation of the mill house. The magnitude of these changes was assessed to be medium and the significance of effect has been assessed to be moderate adverse. Summary Horizon considers that the assessment undertaken is appropriate and proportionate to the nature and level of the significance of these assets (as required by paragraph 5.8.20 of EN-1). and the potential effects on them. For further detail regarding the assessment of the potential effects on these heritage assets against relevant national and local policy, see the Planning Statement. Horizon continues to engage with National Trust on these issues through the Statement of Common Ground process.	
Q6.0.16	Is there merit in drawing up a comprehensive Conservation Management Plan for the group of heritage assets comprising: · Cestyll Garden (Historic Landscape Type 2) · The sites of Cestyll House and kitchen garden · Felin Gafnan Corn Mill (Grade II* Listed Building); · Mill House at Felin Gafnan (Grade II* Listed Building); and · The Corn-drying House at Felin Gafnan (Grade II Listed Building); · Cafnan House (Grade II Listed Building) If so, how might this be done and how might it be secured through the dDCO?	Chapter D11 of the Environmental Statement details the embedded, good practice and additional mitigation measures that are proposed in respect of the cultural heritage assets identified during the environmental impact assessment including Cestyll Garden, Cestyll House and kitchen garden, the historic buildings at Felin Gafnan and Cafnan House. These mitigation measures are secured by the Wylfa Newydd Code of Construction Practice (CoCP) whilst cultural heritage asset specific additional mitigation measures are secured by the various site-specific sub-CoCPs [APP-415 to APP-420]. Cestyll Garden The following mitigation measures have been identified to mitigate the construction effects on Cestyll Garden. These will be secured by the Wylfa Newydd Code of Construction Practice and Wylfa Newydd Main Site sub- CoCP: • A level 2 topographic and historic landscape survey. • Archaeological earthwork survey of any surviving remains of Cestyll House, Former Site of (Asset 132). • Historic England Level 2 historic building recording of surviving structures. • A photographic survey to provide a permanent visual record of the garden in its current form and condition and Significant Views and provide a detailed visual record of the garden, providing a comprehensive record of its existing form, appearance, setting and key views. This would include the former site of Cestyll House. • Translocation of 'Lady's Finger of Lancaster' apple trees from Cestyll Garden kitchen garden. • Consult with the landowner to implement appropriate monitoring of soil pH and a visual inspection of the condition of plants during the bulk earthworks of the construction period.	This response does not address the proposed requirement for a detailed and binding CMP as set out in IACC's response and LIR. It is clear that the nature and severity of the effects on Cestyll Garden require a complex scheme of mitigation with multiple elements and actions beyond those suggested by HNP. IACC consider that these requirements would be most appropriately managed through the agreement of a CMP.

	Further mitigation is proposed for the operational period of the Power Station to offset operational effects on Cestyll Garden (HLT 2). This mitigation will be secured by the Draft DCO s.106 and includes an obligation on Horizon to use reasonable endeavours to enter into a Deed of Covenant with the Nuclear Decommissioning Authority as the landowner of Cestyll Garden (or its successor in title), prior to the operation period, to develop and deliver a management plan for Cestyll Garden which will comprise restoration works, installation of interpretation boards, a programme of maintenance during the operational period and enhanced public access to the Cestyll Gardens. Felin Gafnan To mitigate the effects from construction on Felin Gafnan Corn Mill, the following additional mitigation is proposed and will be secured by the Wylfa Newydd Code of Construction Practice and Wylfa Newydd Main Site sub-CoCP: • a vibration risk assessment will be undertaken as part of the section 61 application for any construction activity involving vibratory or impact equipment to be used on the Wylfa Newydd Development Area. This will establish the safe working distances for receptors in relation to construction vibration. to establish working practices to avoid effects from vibration. This would be informed by vibration monitoring. • Photographic survey to document the existing setting of this heritage asset. Photographic surveys will be undertaken to document the existing setting of Mill House and the Corn-drying House at Felin Gafnan to provide a permanent visual record of the current conditions of these historic buildings and their settings as set out in the Wylfa Newydd Main Site sub-CoCP. Cafnan House Cafnan House is an undesignated heritage asset. To mitigate effects on the setting of Cafnan House during construction, photographic survey and Level 2 Historic Landscape Recording will be undertaken to as secured in the Wylfa Newydd Main Site sub-CoCP. This will provide a drawn and photographic record of the setting of Cafnan House and Outbuildings in its current form and condition. Summary The mitigation identified in chapter D11 (Cultural heritage) and summarised above is considered by Horizon to be proportionate to the nature and level of the significance of these assets (as required by paragraph 5.8.20 of EN-1). and the potential effects on them. The development of an additional Conservation Management Plan (CMP), or a comprehensive CMP to cover Cestyll Garden, the former site of the Cestyll House and the	

		kitchen garden Felin Gafnan Corn Mill, the Mill House at Felin Gafnan, the Corn-drying House at Felin Gafnan and Cafnan House is therefore considered unnecessary. As noted above, the management plan that is proposed for Cestyll Garden during the operational period of the Power Station will be developed by Horizon and the Nuclear Decommissioning Authority and will be secured through the Draft DCO s.106 to be entered into between Horizon, the Isle of Anglesey County Council (IACC). All other additional mitigation measures will be secured through inclusion in section 12 of both the Wylfa Newydd CoCP and the Main Power Station Site sub-CoCP.	
Q6.0.17	Produce a plan at scale 1:1250 of the area from Porth-y-Pistyll extending south to Cemlyn Road showing the location of: · Cestyll Garden (Historic Landscape Type 2); · The site of Cestyll House and kitchen garden; · Felin Gafnan Corn Mill (Grade II* Listed Building); · Mill House at Felin Gafnan (Grade II* Listed Building); and · The Corn-drying House at Felin Gafnan (Grade II Listed Building); · Cafnan House (Grade II Listed Building) in relation to the boundaries of the WNDA area, the Wylfa NPS site and the Wylfa Power Station site. Show (a) the works planned for this location during site preparation and clearance and construction; and (b) the situation during the operation period, accurately plotting the proposed boundary fences, the proposed line of the Welsh Coastal Path and the proposed landform and landscape. How would the public access these heritage assets during construction, operation and decommissioning?	Three plans have been produced to illustrate the information requested and submitted alongside this written response. These are attached with this submission. Figure 1a, Appendix 6a (60PO80AS_Q6.0.17_01a) illustrates the information requested in relation to the site preparation and clearance phase of construction. Figure 1b, Appendix 6b (60PO80AS_Q6.0.17_01b) illustrates the subsequent main construction works. Figure 2, Appendix 6c (60PO80AS_Q6.0.17_02) illustrates the information for the operational stage. Where located within the plan view at the scale requested, operational plant are included on Figure 2. All responses under the Public Access heading below should be read in conjunction with these plans. It must be noted that the locations of the construction works and permanent structures shown are illustrative and subject to change within the parameters and controls of the draft DCO and control documents. The information provided is drawn from the series of Reference Point drawings WN0902-HZDCO-LFM-DRG- 00002 to WN0902-HZDCO-LFM-DRG-00005 (Wylfa Newydd Development Area and Power Station Site Plans Part 1/2, [APP-014]). For the assessment of effects on these heritage assets, please refer to ES Volume D – WNDA Development D11 – Cultural Heritage. Public Access <i>Felin Gafnan Corn Mill, Mill House at Felin Gafnan, the Corn-drying House at Felin Gafnan</i> During construction and operation, public access to Felin Gafnan Corn Mill, Mill House at Felin Gafnan, the Corn-drying House at Felin Gafnan would be maintained via the existing Permissive Wales Coast Path (on National Trust land at Cemlyn) and public rights of way (PRoW) 18/001/1 and 18/001/2.	IACC notes that this information has been submitted to the Examination and will make further reference to it in future submissions. IACC has the following initial observations in relation to these figures: Figure 1a – Site Preparation and Clearance Phase: • The Gardener's Cottage and original driveway should be identified. . Figure 1b – Construction Phase: • The location and layout of the temporary WWTP is not shown and needs to be added (see Temporary Waste Water Drainage Outfall plan, WN0907-HZCON-LAP-DRG-00023) together with the intended routes of any proposed above and below ground services. • The routes of the perimeter fencing should be shown. • The access route to the breakwater and extent of temporary construction works around Porth-y-pistyll should be shown. Comparing Figure 1b with the Marine Works Site Layout Plan (WN0907-HZCON-LAP-DRG-00003), it appears that these would be within the grey area denoted as “Power Station Site” to the north of the Kitchen Garden. • The Kitchen Garden and former site of Cestyll House are shown as “removed” but are not shown as part of the adjacent laydown area (to the west and north) and would not be affected by the Power Station Site (to the north and east) or the nearby changes in landform (to the east). This suggests that the Kitchen Garden and House Plot (and the adjacent Gardener's Cottage) could be retained during the construction phase. • Are the landform contours and slope shown over the southern part of the original driveway part of Mound D? Figure 2 – Operational Phase: • No details are provided regarding Horizon's intentions for the Kitchen Garden and former site of Cestyll House. These are shown as “removed” but are not shown as part of the proposed coastal heath/grass mosaic (to the west and north) and would not be affected by the Power Station Site (to the north and east), the nearby changes in landform (to the east) or the proposed woodland (to the southwest). This suggests that the Kitchen Barden and House Plot (and the adjacent Gardener's Cottage) could be retained during the construction phase and restored at the beginning of the operational phase. • Are the landform contours and slope shown over the southern part of the original driveway part of Mound D?

During construction the route described above begins at the point by Cemlyn Lagoon where the Wales Coast Path diversion would begin. This route allows the public to undertake a circular walk via these assets which leads back to the Wales Coast Path diversion along the PRoW (18/001/1 and 18/001/2) and the section of Cemlyn Road beyond the WNDA boundary. This option is outlined in Figure D4-5 of ES Volume D WNDA Development Figure Booklet Part 1 of 2.

It is noted that under the Draft DCO s.106, Horizon has committed to the provision of a Public Rights of Way (PRoW) contribution. This contribution will be paid to IACC who must apply the contribution towards PRoW improvements which includes additional signage for, and information/interpretation boards on or near the ProW network, creating new PRoW and updating existing PRoW. (see the response to Q11.1.27). These PRoW improvements may be applied to PRoW to these assets. During operation, the Wales Coast Path diversion would be via the existing PRoW 18/001/1 and 18/001/2, affording a continuous route along the path and via these assets as illustrated in the attached plans.

Cestyll Garden - Valley Garden

The valley garden of Cestyll Garden is currently only open to visitors for a few days annually at the discretion of the landowner and is not accessible to the public outside these arrangements.

Figure 1b and 2 show the private means of access that would be allowed for during the main construction and operational phase of the development. This would ensure the existing level of access is maintained.

The corresponding drawing for approval in the application is WN0902-HZDCO-ROW-DRG-00019 (Wylfa Newydd Project Plans, Sections and Drawings (Part 4 of 19) – 2.4 Rights of Way).

The site where Cestyll House formerly stood (demolished in 1991) and the kitchen garden is within the WNDA (and the NPS site boundary) would not be accessible during construction. Footpaths in the area would be stopped up as per the corresponding drawing for approval WN0902-HZDCO-ROW-DRG-00015.

The site of Cestyll House and kitchen garden

As shown on Figure 1b, this area is required as a temporary laydown area during the construction of the marine works. This would involve the physical removal of the kitchen garden and the plot of land where Cestyll House formerly stood.

An assessment of these effects against policy was set out in the Planning Statement.

The assessment of effects is provided in chapter D11 of the Environmental Statement with identification of additional mitigation measures for the operational phase. This includes agreeing the design of appropriate

		landscape measures to restore and/or enhance the former location of the kitchen garden with National Trust, Cadw and Gwynedd Archaeological Planning Service (GAPS). Cafnan House With respect to Cafnan House, it is noted that this asset is an undesignated heritage asset as per the assessment in chapter D11 and shown on Figures 1a, 1b and 2. It is not a Listed Building. The existing access route leading to Cafnan House is via Cemlyn Road. This section of Cemlyn Road will be permanently stopped up as part of the works. Footpath 38/036/1 which runs north to south from Cemlyn Road a short distance to the east of Cafnan House would also be stopped up. This is shown on Figure 1b accompanying this response. The corresponding drawing for approval in the application is WN0902-HZDCO-ROW-DRG-00014. A private means of access for Cafnan House would be established for the construction and operational phases shown in Figure 1b and 2. The corresponding drawing for approval in the application is WN0902-HZDCO- ROW-DRG-00019. In the operational phase, a proposed footpath running north to south along the Afon Cafnan and leading to Cafnan House would be established. This is shown on Figure 2 and shown on the illustrative drawing in the application is WN0902-HZDCO-ROW-DRG-00024. Decommissioning The operational phase of the Power Station would be approximately 60 years after which it would be decommissioned. With respect to public access during the decommissioning phase, this would be subject to the details to be provided to the IACC for approval under PW10 in the draft DCO.	
Q6.0.20	Address the IACC concern in relation to the A5025 Off-line highway improvements that: 'There is a lack of detail on possible impacts on heritage assets including Siop Soar and Black Lion Inn (Grade II listed buildings) and Capel Soar Standing Stone, and how these will be mitigated and/or compensated for'?	Capel Soar Standing Stone Capel Soar Standing Stone (a Scheduled Monument) is identified in Chapter G11 of the Environmental Statement (Cultural heritage - A5025 Off-Line Highway Improvements) as Asset 146. This heritage asset was assessed to be of high value. A summary of baseline information for this heritage asset is provide in paragraph 11.3.38 of G11. More detailed baseline information is provided in appendix G11-1 A5025 On-line and Off-line Highway Improvements, Anglesey: Cultural Heritage Desk-Based Survey and Walk-Over Survey Report and Appendix G11-4 Gazetteer of heritage assets and the latter also contains a description of the setting of the standing stone.	The general design mitigation offered is noted and welcomed. However, the ES assessment notes a permanent adverse residual effect (i.e. harm to significance), albeit of a low magnitude. The failure to identify appropriate specific mitigation for the lasting effect on Capel Soar standing stone is concerning and should be considered in any balancing decision made by the ExA. IACC have made suggestions for appropriate mitigation in Chapter 22 of the LIR.

As identified in paragraph 11.4.7 and 11.4.11 of chapter G11 the following embedded mitigation measures were included in the design of the A5025 Off-line Highway Improvements to reduce impacts on the setting of Capel Soar Standing Stone:

- Reduction of embankment slopes (please refer to chapter G2, A5025 Off-line Highway Improvements – alternatives and design evolution [APP-305] for further information);
- Slackening of earthworks slopes at the Llanfaethlu off-line section to provide integration with the surrounding landform; and
- Shrub planting on embankment slopes to soften their appearance.

This embedded mitigation will be secured by the relevant Work Plans [APP-011] and the Design and Access Statement, Volume 3 ([APP-409] and [APP-410]).

As detailed in paragraph 11.5.18 of chapter G11 construction would result in visual and noise intrusion on the setting of Capel Soar Standing Stone (Asset 146), detracting from its rural character. However, as the key attributes of its setting comprising its prominent location on a north/south ridge to the immediate east of the existing A5025, and extensive views across enclosed farmland to the east would be maintained, the magnitude of this short-term adverse impact has been assessed to be moderate and the significance of effect moderate adverse.

As detailed in paragraph 11.5.23 of chapter G11 operation would increase the prominence of highways infrastructure within the setting of Capel Soar Standing Stone (Asset 146) resulting in intrusion on views west from the asset. However, realignment of the road further to the west would reduce intrusion from traffic in the immediate vicinity of the standing stone and operation of the A5025 Off-line Highway Improvements would not diminish the asset's prominence in the landscape. The magnitude of this permanent adverse impact was therefore assessed to be moderate and the significance of effect has been assessed to be moderate adverse. Therefore, no additional mitigation was identified in respect of the Capel Soar Standing Stone (Asset 146) and the significance of residual effect during construction and operation was predicted to be moderate adverse.

Siop Soar and The Black Lion Inn

Siop Soar and The Black Lion Inn are Grade II Listed Buildings of 18th century date and are identified in chapter G11 as Asset 149 and 150 respectively. A summary of baseline information on these heritage assets is provided in paragraph 11.3.55 of chapter G11 while more detailed baseline information is provided in appendix G11-1 A5025 On-line and Off-line Highway Improvements, Anglesey: Cultural Heritage Desk-Based

	Survey and Walk-Over Survey Report and appendix G11-4 Gazetteer of heritage assets and the latter also contains a description of the setting of these historic buildings. As identified in paragraph 11.4.7 and 11.4.11 of chapter G11 the following embedded mitigation measures were included in the design of the A5025 Off-line Improvements to reduce impacts on Siop Soar and The Black Lion Inn: • Reduction of embankment slopes (please refer to chapter G2, A5025 Off-line Highway Improvements – alternatives and design evolution for further information); • Slackening of earthworks slopes at the Llanfaethlu off-line section to provide integration with the surrounding landform; and • Shrub planting on embankment slopes to soften their appearance. This embedded mitigation will be secured by the relevant Work Plans and the Design and Access Statement, Volume 3 ([APP-409] and [APP-410]). As identified in paragraph 11.5.20 of chapter G11 construction would result in visual and noise intrusion into the setting of Siop Soar and the Black Lion Inn, detracting from the semi-rural character of their setting. However, as the group value of these heritage assets resulting from their physical relationship to each other would continue to be understood, the magnitude of this short-term adverse impact was assessed to be moderate and the significance of effect moderate adverse for both heritage assets. Therefore, no additional mitigation measures were identified for Assets 149 or 150 during construction and the significance of residual effect for both was predicted to be moderate adverse. As stated in appendix G11-5: Effects on heritage assets during operation, the presence of the scheme would result in a noticeable change to the semi-rural setting of Siop Soar, due to the prominence of modern highways infrastructure. Whilst the road would form an intrusive element in views from the heritage asset across the rural landscape to the west, landscaping measures, including the use of hedgerow boundaries to reinforce the remnant field pattern and shrub planting on embankment slopes to soften their appearance would aid the scheme's integration into the surrounding landscape. This mitigation will be secured through the Landscape and Habitat Management Strategy [APP-424 and APP-425]. The heritage asset's architectural and historic value as an example of 19th century vernacular terraced cottages and its group value with the Black Lion Inn (Asset 150) would be maintained. As such, the potential magnitude of change was assessed to be minor and the potential significance of effect slight adverse.	

		As identified in appendix G11-5: Effects on heritage assets during operation, the presence of the scheme would result in a noticeable change to the Black Lion's (Asset 150) semi-rural setting, increasing the prominence of modern highways infrastructure. Whilst the road would form an intrusive element in views from the heritage asset across the rural landscape to the west, landscaping measures, including the use of hedgerow boundaries to reinforce the remnant field pattern and shrub planting on embankment slopes to soften their appearance would aid the scheme's integration into the surrounding landscape. This mitigation will be secured through the Landscape and Habitat Management Strategy [APP-424 and 425]. The heritage asset's architectural and historic value as traditional inn and its group value with Siop Soar (Asset 149) would be maintained. As such the potential magnitude of change was assessed to be minor and the potential significance of effect slight adverse. Therefore, no additional mitigation measures were identified for Assets 149 or 150 during operation and the significance of residual effect for both was predicted to be slight adverse.	
Q6.0.21	(a) How would an agreed archaeological excavation and recording programme be agreed, adhered to and completed prior to the Examination; and (b) Explain how archaeological mitigation is to be achieved across all the sites? Welsh Government [RR-092] IACC [RR-020] NT [RR-053]	Horizon has no plans to carry out any further archaeology investigation works within the Examination timetable other than those areas identified in a letter to the Isle of Anglesey County Council (and copied to Welsh Government) dated 7 August 2018. However, if planning permission for site preparation and clearance (SPC) works is granted by IACC, Horizon may commence early works on the site (in advance of the Development Consent Order being granted) which have the potential to trigger additional archaeological works. The SPC planning permission will, however, be subject to various conditions relating to archaeological matters. The current draft conditions include a condition that no works (including demolition, clearance, trial pitting, topsoil strip or other groundworks) shall take place until a detailed Written Scheme of Investigation (WSI) of archaeological work has been submitted to and approved in writing by IACC. The development must be carried out and all archaeological work completed in strict accordance with the approved WSI details. A Scheme of Archaeology Investigation Reporting on the archaeological work must be submitted to and approved in writing by IACC within six months of the completion of the archaeological fieldwork. Further mitigation will be secured through the Draft DCO s.106 to the SPC planning permission. The Draft DCO s.106 includes an obligation on Horizon to pay to IACC a Heritage and Archaeology Contribution. The contribution will be applied to various measures including: • a Heritage and Archaeology Officer to facilitate and deliver the following mitigation measures; • the provision of bilingual interpretation boards and signage which deal with the cultural, archaeological and heritage significance of the Site;	For clarity, IACC do not anticipate or require further archaeological works to be completed in advance of the completion of the Examination. However, the response provided by HNP does not address the concerns raised for the agreement of mitigation documents for archaeological investigation, landscape mitigation at Cestyll and the Dame Sylvia Crowe landscaping or heritage outreach. Given the concerns raised by IACC, Cadw, NT and WHGT, it is important that any mitigation proposals be agreed and secured in advance of the completion of the examination. The commitment to heritage oureach is welcomed, but this would be most appropriately considered within the scope of comprehensive and coordinated proposals for heritage outreach across the project as a whole.

- the provision of a web presence which shall include online interpretation material including (if the Council considers it appropriate the use of augmented reality / digital experiences and Social Media); and/or
- the provision of a public exhibition explaining the historical significance of the Site; and
- other such matters as agreed between Horizon and IACC.

If the Development Consent Order is granted, Horizon's approach to cultural heritage management during construction will be based on the controls set out in Section 12 of the Wylfa Newydd Code of Construction Practice (CoCP) whilst cultural heritage asset specific additional mitigation is presented within Section 12 of the relevant sub-CoCPs [APP-415 to APP-420]. Where changes to the mitigation identified in the sub-CoCPs are proposed the sub-CoCPs will be updated.

Section 12 of Wylfa Newydd Code of Construction Practice (CoCP) also identifies the procedure in the event of the discovery of unknown archaeological remains.

As identified in the sub-CoCPs [APP-414 to APP-420] the mitigation will be undertaken in accordance with the relevant standards and good practice guidance from the Chartered Institute for Archaeologists, and Written Schemes of Investigation (WSI) which will be developed in consultation and agreed with the appropriate authority i.e. Gwynedd Archaeological Planning Service. In addition to identifying the approach to fieldwork, the WSI will also identify the approach to post-fieldwork assessment, reporting, analysis, publication, other forms of dissemination and archiving.

Timescales for the completion of the fieldwork, and programmes for subsequent post-fieldwork assessment, reporting, analysis, publication, other forms of dissemination and archiving, will be identified in the WSIs. The development of the WSIs, in consultation with relevant stakeholders, will determine subsequent timing of activities.

The controls provided for in the WN CoCP the various site-specific sub-CoCPs will be secured by the Development Consent Order. The requirements in Schedule 3 of the Draft Development Consent Order state that the construction of the Wylfa Newydd Project, as described in Schedule 1 of the Draft Development Consent Order, must be carried out in accordance with this CoCP and the relevant sub-CoCP applying to a specific site.

Q6.0.22	Further to the NT RR[RR-053] can you set out the marine archaeological assumptions concerning Porth-y-Pistyll and Porth y Felin.	Horizon has been engaging with the National Trust in respect of this matter as part of the Statement of Common Ground process. Based on discussions with National Trust in a meeting of 18th October 2018, Horizon now understand that the National Trust's concerns relate to two intertidal archaeological sites in Porth-y-Pistyll and Porth-y-Felin, adjacent to National Trust land, and recorded on the National Monument Record of Wales which have not been identified in the marine archaeological baseline and have not been assessed in the heritage impact assessment. Intertidal archaeological remains are presented in appendix D11-1 of the Environmental Statement and not in the marine baseline presented in Appendix D11-3a. In Appendix D11-1 one intertidal site was identified in Porth-y-Pistyll and Porth-y-Felin, adjacent to National Trust land, comprising two landing places. These are identified in Appendix D11-1 as Asset 110. An assessment of the potential effects on Asset 110 is presented in Appendix D11-6. The assessment concludes that there would not be a physical effect on this heritage asset but there would be an effect on its setting. During construction, and after additional mitigation in the form of a photographic survey as secured by the Wylfa Newydd Main Site sub-CoCP, the significance of residual effect has been assessed to be negligible adverse. During operation the significance of residual effect has been assessed to be minor adverse. The National Monuments Record of Wales was consulted via the Coflein website (http://www.coflein.gov.uk/) on 29th October 2018. No additional intertidal archaeological sites in Porth-y-Pistyll and Porth-y-Felin, adjacent to National Trust land were identified from this source.	This clarification is welcomed. IACC note that the potential landing places at Porth y Felin (Coflein NPRN519024) appear to be at least partially within the redline of works at the MOLF and request a more detailed explanation of why no direct effect is anticipated
Q6.0.23	Would archaeological digs and/or archaeological finds be accessible to local groups as suggested by Cemaes Bay History Group [RR-016] and Jesse Hughes Youth Club [RR-051] and if so how would this be secured?	To date, Horizon has conducted two community dig events and through its engagement with IACC has provided full access to field investigations both to Gwynedd Archaeological Planning Service (GAPS) Senior planning archaeologist (the curator) and other stakeholders and interested parties i.e. Welsh Government and Cadw. The Curator has provided input and guidance on all planned investigations to date and appropriate mitigation measures developed. Horizon is not currently proposing to conduct any further 'community digs' or archaeological open days. Horizon's commitment to recording and reporting archaeological finds as set out in Chapter D11 of the Environmental Statement. Further, the WN CoCP sets out the commitment to making information available in relation to Archaeological Remains / Historic Buildings / and historic Landscapes (ref: section 12). The general mitigation controls to be implemented for cultural heritage are described in Section 12 of the WN CoCP. Further, site-specific controls are set out in the sub-CoCPs [APP-415 - APP-420]; these provide details of mitigation treatment as per each cultural heritage asset.	The commitment to further community involvement in heritage is welcomed, but this would be most appropriately considered within the scope of comprehensive and coordinated proposals for heritage outreach across the project as a whole as set out in the IACC LIR.

	Any archaeological data/information to be made available will be done in accordance with the Standard and guidance for archaeological excavation from the Chartered Institute for Archaeologists Standard and guidance for archaeological excavation (2014), as set out within approved Written Schemes of Investigation (WSI) and agreed with GAPS. The timeframes for post-Excavation Evaluation and Reporting, Publication and Archiving with Historic Environment Records is yet to be agreed during DCO Examination and will be subject to review with key stakeholders through Statement of Common Ground (SoCG) with Welsh Government and Cadw. The level of reporting would be commensurate with the value of the historic landscape affected and would include submission of reports to the Historic Environment Record and National Monument Record of Wales.	

ExA Ref.	Question	Horizon's Response to Question	IACC Comments/Response
Q7.0.2	Is the Applicant's approach to the landscape and visual effects of the development in relation to the Wylfa Newydd Development Area as set out in 6.4.10 ES Volume D - WNDA Development D10 - Landscape and visual [APP-129] adequate and if not how should any issues be addressed; with reference to: (a) The approach to the Study Area as described in section 10.2; including the Zones of Theoretical Visibility, the main Assessment Points and the extent of theoretical visibility of the different assessment points within the overarching study area, for the different assessment stages presented in figures D10-18 to D10-27 of 6.4.101 ES Volume D - WNDA Development Figure Booklet - Volume D (Parts 1 and 2) [App-237 and APP-238]; (b) The summary of the landscape and visual baseline conditions within the study areas including the Value of Landscape Receptors summarised in Table D10-3; the selected Representative and Illustrative viewpoints for both daytime and night-time described in Section 3 and shown in Figures D10.14 – D10.17 of 6.4.101 ES Volume D - WNDA Development Figure Booklet - Volume D (Part 1 of 2) [APP-237 and APP-238]; (c) Design basis and activities for construction, operation and decommissioning, including Embedded and Good Practice mitigation; (d) Assessment of effects including: · evaluation of sensitivity of receptors · effects on landscape and seascape character	Whilst the question is not directed to the applicant, Horizon at this stage would like to comment on the last part to question FWQ7.0.2 relating to the assessment of community views as follows: The approach taken to the assessment of effects on the visual amenity of communities was discussed during the stakeholder meeting held on 1 April 2016 with the Isle of Anglesey County Council (IACC), during which the IACC expressed support for a community views approach to the assessment. Within chapter D10 of the DCO ES [APP-129], the assessment of visual effects is based upon 'representative' views, that is typical views, likely to be experienced by the community in general from publicly accessible locations, as opposed to individual residents within the community. This is considered consistent with the Landscape Institute and Institute of Environmental Management and Assessment's Guidelines on Landscape and Visual Assessment, Third Edition (2013) which recommend that representative viewpoints should be "selected to represent the experience of different types of visual receptor, where larger numbers of viewpoints cannot all be included individually and where the significant effects are unlikely to differ". Visual effects on the following local communities have been assessed: • Cemaes; • Tregele; • Llanfairynghornwy; • Llanfechell; and • Mynydd Mechell (Only night-time visual effects assessed, as daytime visual effects on this community were scoped out). Chapter D10 (landscape and visual) of the ES [APP-129] explains that where appropriate, representative viewpoints have included locations within or on the edge of main settlements, in order to provide an indication of the likely worst case visual effects on the local communities. The assessment provided in chapter D10 of the ES and supporting appendices is considered to provide sufficient information to identify the likely significant effects on the visual amenity of local communities. However, following a meeting held with the IACC on 17 October 2018, Horizon has agreed to consider supplementary assessment of three additional representative viewpoints for Cemaes, in order to provide further information on the likely effects on visual amenity. This assessment will be informed by preparation of additional photomontage views from close to Illustrative Viewpoints F and G in appendix D10-5 of the ES (illustrative viewpoints) [APP-196] on the western edge of Cemaes (which will become representative viewpoints) and a new representative viewpoint from high ground within the settlement. Horizon has also	The additional viewpoint visualisations need to be submitted by Deadline 4 (17 January 2019) to allow for a discussion on the appropriate mitigation for affected properties which would need to be secured within the Main Power Station Site sub-CoCP, the DCO and/or S106. The examination programme requires the updated Schedule of Mitigation to be submitted at Deadline 5 (12 February 2019) and the final s106 to be submitted at Deadline 6 (19 February 2019), so submitting the visualisations at Deadline 6 would be much too late.

	· daytime and night-time effects · effects on landscape and seascape character · visual effects (e) Additional mitigation during construction, operation and decommissioning; (f) Residual effects and Additional Mitigation for construction, operation and decommissioning summarised in Tables D10.43 to D10 for landscape; daytime visual; night-time visual; and (ecological compensation sites) receptors. Is the approach of using representative community views as opposed to individual viewpoints sufficient for assessing daytime and night- time visual effects on community receptors?	agreed to consider supplementary assessment of an additional representative viewpoint within Tregele and to prepare an additional photomontage view from this viewpoint and from the current Representative Viewpoint 18. Horizon is planning to submit these documents into examination at Deadline 6.	
Q7.0.4	IACC [RR-0202], NRW [RR-088] and NT [RR-053] raise concerns over impacts on the Anglesey AONB. Respond to the assertions that: (a) Detailed proposals will need to be submitted to ensure mitigation of impacts upon the AONB are fully developed and to confirm that the power station's landscape and visual integration with the AONB has been developed to best effect; and	Whilst the question is not directed to the applicant, Horizon at this stage would like to comment as follows: (a) Schedule 3 of the Draft DCO [APP-029] sets out requirements for submission of detailed proposals to the IACC for approval. This allows IACC to ensure that the final landscape scheme for each development is in accordance with the principles set out in chapter 4 of the Landscape and Habitat Management Strategy [APP-424] or the relevant Design and Access Statement for each development [APP-407] to [APP-410]. IACC can consult statutory consultees, including NRW and other relevant consultees, on the discharge of such Requirements. The landscape design principles for each development have been informed by a thorough analysis of the site of each Wylfa Newydd DCO Project development and its wider context, in order to mitigate adverse effects on the surrounding landscape, including the Anglesey AONB and its setting. The relevant requirements for the detailed design of the respective developments are described further below: Wylfa Newydd Development Area The landscape design principles in chapter 4 of the Landscape and Habitat Management Strategy set out key requirements for subsequent detailed landscape design development for the Wylfa Newydd Development Area following grant of Development Consent Order (DCO). Schedule 3 of the Draft DCO, Requirement WN9 requires that the final landscape and habitat scheme must be prepared in accordance with the principles in Chapter 4 of the Landscape and Habitat Management	The Off-Site Power Station Facilities, the A5025 Off-line Highways Works and the Parc Cybi Logistics Centre are also adjacent to or in the AONB and the relevant requirements in Schedule 3 of the DCO need to be amended to require the submission of detailed landscape and habitat implementation and management schemes for these AD sites.

Strategy and must include details about a number of specific elements, including amongst other the “*areas of permanent mounding*”.

The Landscape and Habitat Management Strategy includes the following overarching landscape design and mitigation principles that are particularly relevant to landscape and visual integration with the AONB:

- “A new landscape setting will be created that reflects the existing open, rolling, drumlin landscape character and sense of place, minimizing harm to the setting of the Anglesey Area of Outstanding Natural Beauty (AONB) and North Anglesey Heritage Coast.”
- “An appropriate landscape setting will be provided to help integrate a major development through the use of large scale mounding and tree planting to soften views of the Power Station and reduce adverse visual impacts, screening low level buildings and maintaining a natural setting as close to the Power Station as possible.”

Off-Site Power Station Facilities

The embedded landscape mitigation proposals for the Off-Site Power Station Facilities are illustrated on the Proposed Landscape Masterplan [APP-025] and set out in volume 3 of the Design and Access Statement, Appendix 1-1 (Off-site Power Station Facilities) [APP-409].

Schedule 3 of the Draft DCO, Requirement OPSF2 in respect of any Off-Site Power Station Facilities, requires that no construction may commence until plans and written details of the design (including size, external appearance, and siting) have been submitted to and approved by IACC. Requirement OPSF2 also requires that submitted details must be prepared in accordance with the design and landscaping principles in volume 3 of the Design and Access Statement.

The Design and Access Statement (Appendix 1-1 Off-Site Power Station Facilities DAS) includes the following overarching landscape design and mitigation principles that are particularly relevant to landscape and visual integration with the adjoining AONB:

- “Architectural treatment of proposed buildings and structures will seek to integrate with surrounding landscape to reduce adverse visual effects.”
- “The strategy will integrate the development site with the character of the surrounding landscape by maintaining the matrix of local vegetation patterns, blending with local landform and softening views of the site.”
- “Planting will achieve visual screening of the Off-Site Power Station Facilities during the operational phase, as far as reasonably practicable.”

		A5025 Off-Line Highway Improvements The landscape design principles in volume 3 of the Design and Access Statement, appendix 1-1 set out key requirements for subsequent detailed landscape design development following grant of DCO. These landscape design principles have been informed by a thorough analysis of the site of the A5025 Off-Line Highway Improvements corridor and its wider context, in order to mitigate adverse effects on the surrounding landscape, including the Anglesey AONB and its setting. Schedule 3 of the Draft DCO, Requirement OH8, requires plans and written details of the landscape design for the operational phase of the A5025 Off-Line Highway Improvements to be submitted to IACC for approval. The Design and Access Statement (Appendix 1-5 A5025 Off-line Highway Improvements DAS) includes the following overarching landscape design and mitigation principles that are particularly relevant to landscape and visual integration with the adjacent AONB: • “Slackening of earthwork slopes to the south of the viaduct at section 3 must be provided to reduce adverse effects on landscape character and views from adjacent residential properties and the AONB, wherever practicable against existing land constraints.” • “The alignment of section 5 of the A5025 Off-line Highway Improvements must be designed to avoid Anglesey AONB.” • “A landscape planting strategy must visually screen and contain roadside features, improve landscape integration and reinstate field boundaries using hard and soft landscaping, wherever practicable.” • “Planting and seeding along the A5025 Off-line Highway Improvements must be provided to visually screen and contain roadside features and reduce adverse effects on landscape character and views, where appropriate...” Logistics Centre The landscape design principles and planting strategy are set out in volume 3 of the Design and Access Statement, appendix 1-4 (Logistics Centre). Schedule 3 of the Draft Development Consent Order, Requirement LC2 in respect of the Logistics Centre, requires that construction “<i>must be carried out in accordance with the approved Detailed Design Drawings relating to the Logistic Centre</i>”, as included in schedule 2 of the draft Order, within the parameters set out in requirement LC4 and with the exceptions set out in requirement LC3.	

(b) Landscape harm in and adjoining the Anglesey AONB is underestimated and inadequate mitigation and compensation is proposed.

Show how in relation to:

- Wylfa Newydd Development Area
- Off-site Power Station Facility
- A5025 Off-line highway improvements
- Logistics Centre at Parc Cybi

the mitigation measures outlined in D10.14 of ES Volume D - WNDA Development D10 - Landscape and visual [APP-129] in relation to the Isle of Anglesey AONB meet the policy objectives of EN-1 paras. 5.9.9 to 5.9.11 and both Welsh national and local planning policies, including policies in the AONB Management Plan, as summarised in paragraphs 6.4.244 to 6.4.257 of 8.1 Planning Statement [APP-406]?

The Design and Access Statement (Appendix 1-4 Logistics Centre DAS) includes the following overarching landscape design and mitigation principles that are particularly relevant to landscape and visual integration with the AONB:

- "Hard and soft landscaping will be used to help integrate the Logistics Centre appropriately into the surrounding landscape. Where practicable, existing hedgerows and stone walls will be retained and enhanced to define and reinforce the boundaries of the site."

(b)

This response to part (b) of the question:

- sets out the relevant landscape and visual chapters of the Draft DCO application and summarises the landscape effects of the WNDA Development, the Off-Site Power Station Facilities and Associated Development on the Isle of Anglesey AONB;
- sets out the main policy objectives of relevance to the AONB landscape and considers the compliance of each development on those policies in terms of:
 - Overarching National Policy Statement for Energy, EN-1;
 - Other policies relating to conservation and enhancement of the AONB;
 - Significant effects on published character areas;
 - Protection of Special Landscape Areas (SLA); and
 - Use of LANDMAP.

Assessment summary

Effects on the landscape character of the Isle of Anglesey AONB are considered in the relevant landscape and visual chapter of the ES as follows:

- Chapter D10 of the ES [APP-129] for the Wylfa Newydd Development Area;
- Chapter E10 of the ES [APP-248] for the Off-Site Power Station Facilities;
- Chapter G10 of the ES [APP-313] for the A5025 Off-line Highway Improvements; and
- Chapter H10 of the ES [APP-364] for the Logistics Centre.

As explained in section 10.4 of each of the above chapters, the assessment is based upon a likely 'worst case' scenario to ensure that effects are not underestimated.

In relation to the Power Station, an assessment of both indirect and direct effects on the landscape character of the AONB has been undertaken, as described in appendix D10-6 of the ES (landscape effects schedule) [APP-197] and in the chapter D10 narrative. As well as including an assessment of effects on the overall AONB, an assessment has been made of both the direct and indirect effects on the AONB within the Wylfa Newydd Development Area and of the indirect effects on the locally affected area of the AONB beyond the Wylfa Newydd Development Area. A combined assessment of indirect and direct effects has been presented in appendix D10-6 and the chapter narrative. (A misunderstanding may have arisen from the assessment

	column references in appendix D10-6 to 'directly affected area'. These assessment column references should read 'directly and locally affected area', since the assessment of indirect effects is not confined to the Wylfa Newydd Development Area boundary. This is evident by both the description of change in the landscape effects schedule and in the chapter narrative. It is also evident from the explanatory note in the landscape effects schedule, which sets out the IACC landscape character areas that the AONB assessment has been based on.) <u>Wylfa Newydd Development Area</u> Most of the Wylfa Newydd Development Area lies outside the Anglesey AONB, however, the western margin lies within the AONB, to the west of the Afon Cafnan watercourse. The AONB also encompasses the shoreline of Porth-y-pistyll bay within the Wylfa Newydd Development Area. The proposed Power Station would be principally constructed outside the AONB, with the main exceptions comprising the marine works including the Cooling Water System Intake, Marine Off-Loading Facility (MOLF) and temporary causeway for construction of the off-shore western breakwater. To the west of Afon Cafnan, landscape mounding is proposed within the AONB, which will be landscaped to help integrate the Power Station into the landscape. No permanent buildings or structures are proposed within this area. Chapter D10 of the ES concludes that there would be a major adverse effect on the affected part of the AONB locally during construction and operation of the Power Station. However, due to the scale of the AONB, the overall effect on the AONB would not be significant. <u>Off-Site Power Station Facilities</u> The Off-Site Power Station Facilities site is located outside the AONB but adjoins the AONB on its western boundary. Views of the proposals would only be experienced within a small part of the AONB, from sections of a public footpath to the west. The increase in built form seen within the site of the Off-Site Power Station Facilities would only alter the visual amenity of receptors to a limited extent, as the overall composition of views including the wider views from the AONB would be unaffected. The visual effect has therefore been assessed as minor adverse, which is not considered to be significant. Chapter E10 of the ES concludes that there would only be a minor adverse, indirect effect on the landscape character of the AONB within the locality, during construction, operation and decommissioning of the Off- Site Power Station Facilities, which would not be significant.	

A5025 Off-line Highway Improvements

With the exception of two small parts of sections 3 and 5 of the A5025 Off-line Highway Improvements (comprising a field edge requiring removal of a short section of stone wall for section 3 and part of the existing A5025 requiring removal of the associated landscaped strip between the main carriageway and adjacent local road for section 5), the A5025 Off-line Highway Improvements would take place outside of the AONB, up to a distance of 1.5 km from its boundary.

The detailed assessment within appendix G10-3 [APP-338] concludes that the overall effect on the AONB during construction and operation year 1, including the effects of both sections 3 and 5, would be slight adverse and therefore not significant, as impacts would be limited to predominantly indirect effects on localised parts of the designated area.

The tree and shrub planting proposed in the A5025 Landscape Scheme, Appendix G10-9 [APP-344], is in keeping with the local landscape character would help to integrate the A5025 Off-line Highway Improvements into the surrounding landscape at operation year 15, resulting in a neutral effect on the landscape character of the AONB.

Logistics Centre

Although the site of the Logistics Centre lies within the AONB, it is situated within an area allocated as a Safeguarded Employment Site in the adopted Anglesey and Gwynydd Joint Local Development Plan 2011

- 2026 (Anglesey and Gwynydd, 31 July 2017) on the edge of an existing industrial area on the south-west side of Holyhead, including the large scale former aluminium works adjoining the A55 to the north-east. Hedgerows are proposed around the perimeter of the site to help integrate the Logistics Centre into the surrounding landscape, within the AONB.

Chapter H10 of the ES concludes that although there would be a moderate adverse effect on the directly affected part of the AONB locally to the Logistics Centre during construction and operation, the overall effect on the AONB would not be significant.

Policy objectives

With regard to the Wylfa Newydd DCO Project, the following are the main policies considered relevant to the conservation and enhancement of the Isle of Anglesey AONB, the effects on published landscape character areas, protection of SLAs and use of LANDMAP to inform assessment:

- EN-1 paragraphs: 5.9.9 to 5.9.13.

	• Section 5.3 of Planning Policy Wales (PPW). • Policy PCYFF 4 in the JLDP. • Strategic Policy PS 19 of the JLDP. • Policy AMG 1 of the JLDP. • Policy AMG 2 of the JLDP. • Policy AMG 3 of the JLDP. • Policy CCC 1.1 of the Isle of Anglesey AONB Management Plan (2015). • Policy CCC 3.1 of the Isle of Anglesey AONB Management Plan (2015). • Policy CCC 3.2 of the Isle of Anglesey AONB Management Plan (2015). • Policy CCC 3.3 of the Isle of Anglesey AONB Management Plan (2015). • Policy CCC 4.1 of the Isle of Anglesey AONB Management Plan (2015). • Wylfa Newydd Supplementary Guidance (SPG) (2018). Section 10.2 of chapter B10 of the ES (introduction to the environmental assessments - landscape and visual) [APP-075] sets out the key policy objectives that have been used to inform the scope and content of the LVIA; assist in the identification of potential effects and mitigation; and influence the design of the Wylfa Newydd DCO Project to mitigate the significance of effects. There follows below a summary (where not already set out above) of how the landscape and visual mitigation measures for the Wylfa Newydd Project address policies relating to the conservation and enhancement of the AONB. These include EN-1 paragraphs 5.9.9 to 5.9.11 and, Welsh national and local planning policies, including policies in the AONB Management Plan, as summarised in paragraphs 6.4.244 to 6.4.257 of 8.1 Planning Statement [APP-406]. As several of the policies cover similar themes, the responses have been grouped by theme to avoid unnecessary repetition. Further below is a summary of the how the landscape and visual mitigation measures for the Wylfa Newydd Project address relevant Welsh national and local planning policies relating to the effects on published landscape character areas, protection of SLAs and use of LANDMAP to inform assessment. <u>Compliance with policies relating to the conservation and enhancement of the AONB</u> <u>EN-1 policies</u> The Overarching National Planning Policy Statement for Energy (EN-1) (paragraph 5.9.9) requires that the statutory purpose of AONBs be given due regard and that conservation of the natural beauty of AONB landscapes should be given substantial weight in deciding applications for development consent. However, EN-1 also makes provision for grant of development consent within designated areas including AONBs in exceptional circumstances (paragraph 5.9.10), requiring an assessment of any detrimental effect on the environment including landscape and the extent to which such effects could be moderated. The Planning	

	Statement demonstrates that the requirement of exceptional circumstances is met in respect of the Wylfa Newydd DCO Project, in accordance with Paragraph 5.9.10 of EN-1 (see, in particular, paragraph 6.4.265). In such circumstances, EN-1 requires projects consented in AONBs to be carried out to high environmental standards (paragraph 5.9.11). In this respect, Horizon has had regard to the Isle of Anglesey AONB Management Plan, as set out in the Landscape and Habitat Management Strategy, and in accordance with Policy AMG 1 of the JLDP. EN-1 confirms that the duty to have regard to the purposes of AONBs also applies when considering developments outside the boundaries of the designation that could have impacts within the designation and that <i>“The aim should be to avoid compromising the purposes of designation and such projects should be designed sensitively given the various siting, operational, and other relevant constraints”</i> (paragraph 5.9.12). However, EN-1 also confirms that <i>“the fact that a proposed project will be visible from within a designated area should not in itself be a reason for refusing consent”</i> (paragraph 5.9.13). Compliance with this policy is demonstrated elsewhere in this response, in terms of how the Wylfa Newydd Project avoids compromising the purposes of the AONB designation, and is designed sensitively given the various siting, operational, and other relevant constraints. <u>Other policies relating to the conservation and enhancement of the AONB</u> The primary statutory purpose of the AONB designation to conserve and enhance the natural beauty of the AONB has been given due consideration in development of the proposed landscape mitigation design for the Power Station and the relevant Associated Developments. <u>Wylfa Newydd Development Area</u> The overarching landscape design principles for the Power Station are set out on page 60 of the Landscape and Habitat Management Strategy, including the aspirations for the ‘landscape setting’ of the Power Station to reduce adverse effects on the AONB. Section 6.2 of the Landscape and Habitat Management Strategy describes the approach to the landscape design, with reference to the AONB Management Plan. The likely effects of the Power Station on the landscape character of the Isle of Anglesey AONB, as well as any Significant Views, have been rigorously assessed in the ES, with reference to the relevant features and special qualities of the Isle of Anglesey AONB. The relevant features and special qualities are listed in the baseline description of the AONB in appendix D10-6. The construction of the Power Station would affect special qualities of the AONB, such as peace and tranquillity, and expansive views of the AONB. The landscaping of completed areas of landscape mounding and restoration to agricultural use in keeping with the existing AONB would to some extent offset these adverse effects as the planting establishes. Other special qualities of the AONB that would be adversely	

	affected would include the associated seascapes and partially open aspect of Cestyll Garden, including the Significant Views from the garden, which would initially be obstructed by construction of the temporary causeway and breakwater. However, the removal of the temporary causeway would to some extent reduce the effect. Despite this, chapter D10 of the ES concludes that there would be a significant effect on the Significant View at Cestyll Garden during construction and operation of the Power Station. Volume D of the ES sets out the assessment of effects of the Power Station on the environment, including embedded, and good practice mitigation measures. Section 10.6 of chapter D10 of the ES identifies several additional mitigation measures that would help to reduce adverse effects on landscape and visual receptors, including the AONB. These measures include enhancements to existing boundary features retained on the Wylfa Newydd Development Area within and outwith the AONB, which could include infill planting and management to improve structure and species diversity, and introduction of hedgerow trees where appropriate. Stone walls would be repaired and the current condition of cloddiau improved, where necessary and practicable. A key measure is the development of a colour scheme for the Power Station based on natural colours, in accordance with the design principles in volume 2 of the Design and Access Statement (Power Station Site) [APP-408], which would seek to break down the scale and massing of the Power Station buildings and help integrate them into the landscape. However, chapter D10 of the ES concludes that the residual effects reported for the AONB would remain despite the proposed mitigation measures. This is in part due to the scale and nature of the Power Station, which means it is only practicable to reduce rather than eliminate significant effects. <u>Associated Development and Off-Site Power Station Facilities</u> As explained above in the Part A response, the overarching landscape design and mitigation principles that are particularly relevant to landscape and visual integration with the AONB are set out in the relevant Design and Access Statement as follows: • Off-Site Power Station Facilities. • A5025 Off-line Improvements. • Logistics Centre. In respect of the Off-Site Power Station Facilities, Volume 3 of the Design and Access Statement, appendix 1-4 details the proposals and planting strategy for the Off-Site Power Station Facilities “... made up of landscape elements, which help to mitigate the adverse impacts of the site and enhance the local landscape character” and, as such, seek to protect and enhance this local part of the AONB.	

New hedgerow planting is proposed where practical including a hedgerow and areas of native tree and shrub planting to the south and east of the site, which would help compensate for that lost and reinforce the local landscape character.

In respect of the A5025 Off-line Highway Improvements, as described in volume 3 of the Design and Access Statement, appendix 1-5, the need to protect environmental features including the Anglesey AONB informed decisions on the alignment and design for the A5025 Off-line Highway Improvements. The landscape proposals as illustrated within the A5025 Landscape Scheme in appendix G10-9 would help to avoid, minimize, mitigate and compensate for landscape and visual impacts on the local and wider area and are proportionate to the scale of the A5025 Off-line Highway Improvements.

In respect of the Logistics Centre, the site layout has been developed to retain as many of the existing landscape features as possible, driven by site constraints and functional criteria. The landscape proposals comprise the retention of an area of existing woodland/scrub and an area of rocky outcrop; the retention and enhancement of existing hedgerow planting and stone walling on the site boundaries to retain the local vernacular and reinforce local landscape character and filter views of the embankments and boundary fence. The location of the Logistics Centre buildings and planting would maintain the view between the Trefignath Burial Chamber and the Ty Mawr Standing Stone ancient monuments.

Summary of effects of Associated Development and Off-Site Power Station Facilities

The likely effects of the Off-Site Power Station Facilities, A5025 Off-line Improvements and the Logistics Centre, on the landscape character of the Isle of Anglesey AONB, as well as Significant Views where relevant, have also been rigorously assessed in the ES, with reference to the relevant features and special qualities of the AONB.

Chapter G10 of the ES concludes that there would not be any significant effects on views from the Significant View at Carreglwyd Registered Park and Garden as a result of the A5025 Off-line Highway Improvements during any assessment stage.

The Logistics Centre site layout and landscape proposals have been designed to maintain the view between the Trefignath Burial Chamber and the Ty Mawr Standing Stone ancient monuments. However, chapter H10 of the ES concludes that there would be a short-term significant effect on the views of visitors at these locations during construction and operation of the Logistics Centre.

Additional mitigation measures are also proposed, where practicable, to reduce adverse effects on the AONB from the Associated Developments, such as architectural treatments of buildings and structures for the Off-Site Power Station Facilities and the Logistics Centre, and selection of visually recessive colours

and types of construction compound fences and temporary structures for the A5025 Off-line Highway Improvements. However, the assessment in chapter H10 of the ES concludes that the residual effects reported for the AONB would remain despite these measures.

Overall summary of effects on the AONB

As set out above, the assessment of landscape effects in Chapters D10, E10, G10 and H10 of the ES [APP- 129], [APP-248], [APP-313] and [APP-364] concludes that although there would be some significant adverse effects on the AONB locally as a result of construction and operation of the Power Station and Logistics Centre, there would not be a significant effect on the AONB as a whole due to the overall scale of the AONB. It is therefore considered that, whilst there would be some adverse effects on the landscape character of the AONB locally, the primary statutory purpose of Isle of Anglesey AONB would not be compromised.

Conclusion on policy compliance in relation to conservation and enhancement of the AONB

For the reasons set out above, the Wylfa Newydd DCO Project is therefore in compliance with the following policies in relation to conservation and enhancement of the AONB:

- EN-1 paragraphs: 5.9.9 to 5.9.13.
- Section 5.3 of Planning Policy Wales.
- Policy AMG 1 of the Joint Local Development Plan (JLDP).
- Strategic Policy PS 19 of the JLDP.
- Policy CCC 1.1 of the Isle of Anglesey AONB Management Plan (2015).
- Policy CCC 3.1 of the Isle of Anglesey AONB Management Plan (2015).
- Policy CCC 3.2 of the Isle of Anglesey AONB Management Plan (2015).
- Policy CCC 3.3 of the Isle of Anglesey AONB Management Plan (2015).
- Policy CCC 4.1 of the Isle of Anglesey AONB Management Plan (2015).

Compliance with policies relating to significant effects on published

character areas Wylfa Newydd Development Area

The illustrative design proposals on reference point drawing 5 in appendix B of the Landscape and Habitat Management Strategy [APP-425] have been developed to provide mitigation for the Landscape and Seascape Character Areas that would be significantly affected by the Power Station, including those within the AONB; LCAs 4 and 5, defined in The Isle of Anglesey: Anglesey Landscape Strategy Update 2011 (IACC, 2011) and SCAs 8 and 9 of the Anglesey and Snowdonia Seascape Character Assessment (Fiona Fyfe Associates with Countryside and SEACAMS (University of Bangor), 2013). The landscape mitigation

includes large-scale landscape mounding with hedgerow and other traditional field boundaries and woodland planting to reflect the local drumlin topography and landscape character.

Off-site Power Station Facilities

Chapter 4 and figure 21 of volume 3 of the Design and Access Statement, appendix 1-1 illustrates how the Off-site Power Station Facilities proposals would integrate into their surroundings and section 3.2 details how the design has evolved in response to the natural topography, local and strategic views, natural features and vegetation. The assessment in Chapter E10 of the ES concludes that there would not be a significant effect on local landscape character during construction or operation of the Off-site Power Station Facilities.

A5025 Off-line Highway Improvements

The tree and shrub planting proposed in the Landscape Scheme in appendix G10-9 is in keeping with the local landscape character and would help to integrate the A5025 Off-line Highway Improvements into the surrounding landscape, resulting in a neutral effect on the landscape character of the AONB at operation year 15.

Logistics Centre

The retention and reinstatement of stone walling and hedgerows to site boundaries are examples of how the local landscape character has influenced the landscape design.

Conclusion on policy compliance in relation to significant effects on published character areas

For the reasons set out above, the Wylfa Newydd DCO Project is therefore in compliance with the following policies in relation to significant effects on landscape character:

- Policy PCYFF 4 in the JLDP.
- Policy AMG 3 of the JLDP.
- Wylfa Newydd Supplementary Planning Guidance (2018).

Compliance with policies relating to the protection of SLAs

The landscape and visual impact assessment of the Wylfa Newydd DCO Project has had regard to the national level importance of the Isle of Anglesey AONB and the county level importance of the Special Landscape Areas (SLA), including SLA 12: Parciau Estatelands, SLA 13: Parys Mountain and Slopes, and SLA 14: Mynydd Mechell and Surrounds. However, the Wylfa Newydd Development Area is not located within any SLA and chapter D10 of the ES concludes that there would be no significant effect on SLAs within the surrounding.

Chapters E10, G10 and H10 of the ES [APP-248], [App-313] and [APP-364] also conclude that the Off-Site Power Station Facilities, A5025 and Logistics Centre would not significantly affect any SLA, as the closest SLAs are located approximately 1km from the A5025 Off-line Highway Improvements (at section 7), 3km from the Off-Site Power Station Facilities site and 13km from the Logistics Centre site.

Conclusion on policy compliance in relation to protection of SLAs

For these reasons, the Wylfa Newydd DCO Project is therefore in compliance with the following policies in relation to the protection of SLAs:

- Section 5.3 of PPW.
- Policy AMG 2 of the JLDP.
- Wylfa Newydd Supplementary Planning Guidance (2018).

Compliance with policies relating to LANDMAP

Section 5.3 of PPW notes that LANDMAP NRW, (2011 and 2013a-2013d) provides an important information resource to use in undertaking landscape assessments which inform decision making. Policy CCC 1.1 of the Isle of Anglesey AONB Management Plan (2015) notes that LANDMAP is used as the process by which the landscape character of the AONB is valued and assessed.

LANDMAP has been used to help to define the Local Landscape and Seascape Character Areas set out in appendix D10-3 of the ES (landscape and seascape character study) [APP-194], which was used to form the baseline for the assessment of effects on local landscape character presented in appendix D10-6 of the ES (landscape effects schedule). This includes Landscape and Seascape Character Areas located completely or partially within the AONB.

LANDMAP has also been used to inform the landscape baseline in section 10.3 of chapters E10, G10 and H10 of the ES [APP-248], [APP-313] and [APP-364].

Conclusion on policy compliance in relation to use of LANDMAP

For these reasons, the Wylfa Newydd DCO Project is therefore in compliance with the following policies in relation to use of LANDMAP to inform assessment:

- Section 5.3 of PPW; and
- Policy CCC 1.1.

		Conclusions The above response explains the approach taken to the landscape and visual impact assessment to ensure that effects on the Isle of Anglesey AONB are not underestimated and highlights the key landscape design and mitigation principles to help integrate each of the four developments into the AONB and surrounding landscape. As explained above, Schedule 3 of the Draft DCO sets out the requirements for further details to be provided to IACC for approval for each of the developments within or adjacent to the Isle of Anglesey AONB. This response also provides an overview of how the proposed mitigation measures meet the relevant AONB policies summarised in the Planning Statement.	
Q7.0.6	All the viewpoints in 6.5.23 ES Volume E - Off- Site Power Station Facilities: AECC ESL and MEEG App E10-5 - Photomontage viewpoints [APP-261] are described as “view from footpath south of the MEEG”; this cannot be accurate in each case. Please provide a corrected version.	There are two photomontage views in appendix E10-5 of the ES [APP-261], Viewpoints 7 and 8. Viewpoint 8 illustrates a view from a footpath to the south of the MEEG. Viewpoint 7 illustrates a view from a footpath to the west of the MEEG, as shown in the inset plan on the photomontage drawing. A revised version of drawing number 60PO8077_DCO_VOL_E_APP_10_05_01 and 60PO8077_DCO_VOL_E_APP_10_05_02 showing the photomontage view from Viewpoint 7 is therefore provided, with the viewpoint title corrected to read “VIEWPOINT NO 7: View from footpath west of the MEEG in AONB”. The corrected versions of these viewpoints are appended; see appendix 7a and 7b.	

Q7.0.7	The Tregele Action Group [RR-101] and other local residents [RR-117 and RR-118] are concerned about how effective the artificial drumlins will be in protecting the quality of life of Tregele residents. Provide a set of photomontage images from Representative Viewpoint 18 (left) to show the position and height of the proposed mound opposite the residential properties on the A5025 in Tregele and explain the extent to which it will mitigate noise, dust and light pollution during construction and operation.	Photomontages Horizon will provide photomontage views from Representative Viewpoint 18 (including the left part of the view) to show the position and height of the proposed landscape mound opposite residential properties in Tregele as follows: - the existing autumn 2018 baseline ('before') view; - an after view in year 1 of operation during autumn, with proposed buildings and landscape mounding; - a further 'after' view in year 15 of operation during autumn, to illustrate the effect of plant growth, with proposed buildings and landscape mounding; - a view in year 1 of operation during autumn showing the maximum Power Station parameter envelope; and - a view in year 15 of operation during autumn showing the maximum Power Station parameter envelope. However, it has not been possible to provide the requested photomontage in time to accompany the response to question Q7.0.7. This photomontage will be provided at Deadline 4 (17 January 2019). Landscape and visual 1.1.3 Implementation of the proposed landscape mound approximately 7m high early during construction, will provide mitigation for the effects of the proposed development on visual amenity (including night-time views) and noise. Pending preparation of photomontage views, reference is made to the assessment in the DCO Environmental Statement as follows: The visual effects from Viewpoint 18, representing community views from the western edge of Tregele, are assessed in appendix D10-7 of the ES (visual effects schedule) [APP-198] which also sets out proposed mitigation measures. (Refer to pages 35 to 38 for day-time views from Viewpoint 18 and pages 88 to 89 for night-time views from the equivalent night-time Viewpoint N4.) Once in place, the approximately 7m high landscape mound will obscure lower-level views of construction activities taking place on the construction and laydown area behind it in views from Tregele. The mound would be planted with a mix of native tree and shrub species to soften its appearance and increase the height of visual screening as planting establishes. However, large-scale construction activities for the Power	As requested in Q7.0.7, photomontage views from Viewpoint 18 also need to be provided to show views during construction including the bund and the cranes and other structures at full height. IACC appreciates that the construction phase is a “moving feast” so Horizon should show what it considers to be the “worst case” views during the construction phase. IACC will comment on these once received..

		Station buildings, including a number of tall cranes, would be visible above the bund from some residential properties on the edge of Treglele. On completion of construction, the landscape mounding implemented early during construction would be expanded westwards, to landscape the former construction and laydown area and increase visual screening of the Power Station during operation. Proposed broadleaved woodland on the landscape mounding would gradually supplement this screening, as the planting establishes. Lighting Proposed lighting mitigation for the laydown area west of the proposed mound adjacent to Treglele is outlined in appendix D10-10 of the Environmental Statement (Environmental Lighting Impact Assessment) [APP- 201] at paragraph 1.5.19 as follows: “To limit light spill column heights for the laydown area lighting would taper downwards with increasing proximity to Treglele. The columns running alongside [the] mound shall be no higher than the completed mound height to ensure the mound shields Treglele from excess spill light” Appendix D10-10 also sets out embedded and good practice mitigation measures. Any additional lighting effects are expected to be very limited, given existing street lighting in Treglele. Air quality The primary mitigation of air quality effects (increases in air pollutant concentrations or dust deposition rates) in the vicinity of the Wylfa Newydd Development Area is based on the embedded, good practice and additional mitigation set out in chapter C4 (air quality effects of traffic) [APP-091] and chapter D5 (air quality (excluding emissions from traffic)) [APP-124] of the Environmental Statement. Although the proposed landscape mound to the west of Treglele would affect airflow and may act as a barrier to larger dust particles which are not fully suspended by the wind, the mound does not form part of the suite of mitigation measures proposed to control and manage air quality effects. Terrain effects or differing terrain have been reported to have little effect on the predicted concentrations of pollutants at nearby receptors due to emissions from sources within the Wylfa Newydd Development Area (see appendix D5-2 of the ES (Main Site Construction Phase Air Dispersion EIA - Final Modelling Report) [APP-140] and appendix D5-3 of the ES (Main Site Operational Dispersion - EIA - Dispersion Modelling Report of the Emissions to Air Arising from Operational Combustion Plant) [APP-141] of the Environmental Statement). Noise In respect of construction noise, the modelling and assessment undertaken to inform chapter D6 of the ES (noise and vibration) [APP-125] identifies a major residual adverse effect at some properties in Treglele. The	IACC will comment on the detailed lighting scheme to be submitted by Horizon during the examination process. Agree with HNP’s response. The earth mounds are not designed for mitigation of air quality. Therefore whilst they may slightly mitigate against some dust deposition, that is not their intended purpose. Agree with HNP’s comments. Landscape Mound B1, which runs along the site boundary with the A5025 opposite Treglele and is approximately 7m tall, and is primarily provided for noise control and to mitigate visual impact. However, it is also noted that the construction noise assessments in chapter D6 of the ES do not take into consideration the benefits of the Local Noise Mitigation Strategy (LNMS).

		'drumlins' (which are referred to as 'landscape mounds' within the ES) are part of the embedded mitigation and, with the exception of Mound B1, are included in the construction noise models of situations after First Nuclear Concrete (FNC). Landscape Mound B1, which runs along the site boundary with the A5025 opposite Tregele and is approximately 7m tall, is provided for noise control and to mitigate visual impact. This mound will be constructed early in the construction programme and is therefore included in the construction noise models of scenarios prior to FNC. Landscape Mound B1 is effective in reducing noise from construction activities within the site at the first row of properties in Tregele by between 5 dB and 7 dB, depending on exactly which property is considered. Despite this mitigation however, there are significant adverse noise effects predicted for properties in Tregele. However, it is noted that the construction noise assessments in chapter D6 of the ES do not take into consideration the benefits of the Local Noise Mitigation Strategy (LNMS) which offers secondary glazing to properties within the LNMS Construction Boundary Plan area for the Wylfa Newydd Development Area and along the A5025, as per the Wylfa Newydd CoCP [APP-414]. Tregele is within the LNMS Construction Boundary Plan area and residential properties within this area which meet the following qualification criteria will be eligible for noise insulation works: A residential property, guest house, bed and breakfast or hotel where: - the applicant is the property owner or the holder of a long lease (with at least three years remaining), and - the property is lawfully occupied as a permanent dwelling at the date the DCO is granted. The noise insulation works apply to bedrooms and living rooms and comprise: double or secondary glazing, noise insulated exterior doors and additional (noise insulated) ventilation so that windows may be kept closed whilst sleeping or relaxing. Further details regarding the administration of the LNMS, Horizon's commitments, and what residents will need to do to claim eligibility will be issued during the Examination. The environmental effects of construction, including light pollution, dust and other airborne pollutants, noise and vibration, will also be controlled by the Wylfa Newydd Code of Construction Practice (CoCP), the Main Power Station Site sub-CoCP [APP-415] and Marine Works sub-CoCP [APP-416].	
Q7.0.8	In relation to the proposed Breakwater and MOLF: (a) Provide information on the potential range of materials for their construction and the potential palette of colour through the	(a) Design and Access Statement – Volume 1 – Project Wide provides justification for the parameters approach taken for the construction and operation of the Marine works within the WNDA which is inherent to the DCO. The final design will be within parameters set in the Development Consent Order (DCO as secured by Requirement WN25 and WN26, dealing with matters related to size, external appearance and siting.	

Q7.0.12	operational period. Explain how the selected colours would be maintained. (b) How would the agreed materials and colour be secured within the dDCO? (c) Explain the purpose and use of the MOLF post-construction? Applicant – Please confirm the proposed hours of lighting for the Park and Ride? (paragraph 4.3.1 of the PRSCoCP [APP-418])	Notwithstanding the above, as outlined in the Marine Works Design Principles which are set out in the Design and Access Statement – Volume 2 – Power Station Site, new structures within the marine environment will seek to integrate in to the existing seascape character, as far as reasonably practicable, through the selection of appropriate materials. These design principles will be secured by Requirement WN25 in the draft Order which states that detailed design must be prepared in accordance with the design and landscaping principles relating to the Power Station in Volume 2 of the Design and Access Statement. With specific reference to the breakwaters the use of interlocking concrete blocks on the external surfaces of the breakwaters is proposed in order to dissipate wave energy. As such it is envisaged that the breakwaters would be constructed from a concrete material that would be concrete in colour. With regard to the MOLF this is also proposed to be of a concrete construction which would also be of a natural concrete colour. It should be noted that the overarching design principles for the Power Station Site require that the materials chosen as part of the Marine works design will be, amongst other requirements, based around meeting maintenance needs. The nature of these maintenance needs would be determined by the final material chosen. (b) As set out in the draft DCO [APP-029] Requirement (WN25) require detailed designs for the marine works including the proposed Breakwater and MOLF to be submitted and approved post-DCO grant by NRW. The detailed designs must be submitted in accordance with the with the parameters and parameter plans identified in Requirements (WN26, WN26B – WN26E). (c) Paragraph 5.2.5 of the Code of Operational Practice [APP-421] secures the function of the MOLF and Breakwater post-construction where it is proposed that the MOLF will be made available to be used for the transportation of bulk components, if required during the operational stage. <u>Hours of lighting</u> The Park and Ride will operate 24 hours per day (although main operational hours would be between 06:00 and 20:00) and so lighting will be required during the hours of darkness (circa 16:00 to 08:30 dependent on the time of year) seven days a week.	The detailed designs for the marine works would also need to be submitted to and approved by IACC who is the discharging authority within the inter-tidal area and has not agreed to relinquish that statutory role.

Q7.0.14	In relation to residential properties at Llanfachraeth (R24, R25, R27, R28, R30, R33, R36 and R40) and any other residential properties which experience very large or large adverse effects from light spillage during both construction and operation of the A5025 Off-line highway improvements explain how these impacts would be mitigated in practical terms with the aid of plans and sections. [APP- 313].	<u>Controls on lighting</u> Although lighting will be required during the entire night-time period, the Park and Ride sub-CoCP requires lighting of the Park and Ride to be kept to a minimum lux level and the Wylfa Newydd CoCP requires lighting designs that will ensure that light spill onto water bodies and hedgerow/boundary habitats is avoided, wherever possible. However, as pedestrian safety would be a priority, a central lighting management system (CLMS) would be used on site to allow lighting throughout the site to be controlled, either through dimming or turning off when not in use as secured by Wylfa Newydd CoCP. Horizon will be providing updated lighting controls in a detailed Lighting Strategy which will be contained in the updated Wylfa Newydd CoCP and Park and Ride sub-CoCP [APP-418] that will be submitted at Deadline 4 (17 January 2019). <u>Construction</u> As set out in pages 31 to 56 of 6.7.36 ES Volume G - A5025 Off-line Highway Improvements App G10-4 - Visual effects schedule [APP-339] residential receptors which would have direct views of construction activity, plant, and machinery have the potential to experience major (very large) to moderate (large) adverse significant effects due to their proximity to the construction works. Temporary lighting is proposed for the construction period. As set out in paragraph 1.5.6 of 6.7.1 ES Volume G - A5025 Off-line Highway Improvements G1 - Proposed Development [APP-304], construction work would be undertaken between the hours of 07:00 and 18:00 Monday to Friday, and between 07:00 and 13:00 on Saturday. Any working outside of these hours would be agreed in advance with IACC. Therefore, limited lighting would be required. Temporary changes in night-time views when construction lighting is used is acknowledged in the Environmental Assessment, although it is noted that construction lighting is likely to only be used for short periods of time and positioned in a manner that reduces unnecessary light-spill. The main source of effects would be day-time views of construction activities and the effects of temporary construction lighting in night- time views would contribute little to the overall effects. Measures to reduce light spill on sensitive receptors and light pollution across the construction site are currently set out in section 4.2 of the Off-Line Highway Improvement Works sub-CoCP and the Wylfa Newydd CoCP. Requirements PW7 and WN1 require Horizon to comply with these control documents during construction.	

Q7.0.15	Residents of Plas Ellen [RR-063] are concerned about (a) noise from increased traffic on A5025; (b) visual impact & noise from proposed bypass; and (c) closer proximity to our property, of proposed bypass. Explain how this situation would be mitigated including whether noise abatement barriers to the east side of the A5025 are to be installed.	In addition to these measures, Horizon is preparing a detailed Lighting Strategy which will be included as part of the updated CoCPs at Deadline 4 (17 January 2019). <u>Operation</u> As set out in pages 31 to 56 of 6.7.36 ES Volume G - A5025 Off-line Highway Improvements App G10-4 - Visual effects schedule, major (very large) to moderate (large) adverse significant effects relate specifically to the proximity of residential receptors to the road and associated 2m noise barrier to receptors which would affect views. (Refer to Appendix 1-5 Drawing reference WN034-JAC-PAC-DRG-00012 to WN034-JAC- PAC-DRG-00015 in Design and Access Statement Volume 3 for details of the noise barrier locations. Operational lighting is proposed along the A5025 at Section 1 of the A5025 (Valley Roundabout) and at the Power Station Access Road roundabout (section 9). (Refer to plan WN0902-HZDCO-OHW-DRG-00002 which shows the lighting detail for Section 1.) All other sections of the Off-line Highway Improvements will not be permanently lit with street lighting poles. As noted in response to Q7.0.16, the current designs for the Power Station Access Road do not include lighting designs and so Horizon will submit updated designs for the Power Station Access Road which will indicate the proposed lighting at Deadline 4 (17 January 2019). In addition, where Horizon seeks to submit detailed designs for the Off-Line Highway Improvement Works to IACC for approval in accordance with Requirements OH2 or OH5 these designs would need to be in accordance with the design principles set out in the Design and Access Statement (Volume 3) which include a number of detailed requirements relating to lighting design and the reduction of light spill. <u>Noise</u> Plas Ellen and associated campsite are situated to the east of the A5025, close to the meeting point of sections 3 and 4 of the A5025 Off-Line Improvement Scheme, which are shown on figure C5-3 of Volume 6: Environmental Statement (Part 15/73) ES Volume C - Road traffic-related effects (project-wide) Figure Booklet - Volume C [APP-119]. An assessment of the potential noise effects from increased traffic on A5025 and from the proposed bypass are set out in ES Volume C5 - Noise and vibration effects of traffic [APP-092]. This assessment has included the potential impact on noise from increased traffic on Section 4 of the A5025 which will remain at its current alignment, and from the proposed bypass at Section 3 which will be east of its current alignment.	IACC requests that HNP consider whether this property also meets the criteria for the Local Noise Mitigation Scheme.

The noise assessments indicate that at this property there will be an increase in noise due to the additional traffic. This has been predicted for both the construction and operational phases of the project. To minimise this increase in noise Horizon will install new low noise surfacing along the relevant sections of the A5025; the resurfacing of Section 4 will be undertaken as part of the A5025 On-line Highway Improvements (already consented under a separate planning permission), and Section 3 will be undertaken as part of the A5025 Off-line Highway Improvements (as secured by the General design principles in the Design and Access Statement – Volume 3, Appendix 1-5 A5025 Off-line Highway Improvements [APP-410]).

In addition to the provision of low noise surfacing along sections of the route, as part of the A5025 Off-line Highways Improvements Horizon will install a noise barrier along the eastern side of the proposed bypass (Section 3) which terminates near to the junction with the side road that leads to Plas Ellen (as secured by the General design principles in the Design and Access Statement – Volume 3, Appendix 1-5 A5025 Off- line Highway Improvements [APP-410]). Although an increase in noise is still predicted with these mitigation measures in place, this noise barrier will reduce the impact of the bypass at Plas Ellen on all facades. The increase in noise at Plas Ellen for the peak construction traffic year (2023) with the bypass in place has been assessed in accordance with the methodology set out in ES Volume C - Project-wide effects C5 - Noise and vibration effects of traffic [APP-092] as being a negligible adverse effect.

The provision of a noise barrier on the eastern side of the A5025, to the north of the side road, was examined and found to provide a negligible benefit. This is in part because the efficiency of such a barrier is compromised by the gap that would be required in order to provide access to the side road which leads to Plas Ellen.

In respect of construction noise and vibration, the assessments undertaken to inform ES Volume G - A5025 Off-line Highway Improvements G6 - Noise and vibration [APP-309] indicates that for both noise and vibration, the magnitude of change at Plas Ellen would be negligible, leading to minor effects (not significant).

Visual impact

The assessment as reported in ES chapter G10 [APP-313] concludes that there would be a large adverse (and therefore significant) effect on views in the short-term at Plas Ellen, where there would views towards construction works for the northern end of section 3 as far as Parc Llynnon (up to 1km). During the winter of the 1st year of operation and the summer of the 15th year of operation the effect is predicted to have reduced to moderate adverse. Mitigation measures proposed during construction, which are secured by the A5025 Off-line Highway Improvements sub-CoCP [APP-420], include limiting light spill during temporary construction activities, seeking to use visually recessive colours/types of construction compound fences (such as hoarding) and temporary structures. Planting would be undertaken as close to the completion of highway works as possible to reduce the amount of time bare earth is visible. In accordance with the

IACC agrees with Horizon's assessment that during construction residents at Pas Ellen would experience significant residual effects given elevated location and proximity to northern construction works. These would be maintained at Operation Year 1 due to its proximity to the northern end of Section 3, with the property orientated such that there would be views of traffic movement along northern section and the relative prominence of the noise barrier on eastern side of A5025. At Year 15 whilst the proposed on-site mitigation planting would be established and should partly screen/filter views of traffic movement and the noise barrier effects would remain significant. IACC considers there to be the potential for more effective screening through off-site planting reinforcing and enhancing the hedgerow to immediate south of this property and the adjacent Tan y Bryn.

Landscape management should be implemented for a period of 5 years (see IACC LIR Chapter 22 and responses to ExA DCO questions).

		landscape design principles in the Design and Access Statement – Volume 3, Appendix 1-5 A5025 Off-line Highway Improvements [APP-410], the landscape proposals include proposed native hedgerow with trees and native species shrub planting which would help to screen the road and traffic, along with other measures that would improve visual amenity, including sowing of various types of grassland. In accordance with paragraph 11.8 of the A5025 Off-line Highway Improvements sub-CoCP [APP-420], a landscape management strategy would be implemented for a period of three years following the completion of the works, to ensure successful establishment of proposed landscaping prior to handover to IACC for long-term management in accordance with the agreed strategy.	
Q7.0.16	Chapter G1 states that operational lighting is required for section 1 (para 1.3.46) and the power station access road (para 1.3.197) – Please can you provide design drawings for this lighting or indicate where in the documentation this information can be found and indicate how this lighting would be secured.	A5025 Off-line Highway Improvements - Section 1 [APP-019] Drawing number WN902-HZDCO-OHW-DRG- 00002 shows the locations of the street lighting columns proposed. The power station access road roundabout also requires operational lighting; however, these have not been included on the current plan submitted for approval (WN0902-HZDCO-OHW-DRG-00063). Horizon will submit an updated plan showing the proposed lighting designs at Deadline 4 (17 January 2019).	
Q7.0.17	Chapter D1 para 1.6.97 refers to heavy lift cranes of different heights (“two very heavy lift cranes up to 270m high, one mobile very heavy lift crane up to 220m high, approximately 40 tower cranes up to 192m high and a large number of smaller mobile cranes”). The heights do not accord with the max heights provided in Table D1-4; it is assumed this discrepancy is because of measurements in Table D1-4 are AOD (and it is these heights that accord with Tables WN2B & WN2C of the draft DCO). Similarly, the number of cranes in Table D1-4 do not accord with paragraph 1.6.97; it is therefore unclear how many would be in use at any one time.	Horizon can confirm that the discrepancy referred to in the Examiners Authority’s question is because para 1.6.97 of ES Volume D WNDA Development D1 (Proposed development) [APP-120] states crane heights in metres (m) above ground level and Table D1-4 states the maximum crane height to be used in a particular parameter zone in m Above Ordnance Datum (mAOD). There is not a maximum number of cranes proposed and therefore it is not included in Table D1-4. The reference to numbers of cranes in para 1.6.97 of chapter D1 is a worst case assumption made to inform topic assessments in the Environmental Statement. This worst case assumption is noted in para 10.4.13 of ES Volume D WNDA Development D10 – Landscape and Visual in relation to the construction of power station buildings. Paragraphs 10.2.14 and 10.2.17 to 10.2.19 provide further detail on the basis of landscape and visual impact assessment. The parameters used for the landscape and visual impact assessment are as per those set out in the Draft DCO which allow for a maximum crane height of 270m for very heavy lift cranes. All other zones allow for a maximum crane height of 220m.	These cranes should be illustrated in the additional photomontages from Viewpoint 18 for the construction phase (see Q7.0.7 above).
Q7.0.18	Explain how the ‘proposal to create artificial drumlins and 2 metre perimeter fencing close to us will have a permanent impact upon our	It is assumed that the reference to “artificial drumlins” refers to the proposed landscape mounding on the Wylfa Newydd Development Area and that the reference to “2 metre perimeter fencing” refers to the	From the wording of the question, this would appear to be a response to a specific residential property put forward by the occupants. Unfortunately it is not detailed which property, therefore, the response from IACC is generic regarding mitigation by Horizon. Horizon clearly states that this property qualifies for and shall benefit from the LNMS. Horizon also indicate various mitigation measures for this property. Without specific noise computer modelling being undertaken, it is difficult to envisage what the actual noise mitigation proposals (i.e. the benefit) will offer to the occupants of this property other than the assumptions. It would be appropriate for Horizon to produce photomontages from the property of the respondent in RR-007 (or from the A5025 close to this property) in order to illustrate how the perimeter fence, mounds and other features on the site would appear from this property during both construction and operation.

	environment' will be mitigated during construction and operation [RR-007].	temporary perimeter fencing during construction. It is understood that this question relates to a location between the Wylfa Newydd Development Area and A5025 between Tregele and Cemaes. The effects of the proposed landscape mounding and temporary perimeter construction fencing will depend on the location of the receptor (the person/ persons experiencing those effects). It should be noted that, unlike the landscape mounds, the temporary construction perimeter fence will be removed after construction. However, to mitigate effects whilst the fence is in place, a visually recessive perimeter fence colour (a colour that is not visually prominent) will be selected to reduce visual effects, whilst still maintaining a safe and secure barrier, in accordance with the Main Power Station Site sub-CoCP. Proposed mitigation measures to mitigate the effects of mound construction are set out in the Main Power Station Site sub-CoCP. Where soils will be stored for longer than 60 days, stockpiles and temporary landscape mounding will be seeded with an appropriate low maintenance seed mix to help control dust and visual impact. Landscape mounding would be provided to help soften views of and integrate the Power Station into the landscape in accordance with the landscape design principles set out in the Landscape and Habitat Management Strategy. To facilitate landscape integration of the Power Station, the final landscape scheme would include returning the land to pasture for grazing sheep or cattle, in conjunction with proposed ecological enhancement measures and restoration of boundary hedgerows, cloddiau and dry stone walls in keeping with surrounding landscape character. To inform the Development Consent Order (DCO) application, Horizon has undertaken extensive modelling to predict potential impacts from the construction and operation of the Wylfa Newydd DCO Project. In respect of construction noise, the modelling and assessment undertaken to inform Chapter D6 'Noise and vibration' of the Environmental Statement identifies a major residual adverse effect at the Interested Party's property during construction. Horizon has provided a detailed response in relation to the effectiveness of Landscape Mounds in response to FWQ9.0.25. All potentially noisy construction activities of the Wylfa Newydd DCO Project will be subject to Section 61 applications under Control of Pollution Act 1974 (as amended). As part of this application, Horizon will need to demonstrate best practicable measures are put in place to reduce noise effects as far as reasonably practicable. The 'drumlins' (referred to as 'Landscape Mounds' within the ES) are part of the embedded mitigation and are included in the construction noise models. In respect of Mound A (adjacent to 'receptor group C' dwellings near the A5025 between Tregele and Cemaes, which includes the Interested Party's property),	

	the faces nearest to dwellings will be progressively raised from the outside face inwards to form an effective noise bund, and the bulk of material deposition will be carried out behind those faces. Despite this mitigation however, there are significant adverse noise effects predicted for properties close to the site including 20 dwellings near the A5025 between Tregele and Cemaes. This construction method for the mounds is secured as a mitigation for noise in Main Power Station Site sub-CoCP. The property in question is eligible for noise insulation under the Local Noise Mitigation Strategy ("LNMS") due to its location within the LNMS Construction Boundary Plan area shown on Figure 8-1 of the Wylfa Newydd CoCP provided that the property meets the ownership, lease length and lawful occupation requirements set out in paragraph 8.3.7 of the Wylfa Newydd CoCP [APP-414]). The noise insulation offered in this scheme will reduce noise effects within the property during construction if the offer of noise insulation is taken up. Noise insulation works will apply to qualifying windows in bedrooms and living rooms and to external doors. Noise insulation works will comprise: double or secondary glazing, noise insulated exterior doors and additional (noise insulated) ventilation so that windows may be kept closed whilst sleeping or relaxing. Horizon is committed to offer noise insulating fences which will mitigate noise in outdoor spaces near the construction site to certain properties. The offer of noise insulated fencing will be as a result of a survey undertaken by Horizon to identify the suitable noise insulation measures required at the property. The principle of ameliorating the effects of construction noise through off-site mitigation has been set by other Nationally Significant Infrastructure Projects, and is explored in the response to FWQ9.0.23. There is the potential for dust emissions during the formation of the proposed landscape mounding. The assessment of dust emissions is set out in chapter D5 Air quality (excluding emissions from traffic) and appendix D5-1 Construction dust assessment [APP-139]. Proposed mitigation measures to prevent and reduce emissions of dust and mitigate the potential dust effects of mound construction are set out in the Wylfa Newydd Code of Construction Practice (CoCP) and Main Power Station Site sub-CoCP. Since the DCO application submission, Horizon has discussed air quality monitoring during construction at length with IACC through the Statement of Common Ground Process. With this in mind, the Main Power Station Site sub-CoCP will be updated at Deadline 2 to show agreed monitoring locations, equipment and trigger thresholds for dust emissions. Through the use of PM10 as an indicator, Horizon will use continuous monitoring to react to exceedances of amber and red trigger levels to implement further dust mitigation measures to prevent significant effects from dust being realised at receptors.	

		The construction plant which would be used to create the landscape mounds would emit oxides of nitrogen and fine particulates and these emissions were assessed in chapter D5 Air quality (excluding emissions from traffic). The assessment concluded that air quality effects due to plant emissions would be not significant with the implementation of the mitigation measures relating to construction plant emissions set out in the Wylfa Newydd CoCP and Main Power Station Site sub-CoCP. Since the DCO application submission, Horizon has committed to a non-road mobile machinery fleet mix that is a minimum of 90% EU stage IV emission standards plant for construction at the WNDA. This mix is secured by its inclusion in section 7 of the Main Power Station Site sub-CoCP update at Deadline 2 (4 January 2019). This level of EU stage IV plant significantly reduces the quantified NO2 levels at receptors displayed in chapter D5 of the Environmental Statement. An updated report to demonstrate the effects of emissions from construction plant with this percentage of stage IV plant will be submitted later in the examination process.	
Q7.0.19	Provide a CGI of the main site and WNDA area at 5-year operational stage at maximum parameters (i.e. maximum height of buildings and structures and minimum height of landscape re-modelling, including new 'drumlins') from the bend in the A5025 at GR 3170 8866.	The location for the proposed visualisation from the bend in the A5025 is not clear from the grid reference provided in this question. Horizon requests that the location of this bend is clarified using six-digit easting and northings. It is noted that three photomontage views from the A5025 are already provided in Appendix D10-8 (Photomontage Views) of the DCO Environmental Statement [APP-199] at Viewpoints 6, 17 and 23. These show the maximum building parameters (as set out in Schedule 3 of the Draft DCO [APP-029]) at year 1 and year 15 of operation. Views have been illustrated at year 1 of operation to illustrate the proposals upon completion of construction before planting mitigation has had time to become effective and at year 15 of operation to illustrate the effectiveness of proposed planting mitigation after establishment. The height of the proposed landscape mounding shown in the photomontage views in Appendix D10-8 of the ES has been based on the indicative heights shown in Part 1 of the Landscape and Habitat Management Strategy. Requirement WN9 of the Draft DCO will secure the design of the final landscape scheme to be submitted to IACC for approval 12 months prior to the Unit 2 Commissioning Date. The Requirement requires the final scheme to be in accordance with the overarching and operational principles defined within section 4 of the Landscape and Habitat Management Strategy (which include principles relating to planting and visual screening), hence there are no minimum landform parameters to model.	The grid reference identifies a location between Rhydwyn and the A5025 4km south of the WNDA so does need to be checked and a new grid reference provided.

ExA Ref.	Question	Horizon's Response to Question	IACC Comments / Response
Q8.0.2	Can the Applicant explain the extent to which it considers the marine ecological baseline remains accurate considering that surveys were taken in or before 2016?	Whilst the majority of marine baseline data was collected in or before 2016, a number of additional surveys have been undertaken since to examine the validity of the current dataset and to provide further evidence of baseline conditions. For example, additional water quality, seabird and marine mammal surveys have been carried out since 2016, with some surveys occurring as recently as August 2018. Results from these more recent surveys were found to be within the range of data collected previously. Comparisons to recently published information have also been made within the various appendices supporting ES Volume D – WND A Development: D13 – The Marine Environment [APP-132], to further validate the findings of the baseline monitoring programme. Marine baseline data for each of the receptor groups (e.g. water quality, plankton, benthic habitats and species, fish, marine mammals and seabirds), exhibits little temporal change and is believed to be indicative of natural year-on-year variation. As such, Horizon considers the current marine baseline data supporting the marine assessments to remain accurate. The Examining Authority should note that NRW have not expressed any concerns about the age of the marine baseline dataset during the Statement of Common Ground process or any stakeholder meetings held to date.	
Q8.0.4	Can the Applicant identify VP-1 on Figure D13-12 [APP-238]?	The location of VP1 is shown on Figure D13-12, however the label marker has not been shown. This is now corrected and appended to this response; see Appendix 8a (FWQ8.0.4-60PO8077_DCO_D_13_12).	
Q8.0.5	Can the Applicant clarify the measures taken to prevent polluted water from the concrete batching plant from entering the sea?	During the construction period concrete will be produced in an on-site concrete batching plant. The concrete batching plant will produce two wastewater streams: • Process water, generated as part of the concrete production process and from concrete mixer vehicle wash-out; and, • Surface water run-off from the area surrounding the batching plant. As described in Chapter D13 – The Marine Environment, all process water used in the concrete batching plant will be either recycled where possible, or where there is excess this will be tankered off site for treatment and disposal at a permitted waste facility. This requirement is set out in paragraph 10.2.12 of the	

		Main Power Station Site sub-CoCP [APP-415]. There will be no on-site discharge of process water to the sea. The concrete batching plant and the immediately surrounding process areas will be covered by hard surfacing which will drain rainfall to collection tanks for containment. Water from the collection tanks will not be discharged to surface water drainage system. The treatment of surface water run-off from the site is secured in paragraph 10.2.5 of the Main Power Station Site sub-CoCP. The specific mitigation is stated as follows: ‘<i>Appropriate drainage will be installed prior to Main Construction. This will include settlement ponds, appropriate treatment to manage flows and meet agreed water quality thresholds (Environmental Quality Standards). An application will be made for an Environmental Permit which will set limits on the concentration of substances which could be discharged to protect the receiving surface water</i>’. As such, control of effluent discharge will be secured through the Environmental Permits.	
Q8.0.6	Are the metrics used for the assessment of underwater noise consistent with the Marine Strategy Framework Directive and the UK guidance documents?	The metrics used in the assessment of underwater noise on fish and marine mammals has been based on a review of the available literature. This is consistent with the Marine Strategy Framework Directive and the UK guidance documents looking at Indicators 11.1.1 (‘low and mid frequency impulsive sounds’) and 11.2.1 (‘Continuous low frequency sound (ambient noise)’). For the assessment of underwater noise on marine fish, the criteria set out by Popper <i>et al.</i>, 2014 was used. This categorises fish by hearing sensitivity, and assessments within chapter D13 have been based on those species considered the most sensitive to underwater noise. For the assessment of underwater noise on marine mammals a number of criteria have been used in order to provide the most appropriate assessment for the species and activities reviewed. For high frequency cetaceans i.e. harbour porpoise (<i>Phocoena phocoena</i>) criteria developed by Nehls <i>et al.</i>, 2014 and Lucke <i>et al.</i>, 2009 have been used. For mid-frequency cetaceans i.e. bottlenose dolphin (<i>Tursiops truncatus</i>) the criteria used are Southall <i>et al.</i>, 2007 and Finneran and Jenkins, 2012. For pinnipeds in water the criteria used are Southall <i>et al.</i>, 2007 and Finneran and Jenkins, 2012. References Popper, A.N., Hawkins, A.D., Fay, R.R., Mann, D.A., Bartol, A., Carlson, T.J., Coombs, S., Ellison, W.T., Gentry, R.L., Halvorsen, M.B., Lokkeborg, S., Rogers, P.H., Southall, B.L., Zeddis, D.G. and	

Q8.0.7	Chapter D13 para 13.5.8 states that run off would be treated if pH levels exceed 8, would this be secured in the CoCP?	Tavolga, W.N. 2014. <i>Sound Exposure Guidelines for Fishes and Sea Turtles: A Technical Report prepared by ANSI – Accredited Standards Committee S3/SC1 and registered with ANSI</i>. Springer Briefs in Oceanography, ASA S3/SC1.4TR-2024. Southall, B.L., Bowles, A.E., Ellison, W.T., Finneran, J.J., Gentry, L., Greene, C.R., Kastak, D., Ketten, D., Miller, J.H., Nachtigall, P.E., Richardson, W.J., Thomas, J.A. and Tyack, P.L. 2007. <i>Marine mammal noise exposure criteria: Initial scientific recommendations</i>. Aquatic Mammals. 33(4), pp.411-521. Nehls, H., Mueller-Blenkle, C., Dorsch, M., Girardello, M., Gauger, M., Laczny, M., Meyer-Löbbecke, A., Wengst, N. 2014. <i>Horns Rev 3 Offshore Wind Farm – Marine Mammals. Report by Energinet.dk for Orbison A/S</i>. [Online]. [Accessed: October 2016]. Available from: https://ens.dk/sites/ens.dk/files/Vindenergi/noise_offshore_v3.pdf Lucke, K., Lepper, P.A. and Blanchet, M. 2009. Temporary shift in masked hearing thresholds in a harbour porpoise (<i>Phocoena phocoena</i>) after exposure to seismic airgun stimuli. <i>Journal of the Acoustical Society of America</i>. 125(6), pp.4060–4070. Finneran, J.J. and Jenkins, A.K., 2012. <i>Criteria and thresholds for US Navy acoustic and explosive effects analysis</i>. SSC Pacific Technical Report, April 2012. The treatment of surface water run-off from the site is secured in paragraph 10.2.5 of the Main Power Station Site sub-CoCP [APP- 415]. The specific mitigation is stated as follows: ‘<i>Appropriate drainage will be installed prior to Main Construction. This will include settlement ponds, appropriate treatment to manage flows and meet agreed water quality thresholds (Environmental Quality Standards). An application will be made for an Environmental Permit which will set limits on the concentration of substances which could be discharged to protect the receiving surface water</i>’. As such, control of effluent discharge, including pH levels, will be secured through the Environmental Permits.	
Q8.0.8	How would monitoring of suspended solids in seawater, Chapter D13, para13.5.27, be secured?	As identified in row 7 of the Wylfa Newydd DCO Project Details of Consents, Licenses and Agreements [APP-053], an Environmental Permit would be required for dewatering activities. The relevant Environmental Permit will set limits on the concentration of substances that could be discharged, and it is expected that regulatory input on the monitoring would arise through future permit applications. Furthermore, Horizon have committed the active management of drainage systems which <i>will include monitoring of every discharge point</i> as stated in 10.4.2 in the Main Power Station Site sub-CoCP.	

		Finally, Horizon will be required under Requirement WN1 to comply with the in the Main Power Station Site sub-CoCP in undertaking construction which states that runoff and discharge into receiving waters will meet agreed water quality thresholds (Environmental Quality Standards).	
Q8.0.9	How would maximum lighting levels Chapter D13, para 13.5.74, be secured?	The following mitigation will be secured via the Main Power Station Sub-CoCP and the Marine works sub- CoCP when updated and submitted into examination at Deadline 4 (17 January 2018). <i>Lighting levels would vary based on the construction activity with maximum levels of 200 LuX Eav associated with dredging operations. Land based operations would have light levels between 2Lux and 120Lux Eav.</i>	
Q8.0.10	Can the Applicant confirm that the dredging plan referred to in Chapter D13 para 13.5.78 would be secured in the CoCP?	The dredging plan referred to in Chapter D13 is secured in the Marine Works Sub-CoCP ([APP-416], see paragraph 10.3.1) which states that dredging of soft sediments will be restricted to the area identified in the dredging plan. The contents of the dredging plan will be discussed and agreed with National Resources Wales through the marine licence application process.	
Q8.0.11	In Chapter D13, para 13.6.13, limits for sewage discharge are given, how would these be secured?	As identified in row 7 of the Wylfa Newydd DCO Project Details of Consents, Licenses and Agreements, an Environmental Permit would be required for water discharge activities. The relevant Environmental Permit will set limits on the concentration of substances that could be discharged, and it is expected that regulatory input on the monitoring would arise through future permit applications. Under Schedule 3 of the Draft DCO, Horizon will be also required under Requirement WN1 to comply with the Main Power Station Site sub-CoCP, runoff and discharge into receiving waters will meet agreed water quality thresholds (Environmental Quality Standards). The sub-CoCP also notes that limits for concentrations of substances which could be discharged will be limited by the Environmental Permit.	
Q8.0.12	Chapter D13 para 13.6.45 gives exclusion limits for grazing, how would these be secured?	Horizon can confirm, prior to the start of works, grazing would be excluded from the Cemaes catchment area (found within the Wylfa Newydd Development Area) for four weeks which would allow sufficient time for animal faeces to biodegrade naturally, and reduce the risk of runoff containing <i>E.coli</i> and intestinal enterococci. As this measure is not currently secured, Horizon will submit an amended Main Power Station Site sub- CoCP at Deadline 4 (17 January 2019) which will clearly secure this mitigation.	

Q8.0.13	Chapter D13 para 13.6.281 gives worst case hammer parameters used for modelling. Are these parameter restrictions secured in the dDCO?	At the time that chapter D13 of the Environmental Statement was written, details of the specific equipment to be used for the marine works was not known. However, a worst case was modelled as the basis for the assessment which includes a maximum hammer diameter, blow energy and strike rate. Paragraph 13.6.281 states that: "the plant used to do this has not yet been finalised. Modelling has been based on option using a hammer with a diameter of 50cm, with a blow energy of 70kJ and a strike rate of 43 strikes/minute to represent the worst case noise levels for rock breaking". These model assumptions (or parameter restrictions are not expressly secured in the Draft DCO.	
Q8.0.14	Chapter D13 para 13.6.366 states that JNCC best practice for piling will be adopted. What measures would be taken for other noise impacts during construction?	Best practice guidelines for marine mammals and underwater noise have been developed by JNCC to cover piling operations, the use of explosives and the use of seismics. There are no specific guidance documents with respect to mitigating underwater noise from operations such as dredging as they are not considered likely to cause a significant impact to marine mammals. The mitigation regarding Best Practice for piling outlined in the Marine Works Sub-CoCP and referenced in chapter D13 of the ES, would be adopted for rock breaking and drilling as they are similar in nature to piling operations. No measures are proposed for rock cutting and dredging as these are considered low noise activities, and no guidance exists. Measures relating to rock breaking and drilling as referred to above will be included in the Marine Works Sub-CoCP which will be submitted at Deadline 4 (17 January 2019).	
Q8.0.18	How would the enhancement measures for ecological enhancement described in Chapter D13 para 13.8.8 and the monitoring programme in 13.8.9 be secured?	The marine ecological enhancement mitigation described in chapter D13 of the Environmental Statement, paragraph 13.8.8 is secured in paragraph 11.2.1 of the Marine Works sub-CoCP. The monitoring programme described in chapter D13 of the Environmental Statement, paragraph 13.8.9 is not explicitly mentioned in the Marine Works sub-CoCP although it was Horizon's intention to deliver this alongside the monitoring programme for invasive non-native species as described in section 11.3 of the Marine Works sub CoCP. A monitoring programme to assess the effectiveness of the marine ecological enhancement mitigation will be secured in an updated Marine Works sub-CoCP which will be submitted at Deadline 2 (4 December 2018).	
Q8.0.19	Para 8.3.12 of the Marine Works sub CoCP ([APP-416]) details noise limitation measures for Tern. Can the Applicant describe how day to day decisions would be made?	The day-to-day arrangements described below will be implemented during the tern and black-headed gull breeding seasons during the Wylfa Newydd DCO Project's construction phase. This system will be used for management and decision making regarding the control of construction noise and is proposed on a precautionary basis. The details of these measures are provided in the Main Power Station Site sub-CoCP and duplicated in the Marine Works sub-CoCP. Further to this question and discussions during the SoCG	

	process, Horizon intends to amend the text in these sub-CoCPs to reflect the clarifications below and submit at Deadline 4 (17 January 2019). Noise levels will be monitored against action thresholds (amber and red - breach), which are to be defined according to the noise thresholds set out in the Shadow HRA (with amber being a noise level sufficiently below the agreed red threshold to enable mitigation action to be taken before an exceedance occurs). Where noise levels reach the amber threshold, the following steps will be implemented: • A review of the real-time monitoring data will be conducted to confirm that the monitored levels are not being impacted by other noise or vibration sources (not connected to the development). • Once confirmed, the onsite management team (Construction Manager) will be notified that an action level has or is about to be exceeded and an appropriate action plan agreed. The appropriate managers will review the works and working strategies in areas likely to be causing the breach and consider the possible/viable mitigation actions. • Mitigation measures will be identified to reduce the noise to the acceptable specified level at the receptors and may include: ○ plant/equipment substitution; ○ adjusting the scheduling of the works; ○ adjusting the intensity of the works; ○ alternative construction methodologies; and ○ temporary relocation of certain activities. • The decision-making process on the mitigation measures to be applied will be guided by safety considerations, amongst others, as well as the availability of equipment and potential impacts on other environmental receptors, and overall construction programme. • The appropriate managers will ensure that the selected mitigation measures are implemented, noting that for any construction activity to be halted, an assessment first needs to be undertaken regarding whether the works are stable, and it is safe to do so (i.e. some works may need to be completed before they can be stopped); this will affect the time taken to alter working practices. • Monitoring will be continued to verify that the control measures have reduced the noise levels to an acceptable level at the relevant receptors. As part of the above system for day-to-day decision making, the Cemlyn Bay tern colony will be continuously observed between 15th April and 15th August during the construction phase (taking into account, on an annual basis, early or late arrivals) by independent bird specialists during daytime working activities. The observers will also monitor black-headed gull to determine if their nesting behaviour appears to be affected by construction noise. If there is a lack or low numbers (based on black-headed gull status and trends) of recorded black-headed gull nesting attempts at the Cemlyn colony, the additional establishment period measures will be implemented earlier.	

		Further to the above, if the independent observers determine that ‘fly up’ responses appear to be associated with Project activities (as defined by the mitigation procedures), the following actions will be undertaken: • The Project activities responsible for the tern ‘fly ups’ will be identified (based upon matching the acoustic signatures with site activities). • Site activities will be reviewed to identify what alterations can be made (e.g. change in work intensity, schedules or methods, or additional noise abatement). • Alternatives will be adopted where these are assessed as being safe and practicable. • Monitoring will continue to identify that the causes of the previous tern ‘fly ups’ are understood and controlled appropriately. The above protocol will be implemented by the site management team. The latter will have full knowledge of the construction activities being undertaken and the authority to instigate the control measures deemed to be necessary.	
Q8.0.20	NRW in its RR [RR-088] para 4.2.2 advises that further information is required to demonstrate that benthic invertebrates in the Skerries Water Body would not be at risk of deterioration. Can the Applicant provide this information?	Horizon considers that there is sufficient evidence provided within the marine part of the ES D13 chapter, and the Water Framework Directive (WFD) Compliance Assessment [APP-444] to demonstrate that the benthic invertebrates in the Skerries waterbody would not be at risk of deterioration. Horizon is working towards a Statement of Common Ground with NRW which will include this issue to address specific points raised. Predicted effects on benthic invertebrates Within section 7 of the WFD Compliance Assessment, it is presented that 23.2ha of subtidal (i.e. coastal bed) and 7.3ha of intertidal invertebrate habitat would be permanently lost under the footprint of the Marine Works in Porth-y-pistyll. This represents 0.51% and 3.6% of the subtidal and intertidal areas, which comprise The Skerries waterbody, respectively. The ‘worst case’ operational scenario (i.e. greatest thermal and TRO effects) presented in the chapter D13 estimates that within The Skerries waterbody, a total of 25.1ha (0.56%) of subtidal area would be affected cumulatively by the Wylfa Newydd DCO Project. Potential thermal and TRO effects to intertidal areas within The Skerries waterbody due to Cooling Water discharge is expected to be highly localised, being limited to a couple of hundred metres to the west of the Cooling Water outfall. Consequently, there is limited cumulative impact to invertebrates found intertidally and therefore the assessment of effects remains as reported above (for direct loss under the footprint of the Marine Works).	

	In reality, it is not anticipated that all invertebrates within the total area of The Skerries water body potentially affected by the Wylfa Newydd DCO Project would be at risk of deterioration. Outfall surveys at the Existing Power Station have shown that acute effects such as reduced species diversity and abundance, as well as the loss of key characterising species would only likely occur within a couple of hundred metres of the outfall. Beyond 300m no significant differences in the subtidal communities were observed during Cooling Water outfall surveys of the Existing Power Station (6.4.87 Appendix D13-5 [APP-223]). Although the Wylfa Newydd Power Station would discharge Cooling Water at a greater rate and temperature, the Cooling Water outfall has been designed to direct the plume away from the seabed thereby reducing effects to benthic invertebrates. As evidenced in section 13.6 of chapter D13 of the Environmental Statement, it is considered that most benthic invertebrate species would not experience lethal effects from TRO at the highest concentrations (i.e. 0.1mg/L) modelled close to the outfall. In addition, there is considered to be no impact to invertebrate species from additional chemical changes associated with Cooling Water and other construction or operational water discharges (e.g. metal concentrations, dissolved oxygen, pH and ratio of ionised to unionised ammonia). Therefore, whilst deterioration of habitat and sessile invertebrate species is likely to occur in Porth-y-pistyll under the footprint of the Marine Works and within the immediate vicinity of the Cooling Water outfall (i.e. a couple of hundred metres), significant deterioration is not anticipated outwith this area. Furthermore, mobile benthic invertebrates would be able to move away from areas of disturbance or unfavourable conditions, and so whilst habitat may be lost, mortality may not occur. Subtidal and intertidal habitats along the north Anglesey coastline are not considered to be a limited resource for marine invertebrates known to be present within the area potentially affected. Based on the worst-case assessment outlined above, the proportion of The Skerries waterbody potential at risk of deterioration for marine invertebrates does not exceed 5% of its surface area, nor does it cover a contiguous surface area which exceeds 0.5km². This conclusion remains valid when intertidal and subtidal areas are considered in combination and isolation. Therefore, in accordance with the normative definition outlined in Table A1a of the UK Technical Advisory Group Recommendations on Surface Water Classification Schemes for the purposes of the Water Framework Directive (UK TAG, 2007), the predicted cumulative effect to marine invertebrates as a biological quality element of The Skerries waterbody does not represent a failure which is inconsistent with classification as high ecological status. Considering this and the information presented in chapter D13 of the Environmental Statement and summarised above, the current classification for marine invertebrates is not considered to be at risk of deterioration as a consequence of the Wylfa Newydd DCO Project.	

Q8.0.21	NRW in para 4.2.9 of its RR does not agree that “there are no effects predicted on the bathing water at Cemaes, and that the Wylfa Newydd Project is considered to be compliant with the Bathing Water Directive”. Can the two parties resolve NRW’s concerns?	Horizon has considered potential impacts on bathing water from a variety of perspectives including modelling of discharges of treated foul effluent, and modelling of sediment from construction discharges. These are described in chapter D13 of the Environmental Statement. As presented in summary in the Water Framework Directive Compliance Assessment, the project will not risk further deterioration in bathing water quality. Horizon concludes that its assessment is conservative due to the assumptions incorporated into the modelling and assessment work. Horizon will continue to hold meetings with NRW on these issues through the Statement of Common Ground process, and in the context of the Marine Licence Application and Environmental Permit Applications. Horizon will ensure that NRW has the information necessary to inform its assessment of in respect of the Water Framework Directive. Horizon also continues to engage with DCWW through the Statement of Common Ground process.	
Q8.0.23	In its RR para 4.6.1 NRW advise that there is insufficient evidence to demonstrate that cumulative effects of the project on benthic habitats are insignificant? Can the Applicant comment?	The marine environment assessment presented in chapter D13 of the Environmental Statement identified a total of 13 impact pathways via which potential effects to benthic habitats could occur within the Wylfa Newydd Development Area. The assessment presented in section 13.6 of chapter D13, concluded that the Wylfa Newydd DCO Project could potentially result in two significant effects representing a medium magnitude of change and a moderate adverse effect to benthic habitats. Firstly, from the direct loss of habitats and species under the footprint of the Marine Works, and secondly, from the potential introduction of invasive non-native species during Main Construction. Two additional minor non-significant effects to benthic habitats were identified due to the discharge of Cooling Water and the associated thermal and Total Residual Oxidants (TRO) (see paragraphs 13.6.679, 13.6.690, 13.6.784 and 13.6.789 of chapter D13 of the Environmental Statement) (APP 132). No other topic assessments presented within the Environmental Statement identified effects to benthic habitats. It is noted that sub-lethal effects of TRO and thermal discharge are expected to be highly localised being limited to the immediate zone of discharge (i.e. within a few 100 metres of the outfall). Whilst effects of smaller magnitude may occur further afield, these would remain reasonably localised, covering a subtidal and intertidal area of 4.2ha and 0.3ha, respectively (see paragraphs 13.6.679 and 13.6.690 of chapter D13 of the Environmental Statement). The subtidal and intertidal habitats (including those of conservation importance) that would be affected cumulatively by the Project are considered common on a regional scale and therefore any loss would not result in wider effects on the structure and function of benthic habitats. The magnitude of change and	

		combined effect to benthic habitats is therefore considered to be negligible and not significant. On this basis, there is no requirement to consider further mitigation and/or enhancement measures.	
Q8.0.24	Paragraph 6.4.127 of the Planning Statement [APP-406] makes reference to the fact that there is a flood risk for the proposed Park and Ride. It then states that 'Proposed additional mitigation measures would be implemented...' Can the applicant confirm what these additional mitigation measures would be and whether they would be implemented? Can the IACC and NRW confirm what additional measures they consider would be necessary and how they would wish to see these additional measures secured?	The flood risk to the proposed Park and Ride at Dalar Hir is identified in Appendix F8-1 Dalar Hir Park and Ride Flood Consequences Assessment (FCA) [APP-281]. Hydraulic modelling results presented and discussed in the FCA indicates that the floodplain of Nant Dalar Hir extends across part of the Park and Ride and reaches depths greater than 2m at the 0.1% Annual Exceedance Probability event. The surface water flood risk is broadly similar in both extent and flood depth to that from fluvial flooding. The FCA concluded that there was a high risk of flooding from both fluvial and pluvial sources to the Park and Ride site as well as to the A5 and A55 to the south of the site and to agricultural land to the north. The conclusion in the FCA was reached on the basis of conservative hydrological analysis and hydraulic modelling of both sources of flooding, without presentation of how the flood risk could be avoided, mitigated or managed. As only the baseline risk was assessed, no indication of any increase or decrease in risk elsewhere was presented. The risk from other sources of flooding was considered low. Whilst not explicitly stated in the FCA, because of the fluvial and pluvial risk to the Park and Ride site, the development would be considered non-compliant with TAN15 Development and Flood Risk. Additional assessment has since been undertaken to review and update the conservative approach presented in the Dalar Hir Park and Ride. Further details of the flood attenuation design for Dalar Hir have been developed in order to mitigate potential flooding effects. This detailed design is shown in [WN0902-HZDCO-ADV-DRG-00038] and is described in the updated Design and Access Statement for the Park and Ride. These have all been submitted at Deadline 2 (4 December 2018). The proposed design mitigation includes: - Two north eastern fields lowered to a level of 15.03m above Ordnance Datum (AOD). - Construction levels of car park 1, car park 5 as defined in the CAD model supplied (ref to: 60PO8081-JACCIV-MOD-00024.dwg) - The spine road refined to be set at a level of 16.3m AOD. - Stream crossing under the spine road defined as a culvert with an appropriate capacity and a cover of 0.5m above the soffit.	The IACC acknowledges that HNP has undertaken further flood mitigation modelling and that the results are presented in the Park and Ride - Addendum to Flood Consequence Assessment, which has been submitted at Deadline 2 (4 December 2018). The IACC did not receive a copy of the updated FCA until 14th December 2018 and therefore has not completed its review.

		Further flood modelling has been undertaken by Horizon based on this more detailed design. The results of this are presented in the Park and Ride - Addendum to Flood Consequence Assessment, which has also been submitted at Deadline 2 (4 December 2018) Overall, the proposed design mitigation, by introducing lower ground levels to act as storage, raising car park levels to avoid impacts and incorporating structural changes at the crossing of the Nant Dalar Hir on the Park and Ride site reduces the flood risk to the development and to the A5 downstream. This has a beneficial effect on flood risk as there is a high flood risk in the baseline scenario. The proposed design mitigation is compliant with TAN 15 and Planning Policy Wales, as it meets the key objectives of not causing flooding on the site or increasing the risk of flooding elsewhere.	
Q8.0.26	The Wylfa Newydd Code of Operational Practice [APP-421] in 10.3 refers to the development of a flood mitigation plan for the operational phase. Applicant – would this plan be drawn up in conjunction with IACC and NRW and would it be submitted for approval to IACC and/or NRW? IACC/NRW – would you want this plan to be submitted to you for approval?	Horizon can confirm that the flood mitigation plan for the operational phase of the Power Station and surrounding landscape will be submitted to the IACC and/or NRW, as is appropriate at the time it is submitted. Horizon will include this commitment in the updated Wylfa Newydd Code of Operational Practice to be submitted at Deadline 4 (17 January 2019).	The IACC reserves comment until it has reviewed the updated Wylfa Newydd CoCP that is to be submitted at Deadline 4. The Flood Mitigation Plan should be submitted for approval to the IACC, and the IACC will consult with NRW.
Q8.0.27	ES D13 para 13.5.70 is somewhat contradictory with regards to the discharge point for the fish recovery and return system. It first states that the location has yet to be determined but is stated to be located 'to the north of the eastern breakwater in the region of the - 6.0m contour'. It subsequently states the discharge point would be fixed to the northern face of the eastern breakwater. Can the Applicant clarify?	It is true that the exact location of the discharge point for the fish return and recovery system is still to be determined by Horizon and confirmed with National Resources Wales through the Operational Water Discharge Environmental Permit. However, chapter D13 of the Environmental Statement included an indicative discharge point located off the northern side (i.e. outer edge of the eastern breakwater, positioned subtidally in the region of the -6m AOD contour. The indicative location on the northern side of the eastern breakwater offers a longer release window, sheltered release point, limited risk of re-impingement and the possibility of an overland route for the conduits.	

ExA Ref.	Question	Horizon's Response to Question	IACC Comments / Response
Q9.0.1	Paragraph 6.4.13 of ES document D6 Noise and vibration [APP-125] notes that final reinstatement activities would begin in month 112 i.e. after the end of year 9 (108 months). This appears to conflict with the information in the Gantt style chart at Figure A2-6 Construction Timeline of ES document A2 [APP-056], which indicates that final reinstatement would take place in years 7 – 9. Please explain this apparent discrepancy.	An examination of this discrepancy has determined that the relative timescales in the construction plant schedule that the construction noise assessments are based on a different start date to the Gantt style chart at Figure A2-6 Construction Timeline of ES document A2 [APP-056]. The start of the timeline in Figure A2-6 coincides with the onset of construction activities at the WNDA, whilst the plant schedule starts 13 months before the first construction activities are scheduled to take place within the WNDA. If the construction plant schedule is aligned with Figure A2-6 (i.e. if the 13 months during which there is no activity within the WNDA are disregarded), then the construction plant schedule has the final grading activity during year 8 of construction. While any confusion cause by this discrepancy is regrettable, Horizon assures the Examining Authority that the construction noise assessment remains valid. The absolute or relative point in time that an activity takes place is not important to the noise assessment, other than influencing which other activities overlap with it. This determines what heavy plant and equipment is operating on site during the period of interest, which together contribute to the cumulative noise emissions for that period. The following activities are identified in the construction plant schedule as overlapping with the final grading works: • Craneage around Unit 2 • Back-fill (taking material from Mound A to the deep excavations, crushing, screening and placing it) • Concrete production, distribution and placing • Reinforcement bar cutting, bending, coupling and distribution • Structures access (use of hoists and lifts) • Site logistics and general activities (buses, forklifts, pick-ups, trucks, tractors, water browsers, road sweepers, de-watering pumps) across the whole of the site road network.	

		All of these activities are associated with 'Unit 2 Construction, Commissioning and Start-up' in Figure A2-6 Construction Timeline of ES document A2. The cumulative situation with the final grading and other heavy plant on site is therefore correct. Whilst Figure A2-6 Construction Timeline indicates that final grading will occur during the final two years (year 7 to year 9), the activity is compressed to within one year in the plant schedule. This presents a worst case scenario as it would take more plant (and therefore cause greater noise emissions) to complete in one year rather than two.	
Q9.0.2	Paras 6.4.39 – 6.4.41 ES document B6 [APP- 071] states that a spreadsheet technique, that employs an empirical prediction method, has been used to estimate vibration levels. These paragraphs suggest that the approach is justified as the accurate prediction of vibration propagation requires complex computational models populated with detailed input data, and that this is beyond the scope of a vibration assessment at this stage of the proposal. It is also stated that empirical prediction methods tend to overestimate vibration levels so therefore represent a conservative method. Please confirm whether this approach was agreed with relevant consultees.	Both NRW and the IACC have been consulted regarding the vibration prediction methods used in the environmental impact assessment as described in chapter B6 of the Environmental Statement. Text mirroring and expanding on the text presented at paragraphs 6.4.39 – 6.4.41 of chapter B6 of the Environmental Statement was included in a Noise and Vibration Modelling and Assessment Methodology technical note. A draft of this technical note was discussed on 24th November 2014 with both the IACC and NRW, as recorded in Table B6-10 of chapter B6. The agreed technical note was included in the 2016 scoping submission as noted in Table B6-4, and in the 2016 EIA Progress report as described at Para 6.3.9 of chapter B6. Summary text presenting the same information regarding the vibration prediction methodologies was also contained in the 2017 draft Environmental Statement as detailed at Para 6.3.10 of chapter B6. An updated version of the technical note forms the basis of the Introduction to the environmental assessments B6-2 – Noise and Vibration Modelling and Assessment Methodology Report [APP-086]. Finally, in recent statement of common ground discussions IACC have expressly confirmed that they are satisfied with the noise and vibration assessments made in ES Volume D - WNDA Development D6 - Noise and vibration[APP-125].	IACC's response to this is still the same with regards to agreement of the prediction methodologies employed by Horizon. However, the usage of BS6472-2:2008 is still a matter of SoCG of discussion (and refer to Q9.0.21 below) as Horizon wish to alter the timings and vibration limits as recommended by the British Standard.
Q9.0.3	Paragraph 6.4.61 of ES document D6 Noise and vibration [APP-125] identifies a number of potential noise sources that have been scoped out of the assessment on the basis that they are likely to have negligible effects. It is not indicated whether this approach was agreed with the relevant consultation bodies. Please could IACC and NRW confirm the extent to which they are happy that all relevant noise sources have been taken into account?	Whilst the question is not directed to Horizon as the applicant, the following response from Horizon is provided at this stage: The sources referred to in Paragraph 6.4.61 of chapter D6 of the Environmental Statement - Noise and vibration are: • Equipment within the various reinforced concrete buildings built to withstand impact from aircraft, and • The centralised air handling system that has neither exhaust nor intake openings.	

		Both NRW and the IACC were made aware during the scoping stages of the draft DCO application that these sources would be scoped out of the environmental impact assessment. Text scoping out these noise sources was included in the 2016 EIA Progress Report which is described at Para 6.3.9 of chapter B6 of the Environmental Statement [APP-071] and the 2017 draft Environmental Statement which is detailed at Para 6.3.10 of chapter B6. No comment on this matter was received from any stakeholders at any point. Horizon is confident that all relevant noise sources have been taken into account during the environmental impact assessment.	
Q9.0.4	In respect of potential noise from the fans used to push air through the reactor building stacks, paragraph 6.4.62 of ES document D6 Noise and vibration [APP-125] notes that the exhaust system is not yet specified and the noise levels are unknown, and that a combined sound power worst case scenario of approximately 110dB(A) has been assumed based on professional judgement. It is not indicated if this has been discussed with relevant consultation bodies. Please could IACC and NRW indicate if they have any objections to the assumptions made to establish the worst case for the exhaust system, ie the level of 110dB(A).	Whilst the question is not directed to Horizon as the applicant, the following response from Horizon is provided at this stage: The reactor stack fan sound power of 110 dB(A) was previously presented to IACC and NRW in the 2016 EIA Progress report (described at paragraph 6.3.9 of chapter B6 of the Environmental Statement). The reactor stack fan sound power of 110 dB(A) was derived based on the assessor's professional experience of undertaking noise testing of large industrial fans. The fan sound power is one of two key parameters involved in the calculation of environmental noise from the reactor stack, the other of which is the sound reduction provided by splitter attenuators. In the event that the sound power of the selected stack fan was to exceed 110 dB(A), noise effects due to operation of the stack fan would be avoided through the selection of an appropriately sized splitter attenuator.	
Q9.0.5	Paragraph 6.4.63 of ES document D6 Noise and vibration [APP-125] sets out the building platform heights that were used for the noise modelling. These do not reflect either the minimum or maximum parameters for any of the zones as specified in Table WN5 of Requirement WN5 in Schedule 3 to the dDCO [APP-029]. Please explain the basis for the platform heights that were chosen for modelling purposes.	The platform heights shown on drawing WN0902-HZDCO-MSP-DRG-00003 [APP-014] were selected as the basis of the operational noise model rather than the maximum or minimum platform heights presented in Schedule 3 [APP-029]. This was as a result of sensitivity testing which demonstrated that neither the maximum and minimum platform heights would give rise to a more conservative assessment than that undertaken and reported in chapter D6 of the Environmental Statement. This is due to the following reasons. With the adoption of the maximum platform height, there is increased screening associated with the platform itself, which interrupts line of sight from the closest receptors to sources located on the platform. Additionally, it results in increased vertical source-receiver distances. The combination of these factors result in decreased noise levels at the closest sensitive receptors.	

		With the adoption of the minimum platform height, the screening provided by landforms surrounding the site (e.g. the earth bund near Tregele), is increased, again leading to decreased noise levels at the closest sensitive receptors. Horizon can therefore confirm that the selected platform heights represent a conservative assessment approach.	
Q9.0.6	Table D6-18 (on Page D6-41) of ES document D6 Noise and vibration [APP-125] presents the predicted significance of construction noise effects at residential receptor groups A – H in terms of the number of dwellings that may be affected according to each magnitude of change criterion (large to negligible). The subsequent information summarises the results, however there appear to be some omissions/discrepancies: · no reference is made to receptor group C, although of the 5 groups for which there would potentially be a large magnitude of change it contains the second highest number of dwellings (8), resulting in a major significant effect; · within the table, 416 dwellings (the largest number affected in any one location) are identified in receptor group H as experiencing a moderate significant effect due to a small magnitude of change, although it is stated that the assessment will focus mainly on additional mitigation for properties in groups B and F on the basis that the greatest improvements might be made at those locations; · in paragraph 6.5.12, 814 dwellings in total appear to be anticipated to experience a 'moderate significant' effect due to a small magnitude of change, although 815 are identified in the table; and	The following response responds to each of the apparent discrepancies identified by the Examining Authority. Receptor Group C Table D6-18 of chapter D6 of the Environmental Statement details the predicted significance of effect at residential receptor groups A to H. Both medium and large magnitudes of change at residential properties are considered to result in major significant effects to those residential properties. Small magnitudes of change are considered to result in moderate significant effects and negligible magnitudes of change are considered to result in minor (not significant) effects. The methodology used for determining magnitude of change is detailed in the Noise and Vibration Modelling and Assessment Methodology Report. In respect of receptor group C, table D6-18 demonstrates that: • a large magnitude of change will be experienced at 8 residential properties; and • a medium magnitude of change will be experienced at 12 residential properties. The total number of residential properties that are considered likely to suffer major significant effects is therefore 20. Conversely, receptor group B includes 213 residential properties that are considered likely to experience major significant effects and receptor group F contains 68. This is considerably higher than receptor group C and as such no specific mention is made of receptor group C at section 6.5 of chapter D6. However, it should not be inferred that because no specific mention is made to a particular receptor group, it has not been assessed. Table D6-18 demonstrates that all receptor groups have been thoroughly considered. Receptor Group H As noted above and demonstrated in table D6-18, receptor groups B and F contain the greatest number of residential properties that are likely to experience large or medium magnitudes of change and such, the	IACC would concur with the conclusions drawn upon in Horizon's summary to this question. Namely, it shall be the combination and implementation of the various proposed mitigation measures that shall offer respite from such adverse effects.

	· in paragraph 6.5.15, 44 dwellings in total are anticipated to experience a minor effect (not significant) due to a negligible magnitude of change, although 43 are identified in the table. Please could the Applicant explain/clarify these apparent discrepancies and any implications for the assessment, particularly in terms of the need to mitigate any significant effects?	greatest number of properties that are likely to result in major significant effects (281 in total). Receptor group H, on the other hand, includes 416 residential properties that are likely to experience a small magnitude of change and as such a moderately significant adverse effect. Receptor groups B and F, while not the greatest number of residential properties affected, is considered likely to suffer the greatest adverse noise effects from construction i.e. major significant adverse effects rather than moderate adverse significant effects. In light of this assessment, the environmental impact assessment concludes at paragraph 6.5.10 of chapter D6 that the greatest improvements in avoiding, mitigating or minimising adverse noise effects can be achieved by focussing embedded mitigation measures at receptor groups B and F. Further, receptor group H is a logical rather than spatial grouping. It captures any property over 1,000m from the Wylfa Newydd Development Area but within the study area. These receptors are situated to the east, south and west of the Wylfa Newydd Development Area. As such, there is no single location at which mitigation can be targeted to benefit these properties, although the greatest concentrations of dwellings are around Llanfechell, Mynydd Mechell, Troed y Garn and Llanfairynghornwy. Many of these areas are distant from the Wylfa Newydd Development Area, and due to limitations with the BS 5228-1:2009+A1:2014 noise prediction methodology which does not include a number of attenuation terms which become important at distance, the predicted noise levels at these receptors is likely to be an overestimate. On this matter BS 5228-1:2009+A1:2014 states: <i>“Other factors such as meteorological conditions (particularly wind speed and direction) and atmospheric absorption can also influence the level of noise received. The estimation of the effects of these factors is complicated, not least because of interaction between these factors, and is beyond the scope of this standard. In general, at short distances (say less than 50 m), the size of any effects arising from these factors will be small, whereas at longer distances there will be a tendency towards an increase in sound attenuation.”</i> Errors identified in table D6-18 Horizon appreciates the Examining Authority pointing out the discrepancies in table D6-18 and accepts that these are in error. Receptor B "small magnitude of change" should read 375 (not 376) and "negligible magnitude of change" should read 8 (not 7). This in turn lifts the total number of dwellings anticipated to experience a minor effect to 44 dwellings as stated in paragraph 6.5.15 of chapter D6.	

		Summary In summary, Horizon considers that the overall conclusions of the assessment remain valid. The additional mitigation measures proposed by Horizon to respond to the major significant adverse effects identified at receptor groups B and F will also provide benefits to the other receptor groups. These mitigation measures are detailed in chapter D6 and include the following: • Strategic placement of the mounds including the early placement of earthworks when construction of the mounds will create noise barriers that construction plant would work behind. These construction and placement of the mounds will be secured by the Landscape and Habitat Management Strategy [APP-424 and 425]. • Horizon's commitment to the Local Noise Mitigation Strategy (LNMS), secured by the Wylfa Newydd Code of Construction Practice (CoCP) [APP-414]. Residential dwellings that are located within the LNMS Construction Boundary Plan area and that meet certain criteria detailed in the Wylfa Newydd Code of Construction Practice relating to property type, ownership or length of lease, and lawful occupation will eligible for additional noise mitigation measures including noise insulation. For example, all residential properties located in receptor group c are located within the LNMS Construction Boundary Plan. In addition, as a response to Relevant representations, ongoing Statement of Common Ground feedback, and the Requests for Non- material Change currently in consultation, Horizon is lowering the noise thresholds that play a role in defining eligibility of the scheme. This updated criteria will be presented into the DCO examination at Deadline 3 (18th December 2018). • The additional noise controls detailed in the Wylfa Newydd CoCP and the site-specific sub- CoCPs [APP-415 to 420] including a commitment by Horizon to make applications for prior consent for noisy works under section 61 of the Control of Pollutions Act 1974.	
Q9.0.7	Tables D6-19, D6-20 and D6-21 of ES document D6 Noise and vibration [APP-125] present the equivalent information as above for hotels and schools (also identified as high- sensitivity receptors); community buildings and places of worship (identified as medium- sensitivity); and commercial buildings and offices, respectively. However, the names and locations are not identified. In order to provide	Please refer to the attached table in Appendix 9a which provides the address, magnitude of change and significance of effect at each of the non-residential receptors identified in chapter D6 of the Environmental Statement.	

	the context for these receptors, the Applicant is requested to provide this information or state where it may be found in the application documents.		
Q9.0.8	In relation to operation, Table D6-26 (page 52) of ES document D6 Noise and vibration [APP- 125] is described as presenting the initial estimated impact level during normal operations for the most affected property within each residential receptor group (prior to modification for relevant contextual factors). However, it does not include receptor group H. Please could the Applicant provide this information or explain the apparent omission.	Receptor group H includes any property over 1,000m from the Wylfa Newydd Development Area but within study area. The impacts at properties in receptor group H were omitted in the operational noise assessment due to their large separation distance from the operational noise sources. No significant effects are predicted for these receptors in any operational noise scenario.	
Q9.0.9	Please could IACC state whether they agree with the Applicant’s assumption in paragraph 6.5.111 of ES document D6 Noise and vibration [APP-125] that emergency alarm tests would not result in a likely significant effect at nearby noise sensitive receptors, despite the apparent lack of detail to inform this view?	Whilst the question is not directed to Horizon as the applicant, the following response has been provided by Horizon at this stage: Chapter D6 of the Environmental Statement describes the potential noise and vibration effects resulting from the construction, operation and decommissioning of the Wylfa Newydd DCO Project. As part of this assessment, it considers the potential effects arising from the testing of the emergency alarm system for the Power Station. It concludes at paragraph 6.5.111 that the <i>"testing of alarms at the Existing Power Station is considered likely to be heard at receptors within the local community; therefore, the testing of the Wylfa Newydd Power Station alarms would not represent the introduction of a new type of noise source into the acoustic environment. Given the role of such alarms, it was considered that infrequent and short testing of the alarms would not be likely to give rise to significant noise effects"</i>. Horizon can confirm that the Existing Power Station undertakes weekly fire alarm testing on a Tuesday and Nuclear Emergency alarm testing on a Thursday as part of its operational requirements. These can be heard by receptors in the local community. While detail regarding the frequency and duration of alarm tests for the Wylfa Newydd Power Station has not yet been determined, it is expected that testing would be required infrequently for short periods and is only likely to be necessary during the day. In this sense, the noise from testing of the alarms of the new	

		Power Station will be similar to the alarms conducted at the Existing Power Station and as such will not introduce a new noise to the environment, albeit that the Existing Power Station’s routine testing may have diminished before the Wylfa Newydd Power Station is operational. This approach taken in the Environmental Statement including the assumptions on which the assessment was to rely was proposed to IACC and NRA in the EIA Progress Report shared in 2016 which included updated information on the design development and associated environmental assessment. The proposed approach for routine emergency alarm testing in this 2016 EIA Progress Report was as follows: <i>“16.285 The emergency alarm system would include alarms aimed at providing audible coverage at all external areas of the site and would undergo routine testing. The testing procedure for these systems, which would detail the frequency and duration of alarm tests, has not yet been determined. However, it is expected that testing will only be required infrequently for short periods and is only likely to be necessary during the day.</i> <i>16.286 The design and location of the alarm sources is not currently known and it is not yet possible to predict noise levels associated with the alarms. However, it would be expected that tonal alarms would be used and it is likely that they would be audible at a number of local properties during tests and emergencies.</i> <i>16.287 Details of planned routine alarm tests would be made available to the public.”</i> The feedback received from IACC on the EIA Progress Report is summarised in Table B6-8 of ES document B6. No objections to the proposed approach or the assessment of the likely effects in respect of routine emergency alarm testing were raised by IACC. Furthermore, agreement on the methodology and conclusions for the noise assessment in chapter D6 and associated appendices has agreed with IACC through the Statement of Common Ground process and will be reflected in the Statement of Common Ground to be submitted to the Planning Inspectorate at Deadline 2 (4th December 2018).	
Q9.0.10	In relation to the construction of the radioactive waste facilities, the Applicant concludes in paragraph 6.5.115 of ES document D6 Noise and vibration [APP-125] that the potential effects are not likely to be significant. It is also stated that the plant list and programme for the construction of the	The two activities associated with constructing a new building which typically cause the highest noise emissions are earth works and foundation piling (if needed). In the case of the Intermediate Level Waste storage facility and the adjacent spent fuel storage facility, the bulk of the earth works for the building will be undertaken during the site grading works and which have been considered as part of the environmental impact assessment as detailed in the Environmental Statement (chapter D6 Noise and Vibration).	Whilst Horizon have answered the ExA’s question, IACC would comment that any vibration levels attributable to piling foundations, shall be within the times and limit values as detailed within BS6472-2:2008.

	spent fuel store have not yet been compiled and as a result no noise or vibration modelling has been undertaken. Please could the Applicant justify the conclusions reached as to the absence of likely significant effects from activities associated with the waste facilities when there is so little detail currently available regarding their construction?	It is not clear whether this building would require piled foundations, however, assuming a worst case scenario, it is assumed it would. The minimum separation distance between any noise sensitive receptor is in excess of 230m across soft (acoustically absorbent) ground. The highest noise emission data in BS 5228-1:2009+A1:2014 for a hydraulic hammer piling rig is 89 dB $L_{Aeq,T}$ at 1m (Table C3 item C3.1). A calculation undertaken in accordance with BS 5228-1:2009+A1:2014 using a source noise level of 89dB and a separation distance of 230m across soft ground gives a free-field noise level of 57dB L_{Aeq} at the receptor. Using the adopted magnitude scale for short-term construction plant and machinery noise during a weekday set out at table 4-2 of the Noise and Vibration Modelling and Assessment Methodology Report, a free-field noise level of 57dB $L_{Aeq,1hr}$ would result in a negligible magnitude of change which is not significant. This noise level is well below the threshold between negligible and small magnitudes of change (67dB) and therefore this conclusion would not be changed if two piling rigs were operating simultaneously. Similarly, it is unlikely to be exceeded if one piling rig and several other items of plant with lower noise emissions are operating simultaneously. Therefore whilst detailed plant lists and construction methodologies are not available for the construction of these buildings, this sensitivity test indicates that significant effects are not likely to arise from the construction of these buildings.	
Q9.0.11	The predicted significant noise and vibration residual effects are set out in Table D6-35 in Section 6.7 (Pages D6-77 to D6-82) of ES document D6 Noise and vibration [APP-125]. Para 6.7.2 states that no significant residual effects were identified for the operational or decommissioning phases, however this conflicts with the information contained in Table D6-35, which identifies a major effect during the decommissioning phase. The significant residual effects are identified as follows:	Decommissioning effects Horizon appreciates the Examining Authority pointing out the discrepancy in the summary text provided at paragraph 6.7.2 of chapter D6. Horizon confirms that, as detailed in Table D6-35 residual effects were in respect of residential properties, schools and hotels during decommissioning as a result of the potential exposure of such receptors to construction noises associated with the decommissioning. The potential residual significance of this residual effect was identified to be major. Effect at residential properties and other buildings in close proximity to the WNDA resulting from exposure to construction vibration. Table D6-35 of chapter D6 of the Environmental Statement provides a summary of significant residual effects identified either prior to or post application of additional mitigation for the construction phase. Table D6-35	IACC would comment that any vibration levels attributable to piling foundations, shall be within the times and limit values as detailed within BS6472-2:2008. Furthermore, the use of the Section 61 Prior Consent process under the Control of Pollution Act 1974 will only be effective if Horizon abide by these in conjunction with the CoCP and the sub-CoCP's.

· a major effect at 321 and a moderate effect at 850 residential properties from exposure to construction noise (mainly in receptor groups B and H); · a major effect at 1 hotel and a moderate effect at 4 hotels from exposure to construction noise; · a moderate effect at 1 school from exposure to construction noise; · a moderate effect at 1 place of worship from exposure to construction noise; · a moderate effect at 1 commercial property and 5 offices from exposure to construction noise; · a moderate effect at residential properties, and other buildings discussed in (ES D6) Section 6.5.29 onwards, which are in close proximity to the WNDA from exposure to construction vibration; and · a major effect on residential properties, schools and hotels during the decommissioning phase from exposure to decommissioning noise. In respect of the sixth bullet above in relation to construction vibration, the pre-mitigation effect is described for all receptors as major, which is reduced to moderate for all receptors following additional mitigation. However, in Section 6.5 the pre-mitigation effects for a number of the receptors are predicted to be moderate. It is unclear to which receptors it refers. Please could the Applicant identify the specific receptors for which a significant residual effect is predicted in respect of construction vibration and the level of significance of the effect?	at page D6-81 recognises that in respect of the "residential properties and other buildings discussed in section 6.5.29 onwards which are in close proximity to the Wylfa Newydd Development Area", the overall significance of the vibration assessment pre-mitigation is likely to be "major" as a result of the large magnitude of change anticipated. This overall significance is not the significance at all properties. For clarity, the text in paragraph 6.5.29 of chapter D6 onwards describes a large magnitude of change is estimated at five dwellings, a medium magnitude of change at seven dwellings, and a small magnitude of change at 75 dwellings. As detailed in chapter D6 of the Environmental Statement, additional mitigation as secured by the Wylfa Newydd Code of Construction Practice would then be implemented to address these potential effects as follows. Horizon would undertake a vibration risk assessment as part of the Section 61 application for any construction activity involving vibratory or impact equipment to be used on the WNDA. This assessment would establish safe working distances for receptors in relation to construction vibration. This would ensure that any equipment that is identified as having potentially adverse vibration effects can be located sufficiently away from any sensitive receptors, so that any vibration effects on such receptors are negligible. Where works are required within the safe working distances, alternative equipment or working methods would be investigated and vibration levels would be reduced to the greatest extent practicable. If any significant effects from vibration are predicted at specific receptors by the Section 61 process, Horizon will notify all properties affected about the effects that may be experienced at their property. The Section 61 applications would also describe appropriate vibration monitoring to be carried out at the closest receptors to determine the success of these requirements, as per the Wylfa Newydd CoCP. As a result of the additional mitigation, the significance of the residual construction vibration effect would be moderate adverse or minor adverse at all properties. The vibration risk assessments, and subsequent vibration control measures employed by Horizon, will be detailed in applications for prior consent made by Horizon (or its contractors) to Isle of Anglesey County Council under Section 61 of the Control of Pollution Act 1974 as secured by the Wylfa Newydd Code of Construction Practice. While the detail regarding the exact power ratings and dimensions of construction equipment, and other factors which affect the emission and propagation of construction vibration cannot be confirmed until specialist contractors are commissioned for these aspects of work and as such the exact residual effects at specific properties are difficult to predict; Horizon considers that the commitment by Horizon to seek section 61 consents under the Control of Pollution Act 1974 as detailed above provides sufficient comfort that any vibration effects resulting from construction will be appropriately managed and mitigated.	

Q9.0.12	It is not stated whether the list of projects included in the cumulative effects assessment were agreed with relevant stakeholders. Please could IACC state whether they are satisfied that the list encompasses all the developments that could contribute to a cumulative significant effect together with the proposed development, and if not, identify other developments that they consider to be relevant.	Whilst the question is not directed to Horizon as the applicant, the following response is provided by Horizon at this stage: Horizon consulted with stakeholders on this issue in May 2015 and November 2017. These stakeholders included Isle of Anglesey County Council, Gwynedd Council and Natural Resources Wales amongst others. The list of Reasonably Foreseeable Future Projects (RFFP) for inclusion in the cumulative effects assessment was provided for consultation on 28th November 2017. Horizon received a response from each stakeholder and all responses were given due consideration. The outcome of this consultation included the addition of AN30 Holyhead Port Expansion. Where suggested schemes were not included, a response was provided outlining the relevant justification for each. The reasons for not including some projects included the lack of an overlap from a spatial and/or temporal perspective and therefore no interaction of environmental effects. In addition, some projects had not been progressed to a suitable level of detail e.g. no preferred option or environmental information. Table I2 of the Wylfa Newydd DCO Project Environmental Statement Volume I – Cumulative Effects I2 – Scope [APP-385] provides a justification for scoping each project in or out of the assessment and Horizon considers this a robust basis for the assessment of cumulative effects.	
Q9.0.13	In respect of the Power Station transformers, paragraphs 6.4.89 to 6.4.92 of ES document D6 Noise and vibration [APP-125] describe the noise near field limits that are set out in the Wylfa Newydd Code of Operational Practice ('CoOP') [APP-421], and notes that these have been discussed with the IACC, although it is not indicated if they were agreed. Paragraphs 6.4.95 – 6.4.97 state that the modelling indicates that the limits would be exceeded at particular receptors and that there are various ways of achieving the required reduction. An example is provided. The information in the CoOP does not provide any more details of specific mitigation and therefore certainty that effective measures	Transformer noise limits are secured through the Wylfa Newydd Code of Operational Practice (CoOP) [APP- 421] which provides that "transformer noise shall be subject to appropriate near field limits, selected to achieve a free-field transformer noise level of 25dB L_{Aeq,T} or below at the closest residential receptors. Near field limits will also be selected such that the unweighted transformer noise level does not exceed a level of 38dB within the 125Hz octave band at the same locations". Reduction in transformer noise levels to meet these noise limits may be achieved by either specifying low- noise transformers or achieving attenuation through selection of installation methods. Specification of low-noise transformers. There are several methods used by transformer manufacturers to reduce noise level as follows: • The use of specially selected core steel that helps lower magnetic noise; • The use of non-resonant tanks; • Vertical Cooling; • Low flux density (larger winding);	IACC would comment that Horizon must be mindful of any low frequency noise associated with the operation of the transformers. The design of these transformers may not reveal that low frequency noise would be emitted. However, it should be noted that after the final design and during operation of such transformers under load, they may still create low frequency noise emissions. Therefore, if low frequency noise complaints are received, Horizon shall be required to fully investigate any such complaints and implement additional mitigation measures.

	would be implemented. Please could the Applicant identify the proposed mitigation measures, set out where they are secured in the dDCO [APP-029] or other application document, and justify the confidence they have in their efficacy?	• The use of anti-vibration pads; • Low-speed cooling fans. There are also methods that can be employed as part of the transformer installation including: • The use of sound attenuating panels, enclosures or blast walls; • The provision of landscaping screen, or earthen berm between the transformer and the noise receptor. During detailed design, the design engineer shall obtain noise information from the transformer supplier and evaluate the options above. If analysis shows that noise reduction is required, one of the options (or combination of options) would be utilised to ensure that the noise levels set out in the Wylfa NewyddCoOP are achieved. The measures described above are standard techniques that are routinely employed to control noise in a wide variety of industrial processes. Horizon is confident that it can achieve the noise levels secured bythe Wyfla Newydd CoOP due to the variety of established technical measures available in order to achieve them.	
Q9.0.15	Section 6.4 of ES document D6 Noise and vibration [APP-125] provides a high level description of the proposed mitigation measures and states in relation to a number of them that they will be implemented 'as far as practicable'. Although cross-reference is made to the Wylfa Newydd Code of Construction Practice [APP-414] no more specific information is provided within that document. Are IACC and NRW satisfied that implementation of the proposed measures is sufficiently certain?	Whilst the question is not directed to Horizon as the applicant, the following response is provided by Horizon at this stage: Horizon has committed to a range of embedded, best practice (Best Practicable Means) and additional mitigation measures to control and minimise such effects which will be secured via a number of mechanisms including the Wylfa Neywdd Code of Construction Practice (CoCP) and the various site-specific sub-CoCPS. The Wylfa Newydd CoCP at section 8.2 includes a commitment by Horizon to apply to IACC for prior consent for the works under Section 61 of the Control of Pollution Act 1974. The information that will be included in the application for prior consent is set out in Table 8-1 of the Wylfa Newydd CoCP and will include the steps which will be taken to minimise noise and vibration resulting from the works. If, having reviewed the application, IACC are satisfied that they would not serve a notice in respect of the works, IACC shall consent the works. Alternatively, if there are concerns about the works, IACC may attach conditions to a consent, limit or qualify a consent to allow for any change in circumstances or limit the duration of the consent. IACC have agreed in the statement of common grounds discussions that this arrangement is acceptable. Horizon is confident that these measures are adequate to secure necessary measures to control noise from the construction activities across the Wylfa Newydd DCO Project.	

Q9.0.16	Paragraph 6.4.28 of ES document D6 Noise and vibration [APP-125] states that heavy plant and equipment would comply with the noise limits quoted in the Outdoor Noise Directive 2000/14/EC, as set out in the Wylfa Newydd Code of Construction Practice (WNC CoCP) [APP-414]. However the noise limits have not been specified in the WNC CoCP. Please could the Applicant provide this information or identify its location within the application documents.	Outdoor Noise Directive 2000/14/EC as applied by the Noise Emission in the Environment by Equipment for use Outdoors Regulations 2001 stipulates limits on the permissible noise emissions of heavy plant and other outdoor equipment. These noise limits are prescribed as formulae based on the power rating of the particular type of equipment used. Paragraph 6.4.28 of chapter D6 of the Environmental Statement - Noise and vibration states: <i>“Heavy plant and equipment would comply with the noise limits quoted in the Outdoor Noise Directive 2000/14/EC, which is enacted in the Noise Emission in the Environment by Equipment for use Outdoors Regulations 2001 (United Kingdom Statutory Instrument 2001/1701). All plant would be maintained on a regular basis to ensure in good working order and compliance with these noise limits, as per the Wylfa Newydd CoCP (Application Reference Number: 8.6)”.</i> As final equipment selection for the Wylfa Newydd DCO Project is yet to be made, it is not possible to say exactly what limits will apply. However, the table below details the relevant formulae based on the likely equipment to be used in the construction of the Wylfa Newydd DCO Project. Compliance to these noise limits is secured through the Wylfa Newydd Code of Construction Practice which states at paragraph 8.1.6 that: <i>“Heavy plant and equipment will comply with the noise limits outlined in the relevant European Commission Directive 2000/14/EC which is enacted in the Noise Emission in the Environment by Equipment for use Outdoors Regulations 2001 (SI) 2001/1701. All plant and equipment will be maintained on a regular basis to ensure good working order and compliance with these limits.”</i> The Requirements in Schedule 3 of the draft Development Consent Order state that the construction of the Wylfa Newydd DCO Project, as described in Schedule 1 of the draft Development Consent Order, must be carried out in accordance with this CoCP and the relevant sub-CoCP applying to a specific site; this therefore secures the requirement that noise emissions from plant and equipment must comply with the European Commission Directive 2000/14/EC.	

		Type of equipment	Net installed power P (in kW) Electric power P_{el} (1) in kW Mass of appliance m in kg Cutting width L in cm	Permissible sound power level in dB/1 pW	
				Stage I as from 3 January 2002	Stage II as from 3 January 2006
		Compaction machines (vibrating rollers, vibratory plates, vibratory rammers)	$P \leq 8$	108	105
			$8 < P \leq 70$	109	106
			$P > 70$	$89 + 11 \lg P$	$86 + 11 \lg P$
		Tracked dozers, tracked loaders tracked excavator-loaders	$P \leq 55$	106	103
			$P > 55$	$87 + 11 \lg P$	$84 + 11 \lg P$
		Wheeled dozers, wheeled loaders, wheeled excavator-loaders, dumpers, graders, loader-type landfill compactors, combustion- engine driven counterbalanced lift trucks, mobile cranes, compaction machines (non-vibrating rollers), paver-finishers, hydraulic power packs	$P \leq 55$	104	101
			$P > 55$	$85 + 11 \lg P$	$82 + 11 \lg P$
		Excavators, builders' hoists for the transport of goods, construction winches, motor hoes	$P \leq 15$	96	93
			$P > 15$	$83 + 11 \lg P$	$80 + 11 \lg P$
		Hand-held concrete-breakers and picks	$m \leq 15$	107	105
			$15 < m < 30$	$94 + 11 \lg m$	$92 + 11 \lg m$
			$m \geq 30$	$96 + 11 \lg m$	$94 + 11 \lg m$
		Tower cranes		$98 + \lg P$	$96 + \lg P$
		Welding and power generators	$P_{el} \leq 2$	$97 + \lg P_{el}$	$95 + \lg P_{el}$

Q9.0.17	Paragraph 6.4.44 of ES document D6 Noise and vibration [APP-125] notes that key potentially noisy activities would be restricted during the more sensitive evening, night-time and weekend periods, but provides little information on what these would comprise and how this would be achieved. No additional information is provided in the MPSSSCoCP [APP-415]. Please could the Applicant provide details of all the activities that it is proposed would be restricted and how such restrictions would work?		$2 < P_{el} \leq 10$	$98 + \lg P_{el}$	$96 + \lg P_{el}$	IACC does not support the changes to the timings as presented by HNP within Non Material Change No.4 (Table 2-2).	
			$P_{el} > 10$	$97 + \lg P_{el}$	$95 + \lg P_{el}$		
		Compressors	$P \leq 15$	99	97		
			$P > 15$	$97 + 2 \lg P$	$95 + 2 \lg P$		
		Lawnmowers, lawn trimmers/lawn edge trimmers	$L \leq 50$	96	94 ⁽²⁾		
			$50 < L \leq 70$	100	98		
			$70 < L \leq 120$	100	98 ⁽²⁾		
			$L > 120$	105	103 ⁽²⁾		
		(1) P_{el} for welding generators: conventional welding current multiplied by the conventional load voltage for the lowest value of the duty factor given by the manufacturer. P_{el} for power generators: prime power according to ISO 8528-1:1993, point 13.3.2. (2) Indicative figures only. Definitive figures will depend on amendment of the Directive following the report required in Article 20(3). In the absence of any such amendment, the figures for stage I will continue to apply for stage II. The permissible sound power level shall be rounded to the nearest whole number (less than 0,5 use lower number; greater than or equal to 0,5 use higher number).					
		Restrictions on noisy activities					
		Horizon acknowledges that many of the construction activities associated with the Wylfa Newydd DCO Project have the potential to cause adverse noise and vibration effects. As such, Horizon has committed to a range of embedded, best practice (Best Practicable Means) and additional mitigation measures to control and minimise such effects.					
		Table 1-2 titled "Plant list and modelling input data" and provided at page 2 of Volume D - WNDA Development App D6-1 - Noise model inputs and outputs of the Environmental Statement [APP-142] lists the many potentially noisy activities associated with construction of the Wylfa Newydd DCO Project that would be restricted during evening and night time periods. This list of activities was developed with input from Horizon's contractors based on the anticipated construction activities, construction programme and expected percentage of the assessment period for which each activity will take place. These activities have been summarised in Table Q9.0.17 below.					

	Restrictions are also proposed on HGV deliveries and blasting at weekends which will also assist to reduce noise emissions from the site during these times. It is noted that Horizon is currently consulting on proposed changes to a small number of construction activities which would be extended into the evening and night-time, changes to HGV delivery hours and changes to the proposed blasting hours. The combined effects of these proposed changes have been assessed as being non-material. Securing noise mitigation The additional mitigation Horizon has proposed to address the potential noise effects associated with construction of the Wylfa Newydd DCO Project are set out and secured by the Wylfa Newydd Code of Construction Practice (WN CoCP). Section 8 of the WN CoCP details Horizon's noise and vibration management strategy. The strategy includes a commitment by Horizon to make applications to IACC for prior consent for noisy works under Section 61 of the Control of Pollution Act 1974 in accordance with the procedures outlined in the WN CoCP. The information that will be included in the application for prior consent is set out in Table 8-1 of the CoCP and includes (but is not limited to): • The programme for the works, • The proposed working hours for each activity, [emphasis added] • The Best Practicable Means (BPM) of noise and vibration control which will be implemented, • The resulting predicted noise levels at key receptors, and • Details of monitoring programme for noise and/or vibration. The working hours for each activity will therefore form part of the application for prior consent under Section 61 of the Control of Pollution Act 1974. In addition, the noise and/or vibration monitoring programme to be agreed between Horizon and IACC as part of the section 61 application will enable IACC to monitor compliance with the conditions including the hours in which the noisy construction activities were required to have ceased. In respect of the noise and vibration monitoring, a technical note outlining principles was issued to IACC on 10/10/2018 and was subsequently discussed in the Statement of Common Ground meeting held between Horizon and IACC on 12/10/2018. The technical note proposed six monitoring locations for residential receptors around the Wylfa Newydd Development Area, data management and access provisions, and reporting arrangements. The proposals were well received by IACC, and no objections were tabled, although several useful suggestions were noted and have been incorporated in the monitoring proposals. The content of this technical note has been utilised to update the Main Power Station Site Sub CoCP. The agreement	

		with IACC about the noise monitoring proposals discussed is encapsulated in the Statement of Common Ground submitted at Deadline 2 (4 th December 2018).		
		Construction Phase	Work scope	
		Unit 1, Site Access and Civil Contractor Compound Site Grading	Soft excavation, rippable excavation, material haulage, preparatory formations, landscape fill operations)	
		Unit 2 and MEH Contractor Compound Site Grading	Soft excavation, rippable excavation, material haulage, preparatory formations, landscape fill operations)	
		Unit 1 Rock Excavation (and transportation)	Blast hole drilling, excavation and creation of structures (ramps), installation of ground anchors and rock bolts, won material movement and haulage	
		Unit 2 Rock Excavation (and transportation)	Blast hole drilling, excavation and creation of structures (ramps), installation of ground anchors and rock bolts, won material movement and haulage	
		Rock Processing (for use in Marine Works)	Movement of material, processing material using crushers, sorting and selection with screens.	
		Backfill (Process Material)	Crushing and sorting of material, movement of material.	
		Outfall Tunnelling Construction – Cut and cover	Ripping using bulldozers for cut and cover sections of tunnel.	
		MOLF construction	Use of Dawson piling hammer	
		MOLF construction	Use of excavators (inc. breakers), dumper trucks, rock drills and cutters, down the hole hammers, crawler cranes, eccentric rippers, leader rigs, vibratory piling machines, vibratory screens and compressors.	
		MOLF construction	Use of jack-up barges	
		Cut & Bend Reinforcement, Couplers and Distribution	Rebar cutting, bending, swaging, threading, lifting and distribution.	

Q9.0.18	No justification has been provided in ES document D6 Noise and vibration [APP-125] for why the significant residual effects cannot be mitigated further. Please could Interested Parties state if they are content that the mitigation proposed is appropriate and if not, why not.	Site Campus construction	Crane, excavation, grading, material movement.	
		Site Campus construction	Use of soil compactors, cranes, telehandlers, road sweepers, concrete truck mixers, generators and compressors.	
		Zone 9 and Mound A - final re-instatement / landscape formation	Soft material excavation, material haul, landscape fill, grading of haul roads	
		Zone 5 and Mound E - final re-instatement / landscape formation	Soft material excavation, material haul, landscape fill, grading of haul roads	
		Construction Noise		
The code of practice for noise and vibration control on construction and open sites (BS 5228-1:2009+A1:2014 referred to in this response as ‘BS 5228-1’) states that “The intention throughout any construction programme should be to minimize levels of site noise whilst having due regard to the practicability and economic implication of any proposed control or mitigation measures.”				
BS5228-1 also states that Construction and demolition works can pose different noise control problems compared with most other types of industrial activity for the following reasons:				
• They are mainly carried out in the open; • They are of temporary duration although they can cause great disturbance while they last; • The noise they make arises from many different activities and kinds of plant, and its intensity and character can vary greatly at different phases of the work; and • The sites cannot be excluded by planning control, as factories can, from areas that are sensitive to noise.				
As detailed in chapter D6 of the Environmental Statement many of the construction activities have the potential to cause noise and vibration effects. As a result, embedded mitigation has been incorporated into the design of the Wylfa Newydd DCO Project to reduce these potential adverse noise effects. The embedded mitigation includes the provision of landscape mounds including, for example landscape mound B1 which reduces construction noise at the first row of properties in Tregele by 5-7dB LAeq. This embedded mitigation is secured by the Landscape and Habitat Management Strategy.				
Horizon has also committed to extensive noise control measures in the Wylfa Newydd Code of Construction Practice (WN CoCP). This includes a commitment by Horizon to apply to IACC for prior consent for any noisy works under Section 61 of the Control of Pollution Act 1974. The information that will be included in				
		IoACC does not support the changes to the timings as presented by HNP within Non Material Change No.4 (Table 2-2). These timings appear to conflict with construction times as recommended within British Standard’s such as BS6472-2:2008 Guide to evaluation of human exposure to vibration and BS 5228-1:2009 Code of practice for noise and vibration control on construction and open sites.		
		Furthermore, the request to change and adopt such working hours appears to circumvent the necessity for HNP to utilise the Control of Pollution Act 1974 Section 61 Prior Consent process.		

IoACC does not support the changes to the timings as presented by HNP within Non Material Change No.4 (Table 2-2). These timings appear to conflict with construction times as recommended within British Standard's such as BS6472-2:2008 Guide to evaluation of human exposure to vibration and BS 5228-1:2009 Code of practice for noise and vibration control on construction and open sites.

Furthermore, the request to change and adopt such working hours appears to circumvent the necessity for HNP to utilise the Control of Pollution Act 1974 Section 61 Prior Consent process.

	the application for prior consent is set out in Table 8-1 of the WN CoCP and includes plant noise data, the Best Practicable Means (BPM) of noise and vibration control which will be implemented, the resulting predicted noise levels at key receptors as well as details of the proposed noise monitoring programme. Horizon has regularly engaged with IACC on the matter of appropriate construction noise mitigation. In a Statement of Common Ground meeting held between Horizon and IACC on 12/10/2018, IACC confirmed that they were satisfied with the noise assessments presented in chapter D6 of the Environmental Statement and the approach to construction noise control presented in the WN CoCP. Given the extensive noise mitigation measures which will be implemented, the ongoing controls in respect of applications for prior consent under Section 61 of the Control of Pollution Act 1974, and the feedback from IACC, Horizon consider that construction noise has been minimised whilst having due regard to the practicability and economic implication of the mitigation measures. Road traffic noise Considerable noise mitigation is also proposed as part of the A5025 Highway Improvements. As part of the A5025 On-Line Highway Improvements, the road surface along the whole of this route between Valley and the Wylfa Newydd Development Area will be resurfaced with a low noise surface. These works have been consented under a separate planning permission which enables them to be undertaken before the DCO construction traffic begin to use this road. As the new low noise surfaces are expected to be installed before 2020, which is the earliest assessment year considered in ES Volume C - Project-wide effects C5 - Noise and vibration effects of traffic [APP-092], the low noise surfaces are present in the baseline ('do-minimum') situation as well as the with- project ('do- something') situations. As the low noise surfaces are present in both the with / without project scenarios, no benefit is derived in the assessment from the low noise surfaces. This however, is merely a conservative approach to assessment, and does not change the fact that Horizon will provide a low noise surface to mitigate noise emissions from the A5025. A low noise surface will also be provided on the new bypasses to be built during the A5025 Off-line Highway Improvements. The bypass at Section 3 of the Off-line Highway Improvements will feature noise barrier on both sides (around 1500 m length) to reduce noise to dwellings in Llanfachraeth and the surroundings. This embedded mitigation is secured by the Design and Access Statement, Volume 3 [APP-409 and APP-410]. The effects of noise barriers on the west side of Section 1 (a 250 m length from the roundabout with the A5) and the west side of the Section 5 bypass (a 296 m length at the Llanfaethlu bend) were also studied using	

	the economic methodology described in the report “Environmental Noise: Valuing impact on: sleep disturbance, annoyance, hypertension, productivity and quiet”¹ published by Defra in 2014. The report values the impacts of noise on both health and amenity. This study determined that a barrier at Section 1 was unlikely to provide any ‘present monetary health benefits’ due to the large distance between the closest dwellings and the barrier (approximately 230 m). At Section 5 the study determined that there are access and space constraints which make infeasible to install a noise barrier at that location, but even if these were overlooked, a 2 m tall barrier would only provide £5,911 in present monetary health benefits whilst the presenting cost of the barrier would be £131,619. A 4 m tall noise barrier would provide present monetary health benefits of £15,193 but would cost £266,045. It can therefore be seen that even if it were feasible to install such a barrier, the costs would be vastly greater than the present monetary health benefits. As such, it is considered that all the mitigation measures proposed are consistent with BS 5228-1 which seeks to minimise levels of site noise whilst having due regard to the practicability and economic implication of such controls or mitigation measures. Local Noise Mitigation Strategy Neither ES Volume C - Project-wide effects C5 - Noise and vibration effects of traffic or ES Volume D - WNDA Development D6 - Noise and vibration reduce the residual significance of effect reported as a result of the Local Noise Mitigation Strategy (LNMS). However, the principle has been established by other schemes (e.g. Thames Tideway, A14 Huntingdon to Cambridge) that if the minimum standard of avoiding significant adverse impacts cannot be achieved by mitigation incorporated into the scheme, the next option should be to offer mitigation at the receptor and compensation for loss of amenity, even if property values are unaffected. This approach is also recognised in NPS EN-1 which states that in certain situations, and only when all other forms of noise mitigation have been exhausted, it may be appropriate to consider noise mitigation through improved sound insulation to dwellings. In this respect, the voluntary LNMS and the Property Price Support (PPS) scheme that Horizon has committed to both offer mitigation at the receptor. The A14 Cambridge to Huntingdon scheme environmental statement initially reports major adverse significant construction noise effects above the threshold of eligibility for noise insulation at 332 dwellings but relies upon the offer of noise insulation to reduce the number of major adverse significant construction noise effects to zero.	

¹ Department for Environment Food & Rural Affairs, Defra (2014). [Environmental Noise: Valuing impacts on: sleep disturbance, annoyance, hypertension, productivity and quiet. November 2014.](#) A report informed by: The Interdepartmental Group on Costs and Benefits Noise Subject Group.

		It is noted that the number of properties at which noise levels exceed the threshold for noise insulation due to the construction of the A14 is greater than would be the case at Wylfa Newydd Power Station. The Secretaries of State consider this matter in their decision regarding the Thames Tideway, and state that it is 'clear that off-site mitigation is part of the means available to an Applicant to manage the noise impacts, including cases where noise impacts are of such a magnitude that they necessitate compulsory purchase in order to gain consent for what might otherwise be unacceptable development'. Correspondingly, the Secretaries of State noted the Applicant's commitment to develop Trigger Action Plans for premises which would be expected to experience significant adverse impacts and the commitment to offer noise insulation and/or temporary re-housing if trigger levels are exceeded, and ultimately concluded that the proposals succeeded in avoiding significant adverse impacts on health or quality of life. In respect of the LNMS, Horizon are confident that the eligibility criteria for noise insulation compare favourably with other similar schemes, particularly for properties within the LNMS boundary which may qualify even if construction noise levels alone would not be high enough to trigger eligibility.	
Q9.0.19	Paragraph 4.3.6 of the representation from Welsh Government [RR-092] highlights the contexts provided by: the Well Being of Future Generations Act 2015; the 2017 statutory policy guidance on local air quality management in Wales; and, Welsh Government's draft Noise and soundscape action plan 2018-2023 (currently in consultation). How has the Environmental Statement addressed these contexts in relation to the development's potential impacts on air quality and noise?	Policy context The Well-being of Future Generations (Wales) Act 2015 requires public bodies in Wales (e.g. local authorities, local health boards, Natural Resources Wales and Public Health Wales) to achieve "sustainable development". "Sustainable development" means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action that is aimed at achieving the "well-being goals". The Act provides that public bodies must work to achieve the following seven well-being goals: • a prosperous Wales; • a resilient Wales; • a healthier Wales; • a more equal Wales; • a Wales of cohesive communities; • a Wales of vibrant culture and Welsh language; and • a globally responsible Wales. The Act further defines five ways of working public bodies should follow when carrying out sustainable development. The five ways of working are: • looking to the long term so that we do not compromise the ability of future generations to meet their own needs;	

	• taking an integrated approach; • involving a diversity of the population in the decisions affecting them; • working with others in a collaborative way to find shared sustainable solutions; and • acting to prevent problems from occurring or getting worse. The "Local air quality management in Wales" 2017 Policy Guidance (PG(W)(17)) provides assistance to local authorities carrying out their functions under Part IV of the Environment Act 1995 (Air Quality) and in doing so integrates the Well-being of Future Generations (Wales) Act 2015. The guidance recognises that the exercise by local authorities of their functions must be properly joined up with the management of local air quality under the land use and transport planning, environmental permitting and statutory nuisance regimes, as well as with the varying out of any other activities. In July 2018, the Welsh Government released a consultation draft Noise and Soundscape Action Plan 2018- 2023. The plan is intended to replace the current noise action plan for Wales (adopted in 2013) and will for the foundation for future noise and soundscape management activities in Wales. Together these documents form part of the existing national and local policy context that applies to matters relating to quality and noise. The following response explains how the Environmental Assessment has addressed air quality and noise against this context. Air quality As noted above, the 2017 policy guidance seeks to enable local authorities give effect to the Environment Act 1995 and the Well-being of Future Generations (Wales) Act 2015. The guidance is structured in a way to facilitate local authorities to follow the five ways of working when carrying out local air quality management. Paragraph 1.5 of the guidance recognises that to achieve this, local air quality management in Wales should be carried out by, amongst other things: • <i>"seeking to manage air quality at the same time as achieving other, related outcomes"; and</i> • <i>"keeping exposure to air pollution to as low as reasonably practicable across the whole of the population, looking out for areas where the air quality objectives might be at risk of being breached at some point in future and acting pre-emptively to prevent those breaches from occurring".</i> In respect of air quality objectives, paragraph 2.7 of the guidance recognises that <i>"national air quality objectives are not 'safe' levels of air pollution. Rather they represent a pragmatic threshold above which government considers the health risks associated with air pollution are unacceptable. Air just barely compliant with the objectives is not 'clean' and still carries long-term health risks. Nitrogen dioxide (NO₂) and</i>	

	<i>particulate matter [PM₁₀ and PM_{2.5}] currently have no safe threshold defined, and the lower the concentration of those pollutants, the lower the risks of adverse health effects in the exposed population. Therefore, while compliance with the national air quality objectives is essential, it is desirable to keep levels of pollution as low as reasonable practicable."</i> The policy guidance recommends that planning authorities should work closely with air quality officers when determining land use planning applications. In paragraph 6.5, the guidance highlights <i>"the land use and transport planning regimes are key to preventing fresh instances of non-compliance with the national air quality objectives and unacceptable levels of noise from arising as a consequence of new development. There is also some scope for using those regimes to try to maintain levels of public exposure to airborne pollution at as low a level as is reasonably practicable."</i> Turning to the Wylfa Newydd DCO Application, the approach taken in the environmental impact assessment to assess the potential air quality impacts of the Wylfa Newydd DCO Project are detailed in chapters B5 [APP-070], C4 [APP-091], D5 [APP-124], E5 [APP-243], F5 [APP-270], G5 [APP-308] and H5 [APP-359] and Volume I App I4-2 [APP-393] of the Environmental Statement as well as the various supporting statements and reports addressing air quality. Chapter B5 at paragraphs 5.4.121 to 5.4.35 details how the relevant statutory air quality objectives were applied for the purposes of conducting the environmental impact assessment to determine the potential impact of the emission of pollutants on human health. However, the assessment including the provision of embedded, good practice and additional mitigation has sought to maintain increases in pollutant concentrations (namely NO₂ and PM₁₀/PM_{2.5}) to as low a level as reasonably practicable. As detailed in the Planning Statement at paragraph 4.8 onwards (Air quality and emissions), the proposed mitigation will achieve air quality within the national air quality limits and will result in no significant residual effect on air quality during operation, construction or decommissioning. While there are anticipated to be some adverse air quality effects during construction, through appropriate mitigation the potential impact of these effects on human health is unlikely to be significant. This mitigation is detailed below. This approach is considered to be consistent with the principles of the Well-being of Future Generations (Wales) Act 2015 and the five ways of working as translated into the local air quality management policy guidance. At the Wylfa Newydd Development Area, the proposed approach to mitigating potential adverse air quality effects including the sources of emissions (both dust and oxides of nitrogen (NO_x) emissions) includes a commitment by Horizon to a full and detailed continuous air quality monitoring scheme with real-time alerts and response mechanisms. This air quality monitoring scheme will be secured by the Wylfa Newydd Code of Construction Practice and the site-specific sub-CoCPS. The details of this air quality monitoring including measurement, validation and evaluation, as well as triggers and actions are being agreed with IACC via the Statement of Common Ground Process and include, for example, real-time amber alerts specified at	

	relatively low levels to initiate investigation and action at levels well below the air quality objectives (e.g. between 50-60% of the air quality objective values for NO₂ and PM₁₀). This is also supported by visual inspections, complaints recording, investigation and response processes. Horizon and IACC have agreed the level of access to the measured air quality data via an online website and the frequency at which new information will be available to the public. This detail will be secured via its inclusion in an updated Main Power Station Site sub-CoCP at Deadline 2 (4th December 2018). Further, the two Community Involvement Officers that are secured under the Draft DCO s.106 [REP1-010] (one to be employed by Horizon, the other employed by IACC but funded by Horizon) will provide additional support to persons who consider that they are experiencing [elevated levels of emissions or disturbance] as a result of the Wylfa Newydd DCO Project. The mitigation of the sources referred to above also takes account of the further development of the additional mitigation committed to in the DCO submission in relation to reducing emissions of NOx from construction plant and machinery (see section 7.5.2 of the Main Power Station Site sub-CoCP [APP-415]). This comprises a commitment to utilise a high proportion of newer Non Road Mobile Machinery (NRMM) which emit less NOx. This reduces the predicted concentrations of NO₂ at all human receptors compared to those reported in section 5.5 of chapter D5 Air quality (excluding emissions from traffic). The level of mitigation proposed goes beyond just complying with the air quality objectives for NO₂ and achieves considerable reductions on the predicted concentrations at human receptors set out in chapter D5 Air quality (excluding emissions from traffic). For example, the highest increase in annual mean NO₂ concentrations at any long-term human receptor is now predicted to be 6.9µg/m³ (+17% of the air quality objective), a considerable reduction from an increase of 24.2µg/m³ (+68% of the air quality objective) as presented in chapter D5 Air quality (excluding emissions from traffic). The highest increase in 99.8th percentile of one- hour mean concentrations at long-term human receptors is 60µg/m³ (+30% of the air quality objective), a considerable reduction from an increase of 214µg/m³ (+103% of the air quality objective). The highest predicted concentration of 69µg/m³ is now well within the air quality objective of 200µg/m³. The Health Impact Assessment (HIA) Report [APP-429] assesses the potential adverse health effects of the predicted increases in NO₂, PM₁₀ and PM_{2.5}. Recognising that there is no safe threshold for these pollutants, the mitigation includes proposals designed to monitor the impact on health of air quality effects to ensure that no adverse health effects as a result of the Wylfa Newydd DCO Project. For example, the Draft DCO s.106 agreement provides for the establishment of a Health and Well-being sub-group as set out in item 0097 of the Mitigation Route Map [APP-422] (item 0097 Mitigation Route Map. The Draft DCO s.106 provides for the Health and Well-being sub-group to receive health monitoring data collected throughout the construction period (existing indicators) relevant to air quality impacts (e.g. respiratory health).	

	It is considered that the environmental impact assessment undertaken in respect of potential air quality effects, and the embedded, good practice and additional mitigation proposed to address such effects is comprehensive and consistent with the relevant policy context. Noise and vibration The Welsh Government is currently inviting comments on the draft Noise and soundscape action plan 2018 – 2023 which seeks to: • Align noise and soundscape policy in Wales with the cross-cutting framework established by the Well-being of Future Generations (Wales) Act 2015; • Encourage greater integration between noise and air quality management activities by public bodies; and, • Highlights the proposed updates to national planning policy and guidance in Wales that relate to noise and soundscape. The Welsh Government expects public bodies subject to the Well-being of Future Generations (Wales) Act 2015 to follow the five ways of working (detailed at the front-end of this response) when managing noise and soundscapes. In accordance with these five ways of works, noise and soundscape management should therefore be carried out by: • Pursuing long-term, enduring solutions to any existing instances of noise nuisance; • Seeking to manage noise and soundscapes at the same time as achieving other, related outcomes; • Taking opportunities to talk to the public about the challenges associated with exposure to noise and unhealthy soundscapes, listen to their concerns and seek their views on potential solutions and their involvement in delivering them; • Working actively with internal and external partners to mutual benefit in the delivery of desired outcomes; and • Keeping exposure to noise (that is, unwanted or harmful sound) as low as reasonably practicable across the whole of the population, looking out in particular for areas where noise levels might qualify as a statutory nuisance or noise action planning priority area, or where public amenity might be adversely affected by noise at some point in the future, and acting pre-emptively to prevent those things from happening. The following paragraphs highlight excerpts from the draft 'Noise and soundscape action plan 2018 – 2023' that are of particular relevance to the Wylfa Newydd DCO Application. Construction noise	

		Paragraph 9.1.1 of the action plan recognises "<i>neighbourhood noise</i>" as including "<i>noise arising from within the community, such as from trade and business premises, construction sites, localised industry, entertainment premises, domestic noise and noise in the street</i>". Paragraph 9.1.2 recognises that neighbourhood noise is addressed primarily through the statutory nuisance regime set out in Part III of the Environmental Protection Act 1990 i.e. noise that is "prejudicial to health or a nuisance". Paragraph 9.1.9 recognises that construction site noise is "<i>regulated through section 60 of the Control of Pollution Act 1974, which allows a local authority to place restrictions on working hours and the type of machinery used and set noise levels that it considers to be acceptable. Contractors will be expected to have considered noise impacts related to their operations and use best practical means as defined in section 79(9) of the Environmental Protection Act 1990 to minimise impacts, for example, by adjusting working times, considering use of quieter methods, silenced machinery and acoustic barriers, and monitoring</i>". The action plan further recognises at paragraph 9.1.11 that the Welsh Government issued an order to bring Wales' statutory codes of practice on construction noise (and intruder alarms) up to date. This was the Noise from Audible Intruder Alarms (Wales) (Revocation) and Control of Noise (Codes of Practice for Construction and Open Sites) (Wales) Order 2017. Road traffic noise Paragraph 6.1.1 of the action plan recognises that "<i>when residential properties are built, noise to which occupants will be exposed should be kept to acceptable levels, and when road layouts are to be changed, Welsh Transport Planning and Appraisal Guidance (WeITAG) and the Noise Insulation Regulations 1975 are there to ensure that affected properties are identified and suitably protected from the resultant increase in noise</i>". The action plan recognises that a recent noise mapping exercise was taken to measure the number of people whose homes are exposed to a range of noise levels from major roads in Wales. Within the Isle of Anglesey, the A55 and the section of A5025 Pentraith to Llanfairpwllgwyngyll qualify as major roads for which noise mapping has been conducted. The action plan further provides that a new map of road traffic noise priority areas in Wales (area where people's homes are exposed to a day-evening-night noise level exceeding 7 dB according to the 2017 noise maps, or where people live alongside concrete trunk roads) is being produced in consultation with local authorities. However, no noise action planning priority areas, candidate priority areas or quiet areas have been identified within the Isle of Anglesey.	

		Turning to the Wylfa Newydd DCO Application, the approach taken in the environmental impact assessment to assess the potential noise effects of the project are detailed in chapters B6, C5, D6 , E6 [APP-244], F6 [APP-271], G6 [APP-309] and H6 [APP-360] and Volume I App I4-2 [APP-393] of the Environmental Statement as well as the various supporting statements and reports addressing air quality. It is considered that this environmental impact assessment of potential noise effects is consistent with and helps to achieve the five ways of working secured by the Well-being and Future Generations (Wales) Act 2015 as recognised in the 2018 action plan. The Application is considered in light of these five objectives as follows: • There are no long-term significant adverse industrial noise effects predicted from the operation of the proposals, and therefore there are unlikely to be any instances of statutory nuisance. There are however long-term adverse traffic noise effects which are partly due to the bypassing of some villages by the A5025; bypasses are one measure recommended in the draft noise and soundscape action plan as a means of reducing noise to residents in towns and villages that roads run through. The adverse noise effects occur at properties on the outskirts of the bypassed areas and have been minimised as far as reasonably practicable through the use of embedded mitigation such as noise barriers (to be finalised during the detailed design stages of the A5025 Off-line Highway Improvements but secured by the Design and Access Statement, Volume 3), and through the Local Noise Mitigation Strategy (LNMS) secured by the Wylfa Newydd Code of Construction Practice long-term solutions. Low noise road surfaces are also used to control noise; it is expected that these will degrade over time, but all bituminous road surfaces are subject to wear and the lifespan of low noise surfaces has increased compared to initial offerings. No new noise action planning priority areas adjacent to the A55 or A5025 are expected as a result of the proposals. • Best practical means of on-site construction noise control are required by the Wylfa Newydd Code of Construction Practice, which will minimise the effects of construction noise. Applications for prior consent under section 61 of the Control of Pollution Act, 1974 will be made to the local authority, and Horizon will operate the LNMS for situations where on-site mitigation alone is not sufficient; this approach is consistent with the draft 'Noise and soundscape action plan 2018 – 2023' and will prevent any statutory nuisance in relation to construction noise. • Noise has been considered in parallel with other effects (intra-topic combined effects), and where possible mitigation measures have been designed to provide multiple outcomes (e.g.	

		mound B1 along the A5025 reduces construction noise effects at properties in Tregele, and also provides a landscaping function); • Horizon has run several consultation events where residents can discuss exposure to noise, and has listened to their concerns. The Wylfa Newydd CoCP sets out an engagement framework and a Community Liaison Group will be established to seek residents' views on potential solutions and their involvement in delivering them. It is therefore considered that the Wylfa Newydd DCO Application is consistent with the five ways of working recognised in the Well-being and Future Generation (Wales) Act 2015, and the advice on specific noise sources set out in the draft 'Noise and soundscape action plan 2018 – 2023'.	
Q9.0.20	Paragraph 1.6.105 of the Application Reference Number: 6.4.1 ES Volume D – WNDA Development D1 – Proposed Development [REF] states that '...near neighbours would receive appropriate notification of periods of blasting...'. Who would be considered a 'near neighbour' and what would be considered 'appropriate notification'?	We would communicate with our immediate neighbouring communities of Tregele and Cemaes via the existing Neighbour News newsletter process which goes to every household. In addition, we will maintain our enquiries helpline and email for anyone who wishes to contact us directly with any queries around our construction activities. We would produce community information sheets and ensure they contained details of any upcoming blasting schedules and these would be carried on the community van and available at Open Surgeries and Project Liaison Group meetings. In addition we would utilise social media so that the information would be available in a variety of forms. Further, the Draft DCO s.106 secures two Community Involvement Officers (one employed by Horizon and one employed by IACC) who will be responsible for delivering the Community Involvement Officer Joint Work Plan which includes disseminating information about construction and operation safety.	The usage of BS6472-2:2008 is still a matter of discussion from the Non-Material Change No.1 - Blasting and LIR as Horizon wish to alter the timings and vibration limits as recommended by the British Standard. IACC does not support this change and wishes Horizon to adopt the British Standard in its entirety.
Q9.0.21	With reference to Application Reference Number: 6.4.6 1 ES Volume D – WNDA Development D6 – Noise and vibration [REF], to what extent would blasts vary in scale e.g. size of charge and tonnage of rock displaced? Who would be likely to hear the blasting and how frequently would it be expected to occur?	Size and frequency of blasting Details of Blasting Mitigation are proposed in the Main Power Station Site Sub-Code of Construction Practice (Sub-CoCP) at section 8.2 Blasting Mitigation, which confirms that all blasting activities will be designed to ensure that the vibration thresholds set out in the following British Standards are complied with: • BS6472- 2 that sets recommended levels of vibration magnitude for residential receptors, offices and workshop; and • BS5228- 2 for buildings (including those of historic value that are considered structurally sound) Paragraph 8.2.2 of the Sub-CoCP States the following. All blasting methods would therefore be designed to comply with the vibration thresholds set out below.	Horizon are incorrect to state that the British Standard shall be followed. The usage of BS6472-2:2008 is still a matter of discussion from the Non-Material Change No.1 - Blasting and LIR as Horizon wish to alter the timings and vibration limits as recommended by the British Standard. IACC does not support this change and wishes Horizon to adopt the British Standard in its entirety Horizon's response replicates text found in Section 8.2 Blasting Mitigation of the Sub-CoCP which does not really deal with mitigation per se but merely indicates the various criteria to which blasting will be designed and indicates that all blasts will be monitored.

	To prevent undue disturbance at residential dwellings, education facilities, bat roosts and barn owl roosts, the following vibration levels set out in BS6472-2 [RD4] as measured outside the building would apply: - the vibration level shall not exceed: a. 6 mm/s PPV for 95% of blasting events in any six- month period; or b. any higher limits agreed with IACC on a case by case basis; and - the vibration level for any single event will not exceed 10mm/sec PPV. Paragraph 8.2.2 continues and sets out appropriate vibration threshold values for offices and to prevent the onset of minor cosmetic damage to buildings, both of which have limits far higher than for disturbance at residential properties. Paragraph 8.2.3 confirms that the limits set in the Sub-CoCP - Part 8.2 are all based on three blasts per day in accordance with the British Standard. The size of each blast will be specifically designed depending on the rock strength derived from ground investigations and location of the blast to ensure that the blasting vibration limits are not exceeded. Vibration monitoring will be conducted at multiple locations for every blast to demonstrate compliance, and where in the extremely unlikely event this records a potential risk of the vibration exceeding a threshold level then the blasting design would be revisited to ensure further blast remain within the specified vibration limits. An update to the Main Power Station Site sub-CoCP is being provided at Deadline 2 (4th December 2018) of examination, which includes confirmation of the number of permanent vibration monitoring stations and a broad indication of their location in the proximity of the WNDA. Paragraph 8.2.3 requires that, if it is necessary to conduct more than three blasts per day, then vibration levels associated with each blast would be reduced (normally associated with a reduction in charge size) in accordance with the requirements of section 6.2 of BS6472-2. Paragraph 8.2.3 confirms that blasting shall take place Monday to Friday 10:00 to 16:00 and Saturday 10:00 to 13:00. However, a Request for Non-Material Change (no.1) has now been accepted into examination [AS- 020] which extends these Blasting Hours to 09:00 to 19:00 Monday to Friday and Saturday 08:00 to 13:00. Horizon will update the Main Power Station Site sub-CoCP at Deadline 4 (17th January 2019) of the DCO examination in light of the acceptance of this change request by the Examining Authority. The total daily duration for blasting put forward in the change is consistent with BS 6472-2, that is 10 hours per day Monday to Friday, and the standard hours set out in BS 6472-2 on a Saturday. Horizon intends that the detailed blasting designs shall be completed by the specialist blasting contractors appointed from the Supply Chain. Hence it is not possible at this time to provide exact details of the charge sizes and tonnage of rock displaced from each blast. However, the contractor will be required to comply with the requirements set out above. Typically, the blasting contractor would expect to release up to 25,000 cubic metres of rock from an individual blast event, however this may vary(depending on area) but will always be constrained by the specified blast vibration limits as set by BS6472-2 and BS5228-2.	However, there is no mention of any specific blast design mitigation measures/good practice in this section. This section of the CoCP refers to the original blasting hours, namely Monday to Friday 10:00 – 16:00 hours and Saturday 10:00 – 13:00 hours in line with MTAN1. Horizon have since submitted a non-material change application wishing to change the blasting times – see below IACC welcome that monitoring is to be undertaken for every blast and it would be even better to see a specification/methodology for blast monitoring included in the CoCP. Confirmation that this would include monitoring at the tern colony would be a useful provision in any revision to the CoCP. Use of data to provide “live” updates of blast regression line(s) for the site would be useful to see. This is in line with standard procedures – in practical terms it is likely to be difficult to fire more than 3 blasts per day unless there are multiple blasting teams on site at all times The use of BS6472-2 to justify the blasting hours of 09:00 – 19:00 hrs is acceptable however, BS6472-2 also states that blasting after 1800 hrs is defined as “Other Times” by Table 1 for which there is a lower blasting vibration criterion of 4.5mms-1 as a PPV. It is considered that if BS6472-2 is to be used to justify the extension of blasting hours then the appropriate lower satisfactory magnitude in terms of PPV should also be used. The fact that the period during which blasting can occur remains at 10 hours is considered immaterial, since the period 1800-1900 hrs is when people will be returning home and potentially using their outside spaces in the summer months. The appointment of specialist contractors is standard industry practice – all blast designs, charging and firing need to be designed by suitably qualified personnel. IACC recommend that a time slot for blasting operations be defined by Horizon which should be fixed and regular blasting times notified to all interested parties. Notification could be by site notices or via a live web/social media site or through an ‘interested parties’ email database. By restricting blasting to a 10 – 20 minute window at the top of the hour between 09:00 – 19:00hrs this is likely to be viewed positively by site neighbours

		Local communities/residents will be provided with advance notice of all blasting events. However, the prediction of air overpressure from blasting (which includes both the audible higher frequencies and infra- sound components of blast pressure waves) is not commonly undertaken as it is very dependent on the meteorological conditions (air temperature, wind speed and wind direction, humidity) at the time. Other variables which affect the intensity of air overpressure are the charge weight per delay, spatial relationships, detonator delay intervals, confinement, highwall orientation, topography, depth of charge burial, and volume of displaced rock. On the matter of air overpressure being dependent on meteorological conditions at the time of the blast, Minerals Planning Policy (Wales) Minerals Technical Advice Note (Wales) 1: Aggregates states: “In view of this unpredictability, planning conditions to control air overpressure are unlikely to be enforceable. This is not a reason for doing nothing and careful blast design should be able to resolve excessive levels of air overpressure. [emphasis added]”	
Q9.0.22	Respond to concerns raised within representations (including RR-100, RR-113 and RR-106), regarding the possible impacts associated with topsoil stripping and removal.	Appendix D1-2 - Ecological Compensation Sites: Assessment of Environmental Effects [APP-137] assesses the environmental effects of the creation of the proposed compensation habitats, which include a worst case scenario of removing 23,000m³ of topsoil from Cae Canol-dydd and 16,500m³ of topsoil from Cors Gwawr (and temporary storage of this topsoil at the sites for up to three years). An assessment of the traffic movements and other associated effects relating to the removal of this topsoil is included in Appendix D1-2. It is concluded that these activities will not lead to significant effects. Concerns that the environmental benefits of the SSSI compensation strategy will be outweighed by the transport of topsoil are considered to be unfounded, given the above-mentioned conclusion of the Environmental Impact Assessment and the conclusions of the Carbon and Energy Report [APP-423], which are described below. It is estimated that the Wylfa Newydd DCO Project could result in a net offset of 84 MtCO₂e. CO₂ emissions associated with implementation of the SSSI Compensation Strategy would be negligible in comparison to the overall Wylfa Newydd DCO Project net offset. Furthermore, conversion of grassland to wetland has been found to result in changes in carbon exchange, with observed increases in CO₂ sequestration ranging from -2.39 to -14.30 tCO₂e ha⁻¹ yr⁻¹ (Alonso <i>et al.</i>, 2012²). The SSSI compensation strategy, considered in isolation from the wider Wylfa Newydd DCO Project, could therefore potentially result in a net carbon offset on its own.	

²Alonso, I., Weston, K., Gregg, R. & Morecroft, M. (2012) Carbon storage by habitat – Review of the evidence of the impacts of management decisions and condition on carbon stores and sources. *Natural England Research Reports*, Number NERR043.

		Regarding concerns that the removal of topsoil seems purely financial, where the removal of topsoil at Ecological Compensation Sites is proposed, this is because such works are necessary for the site to meet the ecological objectives, as defined in ES Volume D - WNDA Development App D9-23 - SSSI Compensation Strategy - Volume I [APP-190].	
Q9.0.23	Please respond to concerns raised by Interested Parties (RR-101, RR-119, RR-040, RR-117, RR-118 and RR-007) regarding: the effectiveness of mitigation for those who would experience impacts (some of which may be major or moderate impacts) from the proposed development; and, the effectiveness of the Neighbourhood Support Scheme	As this question is asked within the noise and vibration section of the First Written Questions, it has been assumed that it is only those parts of the Relevant Representations which relate to noise and vibration are the focus of the question. This question is in two parts: (1) relating to the effectiveness of mitigation (for both noise and vibration) and (2) the effectiveness of the Neighbourhood Support Scheme (NSS). Additionally, this response has addressed concerns raised by Cyngor Cymuned Mechell Community Council regarding properties in the parish of Mechell. Effectiveness of mitigation The concerns raised in relevant representations RR-101, RR-119, RR-040, RR-117, RR-118 and RR-007 in respect of noise and vibration effects and the effectiveness of the associated mitigation measures can be broadly summarised in two categories as follows. (1) Concerns over the noise levels from construction works (particularly earthworks and the MOLF construction) in Tregele, dwellings on the A5025 between Tregele and Cemaes, and at five offices and one commercial premise; and the effectiveness of the proposed 'artificial drumlins'. (2) Concerns that at least 67 residual receptors in Tregele and between Tregele and Cemaes will experience major or moderate effects from the development; and that for residential properties and other buildings in close proximity to the Wylfa Newydd Development Area vibration during construction could cause annoyance, feelings of alarm and, in the most severe cases, could cause damage to structures. Both of these concerns will be addressed below. Noise level and effectiveness of artificial drumlins In respect of construction noise, the modelling and assessment undertaken to inform Chapter D6 'Noise and vibration' of the Environmental Statement identifies that a number of receptors will experience major residual adverse effects. The 'drumlins' (which are referred to as 'Landscape Mounds' within the ES) are part of the embedded mitigation and are included in the construction noise models. In particular, Mound B which is 7m tall and runs along the site boundary with the A5025 opposite Tregele, is effective in reducing noise from construction activities within the site at properties in Tregele. Noise modelling indicates that Landscape	

	Mound B1 will reduce construction noise levels at Tregele by between 5dB and 7dB L_{Aeq} at the first row of properties facing onto the Wylfa Newydd Development Area. Despite this mitigation however, there are significant adverse noise effects predicted for properties close to the site including 70 dwellings in Tregele (receptor group F) and 20 dwellings near the A5025 between Tregele and Cemaes (receptor group C). It should also be noted that the construction noise assessments in ES Volume D - WNDA Development D6 - Noise and vibration do not take into consideration the benefits of the Local Noise Mitigation Strategy (LNMS) for eligible dwellings, hotels and bed & breakfasts, which offers secondary glazing to properties within the LNMS Construction Boundary Plan area for the main site, and along the A5025, as per the Wylfa Newydd CoCP. All of Tregele and the properties adjacent to the A5025 between Tregele and Cemaes are situated within the LNMS Construction Boundary Plan area and may therefore be eligible for noise insulation works provided that they meet the ownership, lease length and lawful occupation requirements set out in paragraph 8.3.7 of the LNMS in the Wylfa Newydd Code of Construction Practice. Noise insulation works will apply to bedrooms and living rooms and comprise: double or secondary glazing, noise insulated exterior doors and additional (noise insulated) ventilation so that windows may be kept closed whilst sleeping or relaxing. Further, as a result of feedback from Relevant Representations, Statements of Common Ground and in light of Requests for Non-Material Change currently being consulted upon, Horizon has decided to extend the eligibility area and qualifying noise criteria for the LNMS. This update will ensure all major adverse noise effects identified at residential receptors within the Environmental Statement are made aware of their potential eligibility for the scheme. Further details regarding the administration of the LNMS, Horizon's commitments, and what residents will need to do to claim eligibility will be issued by Deadline 4 (17th January 2019) of the examination. A similar approach has been taken by other schemes (e.g. Thames Tideway, A14 Huntingdon to Cambridge) whereby, if the minimum standard of avoiding significant adverse impacts cannot be achieved by mitigation incorporated into the scheme, the next option should be to offer mitigation at the receptor. In their decision regarding the Thames Tideway, the Secretaries of State are '<i>clear that off-site mitigation is part of the means available to an Applicant to manage the noise impacts, including cases where noise impacts are of such a magnitude that they necessitate compulsory purchase in order to gain consent for what might otherwise be unacceptable development</i>'. Correspondingly, the Secretaries of State note the applicant's commitment to develop Trigger Action Plans for premises which would be expected to experience significant adverse impacts and the commitment to offer noise insulation and/or temporary re-housing if trigger levels are exceeded, and ultimately conclude that the proposals have succeeded in avoiding significant adverse impacts on health or quality of life.	

	In respect of the LNMS, Horizon are confident that the eligibility criteria for noise insulation set a lower threshold for residents (particularly those within the LNMS boundary but at which construction noise levels alone would not be high enough to trigger eligibility) than imposed by comparable schemes. This is intentional and reflects the relatively long duration of the bulk earthworks phase, which is the noisiest phase of works at Tregele and Cemaes (and those properties along the A5025 between these conurbations), and is expected to last over two years. It should be noted that no significant adverse noise or vibration effects are predicted during the operational phase of the Wylfa Newydd DCO Project at any residential dwelling. Construction vibration at Tregele In respect of vibration, Chapter D6 'Noise and vibration (excluding traffic-related effects)' of the Environmental Statement identifies that without additional mitigation, vibration levels at properties close to the WNDA could be subject to major adverse effects. These effects are explored in detail in our response to Q9.0.11. However, as a result of this assessment outcome, Horizon committed to the following additional mitigation: "Horizon would undertake a vibration risk assessment as part of the Section 61 application for any construction activity involving vibratory or impact equipment to be used on the Main Site. This assessment would establish safe working distances for receptors in relation to construction vibration. This would ensure that any equipment that is identified as having potentially adverse vibration effects can be located sufficiently away from any sensitive receptors, so that any effects on such receptors can be reduced to negligible. Where works are required within the safe working distances, alternative equipment or working methods would be investigated and vibration levels would be reduced to the greatest extent practicable. The Section 61 applications would also describe appropriate vibration monitoring to be carried out at the closest receptors to determine the success of these requirements, as per the Wylfa Newydd CoCP. Post additional mitigation effects As a result of the additional mitigation, the significance of the residual construction vibration effect would be moderate adverse or minor adverse at all properties. The vibration risk assessments, and subsequent vibration control measures employed by Horizon, will be detailed in applications for prior consent made by Horizon (or its contractors) to Isle of Anglesey County Council under Section 61 of the Control of Pollution Act 1974. The detail regarding the exact power ratings and dimensions of construction equipment, and other factors which affect the emission and propagation of construction vibration, cannot be confirmed until specialist	

	contractors are commissioned for these aspects of work; therefore it is not possible to complete the vibration risk assessments identifying the residual vibration effects at specific properties at this time. It should be noted that no significant adverse vibration effects are predicted during the operational phase of the Wylfa Newydd DCO Project at any residential dwelling. Effectiveness of the Neighbourhood Support Scheme The Neighbourhood Support Scheme (NSS) was consulted upon alongside PAC2 as a voluntary scheme to mitigate effects in the local community. When consulted upon, the NSS had two components: a) Horizon’s Property Price Support plan; and b) Disturbance Mitigation Plan (which has now become the LNMS in the draft DCO) The Property Price Support Plan provides residents who wish to relocate the difference between the value of the property with and without the Power Station proposals (i.e. the loss in value), plus a sum towards the costs of moving and professional fees (including valuations) incurred. The Property Price Support plan is a voluntary scheme and since launch in 2015 a number of applications have been received and all qualifying applicants have received offers of financial support. Loss will be established using the Royal Institute of Chartered Surveyors ‘Red Book’ professional standards. Additionally, Horizon proposes to pay owners a sum of £5,000, in recognition of the survey and legal fees they may incur by moving. The LNMS (further information above), is secured via commitments in the Wylfa Newydd CoCP and is required to mitigate significant effects identified in the Environmental Statement. Parish of Mechell Cyngor Cymuned Mechell Community Council suggests that some properties in the parish of Mechell not identified by Horizon will also be affected. Whilst there will certainly be some dwellings at which significant adverse effects are predicted to the south and west of Tregele, these dwellings are included in the noise assessments for the Main Site (e.g. receptor groups A, E and H) contained in ES Volume D - WNDA Development D6 - Noise and vibration and in ES Volume C - Project-wide effects C5 - Noise and vibration effects of traffic. If Cyngor Cymuned Mechell Community Council has concerns about specific receptors then they are urged to contact Horizon directly.	

Q9.0.25	Artificial drumlins are proposed as a means of mitigating noise. Could the applicant provide examples of where artificial drumlins have been used successfully to mitigate noise and if possible provide the opportunity for the ExA to visit a site where drumlins similar to those proposed are in operation?	The ‘artificial drumlins’ (referred to within the Application as ‘Landscape Mounds’) provide screening of the site, which include noise mitigation, and would help soften views of and integrate the Power Station into the landscape in accordance with the landscape design principles in the Landscape and Habitat Management Strategy. In respect of noise propagation, the landscape mounds are similar to the landforms commonly employed to control noise emissions from quarries and other open sites. Like all forms of noise barrier, the landscape mounds reduce noise by physically obstructing the line of sight between the noise source and the sensitive receptor. The scale of the construction earthworks is substantial, and not dissimilar to that of open site minerals extraction. Minerals Planning Guidance 11: ‘Control of noise at surface mineral workings’ recognises that mounds “...can make a significant reduction in the exposure of local people to noise emissions from mineral working. These mounds are frequently constructed from the top soil, sub-soil and over-burden which an operator has to remove and store in order to access the mineral”. BS5228-1:2009+A1:2014 provides similar guidance, stating that for noise sensitive premises in close proximity, “effective screening of mobile plant and traffic by baffle mounds is likely to be required”, and that where practicable, “noisy static site elements should be located to take advantage of the screening effects of overburden and soil mounds”. Planning Guidance (Wales) Technical Advice Note (Wales) 11 ‘Noise’ suggests screening by natural barriers, or screening by purpose-built barriers as measures introduced to control the source of, or limit exposure to, noise. All of the guidance referenced above indicates that mounds can be an effective noise control feature, which are commonly found at quarries and open cast mines. The approach to design that Horizon has taken is consistent with the advice in NPS EN-1 which indicates that the Wylfa Newydd DCO Project should demonstrate good design through measures which include the use of landscaping, bunds or noise barriers to reduce noise transmission. The provision of the landscaping mounds is considered to assist in achieving the second aim set out in paragraph 5.11.9 of EN-1 in respect of noise, which is to mitigate and minimise other adverse impacts on health and quality of life from noise. An example of a location at which large landscape mounds have been utilised to provide combined landscape and noise screening can be found at the Tower Colliery open cast mine at Rhonda. The website for the development (http://www.towerregeneration.co.uk/project-overview.php) states: <i>“Prior to the commencement and systematically in advance of the mining operations all topsoil and subsoil will be removed but will remain on site. No spoil material is proposed to be removed off site. The removal</i>	IACC would comment that mounds / acoustic bunds are a very common form of mitigation measure. Such examples can be found at the Trac Mon / Anglesey Race Circuit, Ty Croes, alongside the A55 and at most quarries.

Q9.0.26	The WN CoCP [APP-414] proposes a Local Noise Mitigation Strategy (LNMS) for, amongst other things, properties that would be adversely affected by noise relating to traffic, subject to a number of criteria (paragraph 8.3.13). Can the Applicant explain what mechanisms are proposed to deal with disputes or where a claim is rejected, eg where a property owner considers that there is an issue but HNP consider that it does not meet the criteria set out in paragraph 8.3.13 or where the property owner considers that the improvements proposed (paragraph 8.3.17) are unacceptable?	<i>and storage of these materials will be used to establish soil storage and screening bunds which are designed to reduce visual, noise and air quality impacts”.</i> If a site visit is required land access will need to be arranged by prior landowner agreement. This question raises two dispute scenarios: (1) where a property owner considers that there is an issue but Horizon consider that it does not meet the eligibility criteria; and, (2) where the property owner considers that the noise insulation works proposed are unacceptable. The draft LNMS does not include a formal disputes resolution process. Instead, Horizon proposes to deal with disputes as and when they arise on a case by case basis. As such, the two scenarios identified would require different approaches. This is detailed further below. <u>Situation (1)</u> In the case of a person who has concerns around ineligibility: • Horizon will consider on a case by case basis approaches from those who claim to be adversely affected by noise but who are ineligible under the LNMS criteria. • In such cases, Horizon will engage with the individual to discuss the matter, and if necessary arrange a visit to better understand the specifics of the situation. • Where necessary, Horizon will investigate further through site checks, noise monitoring, and other evidence collection as appropriate to gain a greater understanding of the noise levels and situation. • If it is considered that there are exceptional circumstances which warrant noise insulation, then Horizon will provide it on a discretionary basis. <u>Situation (2)</u> In the case of a person who has received assistance under the LNMS but whose issue relates to the quality of LNMS works carried out, or to the effectiveness of the LNMS works in reducing noise: • Horizon will remain available and approachable at all stages of the LNMS process, to deal with queries and situations as they arise. • All suppliers and contractors will be suitably approved by Horizon, insured to undertake works within buildings and will also provide a warranty for the works undertaken.	

		Horizon will work with its suppliers and contractors to ensure that any issues or complaints are resolved in a timely manner, in order to prevent a situation from elevating to become a dispute. In both situations (1) and (2), where disputes do arise and can't be resolved, Horizon will consider the use of an independent third party to review all relevant information and to recommend the course of action to be taken. The use of an independent third party to resolve claims forms part of the updates the Wylfa Newydd CoCP to the LNMS that Horizon intends to submit by Deadline 4 (17th January 2019). This is in response to Relevant Representations, ongoing SOCG feedback and as a result of the Requests for Non-Material Change currently at consultation.	
Q9.0.27	Paragraph 8.4.3 [APP-414] sets out what would happen should noise and vibration exceed the set levels. Can the Applicant explain: (a) Why cease work is not included on this list?	(a) Paragraph 8.4.3 of the Wylfa Newydd Code of Construction Practice contains provisions for works to be temporarily suspended upon a breach of the relevant noise limit: <i>“8.4.3 Where monitored noise or vibration levels are found to be above either the limits set out in the relevant Section 61 approval covering the works at the time, the following actions will be undertaken immediately upon any breach being discovered:</i> <i>review works in the area likely to be causing the breach and consider any necessary mitigation actions (including if necessary, temporary suspension of works) [emphasis added];</i> <i>confirm that monitored levels are not being impacted by other noise or vibration sources;</i> <i>determine whether the exceedance is due to a particular activity or item of equipment, and if so, identify if the equipment can be substituted for an alternative piece of equipment;</i> <i>implement other feasible and reasonable measures (which may include modifying time of works, using an alternate construction methodology, or a combination of these); and</i> <i>continue monitoring (including additional monitoring, if required) to verify that the control measures have reduced the noise levels to acceptable level at the relevant receptors.”</i> This procedure will determine the activity which is causing the noise limits to be exceeded, and then reduce the noise or vibration levels by implementing ‘other feasible and reasonable measures’. Once the measures are in place, the monitoring results would be reviewed to verify that the control measures have reduced the noise levels to acceptable level at the relevant receptors. If the monitoring shows that the noise limits are still not being met, then the process set out in 8.4.3 would be repeated. It will not be necessary to temporarily suspend work in all cases; the trigger thresholds will be set below the level stipulated in the Section 61 approval, allowing Horizon to be proactive in addressing situations before noise limits are exceeded. Furthermore, in some instances the cause of excessive noise will be obvious,	The usage of BS6472-2:2008 is still a matter of discussion from the Non-Material Change Blasting and LIR (and refer to Q9.0.21 above) as Horizon wish to alter the timings and vibration limits as recommended by the British Standard. IACC does not support this change and wishes Horizon to adopt the British Standard in its entirety.

		and it may only be necessary to move a single item of plant or equipment to a location that is further away, or better screened from the receptor. Similarly, it may be possible to change working methods, to provide portable noise barriers/partial enclosures around equipment, or to reduce rather than temporarily suspending the works. Horizon consider that the phrase 'cease work' could have wide ranging interpretations, both spatially and temporarily, which could give residents an incorrect understanding of the procedure outlined in paragraph 8.4.3. For instance, it would not be reasonable to cease works which are not contributing substantially to the noise levels at a receptor, and nor would it be reasonable for the works to remain ceased after further control measures have been implemented. It is considered that a 'temporary suspension of works, when necessary' in the context of the process outlined in paragraph 8.4.3 provides an appropriate balance between the protection of residents (and other sensitive receptors), and the needs of the Wylfa Newydd DCO Project.	
	(b) If they considered whether baffles/portable noise barriers should be included in bullet point 4 and if not whether they should be included as a potential measure?	(b) Bullet point 4 of Paragraph 8.4.3 of the Wylfa Newydd Code of Construction Practice (CoCP) is intentionally wide ranging, as Horizon wish all practicable noise and vibration control options to be available to contractors. The measures identified within parenthesis (modifying time of works, using an alternate construction methodology, or a combination of these) are intended only as examples and are not intended in any way to place limits on the mitigation measures that may be employed. Noise baffles/portable noise barriers can be an effective method of noise control for static equipment, and this is recognised in paragraph 8.1.6 of the CoCP which states that 'localised noise screens or enclosures will be placed around small scale and comparatively immobile equipment, where practicable'. There are some situations however where noise barriers or enclosures may not be suitable, such as at the top of ramps or on ridges where barriers may be in exposed positions and difficult to secure, where they prevent lines-of-sight which are required for safe operations or security, or where the risk of mobile plant colliding with them is high. Notwithstanding the above, Horizon will consider the addition of noise baffles/portable noise barriers to the examples in paragraph 8.4.3 in an update to the CoCP.	
	(c) What is meant by 'other feasible and reasonable measures' and how could this be further defined?	(c) As noted above, paragraph 8.4.3 of the Wylfa Newydd Code of Construction Practice (CoCP) is intentionally wide ranging. The use of the term 'other feasible and reasonable measures' is meant to encompass any action which may reduce noise or vibration at the receptor, which is both technically and logistically feasible, and which does not incur unreasonable cost, delays, safety risks or other negative impacts to the Wylfa Newydd DCO Project. This balance reflects the following guidance in section 7.1 of BS 5228-	

		1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: noise: <i>“The intention throughout any construction programme should be to minimize levels of site noise whilst having due regard to the practicability and economic implication of any proposed control or mitigation measures”.</i> And, <i>“Local authorities should ensure that any noise level limits or restrictions being imposed are necessary and practicable”.</i>	
Q9.0.28	Paragraph 8.3.1 of the Park and Ride sub-CoCP [APP-418] sets out a number of good practice measures to minimise noise. Can the Applicant: (a) Confirm that the Park and Ride will be laid out in such a way as to maximise traffic flows and minimise the need for shuttle buses or other vehicles with reversing beepers to reverse; and (b) Advise what measures would be put in place to minimise noise from reversing beepers.	The Park and Ride facility at Dalar Hir has been designed to prevent buses reversing where possible thereby reducing the use of any reversing alarms. There are 15 ‘pick-up’ bays which have no requirement for reversing due to the site layout as shown in the Park and Ride DCO Drawing no: WN0902-HZDCO-ADV- DRG-00035 [APP-023] (for approval). As shown on the plan referenced above, there are 8 bays within the bus storage area for which reversing is required. In practice, these spaces are to be used after the spaces at the pick-up area are filled, so reversing alarms will be infrequent. Further, the location of the bus storage area has spatial separation from receptors which will minimise the effect from reversing beepers.	
Q9.0.29	A number of good practice mitigation measures to minimise noise are proposed at paragraph 8.2.4 of the Logistics Centre sub CoCP [APP-419]. Can the Applicant explain how delivery drivers will be made aware of these measures and how they will be enforced on-site?	The Workforce Management Strategy (WMS) [APP-413] includes a principle which requires workers to comply with job-specific requirements: ‘All personnel must comply with job-specific obligations and requirements (i.e. abiding by constructional and operational controls identified in securing documents) as well as any construction-related plans or strategies (paragraph 2.2.1, bullet 4). This principle will be included within a Code of Conduct which will apply to all construction personnel, including delivery drivers. In addition, paragraph 5.4.7 of the Wylfa Newydd CoCP states that all construction workers will be provided with an information pack containing the Construction Traffic Management Strategy which will clearly list all transport related controls including safety and operational requirements.	

		Compliance with the operational requirements of the Logistics Centre will be monitored and enforced. Enforcement actions for breaches of any transport related controls could include: • Improvement to communications protocol and channels • service of appropriate warnings • Temporary or permanent removal of approval to park at WNDA • Temporary suspension or permanent removal of suppliers/driver/workers who continually fail to adhere to travel requirements • Having a fund available to implement additional mitigation measures if required. Horizon submitted an updated version of the Wylfa Newydd CoCP at Deadline 2 (4th December 2018) which secures these enforcement measures.	
Q9.0.30	ES B6 para 6.4.82 states that “It is not possible to predict blasting vibrations until blasting designs are complete. Therefore, this assessment has set out limit values for blasting vibration, which are considered to result in negligible or minor effects, and all blasts would be designed to be below these thresholds.” These thresholds are provided in section 8.2 of the Main Power Station site sub- CoCP. Explain how such a design process would ensure vibration levels are to be maintained below these thresholds during construction?	Horizon intends that the detailed blasting designs shall be completed by suitably qualified and experienced specialist blasting contractors appointed from the supply chain. The contractor will use Best Practical Means (BPM) of vibration control to reduce the vibration levels caused by each blast. The specific vibration control measures will be detailed in the relevant Section 61 application for prior consent made to Isle of Anglesey County Council in accordance with the Control of Pollution Act 1974 as required by the Main Power Station Site sub-CoCP. The size of each blast will be specifically designed depending on the rock strength derived from ground investigations and location of the blast to ensure that the blasting vibration limits are not exceeded. Initially, predictions of blast vibration can be made using a simple ‘scaled distance’ approach as set out in Australian Standard: ‘Explosives - Storage and use Part 2: Use of explosives’ which requires only basic input data such as site and rock constants, the maximum instantaneous charge weight and the distance to receptors. Blast vibration monitoring will be undertaken to demonstrate compliance with applicable vibration thresholds, and to provide a feedback for subsequent blasts. It should be noted that BS 6472-2:2008 notes that blast-induced vibration is highly variable, and that the “<i>threshold levels should not be exceeded by more than 10% of blasts</i>”; it is therefore not the case that every blast will be below the threshold. However, Horizon has committed that over a six-month period 95% of blasts will be below relevant threshold for residential dwellings (see the Wylfa Newydd Main Power Site sub- CoCP.	Horizon are incorrect to state that the British Standard shall be followed. IACC does not support the changes to the timings as presented by HNP within Non Material Change No.4 (Table 2-2). These timings appear to conflict with construction times as recommended within British Standard’s such as BS6472-2:2008 Guide to evaluation of human exposure to vibration and BS 5228-1:2009 Code of practice for noise and vibration control on construction and open sites.

Q9.0.31	A number of schools (eg Cemaes Primary School) have been highlighted as potentially being affected by noise and it is stated that measures may be needed to mitigate these effects. Can the Applicant confirm: (a) whether when the schools were assessed regard was had to the effect of the proposal on their external areas (eg playgrounds and sports pitches); (b) whether any of these areas would be affected; and (c) if mitigation measures would be required what form these measures would take to enable pupils at the school to continue to play or participate in sport outside?	The environmental impact assessment on construction noise effect detailed in chapter D6 of the Environmental Statement at page D6-2 identified Cemaes Primary School as the one school-based noise sensitive receptor. In respect of schools as noise sensitive receptors, the current edition of Building Bulletin 93 'Acoustic design of schools: performance standards' (Department of Education and the Education Funding Agency, 2015) does not require any minimum performance standards in respect of noise levels at outdoor spaces in schools. However, the accompanying 'Acoustics of Schools: a design guide' (Association of Noise Consultants (ANC) and the Institute of Acoustics (IoA), 2015) which is intended to give recommendations and guidance regarding noise levels in schools, states that for new schools, 60 dB L_{Aeq,30min} should be regarded as an upper limit for external noise at the boundary of external areas used for formal and informal outdoor teaching and recreation. Horizon can confirm that the highest predicted construction noise levels across the whole of the outdoor space associated with Cemaes Primary School are below 60 dB L_{Aeq,1hour}. 1.1.4 The ANC and IoA guidance expands on this and states that while “Playgrounds, outdoor recreation areas and playing fields are generally considered to be of relatively low sensitivity to noise”, if outdoor areas are used for teaching, (for example sports lessons) then noise levels should not exceed 55 dB L_{Aeq,30min} and there should be at least one area suitable for outdoor teaching activities where noise levels are below 50 dB L_{Aeq,30min}. Of the outdoor space at Cemaes Primary School, which totals approximately 11,200 m² (2.8 acres), around 33% (3780 m² or 0.9 acres) will be subject to noise levels of less than 55 dB L_{Aeq,30min}. The quietest areas of the outdoor space will be the hard-surfaced playground on the south-east side of the school, as in this area the school building acts as a noise barrier. Noise levels throughout the whole of the playground will be below 55 dB and much of it will be below 50dB L_{Aeq,30min}. Therefore throughout construction the external noise levels at Cemaes Primary School will continue to comply with best practice recommendations on outdoor noise levels published by the Association of Noise Consultants and the Institute of Acoustics. As such, no mitigation measures are proposed in respect of the external areas of Cemaes Primary School. For completeness, however, it is noted that the Draft DCO s.106 makes provision for additional noise mitigation measures for Cemaes Primary School to mitigate against potential adverse noise effects experienced inside classrooms. The Draft DCO s.106 requires a Construction Noise Cemaes Primary School Contribution to be paid by Horizon to IACC; IACC must apply the contribution to work with the owners

		of Cemaes Primary School to agree appropriate noise insulation measures to reduce noise in classrooms to address impacts of construction noise for the construction period.	

ExA Ref.	Question	Horizon's Response to Question	IACC Comments / Response
Q10.1.1	In Table 5.2 of the Applicant's Sustainability Statement can the Applicant advise on: Objective 3 – the relevancy of jobs, skills, education and training	The overarching purpose of the Sustainability Statement [APP-426] is to assess and report on the sustainability performance of the broader Wylfa Newydd DCO Project against a bespoke Sustainability Assessment (SA) framework. The Sustainability Statement concludes by presenting Horizon's intentions for continuing to embed consideration of sustainability into future decision making and activities as the Project progresses. Horizon has embedded the sustainability themes common to relevant policies, plans and programmes into 14 SA Objectives to enable sustainability in the context of the Wylfa Newydd DCO Project to be defined and appraised. The 14 SA Objectives are organised around the seven well-being goals of Welsh Government, as defined by the Well-being of Future Generations (Wales) Act 2015. The SA drew on key Project information, inclusive of the findings of the Environmental Statement [APP-055] to [APP-402] and other technical studies and plans that have informed the development of the Wylfa Newydd DCO Project such as the Welsh Language Impact Assessment (WLIA) [APP-432], Health Impact Assessment Report (HIA) [APP-429] and the Equality Impact Assessment (EqIA) [APP-434]. The SA also considers measures that will govern the way in which the Wylfa Newydd DCO Project is implemented, such as those contained in the Wylfa Newydd Code of Construction Practice (CoCP) [APP- 414] and the site-specific sub-CoCPs [APP-416] to [APP-420]. The sustainability performance of the Wylfa Newydd DCO Project is then evaluated and described in relation to the 14 SA Objectives in turn, informed by the project component assessment findings. The SA used a qualitative seven-point scale. The scale was adapted from current practice in sustainability appraisals. The scale is designed to allow the broad-brush qualitative prediction and evaluation of effects to be easily understood. Once assessed, major positive and major negative effects were considered significant. Table 5-2 of the Sustainability Statement provides a summary of the SA scorings that have been predicted for each of the project components, organised by the SA Objectives. Objective 3 - 'To ensure development proposals value and complement the existing landscape and seascape character and established land uses' The relevancy to 'jobs skills education and training' and this receiving a (+) score in the assessment is referred to in paragraph 5.5.7 of the Sustainability Statement, which states that "<i>The delivery of the Power Station requires construction works that extend across the Wylfa Newydd Development Area, which includes</i>	

	Objective 4 – why accommodation is not a negative against the benchmark during construction	areas of land and sea that fall within the Anglesey AONB, the North Anglesey Heritage Coast, the Anglesey SLA and a Registered Park and Garden of Historic Significance in Wales.” Therefore, the positive outcome for this objective is reflected in that a number of the 9,000 workers will be required to work on these elements of the site, construction work will create a number of employment and training opportunities on site. With the construction activities in the marine environment and on the coastal areas, and significant specialised equipment used to complete this work in this environment, there will be a need to have skilled workers to complete the activities. Objective 4 - 'how the project will manage and reduce the impacts of climate change through mitigation and adaptation measures' In respect of Objective 4, the question asks how the why accommodation is not a negative against the benchmark during construction. As stated within paragraph 5.6.5 of the Sustainability Statement, Horizon states that it <i>“intends to make use of available and affordable existing accommodation in order to meet the requirement for temporary accommodation, in addition to the temporary worker accommodation at the Site Campus and does not envisage the development of any permanent buildings to house construction workers. This approach limits the contribution of this part of the Wylfa Newydd DCO Project to the creation of new sources of GHG emissions. The Site Campus will be modular buildings designed for dismantling and re-use elsewhere, with high thermal and energy efficiency. These approaches contribute positively to this SA Objective.”</i> Therefore, Horizon is confident that their approach to accommodating workers, through the Workforce Accommodation Strategy [APP-412] (its Workforce Accommodation Management Service) and housing people in temporary accommodation and in existing accommodation will support the objectives of Sustainability Statement to manage and reduce the impacts of climate change through mitigation and adaptation measures. For these reasons, the temporary accommodation is not why accommodation is not a negative against the benchmark during construction.	
	Objective 5 – sustainable transport is a major positive, while there is no mention in the Sustainability Statement of electric or hybrid vehicles, particularly relevant to buses.	Objective 5 - facilitate and encourage the use of sustainable transport modes In respect of Objective 5, the question notes that there is no mention of electric or hybrid vehicles, particularly relevant to buses, in the SA. The Sustainability Statement has found the Wylfa Newydd DCO Project is considered likely to result in significant beneficial effects against this SA Objective overall. Although there is no mention of electric or hybrid vehicles, it is clear through the establishment of sustainable transport measures in accordance with the strategic framework set by Horizon’s Construction Traffic Management Strategy (CTMS) and	

		Operational Travel Management Strategy (OTMS) (contained in the Wylfa Newydd CoCP], and Wylfa Newydd CoOP [APP-421], respectively), there will be beneficial effect. For example, the Marine Off-Loading Facility ("MOLF") supports the use of sea-based transport for the delivery of bulk materials and certain freight directly to the Power Station Site. It will receive 60% of the total material required for construction. This will reduce HGV movements across the island in respect of deliverables, with a prioritisation of sea-based transport. The Logistics Centre at Parc Cybi will provide queuing for up to eight HGVs at a time; plus parking and holding facilities for HGV/light goods vehicles (LGV). The Centre will employ an integrated distribution management asset tracking system to monitor, manage and control deliveries to the Power Station Site, as set out in the Parc Cybi Logistics Centre sub-CoCP [APP-419] providing a further means to manage the onward transport of freight along the A5025. The Wylfa Newydd CoCP includes a CTMS. The Wylfa Newydd Development Area layout allows for the arrival and departure of construction workers by bus, in support of the Dalar Hir Park and Ride and shuttle bus routes, which will be established for construction workers. Parking proposals during both construction and operation include preferential arrangements for registered car sharers; charging points for electric vehicles in the main staff car park; and the provision of secure bicycle parking (i.e. bicycle stores) and kit storage for those cycling or walking to work. Overall the measures, including significant travel planning measures, plus physical mitigation in the form the Logistics Centre, A5025 Road Improvements, a large park and ride facility for construction workers and significant proportion of deliveries to be made by the MOLF illustrate the importance Horizon has place on sustainable travel, for both the construction of the power station, the movement of its workers, with room for advancements in it travel planning as technology improves, it is clear that the conclusion of this assessment is justified. Objective 13 – to maintain water quality, manage water resources sustainably and minimise the risk of and from flooding' In respect Objective 13, the question notes that the description given to accommodation paragraph 5.15.10 suggests yellow, a range of possible positive and negative outcomes. As the assessment states in 5.15.1 <i>"The uncertainty relates to project component 1, which covers all development in the Wylfa Newydd Development Area and at Off-Site Power Station Facilities, representing a considerably greater scale of development land than is considered in project components 2 and 3.</i>	
	Objective 13 – accommodation is minor positive but the description given in para 5.15.10 suggests yellow, a range of possible positive and negative outcomes.		

		<i>Consequently, therefore, there remains some uncertainty around the likely balance of beneficial and adverse sustainability effects of the Wylfa Newydd DCO Project against this SA Objective overall. This uncertainty is expected to be resolved as the Project progresses to detailed design."</i> When compared to paragraph 5.15.10 the uncertainty does still remain in terms of the objective across the site campus, which is within this area and requires further progress in design work as the project progresses. This does not mean that the positive result is reduced because the SA does recognise that whilst the framework for appropriate controls on water flow and quality is established, the arrangements will be developed as part of the detailed design and only fully tested once construction activities commence.	
Q10.1.2	Do you consider that the proposed site campus would comply with policy PS 10 of the JLDP? If not, why not?	Although this question is directed to the IACC, Horizon would like to provide the following comments. The Planning Statement [APP-406] (at paragraph 5.1.11) concludes that the Site Campus proposals are appropriate in planning terms in their own right and are supported by local planning policy including Strategic Policy PS10 of the Joint Local Development Plan. Policy PS10 sets out a series of criteria which the Councils state would be taken into account in their role as determining authorities for campus style temporary accommodation. This is not therefore applicable to the Site Campus given it is included within the application for development consent. The policy also states, however, that the same considerations will be taken into account in the preparation of a Local Impact Report. The criteria are addressed in turn below. <i>the developer can firstly demonstrate that the proposal satisfies a demonstrable need for temporary accommodation for construction workers that cannot be met through either existing residential accommodation, or the re-use of existing buildings, or the provision of new permanent buildings capable of being adapted for permanent use following their use by construction workers;</i> The need for purpose built temporary workers accommodation is addressed in section 4.2 of the Appendix C of the Planning Statement. Through the Workforce Accommodation Strategy (WAS), Horizon has adopted a balanced strategy that achieves an adequate supply of accommodation that is attractive and affordable for workers and minimises travel to the site. The approach also provides the opportunity for economic benefits from works utilising spare capacity in existing accommodation sources, where this would avoid any negative impacts of displacing existing residents or tourists during peak season.	The IACC does not accept and would contest Horizon's claims that the Site Campus proposal is appropriate in planning terms in its own right. A 'temporary' development of this scale in a prominent coastal location, adjacent to a SSSI, Wildlife Site, sensitive ecological receptors, the AONB, Heritage Coast, (etc) would not be acceptable in any situation other than in connection with a Nationally Significant Infrastructure Project. This is an unprecedented proposal and the IACC have taken active measures to ensure that the impacts of this proposal are considered against a sound and robust policy framework through the JLDP (Strategic Policies PS9 and PS10) and the Wylfa Newydd SPG (GP28b). For clarity, although the IACC are not the determining authority for the Site Campus, the criteria as set out in Policy PS9 and PS10 of the JLDP together with the Guiding Principles as set out in GP28b of the Wylfa Newydd SPG, remain relevant and important considerations in the determination of the DCO. These have informed the preparation of the IACC's LIR and Written Representation. The IACC's assessment of the proposed Site Campus' compliance with Strategic Policy PS10 is contained in the IACC's response to this question and in the Housing Chapter and Site Campus Chapters of the LIR. The only additional matter the IACC would raise in response to this answer is in relation to the Workforce Accommodation Management Service (WAMS). The IACC have always welcomed and supported the principle of the WAMS. However, concern remains that workers cannot be mandated to use the WAMS and what measures, controls or incentivisations Horizon are going to be implemented to ensure that the WAMS operates effectively. This requires further clarity.

	The requirement for 4,000 bed spaces at the Site Campus (at peak) is based on a central case that relies on the use of 3,000 bed spaces (at peak) in existing accommodation and 2,000 workers recruited from existing local residents. The Workforce Management Strategy [APP-413] sets out the principles through which worker accommodation demand will be managed and allocated between existing and new housing supply through the Workforce Accommodation Management Service (WAMS) and Horizon's expectations of workforce conduct and their interaction with the local community, as well as specific protocols of those residing at the Site Campus. With regard to permanent new build housing, as noted at paragraph 4.2.20 of Appendix A of the Planning Statement, permanent new build housing is properly dealt with through the local plan process, to plan for long term housing needs rather than temporary demand. Accommodation will be required through the Site Campus to meet the demand for accommodation and to ensure that adverse effects on the local community and on the tourism sector are mitigated. It is also of note the Planning Act at section 115(2)(b) also makes it clear that a DCO application cannot include the construction of dwellings, though it can include temporary campus accommodation. Proposing permanent homes to facilitate temporary use by workers results in larger homes which do not necessarily meet local need. Therefore, Horizon consider that the requirement for permanent homes is best met through the Housing Fund. The key benefits of providing the Site Campus as part of the worker accommodation strategy is set out in section 4 of Appendix A of the Planning Statement. <i>1. the proposal is located on the Wylfa Newydd DCO Project site or a site located adjacent to or well related to the development boundary of Holyhead, Amlwch, Llangefni, Gaerwen or Valley and is close to the main highway network where adequate access can be provided without significantly harming landscape characteristics and features, and also takes account of policy preference for use of previously developed land;</i> The development of the Site Campus in its location within the WNDA is in accordance with the principles of this criterion which supports campus style temporary accommodation for construction workers on the Wylfa Newydd Project site.	

2. *the proposal must include appropriate mechanisms to mitigate any adverse impacts of the proposed development on the Welsh language and culture or a contribution is made towards mitigating those impacts in accordance with Policy PS 1 and Policy ISA 1;*

As set out at para 4.3.101 of the Planning Statement, mitigation during the operation of the Site Campus will include ongoing communication with the neighbouring towns and villages to facilitate the integration and interaction of the Wylfa Newydd DCO Project with the local community.

The principles for workforce behaviour set out in section 2.2 of the Workforce Management Strategy [APP413].

The Wylfa Newydd Code of Construction Practice sets out the site-specific controls to be complied with in relation to communications and community and stakeholder liaison. These measures ensure that the proposal for the Site Campus satisfies the requirements of this criterion for the inclusion of mitigation mechanisms for the development on Welsh language and culture, and with regard to the strong emphasis on the support for the Welsh language in JLDP Policies PS1, ISA 1, Planning Policy Wales and TAN20.

3. *Where there is insufficient capacity within existing off-site leisure, recreational, retail and healthcare facilities to meet the needs of occupiers of the site or such facilities are not available within an acceptable distance which facilitates pedestrian or cycle access to them, the proposal must include appropriate mechanisms to mitigate negative impacts which may include onsite provision of ancillary facilities for the use of the occupiers;*

The Site Campus proposals include a range of on-site facilities for the use of the workforce. These will include an amenity building with, café, reception area, gym, bar, shop, medical centre and other social space, and outdoor recreation, including two multi-use games areas, outdoor seating and informal public spaces.

The precise nature of the recreational facilities on the Site Campus will be determined at the detailed design stage in accordance with the Design Principles set out in Volume 3 of the Design and Access Statement [APP-409].

4. *operators will be required to maintain occupancy information to facilitate the monitoring of the impacts of the development, including the number of construction workers accommodated, the duration of occupancy and keep a record of anonymised data of workers (having regard to the requirements of data protection legislation) and make this information immediately available, on request, to the Council.*

Q10.1.3	Respond, with evidence, to IACC's [RR-020] concerns that: (a) There is insufficient justification of the need to accommodate up to 4000 workers on site;	The WAMS – which forms part of the WAS (and which will be secured through planning obligation), will provide a Worker Accommodation Management Portal that will be a database of suitable vacant properties offered by landlords and other providers, including the Site Campus. Horizon will via the WAMS and the Worker Accommodation Portal (secured by planning obligation) monitor the Workforces' accommodation choices including the location of the accommodation and the type of accommodation. An Accommodation, Tourism and Leisure Sub-Group (to be defined in the legal agreement) will determine if monitoring data provided indicates a significant adverse effect on the accommodation sector within any particular area. As set out in the WMS principles for workforce behaviour, all personnel must register with the Workforce Accommodation Management Service. All non-home-based personnel should seek to use the Workforce Accommodation Management Service to identify and secure accommodation in the first instance, before using other accommodation services (a) Horizon's justification for the need to accommodate up to 4000 workers on site is based firstly, on the fact that Temporary Workers Accommodation (TWA) is needed for 4000 workers, and secondly, that there are significant benefits to housing 4000 works in a single on-site campus.	(a) The IACC have always accepted that a TWA for 4,000 workers was required to meet the accommodation needs of the non-home based construction workers. The IACC also accept (subject to necessary mitigation measures) that the number of workers living in existing accommodation within Anglesey's communities would not exceed 3,000. The IACC also recognize the benefits of having a single campus to manage and control the workforce, economies of scale, mitigate the impacts on the Welsh Language etc. However, the IACC remain unconvinced that sufficient justification has been provided for the on-site campus in favour of other alternatives. (b) The IACC's position in relation to this point is contained in section 14 of our Written Representation (pages 41 – 45). (c) This answer is inconsistent with Horizon's answer to Q10.1.16 (d) and (e). Horizon state here that the leisure facilities would be provided at the Site Campus for workers residing there and available to workers living elsewhere in the KSA. However in response to Q10.1.16 (d) they state that the facility would be for 4,000 workers only. The IACC maintain that the size of the facility is inadequate to meet the needs of 4,000 let alone 7,000 workers (see LIR Chapter on Site Campus and Community). With <i>'the facilities not be open to the community, with strict security clearances and controls in place for Workers only'</i> as described in Q10.1.16(e), the IACC would question whether workers living in the KSA would use such a facility if other facilities are closer and more convenient. The IACC believe that Horizon have significantly underestimated the potential impact on existing community services and facilities. Mitigating these impacts through a 'Community Fund' after these impacts occur is wholly unacceptable. Horizon's assessment that the increased demand on existing facilities and services is not significant, and in fact may be beneficial to Anglesey from a Community and Welsh Language effects perspective, is rejected. These facilities and services are already very well used, and some are already at capacity. Having 3,000 additional workers using these facilities and services will inevitably have a significant impact, particularly if they are concentrated in Anglesey North and Anglesey West. Proactive measures are required to ensure that these facilities and services are not adversely impacted and a lasting positive legacy benefit is provided to the communities affected in accordance with Guiding Principle GP6, GP7 and GP8 on the Wylfa Newydd SPG. Horizon estimate that between 201 'home based' workers (Source: <i>Gravity Model figures Draft for Focus Group</i>, Horizon, undated) and 245 'home based' workers (Source: Table 3-3 in Technical Appendix C1-2) will travel for more than 1 hour 30 minutes to site. Given the shift patterns proposed, it is probable that this group will seek local accommodation during working days, returning home only on non-working days, thereby adding further pressure on short term accommodation close to site.

		<u>The need for TWA for 4,000 workers</u> Horizon's approach to accommodating construction workers as set out in the Workforce Accommodation Strategy (WAS), including the number of Temporary Workers Accommodation (TWA) bed spaces required and detail regarding the type of TWA proposed. The WAS seeks to ensure that the Wylfa Newydd DCO Project takes a balanced approach to accommodating its workers, by seeking to avoid excess demand being placed on existing provision and other disruption to local communities, while also attracting a productive workforce. This balance will help to ensure that the Wylfa Newydd DCO Project is efficient and cost effective and can offer economic benefits to local accommodation providers utilising under-used capacity. A key part of Horizon's approach is the provision of TWA comprising residential units to be erected for use during the construction phase of the Wylfa Newydd DCO Project. The TWA will ensure that excess demand is not placed on existing accommodation, businesses and communities. It will provide a type of accommodation that is both attractive to workers (including being attractive due to its location) and which is required for the efficient construction of the Wylfa Newydd DCO Project.	

	The key driver of demand for accommodation is the number of workers at the peak of construction and how many are recruited from outside the local area. This peak will be the point at which demand is highest and therefore when demands on accommodation will be the greatest. The WAS explains that the peak number of workers has reduced from approximately 10,700 (presented at PAC2) to approximately 8,500. This is as a result of a greater understanding of the number of workers required to deliver the Wylfa Newydd DCO Project. Horizon has rounded this up to approximately 9,000 workers, in order to provide an appropriate level of contingency. Horizon has also reviewed the proportion of workers that it expects to recruit from the local area, who would not need temporary accommodation (called 'home-based' workers). Horizon estimates there will be approximately 2,000 (22%) home-based workers. Further detail is provided in the WAS. Horizon therefore estimates that there is a need to provide accommodation for approximately 7,000 temporary non-home based workers. Of these, 3,000 are expected to be housed in existing accommodation, while 4,000 would need to be housed in TWA. The 3,000 assumed to be housed in existing accommodation is comprised of those workers who will choose to live in tourist accommodation, the private rented sector, owner occupied (i.e. workers moving to the area and buying their own home), latent accommodation (e.g. spare rooms), and second homes and empty properties. Further detail on the way in which Horizon has calculated the availability of existing accommodation to accommodate workers is provided in the WAS. There is therefore a requirement to provide for up to 4,000 TWA bed spaces. <u>The benefits of a single on-site campus</u> Horizon proposes to provide a single campus (providing accommodation for up to 4,000 workers), rather than multiple smaller campuses. The provision of a single Site Campus has significant benefits, both in terms of delivering combined facilities (such as leisure and health provision) and workforce management (ensuring that the impact on existing communities can be minimised). For details about the Site Campus, please see chapter D1- Project Development [APP-120] and the Design and Access Statement - Volume 3. Horizon carried out extensive consideration of, and consultation on, options for Temporary Worker's Accommodation for the Wylfa Newydd DCO Project. The approach and justification in relation to the site selection process for Temporary Worker's Accommodation is set out in detail in the Site Selection Report	

	Volume 4 – Temporary Workers’ Accommodation [APP-439]. The Site Selection Report explains how other alternative sites were considered, and why these were rejected. As explained in the Site Selection Report, Horizon concluded that the environmental and social effects of the construction workforce on the existing community is best managed through locating a significant proportion of them in a single, temporary purpose-built campus as close as possible to the Power Station. The provision of the Site Campus will reduce daily vehicle trips on the local road network as much as possible, mitigate impact on Welsh language and culture, and will also have the benefit of being able to provide a single, managed campus. As explained in Section 7 of the WAS, in reducing travel times for workers, the Site Campus will increase wellbeing and on-site productivity while reducing health and safety risks. The Site Campus also allows key workers to have immediate and easy access to the site so they can respond to emergencies and out-of- hours site needs. It would also provide significant efficiencies compared to transporting workers from multiple locations, which is particularly important in order to be able to deliver an efficient construction project which is capable of delivering the Wylfa Newydd Power Station as early as possible, in accordance with NPS EN-1 and NPS EN-6. The Site Campus will also play a significant role in attracting and retaining the workforce and ensuring they are able to work safely and productively. A large number of workers will value both the type and location of the Site Campus. The Site Campus will be popular in part because of the range of services and facilities that will be provided which are otherwise only really provided in serviced tourist accommodation, most of which will be significantly more expensive. Large-scale, campus style TWA is generally acknowledged in the construction industry to be best to meet these needs. It provides the type of accommodation workers require in a scale and format that enables the delivery of associated services (e.g. room cleaning and managing changeover between workers) in a way regular houses would not. The campus style is also considered to be an economically viable way of managing accommodation needs. Further, the WAS seeks to achieve a balanced approach of using existing accommodation and thereby providing additional income to providers, whilst at the same time avoiding taking too much accommodation and causing disruption in housing markets. The size and location of the Site Campus reflect a solution that meets this balanced approach.	

	(b) Why alternative locations for the temporary accommodation, including other potential sites within the NWDA and those elsewhere have been rejected;	Horizon therefore believes that the Site Campus is appropriately located on-site and sized at 4,000 bedspaces. (b) Horizon carried out extensive consideration of, and consultation on, options for Temporary Worker's Accommodation for the Wylfa Newydd DCO Project. The approach and justification in relation to the site selection process for Temporary Worker's Accommodation is set out in detail in the Site Selection Report Volume 4 – Temporary Workers' Accommodation. Horizon concluded that the environmental and social effects of the construction workforce on the existing community is best managed through locating a significant proportion of them in a single, temporary purpose-built campus as close as possible to the Power Station. The benefits of a single on-site campus are described further above. As stated in the Site Selection report, the report only considers the site selection process for TWA providing 500 bed spaces or more. It would not be commercially feasible for a bespoke temporary site to provide accommodation together with the necessary services for less than 500 workers. Campuses of this minimum size also deliver efficiency, and limit impact on the highway network, by minimising vehicular trips to the Power Station Site. Section 3 of the report gives a detailed analysis of the methodology undertaken to select appropriate sites for the TWA. Figure 3-1 from the report, below, illustrates the Site Selection Methodology and the 4 key stages to site selection. The methodology is split into four stages, as follows: • Stage 1: Long-list- The process utilised a number of data sources to ensure that Horizon was aware of as many potentially available sites as possible. • Stage 2: Absolute constraints- Stage 2 comprised initial screening of the long-list to discount any sites within/covered by one or more of the key environmental constraints (e.g. SPA/SAC); • Stage 3: Operational pre-requisites, location and compatibility- Stage 3a of the assessment determines whether the remaining sites (following Stage 2) meet Horizon's 'operational prerequisites' for TWA (e.g. Broad Area of Search and Site Size). Stage 3b of the assessment applies location and compatibility criteria to the remaining site; and • Stage 4: Detailed assessment- Stage 4 comprises a detailed assessment of the 'short-listed' sites following the Stage 3b assessment, which comprises RAG criteria based assessment and final comparative analysis.	

	(c) The on and off-site leisure and other facilities are insufficient for a workforce of 9000?	The assessment started at Stage 1 with 539 sites. In Stage 2, 512 sites remained after Horizon applied the absolute constraints on the project. During stage 3, duplicates were removed and the operational criteria was applied, which 49 sites at 3a, with 15 shortlisted sites remaining after Stage 3b was applied, which was based on location and compatibility. A detailed assessment of all 15 was completed in Stage 4, with a RAG assessment and Final Comparative assessment. Horizon considered two options (Option A and Option B) on the Wylfa Newydd Development Area for locating the TWA. This process is covered in SSR Volume 2 (APP-437). Option B was also is also located adjacent to the Tre'r Gof SSSI, but was much closer to residential properties than Option A. It was located in closer proximity of the main part of the construction site, and was ultimately discounted because the site determined that the land associated with Option B is required for landscape mounding. On the basis of the above assessment, Option A, Wylfa Newydd Development Area has been selected as the only site for the provision of TWA and will provide up to 4,000 bed spaces. The site performed comparatively well when considering the planning and environmental criteria applied at Stage 4 and delivers significant planning benefits in terms of reduced traffic movements. It is considered that the site is the most compliant with NPS EN-1 and EN-6 when considered relative to the alternatives; particularly given that NPS EN-1 makes the urgency of providing new nuclear power stations clear, and Option A would facilitate delivering the Power Station as early as possible (there is no significant remediation risk and it is owned by Horizon, for instance), whilst minimising the impacts on local communities. (c) Please see chapter C1 of the Environmental Statement [APP-088], which assesses the project-wide socio- economic effects of the Wylfa Newydd DCO Project, including effects on public services. This assessment covers the potential effects on leisure and community facilities. In terms of increased demand for leisure and community use facilities, socio-economic analysis presented in chapter C1 of the Environmental Statement. based on a worst-case scenario, the increased population in the KSA during construction could result in an increase in visits of 11% over current visit levels on Anglesey. It should however be noted that leisure facilities would be provided at the Site Campus for workers residing there and available to workers living elsewhere in the KSA. ES Volume C - Project-wide effects C3 - Public access and recreation effects of traffic) [APP-090] assess the impact on demand for leisure and community facilities it states that overall, as a result of the provision	

		of facilities in the Site Campus and taking into account the available usage level information, the effect is considered to be of minor significance. Given the potential distribution of workers based on the gravity modelling results, demand may be expected to be more concentrated in Anglesey North and Anglesey West. Therefore it is clear from the ES assessment that although there is increase demand, this is not significant, and in fact may be beneficial to Anglesey from a Community and Welsh Language effects perspective. The increased demand for leisure and community facilities would contribute towards retaining such facilities, which are an integral part of sustainable rural communities like those in the KSA. The Community Involvement Officers' Report identifies that one of the disadvantages facing people living in rural communities is their geographical location which makes it difficult for them to access community facilities and services. Helping to sustain community facilities such as leisure facilities, public houses, shops etc. is therefore important for sustaining Welsh-speaking rural communities such as those in the KSA. Therefore, in terms of safeguarding the provision of such facilities, this is identified as a beneficial effect. Community facilities such as leisure facilities contribute towards providing opportunities to use Welsh in everyday aspects of life, such as fitness classes and sporting activities where Welsh-speakers can use the language socially. Welsh-medium services are considered vital to the survival of the language and they provide opportunities to use the language. Whilst the introduction of non-Welsh speakers into the community to utilise such community facilities would have a beneficial effect in terms of safeguarding the provision of such facilities, there is potential for some adverse effects in terms of diluting the use of the Welsh language within the community. Measures are proposed to educate the non-home-based workers and their families of the role of the Welsh language and culture in community life. The assessment concludes that an increased demand for community facilities is considered to be beneficial in terms of supporting sustainable communities, where the Welsh language can thrive. However, it is acknowledged that introducing non-Welsh-speaking construction workers and their families into communities could adversely affect the use and prominence of the Welsh language within the community. A negligible beneficial effect is identified during construction. Mitigation of any unforeseen impacts could be addressed by the Community Fund, which is secured through the Community Impact Fund part of the Draft DCO s.106 [REP1-010] agreement. The Community Impact Fund, will seek to provide access to funding for localised issues resulting from the Wylfa Newydd DCO Project such as those associated with schools, leisure facilities, recreational resources and open spaces, along with other unforeseen effects.	
Q10.1.4	Paragraph 4.3.14 of the Planning Statement [APP-406] refers to the site campus being provided in a 'phased manner' and the ES	(a) For ES purposes the assessment is based on delivery of the Site Campus in a phased manner. The first phase would provide accommodation for up to 1,000 workers (phase one), then increase incrementally to	(a) The IACC accept that the Site Campus will be delivered in a 'phased manner'. However, as detailed in the IACC's LIR Housing Chapter (section 5.16) phase 1 (1,000 bedspaces) will be available in Y4 Q4 building up to 4,000 by Q2 Year 7. This will result in unacceptable impacts on the existing housing and tourism sectors and the IACC require the delivery of the site campus (phases 2 and 3) earlier in the construction project (Y5 Q4). The IACC will also require the Site Campus to be available for longer, declining more gradually from Y8 Q4 to Y10 Q1. (b) The IACC seeks a DCO requirement limiting the amount of construction workers on-site until each stage of the TWA is available (thresholds to be agreed). This will ensure that the build-up of workers on-site corresponds with the number of TWA bedspaces available to prevent 'overspill' into other accommodation sectors. The IACC would also require that the phasing of the parking is included in this Phasing Strategy and the delivery of the asscoaited facilities (amenity building, landscaping, MUGA etc.). (c) The IACC cover this question in detail in the Hosuing Chapter of the LIR (Section 5.0 onwards). Horizon's current strategy for workforce accommodation is based upon the use of existing private sector accommodation prior to the construction of TWA. Horizon have not provided any data on detailed numbers, but Figure C1-6 (in Chapter C-1 Socio-economics) suggests that there is a very rapid build up of demand for private sector accommodation prior to any TWA coming onstream. The numbers appear to be: 1,245 non home based workers in the private sector

			by Y4Q2; 1,725 by Y4Q3; and 2,420 by Y4Q4, when the first 1,000 bedspaces in TWA become available. The demand for accommodation to be provided by the private sector therefore doubles in the space of six months, from 1,245 in Y4Q2 to 2,420 in Y4Q4 (80% of the total of 3,000 bedspaces in private sector accommodation). If this rate of demand were to be met from existing private sector accommodation, this would seriously disrupt both the housing and tourism markets. The only way in which the proposed build up in workforce numbers can be met prior to the availability of TWA is by the planned provision of additional housing supply. Growth in capacity has, of course, already been occupied, and would only become available through natural turnover. See above: a further 700 bedspaces are required from the private sector in the quarter in which TWA first becomes available. 80% of the 3,000 bedspaces required from the private sector are required before TWA is available. (d) As outlined above and in the IACC's Housing Chapter of the LIR, a 5 year build period for the on-site campus is unacceptable as it will place significant stress on the local housing and tourism sectors. (e) Detail must be submitted and agreed as part of the Phasing Strategy. To guard against delays in the provision of TWA, the permitted workforce numbers on site need to be tied to the provision of TWA.

[APP-088–paragraph 1.4.9 and APP-122 – paragraph 3.4.6] refers to the bed spaces becoming available once workforce thresholds have been met as set out in the dDCO requirement. Can the applicant (a) Indicate where in the submitted documentation further information on this can be found or provide further details as to how this phasing will work and whether it would be linked to the WAMS? (b) Indicate which is the relevant requirement and where are the thresholds referred to? (c) What the workforce numbers would be prior to the need for the site campus being triggered and what the accommodation arrangements for these workers would be?	provide accommodation for up to 2,500 workers (phase two) and 4,000 workers (phase three). This is set out in paragraph 1.8.12 of Chapter D1 Proposed Development. Horizon’s commitment to delivering the Site Campus is in the Phasing Strategy [APP-447], which states within Table 2-1 that the Site Campus needs to be delivered by Peak Construction. The Phasing Strategy will be updated at Deadline 4 (17 January 2019) to expressly include the delivery of the Site Campus in a phased manner, in accordance with the ES. The delivery of the Site Campus and how it contributes to meeting worker demand is set out in Figure C1-6 in document ES Volume C - Project-wide effects C1 - Socio-economics, Page C1-13. As illustrated in Figure C1-6, the phasing of the Site Campus is linked to the growth of the workforce. The WAMS is linked to occupation of the Site Campus in that the WAMS will be used to both book the Site Campus (to the extent bed spaces are available) and to monitor the take-up of all forms of accommodation by workers. Please refer to the answer to (c) below for more information. (b) The relevant requirement is PW2, which states that <i>“The delivery of Key Mitigation must be in accordance with the sequencing set out in the Phasing Strategy, unless otherwise approved by IACC.”</i> (c) The ES has assessed the impact on accommodation at the point of peak demand from workers, which is the overall construction peak. This is based on 3,000 workers looking for space in existing accommodation markets (owner occupied, private rented, tourist, caravans and latent). The delivery of the Site Campus has been phased so that the 3,000 figure in existing accommodation markets is not exceeded at any point. Horizon’s assessment of capacity does not assume any growth in supply and the estimates of capacity are historical (eg the 2011 Census in the case of the PRS), so the existing accommodation market capacity is assumed to be the same at the peak as it is in the early years. This is a conservative assessment because in reality, growth in accommodation capacity has already happened and further growth is likely – particularly given the Housing Fund proposed under the Draft DCO s.106 agreement (namely the Worker Accommodation (Capacity Enhancement) Contribution proposed to deliver new capacity). The total workforce in the last quarter before the Site Campus becomes available is just under 3,200, of which just over 50% (1,620) are expected to be non-home based, i.e. well below the 3,000 assessed in the ES.	

	The numerical breakdown is: <table><tr><td>Sector</td><td>Workers</td></tr><tr><td>Caravans</td><td>350</td></tr><tr><td>Owner occupied</td><td>325</td></tr><tr><td>Latent</td><td>215</td></tr><tr><td>Tourism</td><td>245</td></tr><tr><td>PRS</td><td>485</td></tr><tr><td>TOTAL</td><td>1,620</td></tr></table> (d) Why there is a 5 year build programme for the site campus. (e) When in the build programme/phasing the health and social facilities element (including the MUGAs)of the site campus would be delivered and if this is not in the first phases what alternative arrangements would be made for workers health and social needs during this period. The five year build period is linked to when workers are required for the Wylfa Newydd DCO Project. It links to the worker profile and is currently completed in manner that represents ‘Just in Time’ practices. Work is in progress, with BCUHB, to define the specification for health services to the construction workforce and on the approach to providing financial contributions associated with use of NHS services. The Draft DCO s.106 agreement proposes increased health related payments until the onsite medical facility is delivered. The specification will cover the phases of the construction e.g. the period prior to the opening of the Site Campus Medical Centre and the period when the Site Campus Medical Centre is up and running. In respect of the MUGA, the current intention is to deliver in the build programme (i.e. it will be available for 1st 1,000 workers). No alternative current arrangements are provided, it is not the intention of the project to require alternative measures, due to the nature of construction and Horizon’s commitment to deliver facilities on-site.	Sector	Workers	Caravans	350	Owner occupied	325	Latent	215	Tourism	245	PRS	485	TOTAL	1,620	
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PRS	485															
TOTAL	1,620															
Q10.1.5	Reference has been made in the RR [RR-020] to an extant planning permission (LPA ref: 46C427K/TR/EIA/ECON) for accommodation for 3,500 workers at Cae Glas and Kingsland Sites in Holyhead. (a) Can the IACC provide a copy of the decision notice and committee report for this planning permission and any comments they may wish to make on this scheme; and Horizon's approach and justification in relation to the site selection process for Temporary Worker's Accommodation (TWA) is set out in detail in the Site Selection Report Volume 4 – Temporary Workers’ Accommodation. The Site Selection Report explains how other alternative sites, including sites in Amlwch (Rhosgoch), Holyhead and other locations were considered, and why these were rejected. As explained in the Site Selection Report, Horizon concluded that the environmental and social effects of the construction workforce on the existing community is best managed through locating a significant proportion of them in a single, temporary purpose-built campus as close as possible to the Power Station.	The IACC does not agree with Horizon’s site selection assessment criteria as Land and Lakes is the only consented site for TWA and should not be subject to the same criteria as other ‘non consented’ sites. In accordance with the JLDP requirement to consider consented sites, given that all of the impacts of Land and Lakes has been assessed and (with mitigation) deemed acceptable, the IACC cannot agree to the ‘Red’ RAG statuses as given by Horizon. The assessment criteria is flawed as it does not include weighted criteria. On balance, Land and Lakes was deemed acceptable in planning terms as the legacy benefits and economic and tourism legacy of the project outweighed (with mitigation) the adverse impacts of the proposal. As detailed in the IACC’s Written Representation (section 3.2 – 3.4) The promotion of the well-being of future generations in the context of Wylfa Newydd is addressed most clearly through the concept of legacy. With a temporary workers accommodation, a temporary park & ride, a temporary logistic centre, the IACC question Horizon’s commitment to long term positive legacy, as the overriding reason for not pursuing other options is cost and distance from site (which again equates to cost of transportation). Whilst the IACC recognise that Horizon must have a commercially viable and deliverable project, this must not come at any cost and a positive long term legacy should be secured where possible.														

(b) Can the applicant expand further their reasons (Section 2.2 APP-122] as to why they have chosen to provide an on-site campus for workers rather than use the consented sites which are available now in planning terms and would deliver a long term legacy?	Further detail on the benefits of the Site Campus and why it was ultimately preferred are set out in the response to Q10.1.3. This response, therefore, focuses on the factors that weighed against other sites being selected. All sites identified for review were considered objectively using a RAG Assessment of 19 set criteria. These criteria include key planning, environmental and commercial considerations. This Stage 4 detailed assessment is explained in paragraphs 3.2.48 – 3.2.53 and table 3.5 of the Site Selection Report – Volume 4 – Temporary Workers Accommodation. This assessment also included further information that became available after PAC2 including on commercial viability as a result of a review of the Wylfa Newydd DCO Project to develop more efficient and cost effective proposals (also known as project optimisation). In the Site Selection Report, Cae Glas was assigned five red ratings and Kingsland assigned four in the RAG review for all sites considered by Horizon. The sites both rated red on the basis of being located within the AONB, visual impact (open, greenfield and within the AONB), greenfield status and viability issues. Cae Glas also rated red based on the potential for direct impact on a heritage asset (an Ancient Monument is located within the site). Amber ratings included proximity to SSSIs, potential adverse impact on living conditions and proximity to heritage assets. In comparison, TWA within the WNDA only had two redratings for its greenfield status (in common with all sites other than EZ10) and lack of identified legacy potential (in common with all sites other than Kingsland and Cae Glas). A detailed review of the criteria for the Kingsland site is set out in in Appendix 6-12 to Volume 4 of the Site Selection Report: Stage 4 SP696/SP785. A detailed review of the criteria for the Cae Glas site is set out in in Appendix 6-13 to Volume 4 of the Site Selection Report: Stage 4: SP784 Cae Glas. Further, it is noted that from a local policy perspective, Policy PS10 sets out considerations that the Councils will take into account when preparing their Local Impact Report, which includes consideration as to whether the developer has demonstrated that the need for temporary accommodation cannot be met by either existing residential accommodation, re-use of existing buildings, or the provision of new permanent buildings capable of being adapted for permanent use following their use by construction workers. As explained above, Horizon has thoroughly considered the use of the existing consents at Kingsland and Cae Glas (which include conversion to permanent residential and tourist accommodation respectively) before concluding that temporary accommodation was required. This included significant discussions with the land owner following the grant of consent. Horizon was not consulted by the applicant of these sites during their development and consenting stages and did not have any involvement in the design of the	

		proposals, or in discussions on the practicality and feasibility of the consent or accompanying Draft DCO s.106 Agreement. As a result, the consents that were obtained cannot be reasonably used by Horizon without significant amendments and this would still not overcome the overriding concern of distance from the WNDA. On this basis, Horizon considers that these existing consents have been appropriately considered in line with Policy PS10. For all the reasons set out above, and for the reasons set out in Horizon's response to Q10.1.3, it is Horizon's preference to accommodate workers requiring TWA in the minimum required number of sites to ensure a critical mass to provide on-site facilities and maximise benefits in terms of worker management and behaviours. It is therefore considered that accommodating up to 4,000 bed spaces adjacent to the main construction site through the Site Campus is the most suitable option.	
Q10.1.6	Once operational 1,000 temporary workers would be required every nine months to deal with planned outages for a 25-30 day period. The effects of this have not been assessed as outages were undertaken at Wylfa A without undue effect on the tourism stock (para 1.5.125 [APP-088]). (a) How many workers were required for the outages at Wylfa A and how frequently were they undertaken? (b) Where were these workers accommodated? (c) Were outages for Wylfa A timed so that they did not occur during the August tourism peak?	(a) The normal workforce was supplemented by 400 to 500 contractors depending on the work scope for the outage. Outages were undertaken on a bi-annual basis per reactor, i.e. R1 2000, 2002, 2004 and R2 2001, 2003, 2005 and so on, meaning that there was a planned reactor outage every year. Outage duration for the last 6 or 7 outages was approximately 3 months. (b) The Existing Power Station operator did not get involved in accommodation as the individual contractors organised their own accommodation with workers housed in a combination of local hotels, B&Bs, short term lets. Horizon has not been made aware of any issues that have arisen as a result of outage workers from Existing Power Station. (c) The outages for Wylfa A were not timed so they did not occur during August Tourism Peaks. Outages were initially timed to maximise the sea water cooling ability, so started when sea water temperatures were lowest which is around April. In later years they moved to fit with the 24 month operating period, if the outage finished in May the following outage would commence 24 months later. Recent outages: - Reactor 1 - Jan – March 2014 & Aug – Jan 2011; - Reactor 2 - April – July 2008 & April – Sep 2012	The IACC are trying to obtain local information on impacts (particularly housing and tourism) during outages of Wylfa A. Any detail obtained will be submitted to the Examining Authority at future deadlines. The IACC recognize that outages for Wylfa Newydd will largely be dictated by the nuclear fuel cycle length of 18 months. As such the initial refuelling outage date will be driven by when Horizon start commercial operation. In addition, the timing of planned outages is driven by statutory maintenance requirements. It is inevitable therefore than some outages will occur during summer peak. The IACC would not seek to impose any restrictions on when these outages can or can not happen, but would require appropriate monitoring and mitigation to prevent any adverse impact on the housing and tourism sectors during these outage periods.

Q10.1.7 (d) Would outages for Wylfa B be timed to avoid the August tourism peak and if the IACC consider that this is necessary would this need to be controlled by a requirement? Some workforce accommodation is proposed to be drawn from the headroom available from Caravan and Camping accommodation. Can the applicant: (a) Clarify whether the headroom numbers stated are only from permanent pitches (ie static/mobile caravans and permanently erected tents) or does it include temporary pitches (ie where a caravan would need to be brought onto site or a tent pitched)? (b) If the number does include temporary pitches can the applicant provide figures for temporary and permanent pitches and for the permanent pitches indicate how many of those would be in a caravan or static/mobile home and how many would be in a tent.	(d) It would not be Horizon's intent or ideal for planned outages to occur during the peak summer tourism season in August. It would not be Horizon's preference to organise outages during this period as it would be a challenge for our supplemental outage personnel to find accommodation and a similar challenge to find UK supplemental personnel due to the school holidays. However, timing of planned refuelling outages is predominantly dictated by the nuclear fuel cycle length of 18 months, meaning it will occur so many months after the previous refuelling outage. As such the initial refuelling outage date will be driven by when Horizon start commercial operation. In addition, the timing of planned outages is driven by statutory maintenance requirements. It is therefore considered not possible to impose a requirement on Horizon for it to avoid certain times. (a) The headroom numbers include both static and touring pitches for caravans but exclude tents. The estimates of capacity and headroom in the Workforce Accommodation Strategy ("WAS") and assessed in the Environmental Statement at Chapter C1 Project-wide effects - Socio-economics were taken from Welsh Government data (Welsh Government. Summary of Wales Bed stock Data: Situation as at March 2013. [Online]. http://gov.wales/docs/caecd/research/131011-accommodation-bedstockmarch-2013-en.pdf which identified 29,000 tourist bed spaces in Anglesey and 124,500 in all of Gwynedd (of which around 32,500 were in the Key Socio-economic Area (KSA)). Of these, 45,430 were estimated to be in caravans (both static and touring) – 22,500 on Anglesey and 23,000 on the mainland within the KSA. This is broadly consistent with the bed stock survey that forms part of the evidence base for the JLDP (IACC. Topic Paper 9: Tourism. 2015. [Online]. http://www.anglesey.gov.uk/Journals/2015/02/13/g/v/f/Tourism-Topic-Paper-February-2015.pdf. These documents include both touring and static caravans but did not produce a split between them. (b) Since the Draft DCO application was submitted, IACC has shared some additional data with Horizon that confirms the number of bed spaces is still broadly similar to the numbers presented in the WAS and above. It also indicates that static caravans account for approximately 60% of the bed spaces, with the remainder being touring and seasonal pitches. No workers are assumed to be using tents.	(a) The IACC confirm that the capacity assessed is permanent pitches. It does not include temporary pitches. The Accommodation Bedstock Survey commissioned by IACC showed that while there are some 26,000 bedspaces in the caravanning and camping sector (excluding tents), there are only 164 static caravans and 893 touring caravan pitches available to let by site operators: the remainder are owned by private individuals, and there can be no guarantee that these will become available for Wylfa Newydd workers. (The bedspace numbers also assume that 4 people share one caravan, which may be the case for family holidays, but is unlikely to be acceptable for unrelated adults.) (b) IACC can also confirm that no worker is assumed to be using tents. The IACC's assessment of capacity also excludes short term 'seasonal' pitches (less than one month) as these would not be available for the workforce. Tourism Accommodation is dealt with in detail in section 5.17 of the IACC's Housing Chapter of the LIR and Caravan Accommodation is dealt with in detail in section 5.18. (c) No worker is assumed to be using tents. This is unacceptable. The IACC have obtained recent data from Hinkley on breakdown of accommodation (including caravans). See Table 18 in the IACC's housing Chapter of the LIR. This corroborates Horizon's analysis. The IACC however disagree with Horizon's approach to housing workers in caravans. Horizon should identify and assess suitable sites and these should be made available through the WAMS (i.e. and not left to the tourism sector to accommodate workers). (see LIR Housing Chapter section 4.1.1 and 5.18). As the WAMS has no powers to require workers to use any particular form of accommodation, identifying suitable and 'approved' caravan sites is the only way to monitor and enforce the potential use of unlicensed or unsuitable sites.

	(c) Provide examples of other projects where it was considered acceptable to use tents to accommodate workers? (d) Reference is made to workers potentially bringing their own caravans. Looking at other similar projects elsewhere is there any data as to indicate how many this could be and where they would locate?	(c) No workers are assumed to be using tents and we have not reviewed whether other projects have considered it acceptable to use tents to accommodation workers. (d) The latest figures for Hinkley Point C (March 2018) show around 14% of workers are using caravans but it does not provide a breakdown between static and touring caravans or information on location.1.1.6 Heathrow's Terminal 5 construction had a peak workforce of around 8,000 and recorded around 260 workers bringing touring caravans ("Heathrow's T5: History in the Making" Doherty, 2008, p125). Horizon expects workers who bring caravans to use properly licensed sites. It will use the Workforce Accommodation Management Service, which all personnel must register with (secured by the Workforce Management Strategy) to achieve this and the Housing Fund which is secured in the Draft DCO s.106agreement can be used if required by IACC to monitor and enforce the worker accommodation including unlawful caravan sites.	
Q10.1.8	Policy TAI 14 of the JLDP covers the use of caravans, mobile homes and other non-permanent forms of accommodation for temporary workers. However, this is subject to a number of criteria. (a) Can the applicant confirm if, when they assessed camping and caravanning headroom, these criteria were considered and only those sites/pitches that met the criteria were included in the final calculations and if not, why not? (b) Can the IACC and GCC indicate how many caravan/camp sites in the KSA they consider would meet the criteria set out in the policy and what headroom they would deliver?	(a) Policy TAI14 sets out five criteria for proposals for the use of existing caravan sites "outside of the usual occupancy season". The assessment of headroom in the caravan sector was undertaken in the summer peak as this is when capacity is at its lowest. As a result, Policy TAI 14 would not apply. IACC's latest bedstock survey shows peak occupancy in August of 82%. The lowest occupancy is in February 34% and occupancy remains below 50% from October through to March. In the winter there is therefore still significant occupation of sites, but significantly greater capacity (nearly four times as much). Data provided by IACC identified 1,423 caravan pitches that are licensed for year-round occupancy and a further 474 touring pitches that are licensed for occupancy for over 10 months of the year (no data were provided for static caravans). Using the same ratio of pitches to bedspaces as the bedstock survey (4.4) this would translate to capacity of 8,346 bedspaces available for at least ten months of the year. At winter occupancy levels (37%), that means over 5,250 bedspaces would be unoccupied.	The IACC have dealt with this matter in detail in sections 4.1 and 5.18 of the IACC's LIR Housing Chapter. Assessment of Caravan Capacity is also included in Annex 8Q and maps are included in Annex 8R – 8U. The IACC would however add that the ratio of pitches to bedspaces assumed by the bedstock analysis is different to that used to assess capacity for workers accommodation. The Bedstock Survey assumed a ratio of 4 bedspaces to 1 pitch (i.e. a family of 4), whereas the IACC's analysis for availability for construction workers assumes a ratio of 2 workers per pitch.

		The five criteria in TAI14 are: 1. There is a proven need for temporary residential accommodation in association with an approved building project; and 2. The site is located so as to minimise the need to travel and promotes the use of sustainable transport modes to the approved building project site or a park and ride facility provided by the building project promoter; and 3. It can be demonstrated that the construction worker accommodation facilitates the delivery of the building project's construction workers' accommodation strategy; and 4. It can be demonstrated that the proposal would not have a significant detrimental impact on the tourism industry; 5. The proposal is appropriate when considered against Policy TWR 3. Horizon believes the first three criteria are likely to be met for most sites that might apply to have restrictions lifted. This is for the following reasons: • It is common ground with IACC that temporary residential accommodation is needed to support the delivery of Wylfa. • The large-scale caravan site provision is all well located for access to the site by the proposed shuttle bus network or car. The cluster of sites south of Holyhead are also well located for the Park and Ride. In addition, the large sites are along the A5025 to the north of Valley and in the east of the island on the A5025 from Llanbedrgoch to Brynrefail are also likely to be served by the Horizon shuttle bus network. (The location of all caravan sites is shown in the map below):	



- Use of caravans is part of Horizon’s WAS and extensions to occupancy periods would facilitate the delivery of the strategy

Criteria 6 requires applications for residential use of caravans to not have to significant detrimental impact on the tourism industry. Horizon’s Worker Accommodation Strategy considers that up to 650 workers can be accommodated in caravans without a significant effect on the availability of tourist accommodation. This would be controlled through the Worker Accommodation Management Service.

Criteria 7 requires consideration against Policy TWR 3. This relates to static caravan sites and chalet sites. It sets out a range of considerations that would apply within and outside of the AONB, principally regarding impact on landscape, the requirement for high quality design and layout and that the site is close to the main highway network and adequate access can be provided within significantly harming the landscape. These considerations would be taken into account in any application for planning permission required for new caravan sites and it is considered that it would be possible to ensure that sites came forward that complied with these policy requirements, given the general availability of sites (see Site Selection Reports [APP-436] to [APP-442] and the relatively small number of caravans required.

It should be noted that the policy is generally supportive of new and minor extensions to caravans sites outside of the AONB, subject to meeting certain criteria, including that the proposed development is part of

		a scheme to improve the range of quality of tourist accommodation and facilities on the site and that significant improvements are delivered in terms of design, layout and appearance.	
Q10.1.9	(a) Can you confirm whether or not the figures provided for bed spaces within the private rented sector include bed spaces that would come from holiday self-catering accommodation or second homes? (b) Explain how you have differentiated between private rented and holiday cottages/flats? (c) Provide details of what safeguards you have put in place to ensure that double counting of holiday cottages/flats as both 'tourist accommodation', 'private rented sector' or 'second homes' has not occurred?	(a) The Private Rented Sector (PRS) is defined using the 2011 Census definition, which does not include bed spaces that would come from holiday self-catering accommodation or second homes. The Workforce Accommodation Strategy makes reference to second homes and self-catering but does not include them in the definition of the PRS. (b) As above, holiday cottages/flats are not included in the Census definition of the PRS. The data source for the tourism sector, i.e. holiday cottages and flats, was based on Welsh Government data which was then validated against the IACC Joint Local Development Plan Evidence Base paper on tourism and IACC's periodic tourism bedstock survey. (c) The Census specifically asks who usually lives at the address and includes a separate option of, "No-one usually lives here, for example, this is a second address or holiday home." The Census reports there were 30,594 dwellings with permanent residents and 3,589 dwellings with no usual residents. It then separately reports that of the 30,594 dwellings with permanent residents, 4,324 were privately rented. The households with no permanent residents were not included in the definition of the PRS. During the construction period, accommodation providers will be required to register with the WAMS and demonstrate that they are allowed to rent their properties legally (and safely). For the PRS this will include a requirement to be registered with Rent Smart Wales.	
Q10.1.1 3	Paragraph 1.5.37 [APP-088] estimates that approximately 600 workers would seek to move into owner-occupied stock (ie buy a house/flat). Can you confirm if these would be construction or operational workers and if so, can you provide separate figures for each?	The ES assumes that the split in the 600 workers in owner occupation would be approximately 400 construction and 200 operational staff. At peak construction there will be just under 425 operational staff. The ES assumes that 55% of those (233) will be non-home based when they start work but would become permanent residents likely to take owner-occupied housing. This is an assessment assumption. Horizon is targeting a higher home-based operational workforce and if it achieves it, that would reduce the demand for housing.	This confirms that operational staff will be on site during construction (425 at peak construction, rising to 850 by handover), and need to be added to the numbers in the construction workforce (8,500 to 9,000). This additional demand has not been factored in to date.
Q10.1.1 5	(a) How would the Workforce Accommodation Management Strategy(WAMS) be funded?	(a) The WAMS is required to be delivered and operated by Horizon under the Draft DCO s.106 agreement and the costs of delivery and operation will be borne by Horizon.	

	(b) Would workers be charged to use the service? (c) Would accommodation providers be charged to register/use the service?	(b) There would be no charge to workers to use the service. (c) The intention is that Horizon will meet the costs of the service without charging accommodation providers. However, landlords may need to meet the costs of complying with relevant legislation (eg HMO licences or registering with Rent Smart Wales) and the WAMS may offer a support service for this that could incur charges.	
Q10.1.1 6	The Workforce Management Strategy [APP- 413] indicates that there would be a range of social, leisure and sporting facilities on the site campus in order to occupy workers during their free time. Can the Applicant confirm: (a) What facilities would be provided on site. (b) Whether these facilities would be free and if not whether they would be subsidised.	Section 1.2.5 of Volume 3 for the Design and Access Statement (APP-409), appendix 1-2, states that high- quality ‘campus-style’ accommodation will afford all workers who choose to stay in Temporary Workers Accommodation (TWA) a good environment in which to live. On-site Campus style accommodation would enable a greater opportunity for workers to interact, socialise and bond – all of which would improve the workers’ well-being. The worker welfare and accommodation facilities on the Site Campus will be integral in attracting, caring for and retaining a high-quality, productive and safe workforce. All bedrooms will have en-suite bathrooms and there will be shared kitchens/living rooms and laundry rooms on each floor of each residential block. Furthermore, the close proximity to the Project will reduce the need to travel. (a) The key design principles of the Site Campus, as stated on Page 30, appendix 1-2,(APP - 409) include the amenity building providing facilities to meet workers needs for good quality food and on-site relaxation. Current layouts indicate the amenity building will provide: • fully accessible restaurant and gym; • licensed bars with seating areas and storage area; • multi-purpose rooms/TV/cinema/lounge areas; • accessible changing for external sports facilities; • inclusive well-being room; • catering and dining facilities, including kitchen and stores area; • retail shop outlets providing basic toiletries and snacks. (b) The use of Amenity facilities would be mostly included as part of the Workers Travel & Subsistence allowance, however there will be some elements that worker would need to pay for separately.	IACC’s concerns of the amenity building is contained in the LIR Site Campus Chapter. (b) What elements would the workers need to pay for separately? This could have impacts on local facilities and services. (c) The IACC accept that the Site Campus would not be available to home based workers. (d) Horizon have not answered the question. How have they calculated that the facility is sufficient for the 4,000 workers? The answer provided by Horizon does not clarify which facilities are to be used by which workers. Answer (d) states that campus facilities have been sized for 4,000 workers only but campus facilities include catering and dining facilities, - it is not specified where alternative facilities for other workers meal breaks are provided for or how these facilities will interact. (e) The IACC accept that the facilities would not be available for use to the public. (f) The IACC agree with Horizon that the site campus should be decommissioned and the land returned to it’s original use. However, the IACC object to the building specification and the apparent lack of legacy re-use following its use as a TWA. The IACC believe that the accommodation blocks could, for example, be used as student accommodation or self contained units for people at risk of homelessness, the amenity building could be utilised as a social or leisure facility for the communities of North Anglesey. This again demonstrates Horizon’s lack of commitment towards legacy benefit as outlined in response to Q10.1.6 above.

	(c) Whether home-based workers would be eligible to use the facilities. (d) Indicate how they have calculated that they have sufficient facilities to meet the needs of the proposed 4,000 or 9,000 workers (if they are to be open to home based workers). (e) Indicate whether or not they would be available for use by the wider community (paragraph 2.3.1 BP18). (f) Indicate whether any consideration has been given to whether the social facilities could be constructed in such a way that they could be retained during operation as a legacy benefit for the operational workforce/local community?	(c) Home based workers would only be eligible to access the on-site medical treatment facilities. The Site Campus Medical Centre would include appropriately equipped space and facilities for: • Primary care services, including GP services, specialised clinics, out-of hours care and pharmaceutical services; • Occupational health services, including medicals and screening of workers where required; • Administrative functions, including medical records and health surveillance systems; and • Occupational hygiene facilities and resources, which would then be deployed across the Wylfa Newydd Development Area. Other on-site facilities will be accessible to those workers residing in the Site Campus. (d) The facilities have been sized for 4,000 workers only. (e) The facilities would not be open to the community, with strict security clearances and controls in place for Workers only. (f) The entire site campus is planned to be decommissioned at the end of the construction phase. Notably, all buildings on the Site Campus are design for a 10 year life span. As discussed on page 67, appendix 1-2, a Community Impact Fund (secured through the Draft DCO s.106), will seek to provide access to funding for localised issues resulting from the Wylfa Newydd DCO Project such as those associated with schools, leisure facilities, recreational resources and open spaces, along with other unforeseen effects.	
Q10.1.1 7	The accommodation strategy assumes that housing developers would anticipate and respond to the demand created by the Wylfa	In summary, the market is already responding and is delivering significantly more housing than Anglesey's demographic need requires. From Horizon's discussions with developers, this is likely to continue over the coming years.	The increases in housing construction indicate that existing demand is in excess of demographic demand: these properties would not be available for Wylfa Newydd workers without disrupting the normal functioning of the housing market. For demand unconnected with Wylfa Newydd. Additional housing supply in excess of current market demand is required if the housing market is not to be disrupted, particularly during the rapid build up of the workforce in the period up to Y4Q4, when the first TWA becomes available. This is not compatible with the statement in previous paragraphs that 'the market is already ensuring that the housing stock needed is being delivered on-time.' If additional supply is to be available on time, it will require a planned programme of delivery. Waiting for the market to respond will be too late.

	Newydd Project. Given the lead time for construction are any of the parties pro-actively engaging with developers on this matter to ensure that the housing stock needed is delivered on-time and at an affordable price? How would the proposed Housing Fund help with the delivery of this stock?	In particular, the market has improved over the last two years, with housing starts in Anglesey increasing from an average of 57 dwellings per annum (dpa) in the five years to 2016 (which is still higher than the demographic need of around 50dpa) to an average 133 dpa in 2016/17 and 2017/18.¹ This is consistent with what some of the larger developers and landowners have told Horizon’s Land and Property team (see below). Current activity is therefore now running significantly ahead of the demographic need identified by Welsh Government and IACC, probably reflecting both an improved market and ongoing progress on Wylfa. IACC identified this delivery over the level of demographic need as being a key part of the mitigation for increased demand from Energy Island Projects, including the Wylfa Newydd DCO Project. The market is therefore already ensuring that the housing stock needed is being delivered on-time. This is consistent with the “Preferred Scenario” presented to Horizon by IACC in January 2017 and on which Horizon’s approach to accommodation is based. The Scenario was based on the market delivering more housing than demographic need requires and that housing effectively being available for incoming workers on Wylfa. More generally, Horizon has a good understanding of the Anglesey property market. Its stakeholder relations and land and property teams has had ongoing dialogue with a number of landowners across Anglesey since 2015 and has ensured it has a good understanding of the state of the market. In particular it has spoken to some landowners who have unimplemented consents for housing and held some preliminary discussions about a few of those sites. Generally, there was limited appetite for selling sites to Horizon. The overall response was that landowners were waiting for the market to improve and/or for there to be greater certainty over the Wylfa Newydd DCO Project before beginning construction. IACC provided Horizon with a list of 21 “stalled sites” (ie those with consent or an allocation that were not being built out) in January 2017. Details were not provided for all sites, but the consented sites total just over 1,400 bedspaces. Horizon has been seeking an updated list to continue the dialogue and identify sites that might be suitable for support from the Housing Fund for early delivery. The Housing Fund as proposed in the Draft DCO s.106 agreement has been modelled on the successful equivalent at Hinkley Point C – broad allocations for types of interventions and then contingency spending allowed for, and approved by an oversight committee (the WNMPOP).	

		The Housing Fund also allows for measures to bring forward new housing and returning empty homes to use via the proposed Worker Accommodation (Capacity Enhancement) Contribution. It can also support interventions to stimulate latent capacity and measures to make the market work more efficiently (such as rent deposit scheme, or support for down-sizing). The Worker Accommodation (Capacity Enhancement) Contribution is proposed to be released well before peak worker numbers and therefore appropriately early to enable delivery times for new bed spaces. Empty homes are likely to provide an earlier boost to housing supply and it is common ground between IACC and Horizon that around 20 properties per year could be brought forward by the Housing Fund over a five-year period. The Housing Fund, as currently proposed, is relatively flexible as to how IACC can best utilise it to deliver bed spaces (provided that value for money is achieved and a minimum number of new bed spaces are delivered). Therefore it may be that more of this contribution could be applied to bringing empty homes back in to use if the lead-times on new build housing are too long in some cases. The Worker Accommodation (Capacity Enhancement) Contribution could also be applied by IACC to enable new housing to come forward on some of the stalled sites identified by IACC Horizon intends to continue to work with IACC on identifying those sites capable of being delivered during the early part of the construction phase. In terms of affordability there are two issues – affordability to workers and affordability to local residents, especially those in housing need. It is common ground between Horizon and IACC, Gwynedd Council and the Welsh Government that Wylfa workers are not significantly price constrained. They will be able to afford a large amount of stock on the island.	
Q10.1.1 8	The proposed accommodation strategy is predicated on 2,000 workers being home-based. Paragraph 1.5.21 of the ES [APP-088] states that if this occurred that demand could exceed supply for ‘certain accommodation stock types’. Please clarify which stock types would be affected.	The paragraph referenced states that if less than the estimated 2,000 home-based workers are employed, this would mean that there are more non-home based workers requiring accommodation and this could have impacts on some types of accommodation assessed as available. The Worker Accommodation Strategy states that the delivery of the Site Campus will be subject to a requirement requiring its delivery prior to the workforce exceeding a fixed level. The level of the cap is to be agreed through the SOCG process, but will ensure that the number of non home based using the PRS, tourist accommodation etc. does not exceed the 3,000 that has been assessed in the Environmental Statement.	The IACC accept that, subject to appropriate mitigation to boost supply of accommodation, the number of workers in existing accommodation could be up to 3,000. The IACC however seeks a DCO Requirement which requires Horizon to build out the 4,000 bedspaces in the TWA. Any reduction in peak construction worker numbers should be felt in the existing accommodation stock and not the TWA. Horizon have assessed a base case of 9,000 workers. The peak is estimated to be 8,500 which provides flexibility if assumptions change (i.e. more / less home based workers). However, if less than 2,000 home based workers are employed, there will be more than 7,000 non home based workers to be accommodated.
Q10.1.1 9	Whilst the availability of accommodation has been looked at with regard to affordability has	Although the suitability of accommodation has not been part of the pre-DCO assessment, the intention is that the Workforce Accommodation Management Service (WAMS) will be the tool used to ensure that properties are suitable and safe for workers to use.	IACC’s assessment of affordability (see section 5.8 of the IACC’s LIR Housing Chapter) concludes that a Wylfa Newydd construction worker can essentially afford to rent any property on Anglesey and can afford the vast majority of the tourism accommodation (self catering). The IACC’s assessment however, differs from Horizon’s assessment as it defines accommodation which is suitable to the type of worker and the length of stay (see section 5.5 of the IACC’s LIR Housing Chapter). The IACC’s assessment identified the demand from Professional, Managerial and Supervisory staff. This demand shows that there will be 1,750 non-home based workers in these roles at peak. The IACC’s assumption is that these workers are likely to be here for longer than 6 months and would prefer their own, independent accommodation rather than living in TWA or caravans. This means that there will potentially be greater demand for owner occupation, PRS and serviced accommodation than anticipated by Horizon. Also, the WAMS does not have the power to require that workers live in particular accommodation, whether ‘safe’ or not.

	any assessment of the suitability of accommodation for workers been undertaken? If so what criteria were used?	In order to offer property through the WAMS, landlords will need to demonstrate that their property is safe for anyone to live in and has the necessary licenses and safety certificates (eg gas safety). This will include being registered with Rent Smart Wales in the case of Private Rented Sector landlords. Horizon has also offered annual funding in the Draft DCO s.106 agreement to support IACC with the potential for increased licensing and enforcement work. The WAMS will also help to match workers with accommodation that best meets their needs in terms of location, facilities, cost and length of stay.	
Q10.1.2 0	Availability of accommodation is referred to as headroom. (a) Can the applicant clarify what is meant by headroom? (b) Given that the majority of workers (particularly during construction) would be single individuals, please confirm how a double bedroom has been counted eg would a two bed unit be shown as having a headroom of two or four persons?	(a) Headroom is the stock that has been identified as available for use by workers. This was done by taking into consideration price of accommodation and peak occupancy rates. Further information on headroom (otherwise known as available capacity) is set out in section 3.3 of document 6.3.9 (ES Volume C - Project- wide effects App C1-2) [APP-096]. (b) Table 3-9 presents how the headroom was calculated. It shows how the calculation begins with total number of bed spaces available, then a price moderator removes some bed spaces from consideration, then occupancy rates are applied to consider the current market usage, therefore presenting leftover bedspaces that will be available for the non-home-based workers who do not reside at site campus. In general, if the data states it is a bedroom then it is counted as one bedspace. This is different from one unit of accommodation (such as apartment or self-catering accommodation) equalling one bedspace. In collecting information for the accommodation baseline, assumptions were made to translate accommodation stock (owner occupier, private rental, latent, and tourism) to bedspaces. This obtains the “total bedspace” figure which assumptions are then applied to produce the “headroom” figure. The assumptions vary between each type of housing tenure in terms of how many workers per unit of accommodation.	IACC does not accept the basis of these calculations, which assume that accommodation currently occupied, and becoming vacant through natural turnover, is ‘available’ to house the workforce, except at the expense of local residents and others wishing to move to Anglesey as part of the normal functioning of the local housing market.
Q10.1.2 1	Reference is made to the fact that licensing and planning restrictions may exist for caravan and camping sites regarding occupancy. (a) Do similar restrictions (eg planning conditions) exist for other property within the tourism stock such as holiday cottages?	(a) Horizon is not aware of any additional licensing restriction that apply to all another category of tourist accommodation.	

	(b) If they do how would this effect the availability figures and has this been factored in? (c) Would the IACC support the temporary removal/suspension of these conditions/licence restrictions to enable stock to be used for worker accommodation during the construction phase?	(b) Not applicable.	
Q10.1.2 2	Section 9.3 of the ES [APP-412] makes a number of statements as to what the Housing Fund 'could' do. Can the applicant confirm: (a) What it 'would' do? (b) How it would operate and who would make decisions about how the funds would be most effectively spent? (c) What funds it would have available and would these be available at the outset or would they be phased across the project as a whole?	(a) – (c) Allocation of the Housing Fund referred to in section 9.3 of Workforce Accommodation Strategy is proposed to be secured through the DCO s.106 Agreement. Allocation of the funds is set out in Schedule 5 – Worker Accommodation of the first Draft DCO s.106 Agreement as follows: • A Worker Accommodation (Capacity Enhancement) Contribution payable by the Developer to IACC, GCC and Conwy Council, in proportions which reflect the anticipated percentage of non-home based workers living in those areas. This payment is anticipated as an upfront payment early in the development to enable the Councils' to use these funds to build capacity in advance of peak workforce years. The contribution is proposed to be directed towards the Councils achieving a minimum of 600 bed spaces by: ○ undertaking interventions to stimulate supply of latent accommodation; ○ providing new build permanent housing, including Affordable Housing; ○ supporting the social-rented sector through the provision of assistance to existing tenants (including rehousing support); and ○ bringing empty homes back into use in the period in the lead up to year three in the Construction Period; • A Worker Accommodation (Annual) Contribution payable by the Applicant to IACC annually for 6 years (in the lead up to and covering peak construction). The Council would be required to allocate this money to: ○ monitoring homelessness and housing displacement, and working with Gwynedd Council and Conwy Council on the same ○ establishing and operating community programmes that assist with managing housing and accommodation demands and prevention of homelessness including help with downsizing ○ monitoring accommodation enforcement issues, and working with Gwynedd Council and Conwy Council on the same	600 bedspaces might be equivalent to 150 homes. Not clear why 'rehousing' support is required: this appears to assume that existing tenants will lose their accommodation and require to be rehoused, disrupting their lives and that of their communities. Again, this appears to accept that Wylfa Newydd will displace the local population, who will then become homeless and require rehousing. This has the problem the wrong way round: the need is for an adequate supply of accommodation for Wylfa Newydd workers such that the normal housing market on the island continues to function and is not disrupted.

	(d) What would happen in the event of a dispute? Can the IACC and GCC confirm if they consider that the Housing Fund would help boost the supply of housing in the area? If not, why not?	- Accommodation Officers Contributions, payable by the Applicant to IACC for the construction period to fund between 2 and 3 IACC officers (increasing and decreasing as construction worker numbers peak then fall) to monitor housing and engage with the development and WAMS - An Accommodation Contingency Fund which would be available throughout the construction period. The fund would be released either at the direction of the WNMPOP at the recommendation of the Accommodation, Tourism and Leisure Sub-Group, where a significant adverse effect on the accommodation sector within the Key Socio-economic Area (KSA) may be shown by evidence demonstrating: - An increase in homelessness within the KSA caused by the Wylfa Newydd DCO Project. - A lack of access to the private rented sector within the KSA caused by the Wylfa Newydd DCO Project. - A need for additional officer time to manage and/or monitor the impact of the Wylfa Newydd DCO Project on the accommodation sector within the KSA. (d) Disputes under the Draft DCO s.106 agreement generally are proposed to be covered under Clause 12 of the agreement which allows for reference out to a suitably experienced expert. Disputes as to the Sub- Group or WNMPOP direction are proposed to be managed pursuant to dispute clauses in the WNMPOPs terms of reference. Further work is being done on those terms of reference, which will be shared with IACC and the Welsh Government. The obligations within the Draft DCO s.106 Agreement will continue to be discussed and agreed with IACC and key stakeholders.	
Q10.1.2 3	It is envisaged that an element of accommodation would be delivered through the use of latent accommodation (spare rooms, annexes etc). Can the applicant set out what measures they would propose with regards to safeguarding?	Horizon takes the issue of safeguarding the general public and its workforce extremely seriously. This response addresses the question of latent accommodation. It then considers the measures that are proposed with regards to safeguarding. Direct measures include: employment screening and management systems; liaison with external stakeholders; Horizon policies and adaptive monitoring. Indirect measures relate to community engagement work that Horizon will undertake, for example, through the Community Involvement Officers. Indirect measures are not covered in this response. Latent accommodation: At peak the latent accommodation will provide up to 400 of the 3,000 bed spaces (Table 3-4, APP-096). It is acknowledged that this accommodation stock may provide a significant number of bed spaces for the construction workers, however, the Workforce Accommodation Strategy is not dependent on the use of latent accommodation for the non home-based workers. The basic premise is	The IACC also take the issue of safeguarding extremely seriously. The IACC's position on latent accommodation is contained in section 6.8 of the LIR Housing Chapter. This states that there are safeguarding concerns which means stringent criteria/assessment will be required in order for people to be able to register a room to let on the WAMS. The IACC also seek a DCO Requirement (see section 7.2.3 (j) of LIR Housing Chapter) for the criteria for properties to be eligible for latent accommodation to be agreed with the IACC. This will prevent unsuitable properties / rooms being let (e.g. by more vulnerable tenants, the elderly, houses with children etc.). As well as the suitability of the property / room to let, the IACC will also require checks of the worker as detailed by Horizon in response to this question. The IACC would expect that any worker in latent accommodation would have been subject to the highest level of checks (BPSS and DBS checks). As the numbers are moderately low (400) this should be achievable. Further detail on safeguarding is contained in IACC LIR Chapter 6: Safeguarding.

	that the scale of opportunity will be sufficient to encourage householders to bring forward accommodation. The decision to offer latent accommodation to the construction workforce is one for each household. Screening and management systems: Horizon will take such actions as it can to guide the behaviour of its construction workforce, both on-site and off-site, through the implementation of the Workforce Management Strategy (WMS) and the principles which it outlines in respect to the development of a Code of Conduct. The principles relate to compliance with a Code of Conduct, compliance with relevant behavioural standards, procedures and legislation, training provision and completion, as well as enforcing the use of certain Project facilities and services. All personnel working with, or for, Horizon at site and who will access offices where Sensitive Nuclear Material (SNI) is held, or who require access to SNI, Nuclear Material, Other Radioactive Material or access the Site Licence Site will require a minimum of Baseline Personnel Security Standard (BPSS) pre- employment check. This is in accordance with rules set out by the Office for Nuclear Regulation (ONR) and as written in the Management requirements for the PMC who will be managing the contract. Please see below for the checks that are carried out as part of a BPSS. • Name, DOB, Nationality • Translations as required using a credible company • Address history • Right to work • Employment history • Unspent criminal record check • Police certificates for personnel who have resided outside the UK in the last 3 years • Identity verification using visual and electronic systems • Open source check (i.e. media check for anything that may be of a concern) Not all individuals will require a BPSS as it depends on their role. People who do not require a BPSS may require a Right to Work check and an unspent criminal conviction check. Employment can be denied if an individual is believed to be unsuitable for work at the site, or they will have caveats placed upon their activity, for example, no solo working. Separate to BPSS checks any Horizon staff who will work with children, such as STEM ambassadors, or with vulnerable adults will receive an enhanced Disclosure and Barring Service (DBS) check. This will be co-ordinated through Human Resources. Horizon policies: Horizon's Modern Slavery Act Statement (2018) (available at https://www.horizonnuclearpower.com/files/downloads/our-policies/Modern-Slavery-Act-Transparency-Statement%20(2018).pdf). This sets out a robust response to the risk of modern slavery and maintains a	This accepts that the WAMS cannot 'direct' workers to any particular accommodation.

		focus on developing policies, process and internal capability to understand and manage future risks. This includes existing policies; principles and standards including whistleblowing procedure and a supply chain charter; a proactive approach to risk; a due diligence approach and training and awareness raising. Ongoing liaison with external stakeholders is of great importance. For example, as noted in Item 1040 Mitigation Route Map [APP-422] prior to, and throughout, the operation of the Logistics Centre, appropriate dialogue will maintained between Horizon, the contractor, the delivery and logistics supply chain and local safeguarding agencies, including North Wales Police. This is secured through the Logistics Centre sub-Code of Construction Practice (CoCP). Discussions will include any individual or coordinated measures appropriate to avoiding risks to vulnerable groups, for example in relation to human trafficking and direct or indirect sex work. Security protocols will be agreed by Horizon and North Wales Police, and other safeguarding agencies, and reviewed regularly. Staff will be trained in safeguarding issues so that, for example, security staff who conduct site and/or vehicle inspections will be aware of signs of illegal activity such as human trafficking. As noted in Item 0097 Mitigation Route Map Horizon will establish an external stakeholder group (hereafter Health and Well-being engagement sub-group). If appropriate this sub group will discuss the need for additional mitigation or follow-up investigation. To facilitate this process, a set of key topics and indicators will be agreed. The topics will be expected to include safeguarding [with regard to vulnerable adults and children]. As per the Draft DCO s.106 Agreement issued on 26 October 2018, this sub-group would be part of the Wylfa Newydd Major Permissions Oversight Panel (WNMPOP).	
Q10.1.2 5	The WAMS [APP-412] states (paragraph 1.1.5) states that as there will be a number of other large scale infrastructure projects under construction in the UK at the same time as the proposal. As a result workers would have a choice about where they work and consequently the accommodation offer for this project would need to be attractive. Can the applicant explain how this is reflected in the design, layout and facilities of the site campus (with particular reference to the size of the rooms)?	Horizon's design intention The Wylfa Newydd DCO Project needs to be able to attract and retain a highly skilled workforce. A key component of that is ensuring that there is enough accommodation that is attractive to workers and that it is affordable, has a good range of facilities and provides good access to their place of work. Horizon's proposals for purpose-built accommodation for up to 4,000 workers within the WNDA and close to the site is a key part of that offer. It will also help to avoid a range of adverse impacts on existing communities, such as overdemand on existing tourist and residential accommodation, social and community facilities, and traffic impacts, as well as helping to manage worker behaviour and avoiding impacts on the Welsh language and culture (see the Welsh Language Impact Assessment for further details). As set out in the Draft DCO application the Site Campus will consist of: Accommodation for up to 4,000 workers in campus-style modular form (providing an independent living space for each worker) in close proximity to the Main Construction Site;	

- A purpose-built amenity building (zone 3A-19) including cafeteria, café, reception area, gym, bar, shop, and other social space to provide for social and convenience facilities;
- An on-site medical centre which will provide primary care services (GP services, specialised clinics, out-of-hours care and pharmaceutical services), occupational health services and occupational hygiene facilities.
- Outdoor recreation areas, including two multi-use games areas (zone 3A-29), outdoor seating and informal public spaces for socialising;
- Bus set-down and parking area;
- Disabled parking spaces and parking for light vans/minibuses;
- Temporary parking for workers during the initial phases of construction, consisting of 400 spaces;
- Soft landscaping works; and
- Secondary substation, compactor and bin stores and cycle stores

Paragraph 3.1.4 of the Appendix 1-2 of DAS Volume 3 states that *“The proposed layout of the Site Campus has been developed to:*

- *Provide suitable amenity space to attract and retain a high standard construction workforce;*
- *Provide an environment to meet the needs of the workers during their stay on the Site Campus.”*

Another key consideration in the development of the Site Campus proposal has been the health and well-being of the construction workforce – the vast majority of the construction roles would involve long shifts of physical labour. On-site accommodation will reduce workers’ commuting time, and enable longer rest periods for workers. reduce the need to travel.

For these reasons, worker needs have driven the development proposal for the Site Campus through seeking to ensure that workers are effectively catered for and an attractive site campus has been provided for them to work successfully and have an attractive place to live.

Securing design intentions

Detailed designs for the Site Campus will need to be submitted to IACC for approval and prepared in accordance with the parameters in Schedule 3 of the Draft DCO and the design principles in Appendix 1-2 of Volume 3 of the Design and Access Statement (Requirement WN19 of the Draft DCO [APP-029].

The relevant design principles that will secure Horizon's design intentions include, among others,

- *Design Principle 3.4.8:* The Site Campus will provide safe and good quality single bedroom accommodation to meet accommodation standards for single living accommodation with good access to the construction site.
- *Design Principle 3.4.9:* The amenity building will provide facilities that meet workers' needs, including facilities for good quality food and relaxation on-site.
- *Design Principle 3.4.17:* The Site Campus will provide accommodation and facilities of sufficient quality to attract the temporary workers to stay on the site.
- *Design Principle 3.4.30:* Recreational facilities will be included as part of the Site Campus.
- *Design Principle 3.4.34:* The development will include communal and social spaces for workers including external amenity and fitness areas.

The Design Principles secured in Volume 3 of the Design and Access Statement, highlight the high-quality nature of the site campus illustrating high quality design, recreational activities onsite, access to the Wales Coastal Path, high quality landscaping with a number of sustainability principles and overall an effective layout to get people to work safely and complete recreational activities.

The illustrative drawings (APP-016) and design concepts in Volume 3 of the Design and Access Statement illustrate how the Site Campus could be designed in accordance with the 'building design and landscape principles'.

In terms of room size, the final room sizes will be determined at the time that Horizon prepares its detailed plans for IACC approval under Requirement WN19.

However, Horizon has submitted illustrative plans as part of the Draft DCO Application with 'typical' layouts for room sizes (refer to WN092-HZDCO-SCA-DRG-00012, WN092-HZDCO-SCA-DRG-00013). Illustrative design concepts are also provided in section 4 of Appendix 1-2 of Volume 3 of the Design and Access Statement (see Figures 34 – 35b) and indicative internal floorspace and room totals.

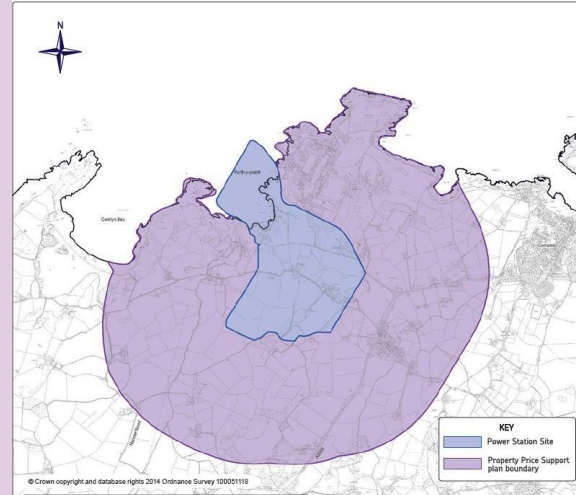
Benefits of the Site Campus

Alternatives to the Site Campus are unlikely to meet the objectives of providing suitable amenity space to attract and retain a high standard construction workforce and an environment to meet the needs of the workers during their stay on the Site Campus.

For example, any permanent housing would need to be located in and around existing settlements away from the site. This would not offer the type of facilities a significant proportion of the workforce is likely to seek, and nor would it reduce the need for them to travel to and from the site every day.

		The location of the Site Campus will be an incentive as it will be close to site and therefore easier to get to and from work. The workers will have to register with the WAMS and this will be used to allocate accommodation to allow effective control. Relative cost has to be part of the solution / attraction and the specification clearly shows effort in terms of good services and amenities for people living in the Site Campus but this is still at concept design stage so needs to be further developed. Overall the Site Campus provides a range of facilities, which will provide on-site entertainment, medical facilities, outdoor recreation and high quality public spaces, which will allow Horizon to keep more workers on-site, reduce the impact on the local community and thus manage the workforce effectively. This will be a significant project benefit because: • It will provide a high-quality place for workers to live on the Island. • Provides workers with the amenities and recreational facilities to enjoy living and working on the island, including health facilities. • It will reduce the number of workers travelling on local roads; • It reduces travel times for workers and so will increase wellbeing, on-site productivity and reduce health and safety risks; • It allows key workers to have immediate and easy access to the site so they can respond to emergencies and out-of-hours site needs; and • It reduces bus movements and travel costs; • Reduce the impact on local community; and • TWA has local policy support.	
Q10.1.2 6	Paragraph 2.1.1 of the WAMS [APP-412] sets out three overarching aims for the WAMS and this includes ‘providing a positive legacy’. Can the applicant advise how this would be achieved through the site campus which is a temporary facility?	The Workforce Accommodation Strategy applies to all accommodation types that may be occupied by the construction workforce during construction of the Wylfa Newydd DCO Project, not just the Site Campus (TWA, private rented sector, tourism, owner-occupied etc). As part of the WAS, Horizon will look for ways to create long-term legacy benefits for the community, including new permanent housing and empty homes being brought back into use. Horizon recognises that the construction workforce will create temporary demand for housing, and it considers that this is best met through Temporary Worker Accommodation (TWA). Provision of permanent housing is properly dealt with through the Local Plan; although Horizon will support this provision through a Housing Fund which will provide financial support for, among other matters, the provision of new accommodation by IACC as a project legacy (including affordable housing) and measures to stimulate more supply including latent accommodation. The Housing Fund is proposed to be secured through the Draft DCO s.106 agreement with IACC. In addition, a Community Impact Fund (secured through the Draft DCO	The question relates to the Site Campus. The site campus will provide no legacy to Anglesey (and the residents of North Anglesey in particular) who will experience the impacts of the site campus for a number of years. As detailed in the IACC’s Written Representation (section 3.3) the concept of legacy is key to the approach taken in the JLDP and is a theme running through all aspects of the plan. The requirement to consider and deliver legacy includes project promoters designing aspects of the project so as to allow continuing or re-use post the construction phase, and developing plans and strategies to maximise long term, intergenerational benefits. This legacy theme continues in the Wylfa Newydd SPG when under the Site Campus (GP28b xiii) it states that proposals for TWA should pay particular regard to promoting or contributing to the delivery of lasting and sustainable legacy benefits for the Island’s communities in line with Policy PS9 of the JLDP. Delivering legacy through the WAS for permanent housing etc. is responding to the impact of 3,000 workers within Anglesey’s existing communities and is not related to the Site Campus. The IACC would therefore request Horizon to answer the question on how the Site Campus will contribute towards delivering a positive lasting legacy for Anglesey and the residents and communities of North Anglesey in particular.

		s.106 agreement), will seek to provide access to funding for localised issues resulting from the Wylfa Newydd DCO Project such as those associated with schools, leisure facilities, recreational resources and open spaces, along with other unforeseen effects. Although the Site Campus will not provide any legacy, through the Housing Fund and the Community Fund, Horizon considers that the aims of the WAS can be achieved alongside the provision of TWA.	
Q10.1.2 7	(a) How many people have used the Property Price Support Plan since it came into effect in April 2015? (b) How is an eligible property defined? (c) Is there any mechanism in the event of a dispute as to whether a property is (i) eligible or (ii) over the valuations? (d) Is there a mechanism to review the £5,000 sum towards the costs of moving and professional fees to account for annual rises in the costs of providing these services?	Six homeowners have been successfully supported by Property Price Support Plan (PPS) to date. The eligibility criteria for the PPS is set out in the Wylfa Newydd DCO Project Neighbourhood Support Scheme – Property Price Support publication which is available to the public from the Horizon website. To be eligible, applications must meet the following criteria: • The property is residential and within the area shaded purple on the PPS Boundary Map (included below for reference); • The applicant is the property owner or holder of a long lease (with at least 3 years remaining); • The property was acquired by the applicant before 28 December 2008 (the date when the possibility of new nuclear development at Wylfa was first announced) • The applicant can demonstrate loss in value by genuine attempt to sell for at least six months and/or a valuation in accordance with the Royal Institution of Chartered Surveyors: Valuation – Professional Standards (RCIS Valuation) which concludes a loss in value caused by the Wylfa Newydd Power Station proposals.	



The eligibility criteria is clear and objective so residents can understand whether they are likely to meet the eligibility criteria when considering whether to apply. Further, the valuations are undertaken by independent RICS Registered Valuers acting jointly for Horizon and the applicant, and the basis of valuations is clearly defined to ensure consistency. The valuation averaging system enables applicants to challenge valuations they consider erroneous and ensures a fair outcome. On this basis a formal dispute resolution arrangement is not considered necessary. It is noted that following this procedure, there have been no disputes since the scheme's inception. In the unlikely event that a dispute did arise, Horizon would work with the applicant to resolve matters in a fair and equitable manner

The payment of £5,000 is an additional payment paid to anyone who is successfully supported through the PPS. This contribution is intended as a contribution towards the costs of moving and professional fees (including valuations) and Horizon considers that such a sum is appropriate for such costs. Horizon remains committed to keeping the details of the PPS under review as needed to ensure it continues to work effectively. This includes reviewing development/construction activities, feedback from applicants and other stakeholders, and peer review of comparable infrastructure projects to monitor industry best practices.

Q10.1.2
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The ES [APP-088] refers to the fact that the number of houses being built on Ynys Môn has decreased by 60% since 2008-2009. Can the IACC provide the following information:

While this question is directed at IACC, Horizon would like to note the following regarding the number of houses being built on Ynys Môn.

The figures below indicate annual housing starts and completions across Ynys Môn over the 10 year period 2008/09 – 2017/18.

	(a) Did the IACC have five years’ worth of housing land supply during this period? If so what was it and was it met? (b) provide an update on the current 5 year housing land supply position? (c) advise whether it is a supply side issue (ie a lack of planning consents) or a delivery issue (ie developers are not implementing planning consents) for any shortfalls?	The data indicates an upward trend in both starts and completions over the two most recent years of annual data available (2016/17 and 2017/18). The 10year peak for new dwelling starts was in 2016/17 (147 starts). The 10 year peak in completions was in 2008/09 (159) following which completions fell year on year up to 2011/12 when there was a rise, before falling again up to 2016/17. <table><tr><th>Year (April to March)</th><th>Anglesey (Total new dwelling starts)</th><th>Anglesey (Total new dwelling completions)</th></tr><tr><td>2008/09</td><td>119</td><td>159</td></tr><tr><td>2009/10</td><td>64</td><td>154</td></tr><tr><td>2010/11</td><td>34</td><td>112</td></tr><tr><td>2011/12</td><td>79</td><td>74</td></tr><tr><td>2012/13</td><td>36</td><td>131</td></tr><tr><td>2013/14</td><td>32</td><td>79</td></tr><tr><td>2014/15</td><td>84</td><td>80</td></tr><tr><td>2015/16</td><td>55</td><td>61</td></tr><tr><td>2016/17</td><td>147</td><td>103</td></tr><tr><td>2017/18</td><td>119</td><td>110</td></tr></table> Source: StatsWales	Year (April to March)	Anglesey (Total new dwelling starts)	Anglesey (Total new dwelling completions)	2008/09	119	159	2009/10	64	154	2010/11	34	112	2011/12	79	74	2012/13	36	131	2013/14	32	79	2014/15	84	80	2015/16	55	61	2016/17	147	103	2017/18	119	110	
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2016/17	147	103																																		
2017/18	119	110																																		
Q10.1.2 9	The WAMS [APP-412] makes reference to the fact that the current JLDP housing targets reflect the forecast for population growth that will occur as a result of the Energy Island Project (EIP). Can IACC explain: (a) What is the EIP? (b) The WAMS states that this is the proposal would be the biggest single element of the EIP. What are the other elements? Applicant – Can you confirm that the cumulative effects of the EIP were taken into	Horizon confirms that all Energy Island related projects were taken into account with respect to the Cumulative Impact Assessment, details of which can be found in the ES Volume I - Cumulative effects I5 - Inter-project cumulative effects (APP-388), the ES Volume I - Cumulative effects App I2-2 - Matrix of receptors affected by Wylfa Newydd DCO Project and which shortlisted projects could affect them [APP-390] and illustrated the ES Volume I - Cumulative effects Figure Booklet - Volume I [APP-397]																																		

	account when drawing up the application documents?																																			
Q10.1.3 0	The KSA also includes Gwynedd but no information regarding the number of new homes being built in Gwynedd appears to have been provided. Can GCC: (a) Detail how many homes were built between 2008/9 and 2015/16 and whether this represents an increase or decrease on previous years? (b) Advise whether you currently have a 5 year housing land supply position; and (c) Indicate whether the current 5 year housing land supply position includes an allowance for the housing needs that would be generated by the proposal?	While this question is directed at Gwynedd County Council, Horizon would like to note the following regarding the number of houses being built in Gwynedd.1.1.2. The figures below indicate annual housing starts and completions in Gwynedd over the 10 year period 2008/09 – 2017/18. <table><tr><th>Year (April to March)</th><th>Gwynedd (Total new dwelling starts)</th><th>Gwynedd (Total new dwelling completions)</th></tr><tr><td>2008/09</td><td>132</td><td>206</td></tr><tr><td>2009/10</td><td>197</td><td>148</td></tr><tr><td>2010/11</td><td>136</td><td>169</td></tr><tr><td>2011/12</td><td>157</td><td>123</td></tr><tr><td>2012/13</td><td>161</td><td>160</td></tr><tr><td>2013/14</td><td>233</td><td>131</td></tr><tr><td>2014/15</td><td>81</td><td>189</td></tr><tr><td>2015/16</td><td>224</td><td>141</td></tr><tr><td>2016/17</td><td>345</td><td>213</td></tr><tr><td>2017/18</td><td>164</td><td>243</td></tr></table> Source: StatsWales The number of starts across Gwynedd were at a 10year peak in 2016/17 (345 starts), whereas completions peaked in the most recent year – 2017/18 (243 completions).	Year (April to March)	Gwynedd (Total new dwelling starts)	Gwynedd (Total new dwelling completions)	2008/09	132	206	2009/10	197	148	2010/11	136	169	2011/12	157	123	2012/13	161	160	2013/14	233	131	2014/15	81	189	2015/16	224	141	2016/17	345	213	2017/18	164	243	
Year (April to March)	Gwynedd (Total new dwelling starts)	Gwynedd (Total new dwelling completions)																																		
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2014/15	81	189																																		
2015/16	224	141																																		
2016/17	345	213																																		
2017/18	164	243																																		
Q10.1.3 1	The ES refers to the fact that Ynys Môn has the ninth highest proportion of second homes for local authorities in England and Wales (paragraph 1.3.9 [APP-088]). How many second homes are there on Ynys Môn and what proportion of the housing stock is this?	Local government finance statistics based on council tax exemptions, indicates that 1,754² of 33,779³ (5.2%) council tax dwellings on the Isle of Anglesey are second homes. These would not be counted as holiday lets if they are not registered as businesses but increasing use of applications such as Airbnb means that some of them may be used as holiday lets.																																		

	Does the definition of second homes include holiday lets?		
Q10.2.1	Figure C1-5 of the ES [APP-088] - please explain what the difference between a labourer and a general labourer is and why it was considered necessary to differentiate between the two.	A general labourer is an employee who is not specifically assigned to any one discipline, and can potentially move between disciplines on a day to day basis. A labourer is an employee who is assigned to a specific discipline and works with the same team on a day to day basis. It is a standard differentiation on construction because they require slightly different skills.	
Q10.2.2	The Jobs and Skill Strategy [APP-411] would not be secured by the dDCO. Given this sets out how Horizon would work with stakeholders to fund additional training to meet the skill needs of the project are the IACC, GCC and the Welsh Government satisfied with this approach?	Although this question is not directed to the Applicant, Horizon notes that Draft DCO s.106 agreement provides at Schedule 4 – Employment and Skills Service and Supply Chain that the Applicant must comply with a Jobs and Skills Implementation Plan, which will be attached to the agreement. The obligations in this Schedule, and particularly in the Jobs and Skills Implementation Plan, deliver the mitigation from the Jobs and Skill Strategy.	The IACC recognizes and acknowledges that Horizon moving from an EPC to a PMC model restricted the detailed development of the SCAP. However, the Council is firmly of the opinion that more work to develop the principles, values and fundamental framework of any SCAP could have been developed and agreed. That only 3 meetings – 02/05/2017, 08/02/2018 and 11/10/2018 – was undertaken with the IACC is disappointing on such an important matter as supply chain due to the need to implement early any interventions to ensure the supply chain can take advantage. Further work has commenced on establishing an agreed outline for a SCAP in early December
Q10.2.3	Paragraph 6.2.9 of the Planning Statement [APP-406] refers to home-based workers – (a) Can you please explain what is meant by a home-based worker, where in the documentation this is defined and if 1,260 of these would be from Ynys Môn where would the remaining 740 home-based workers be based? (b) Is the home-based workers target in relation to the project as a whole (construction, operation and decommissioning) or only construction? (c) Given the operational workforce is indicated to be 850 – what is the target for home-based workers for this element of the scheme?	(a) A home-based worker is a worker who already resides within a 90-minute commute time from the Wylfa Newydd Development Area; this is known as being within the Daily Construction Commuting Zone (DCCZ). This is defined in Chapter C1 paragraphs 1.4.11 and 1.5.4. of the Environmental Statement [APP-088]. At peak construction, 2,000 workers in the DCCZ are expected to be home-based. If 1,260 of these home-based workers are from Ynys Môn then the remaining 740 would come from the neighbouring wards in the DCCZ of Gwynedd, Conwy, Denbighshire and parts of Flintshire and Wrexham. See Table B2-11 and Figure C1-1 for an explanation of geographical scope used in the assessment. (b) Yes, the home-based workers target is only in relation to the construction phase. (c) It is assumed that eventually nearly all operational staff would reside within the KSA, although it may be the case that a very small number of workers would remain in their current location if already within the DCCZ (see Figure C1-1 for geographical scope). Nevertheless, the target for the number of home-based workers during the operational phase of the Wylfa Newydd DCO Project is 85% (paragraph 1.5.118 of Chapter C1).	

Q10.2.4	Paragraph 1.3.7 of the ES Volume C [APP- 088] states that data shows Ynys Môn's resident workforce contains a relatively high proportion of high-level skills (standard occupational classification groups 1-3). (a) Of the roles set out in figure C1-5 of ES volume C [APP-088] how many of these would be classified as high-level skills? (b) If the majority of these roles are low-level skills how is the applicant proposing to fulfil these positions from the local workforce? (c) How does the Jobs and Skills Strategy [APP-411] reflect the training required given the current skill levels of the home-based workers?	(a) Figure C1-5 shows the construction trades. It does not include the managerial and supervisory roles so very few of these roles would be in Standard Occupational Classification groups 1-3. As shown in Figure 2.1 of the Jobs & Skills Strategy, just under 2,000 of the jobs at the construction peak will be managerial and supervisory roles (b) This is answered under (c) below. (c) As is set out in the Jobs and Skills Strategy, there are a number of entry level, semi-skilled and skilled trades where many workers will be required, where there are existing skills shortages and where there is a reasonable prospect of local residents being trained and therefore subsequently enjoying a sustainable long- term career in the construction industry. Further detail on Horizon's proposals and what has been agreed with the Construction Skills Working Group is set out in answers to several other questions: • The response to Q10.2.13 sets out how the draft Jobs and Skills Implementation Plan includes activity to upskill potential Home Based workers into civils roles – based on the training lead time for general labouring roles, scaffolding, steel fixing – and back office professional roles, as well as into site service roles such as cleaning, catering. • The response to Q10.2.14 sets out how the Skills Fund will support both people moving from unemployment into employment (mainly in entry level jobs) and training and upskilling for apprenticeships and people already in work. • The response to Q10.2.15 sets out how the timing of training aligns to the project's forecast demand for skills.	
Q10.2.5	Paragraph 3.2.33 of the Planning Statement [APP-406] states that around a third of the operational workforce will be required to be skilled to a technical level. (a) Please define what is meant by skilled to a technical level?	(a) Paragraph 3.2.33 of the Planning Statement refers to a third of the operational workforce required to be skilled to a “technical level”. This is an error and should refer to “technician level”. Paragraph 6.3.1 of the Jobs & Skills Strategy [APP-411] states that: <i>Around one-third of the operational workforce will be required to be skilled to <u>technician level</u>, making the apprenticeship route an important entry point to a career at Wylfa Newydd Power Station. In 2016, Horizon's</i>	The Council would like to see evidence of how the training will build over time to meet labour demand not only at technician level but across all levels and sectors. IACC continues to require more information concerning the capacity, scope, and timing of training in all relevant sectors, as well as the specific contribution that Horizon plans to make to this and any conditions (such as match funding) that it intends to apply. Of particular concern is the importance of providing training opportunities in locations that are readily accessible to Anglesey residents, many of whom will not have cars and will have limited resources to travel longer distances. The Implementation plan was provided on 10th December 2018 and contains new information. It shows Horizon recognises the need to plan for training whilst projecting the demand for labour. The IACC think it would have been preferable for the forecasting of demand and supply to have taken place already as it would have feed directly into the debate around local capacity and home based labour as well as displacement. In addition the Implementation Plan is still too general and lacks detailed information on the training courses / places on offer. Without this the Council lacks the evidence base to demonstrate how home based workers will be maximised during construction and operation. These documents do briefly set out an intention to monitor and assess training needs in some areas and to provide some relevant training in a timely way, however there is insufficient information to assess whether this is likely to be effective or what contribution Horizon itself would provide and on what terms. There are a range of concerns about these documents in their present form, including the timing of the arrangements, their short-term nature, their scope, their lack of focus on pre-16s education, and key issues such as the accessibility of training to Anglesey residents and recruitment strategy for Horizon and contractors.

		<i>first cohort of 10 apprentices started with local provider Grŵp Llandrillo Menai. An additional 11 Horizon apprentices started in 2017 and Horizon plans to recruit up to 12 in the 2018 cohort\</i>. The first cohort is undertaking a Level 2 Performing Engineering Operations qualification which will be followed by a BTEC Level 3 and NVQ Level 3 in a chosen engineering discipline. The three-year programme involves a common first year, after which the apprentices will be streamed into either electrical, control and instrumentation or mechanical routes. The attached “Career Route Map” (Appendix 10a and Appendix 10b) document provides further information on the pathway and qualifications needed to access these jobs. (b) How many of the construction workforce would be required to be skilled to a technical level? (c) How many of the operational workforce would be required to be skilled to a technical level? (d) What measures (other than apprenticeships) are being proposed to ensure that locally-based workers have access to the training to become skilled to a technical level?	
		(b) Technician Level is a term that applies only in the operational phase. (c) As set out above, around one-third of the operational workforce will be required to be skilled to “technician level”. (d) Routes to technician level jobs at Wylfa Newydd will be either through the Wylfa Newydd DCO Project Technical Apprentice Scheme or through recruitment from the job market. This could be from individuals obtaining similar qualifications to those on the Horizon scheme and applying directly to Horizon. Horizon has previously made a financial contribution to Cwmni Prentis Menai to help increase apprenticeships available and continues to work with GLLM and other interested stakeholders in providing the operational resource requirements to assist with planning of future educational provision. The Jobs and Skills Implementation Plan, to be secured in the Draft DCO s.106 Agreement includes provision for processes for identifying opportunities by which the Horizon and its contractors and IACC will identify skills and training gaps and opportunities to meet the needs of the Wylfa Newydd DCO Project. It also includes provision for the identification of a programme for delivery of the training to fill the identified skills and training gaps and opportunities with training providers including Coleg Menai and other training partners.	
Q10.2.6	Planned outages will require an additional 1,000 workers every nine months – how many of these would be home-based workers?	The outage workforce will be provided by contract organisations and these contracts will not be in place until the later stages of the project, hence Horizon cannot provide a definitive answer. Typically, practice on power stations of this nature is for organisations to draw people from a wide catchment area both locally and UK wide, with some specialists from outside of the UK. Horizon therefore expects that the vast majority of outage workers would be non-home based.	This is the first time that Horizon have stated that the 1,000 additional workers will be from contractors and likely to be pulled from wider afield. IACC would still like to know if local labour can be trained up to take part. The IACC would also like to know how the 1,000 workers every nine months will operate in practice. Anglesey and Gwynedd has vast experience in the nuclear industry from hosting Wylfa A and Trawsfynydd, therefore, are there opportunities for staff from these sites to perform the outage roles? The IACC also has a number of questions regarding these outage roles. For example will they require hotel rooms? How long will they be required to work on site? Is this a relatively short term activity or does it last for a year or more? The IACC acknowledges that some of the jobs relating to these outages will be highly skilled and specialized roles, however it is not clear why this will be “the vast majority”. The agreed goal of maximizing local employment applies to both specialist and non-specialist roles during outages and further information on the skills required for these roles has been requested and is still needed in order to assess the opportunities and to consider impacts and mitigation.

Q10.2.7	The Jobs and Skills Strategy [APP-411] would provide a brokerage service by backfilling vacant posts to support business whose workers moved the Wylfa Newydd project. Would companies be charged to use this service?	No, companies would not be charged for using this service, which would form part of the Wylfa Newydd Employment and Skills Service (WNESS).	
Q10.2.8	A pilot for the Jobs and Skills Strategy was proposed for the Site Preparation and Clearance Proposals. Has the pilot commenced and if it has can you provide an update on how it has operated?	The Draft DCO s.106 agreement in respect of the Site Preparation and Clearance Proposals has not be signed (although that is due imminently). The agreement requires Horizon and IACC to maintain their involvement with the Developer and the Council will maintain their involvement with the Wylfa Newydd Employment and Skills Service (WNESS) in general accordance with the Terms of Reference between the parties to the WNESS for the duration of the site preparation and clearance works. The WNESS has been piloted on a small scale through the provision of Department of Work and Pensions (DWP) resource since June 2016. The activities undertaken to date include: • Vacancy Identification – identification of roles in the construction industry in the region through employment agencies, job posting websites including DWP's own Find a Job page, direct daily contact with employers and engagement with partnership agencies such as the Construction Industry Training Board (CITB). • Vacancy Notification - Identified vacancies are circulated via email to the candidate Database, education providers, JCP staff, Construction Single Points of Contact in jobcentres, Employer teams across DWP in Anglesey and the North Wales region. They are also shared via Social Media including DWP Twitter, DWP's regional Facebook page (which has a following of 982 and a weekly reach of approx. 4000). They are also promoted with the local Builders Merchants to share with their customers. • Training Investment – DWP has collaborated with Grŵp Llandrillo Menai (GLLM), Construction Industry Training Board (CITB) and various training agencies and Employers to deliver the training figures set out below. Since the start of the pilot DWP has invested in excess of £70,000 to retraining and skills. • Engagement activities – The WNESS pilot has established close working relationships with the construction related industry across North Wales and includes employers such as Jones Brothers, Alun Griffiths, GMC, Turners, and Wynne Construction. 'Pathway Into' programmes have been tested and developed for scaffolding and Heavy Plant although the pathway model is transferrable into other trades. The pilot is working alongside CITB and GLLM to develop and implement a General Construction Operative apprenticeship routeway – to date, 8 apprenticeships have commenced. Further sector insight days are	HNP make reference to the draft S106 and its link to the WNESS. Negotiations are ongoing in relation to specific terms of reference and strategy content for the: - Wylfa Newydd Employment and Skills Service - Wylfa Newydd Supply Chain Development Service - Wylfa Newydd Jobs And Skills Strategy/Working Group The effectiveness of these arrangements are directly dependent upon the funding that will be made available to support their running costs and cost of appropriate ongoing monitoring and refinement of the service. The ongoing negotiation of the s106 includes both quantum and scope of this funding which is not yet agreed.

		planned across DWP sites to encourage ‘Construction’ as a viable career. These have been supported by Industry, CITB and colleges across North Wales. • Terms of Reference – draft Terms of Reference for the service have been agreed between IACC, Department of Work and Pensions Wales, North Wales Economic Ambition Board, GLLM and Horizon. This document details the roles of the service and the responsibilities of each party in supporting delivery. It is intended that the WNESS will therefore continue to operate prior to and during implementation of the DCO throughout the construction phase. As at the middle of November 2018, there are just over 1,100 people on the WNESS candidate database. Of these nearly 80% are from Anglesey, nearly 20% from Gwynedd and <1% from Conwy and elsewhere in North Wales. Just over 55% are Welsh speakers. In terms of the demographic breakdown, nearly all registered workers are male (<1% female) and over 18 (<1% under 18) with 25% being under 25 and 75% being over 25. Since the start of the pilot in June 2016, the WNESS has assisted over 680 people into to work, of which 85% were previously unemployed. Over 150 people have attended courses with 125 moving into work and a further 26 have had work experience. The Draft DCO s.106 agreement recognises the WNESS and obliges Horizon and IACC to support the WNESS. It also proposes the delivery of the Jobs and Skills Implementation Plan which identifies and delivers jobs and training initiatives and enhancements.	
Q10.2.9	Would the Employment and Skills Portal be bilingual?	The portal is part of the Wylfa Newydd Employment and Skills Service and will be bilingual.	The IACC welcomes the confirmation that the WNESS will be bilingual.
Q10.2.10	The Workforce Management Strategy [APP- 413] sets out parameters for codes of conduct relating to workforce behaviour (paragraph 2.2.1) and employer behaviour (paragraph 2.3.1). Can the applicant:	The Workforce Management Strategy sets out the principles that will inform the development of the Code of Conduct which will guide workforce conduct and behaviours during the construction of the Wylfa Newydd DCO Project (“the Project”). The Code of Conduct is secured through PW8 in the Draft DCO. The principles are set out under workforce behaviour and employer behaviour, and relevant to individual employees, as well as Horizon and its supply chain partners and contractors	IACC accepts that workforce behaviour is a matter that cannot be guaranteed but can only be made subject to best endeavour obligations by HNP. Clear conduct rules for workers that are contractually enforceable lies at the heart of this with the ability to adapt those contractually binding policies in the light of future changing circumstances. Final agreement on the terms of the WMS has not yet happened, but even at the point that does occur, it must be understood that a range of additional mitigation measures must be in place through the s106 to respond to the effect of cumulative breach of the WMS and similar policies, inability to effectively enforce any elements of those policies or inability of the policies themselves to tackle issues arising out of workforce behaviour.

	(a) Confirm if home based workers would have to sign the codes of conduct? (b) Explain what is meant by workers being off-site? (c) Confirm that the codes would not breach workers (in particular home based workers) Human Rights or employment rights. (d) Explain what the ramifications for breaching the codes would be.	(a) As stated in the 1.2.2 of the Workforce Management Strategy “The Code of Conduct, which will apply to all personnel, will ensure that the identified social, economic and environmental effects of the construction workforce will be appropriately mitigated and managed throughout the construction period.” Therefore, home based workers will also be required to sign the Code of Conduct as part of their contractual agreements. (b) In the context of the Code of Conduct, off-site is intended to mean when workers are in the local community. Horizon will therefore clarify the principles within the updated version of the Workforce Management Strategy to be submitted at Deadline 4 (17 January 2019), so that it is clear that "off-site" means when workers are off duty, living and spending time in the community. (c) Horizon has obtained legal advice on the acceptability of the principles from an employment and human rights law perspective. As a result of that advice, drafting of a small number of principles have been amended in the updated version of the Workforce Management Strategy to be submitted at Deadline 4 (17 January 2019). (d) Enforcement of the Code of Conduct will be undertaken in accordance with the employment contract of the individual concerned. Horizon’s supply chain is likely to be appointed using the National Agreement for the Engineering Construction Industry (NAECI) 2016-2018 or similar. The agreement includes core terms (e.g. disciplinary process that could include termination of employment for gross misconduct, managing disciplinary processes, raising grievances, pay, travel etc). As Horizon will enforce the Code of Conduct through contractual flow downs, NAECI and other agreements (e.g ACAS) would form the basis for enforcement and monitoring processes of the contractor under the Code of Conduct. Agreements like this have already been agreed with Trade Unions on other major projects, they are an industry standard and their importance in supporting the mitigation for this Project is paramount to the implementation of the Code of Conduct.	

	(e) Explain how the codes would be enforced? Are the IACC, GCC, NWP, PHW and BCUHB satisfied with the measures proposed by the WMS given the concerns they have expressed with particular reference to safeguarding and anti-social behaviour? If not, why not?	Any allegations of Gross misconduct on the Project will be addressed through industry standards, like the NAECI agreement in completing our own duty through a number of agreed procedures, with the WMS being something additional to law and order. Horizon has offered the Workforce Management Strategy and the Code of Conduct in order ensure Horizon and its workers have as minimum as possible impact on the community. Horizon will encourage its supply chain to take appropriate action against any of their workers found to be in breach of the Code of Conduct in accordance with the workers' terms of employment. It is worth noting of course that ultimately the Code of Conduct does not replace law and order provisions in place to protect members of the community and which individual workers must abide by. Horizon will cooperate fully with authorities investigating incidents involving workers in breach of law and order provisions. (e) In terms of enforcement the WMS states <i>"Horizon will ensure enforcement of the standards and procedures and will provide support to the community and stakeholders to avoid foreseeable problems and when they arise respond quickly, effectively and seek to prevent recurrence."</i> Enforcement of the Code of Conduct can be effectively imposed through Horizon's contractual agreements with its contractors, within commercially reasonable terms and at commercially reasonable cost. Through the contractual flow down of the NEACI agreement and others, appropriate disciplinary processes can be enforced. These flow downs would effectively ensure that each contractor and worker took into consideration the Code of Conduct. In addition to this, and as confirmed above, Horizon will cooperate with the relevant authorities in respect of any breaches of law. Horizon would propose regular reviews with employers and contractors to assess compliance with the Code of Conduct. This would be an opportunity for feedback on issues arising from the Code of Conduct, and ensure that both Horizon and its contractors are effectively mitigating issues that arise in the community as effectively as a Code of Conduct would allow. This review mechanism is proposed through the Health and Well-Being engagement sub group under the Wylfa Newydd CoCP. In addition, key control documents (i.e. the CoCP and sub-CoCPs, WAMS, Draft DCO s.106, Community Safety Management Strategy) will also support in compliance with the Code of Conduct. For example Section 5 is the Traffic Transport Management Strategy, which secures a number of transportation	

		measures, will help ensure that the Workforce Management Strategy principle around “<i>All personnel must use the transportation services and facilities provided as part of the Project (i.e. the Park and Ride Facility, shuttle bus services, and car sharing initiatives) to travel to the Wylfa Newydd Development Area</i>” is achieved. This illustrates that this document strengthens the ability of the Code of Conduct to work effectively. In terms of workers, most of the principles will be enforced and explained to the workers through the induction process, but throughout their time on the project workers will be reengaged and the Code of Conduct and principles reinforced to them. Workers will need to sign up to this through their contracts. This is further discussed above in d), about how breaches will be dealt with. Overall enforcement will be completed through contractual agreements with the workers and the employers, a number of the principles will be controlled by other control documents, but most importantly the Code of Conduct or the WMS will not replace law, but will support it by ensuring that workers abide by the highest principles to be effective neighbours.	
Q10.2.1 1	Bullet point 8 (BP8) of paragraph 2.3.1 of the Workforce Management Strategy [APP-413] states that ‘appropriate security checks will be carried out on construction personnel’ and bullet point 17(BP17) deals with checks regarding vulnerable adults and children. Can the applicant: (a) Explain why BP8 is only considered necessary for construction personnel and not the whole workforce; and	The Workforce Management Strategy sets out the principles that will inform the development of the Code of Conduct which will guide workforce conduct and behaviours during the construction of the Wylfa Newydd DCO Project. Preparation and implementation of the Code of Conduct is secured through PW8 in the Draft DCO. The principles are set out under workforce behaviour and employer behaviour, and relevant to individual employees, as well as Horizon and its supply chain partners and contractors. Bullet Point 8 of paragraph 8 states that “<i>Appropriate security checks will be carried out on all construction personnel, such as Basic Disclosure Certificate and Confirmation of Right to Work in the UK, National Security Vetting, Baseline Personnel Security Standard [BPSS] and Counter-Terrorist Check.</i>” Bullet Point 17 states that the WMS will “<i>Enforce Horizon’s personnel screening and management system processes to identify any of the workforce which may pose a risk to vulnerable adults and children in accordance with Hitachi Group Codes of Conduct and the Horizon Nuclear Power ‘Modern Slavery Act 2015 Statement. In such cases where a potential risk is identified, further checks will be carried out.</i>” (a) As stated in paragraph of 1.2.2 of the WMS, the Code of Conduct will apply to all personnel on the Wylfa Newydd DCO Project. Horizon are applying the appropriate regulations which state all personnel who access Sensitive Nuclear Information (SNI), Nuclear Matter (NM), Other Radioactive Material (ORM) or require unescorted access to a Nuclear Licensed site require a minimum of BPSS, all other personnel would	The standard check in the UK for those working with vulnerable adults and children is the basic check provided by the Disclosure and Barring Service. A basic check will contain details of convictions and conditional cautions considered to be unspent under the terms of the Rehabilitation of Offenders Act 1974. The cost of a Standard check is £26. However, it is not normal practice to obtain standard checks for employees unless they are working directly with vulnerable adults or children. In the light of this, it is unclear as to what checks Horizon are actually proposing to carry out. The response from Horizon sets out the steps they would take to identify any potential member of the workforce or supply chain workforce that may pose a risk to vulnerable adults or children. However, they are not specific as to what those steps would be. Bullet point 8 of the horizon Workforce Management Strategy states: “Appropriate security checks will be carried out on all construction personnel, such as Basic Disclosure Certificate and Confirmation of Right to Work in the UK, National Security Vetting, Baseline Personnel Security Standard and Counter-Terrorist Check.” However, this wording seems slightly vague and we would want confirmation that all these checks would be carried out and confirmation as to precisely what is being referred to by the term ‘Basic Disclosure Certificate’ (Is it in fact, that the Standard check from the Disclosure and Barring service as described above?) Gwynedd Council queried why the proposed checks were limited to only construction staff and Horizon have confirmed that they would apply to all staff. The North Wales Police comments supported those of Gwynedd and effectively added to them the need for regular up-dating of those checks. We would agree with those additional comments from the North Wales Police.

	(b) Explain what would happen if the employee failed the security or screening checks? Can the IACC, GCC and NWP confirm: (a) That the list of proposed checks in BP8 is sufficient; and (b) Whether the proposed measures in BP8 and BP17 satisfactorily address their concerns regarding Safeguarding?	go through their own employment checks via their own company. For clarity, Horizon will amend BP8 to remove reference to 'construction' in an updated WMS to be submitted at Deadline 4 (17 January 2019). (b) If an individual failed the security or screening checks they would not be allowed to work on the Wylfa Newydd DCO Project in the role they applied for or, in the event the BPSS was signed off with caveats applied, any caveats will be managed by the Project Management Contractor. This would not stop them working on another role that did not require a BPSS. This would need to be managed by the Project Management Contractor.	
Q10.2.1 2	The ES [APP-122] refers to the embedded mitigation for the decommissioning phase being similar to construction (paragraph 3.4.37). Is any mitigation proposed for the operatives in terms of retraining programmes etc to enable them to find alternative employment within the area when the plant has closed?	The Jobs and Skills Strategy Implementation Plan (JSS IP), which will be annexed to the Draft DCO s.106 Agreement will cover the initial 3 years of construction. Horizon will comply with the JSS IP for the duration of the construction period, and will update of the JSS IP following an initial three-year period. The JSS IP does not therefore cover the decommissioning phase. The JSS IP does, however, take due consideration of the need to ensure continuity of employment, for example between the construction and operational phases through an approach to reskilling of the workforce. Horizon will aim to adopt a similar approach to future phases where possible.	IACC has received a copy of a draft Jobs and Skills Implementation Plan (JSS IP), a paper entitled 'Jobs and Skills Working Group' and a document entitled 'Wylfa Newydd Employment and Skills Service Terms of Reference'. These are incomplete working documents and a limited assessment only can be given. The JSS IP sets out measures that cover a three year period only, and this would appear to be likely to expire early in the construction phase. Many of these measures concern preparatory tasks such as identifying information and information gathering, and the documents do not show what contribution Horizon itself proposes to make towards achieving them. IACC's provisional assessment is that the three documents represent an unacceptably short-term approach and that in their present form are insufficient in a number of areas including their overall scope and effectiveness particularly on issues that are more urgent and long-term. Although Horizon's comments state that a new JSS IP would be developed to follow the first one when it expires, it is unclear how this would be achieved, what it would contain or what controls would apply in deciding this. As Horizon's comments acknowledge, the decommissioning phase falls outside the scope of the proposed JSS IP. However, the IACC would like to see more commitment to retraining future staff in the lead up and during decommissioning at a high level and to be agreed closer to the time of decommissioning. As noted by HNP, Anglesey suffers from relatively low employment opportunities and hence it is important to IACC and to the local economy, that those working during the operation phase are able to transition into other employment opportunities locally, or supported to establish their own business on the island. The operation jobs will be highly productive and hence their loss will be significant. We require HNP to commit to a long-term training strategy to mitigate against the future loss of jobs at Wylfa Newydd.
Q10.2.1 3	Can you provide an update on the progress with the Jobs and Skills Strategy?	The Jobs and Skills Strategy (JSS) provides a high-level framework for the priorities and actions that Horizon proposes. It sets out the information that was available at the time on the types of construction skills the Wylfa Newydd DCO Project will need, where those skills are already in short supply and where there is a reasonable prospect of training local people in them.	

		Since submission, Horizon has continued to work with partners to refine and develop the Strategy through a draft Implementation Plan that has been agreed in principle subject to a number of minor amendments through the Construction Skills Working Group consisting of Horizon, IACC, Welsh Govt, DWP, Coleg Menai, Coleg Cambria, CITB and the Regional Skills Partnership (RSP).	A Jobs & Skills Group has been established with appropriate representation from each of the key stakeholders as detailed in Horizon's response.. Further work is required to give the IACC the confidence and re-assurance that Jobs & Skills Group will meet the IACC's expectations in going forward. The Implementation Plan and draft Terms of Reference which was circulated by HNP on 10th December 2018 (as noted in Q10.2.5) is a new release requested sign-off by all parties by 14th December. However it remains very high level and lacks the detail IACC wish to see on training. The implementation plan has no detail on the target number of enrolments or graduates required each year and how this will provide sufficient numbers of skilled labour to avoid local displacement. We are also unclear on how regular the implementation plan will be refreshed. HNP note periodically, but we again like more commitment and detail on HNP's training strategy, how it will be monitored, refreshed and aligned to the needs of the local economy. The IACC still would like to see HNP undertake a detailed analysis of demand and supply of skills in Anglesey. That would identify skills gaps and possible areas of displacement in the local economy and the role of training.

It is intended that the Jobs and Skills Implementation Plan will be appended to the Draft DCO s.106 agreement. It will be used to guide spending decisions over a three-year period, where funds are drawn from the Skills Fund also proposed under the Draft DCO s.106 agreement.

Horizon based the commitments and priorities in the draft Jobs and Skills Implementation Plan on the JSS. The draft Jobs and Skills includes a series of practical steps toward implementing each of these.

For example, the first two major themes in the draft Jobs and Skills Implementation Plan identify steps required to train and upskill potential Home Based Workers (HBW) into civils roles – based on the training lead time for general labouring roles, scaffolding, steel fixing – as well as into site service roles such as cleaning, catering and back office professional roles. There is also a focus in the draft Jobs and Skills Implementation Plan on maximising HBW for the operational phase of the programme, for example by giving local stakeholders sufficient lead time to prepare for available vacancies and apprenticeships coming on stream during the period.

In September 2018 the structure of the plan and main topics were shared with partners including IACC, DWP, Welsh Government and local training providers. The draft Jobs and Skills Implementation Plan was further refined based on feedback received and then presented again in full to the same stakeholders, having been through a process of internal approval.

A number of amendments were requested at this meeting and have subsequently been incorporated into the draft Jobs and Skills and Implementation Plan.

In tandem with development of the draft Jobs and Skills Implementation Plan it was agreed with stakeholders at the Construction Skills Working Group in September that a three year implementation plan was an appropriate period to focus on, but that the document would be dynamic and periodically reviewed at these meetings. It is intended that the (current) Construction Skills Working Group will re constitute as the Jobs and Skills Sub-group to the WNMPOP which will review progress against the Jobs and Skills Implementation Plan, developing future versions and identifying emerging opportunities and challenges.

Also in parallel with these activities, DWP staff have undertaken a number of learning visits to meet with other major project job brokerage services to inform the development of the WNESS. These will inform the development of a fully operational service over the coming years as outlined in the Jobs and Skills Implementation Plan.

Horizon is continuing to further developing the Jobs and Skills Implementation at this state in order to align it with the supply chain action plan and to better define KPIs against it to monitor delivery.

Q10.2.1 4	(a) How much money would be available to the Skills fund?	(a) Horizon has now issued a 2nd Draft DCO s.106 agreement, which contains details on the Skills fund. This has been shared with IACC and Welsh Government and will be submitted to the Planning Inspectorate at Deadline 3 (18 December 2018). The scope of the Skills Fund will be further refined with IACC but as proposed it includes funding for training and employment initiatives which relate to upskilling workers, developing training courses, educational activities (STEM and construction related), mitigation for labour displacement, and engaging and communication with the community including on employment opportunities. The Jobs and Skills Implementation Plan and the Wylfa Newydd Employment and Skills Service (both as proposed in Schedule 4 – <i>Employment and Skills Service and Supply Chain</i>) are also a key focus of the Draft DCO s.106 agreement. Separately to the Skills Fund, and outside of the Draft DCO s.106 agreement, Horizon has already committed £1m to the new Engineering Centre at Coleg Menai and Hitachi has donated heavy plant equipment and power tools to be used to train students. (b) ES Volume C – Project Wide Effects identifies the likely labour market impacts of the development on the local economy and labour market. It identifies that these effects (including the creation of jobs, local expenditure etc.) bring significant benefits to the local economy and concludes that overall the project has beneficial effects. It also identifies that there will be issues in helping the local economy adjust to the increased demand and to maximise benefits for local people. The proposed initiatives which could be supported by the Skills Fund are aimed at responding to those adverse effects and managing the impact on the local economy to maximise the benefits. Horizon has drawn on a range of precedent and evidence in order to develop the obligations in Schedule 4 of the Draft DCO s.106 agreement, including the scope of the Skills Fund. In the development of the obligations consideration was given to other Draft DCO s.106 packages, spending benchmarks from the Government's Work Programme and planning obligations Supplementary Planning Documents. Horizon and stakeholders want to encourage people who are currently unemployed to join the workforce and also aim to promote the take up of apprenticeships, and to support upskilling residents who are already in work. Horizon is confident that the planned measures will be sufficient to meet the full requirement for the assessed case of 2,000 home-based workers at peak by moving 1,000 residents from worklessness into work and training or upskilling the other 1,000 residents to either work on the project or to backfill other vacancies.	HNP make reference to the draft S106 and its link to the WNESS. Negotiations are on-going in relation to specific terms of reference and strategy content for the: - Wylfa Newydd Employment and Skills Service - Wylfa Newydd Supply Chain Development Service - Wylfa Newydd Jobs And Skills Strategy/Working Group The Jobs and Skills Implementation Plan was released for comment on 10th December which the IACC is working now to comment on. It is a high level document that (per our comment on Q10.2.5 in implementation) contains new information but includes recognition the need to plan for training whilst projecting the demand for labour. Ideally, forecasting of demand and supply would already have taken place to inform analysis of local capacity and home based labour as well as displacement. The Implementation Plan is presently too general and lacks detailed information on the training courses / places on offer, leading to a lack of evidence base from which to ensure maximisation of home based workers during construction and operation. Continued negotiation should concentrate upon monitoring and assessing training needs, provision of relevant training in a timely way, overcoming the present short-term focus and lack of focus on pre-16s education, accessibility of training to Anglesey and North Wales residents and the recruitment strategy for Horizon and its contractors. The effectiveness of these arrangements are directly dependent upon the funding that will be made available to support their running costs and cost of appropriate on-going monitoring and refinement of the service. The on-going negotiation of the s106 includes both quantum and scope of this funding neither of which is yet agreed.

		The funding will ensure that Horizon both expands the size of the labour force by 1,000 and provides training for the other 1,000 of the 2,000 workers assumed to be home-based at the peak of construction. In practice, the funding assumptions made are very conservative. Many of the home-based workers will arrive on the project already employed by a contractor and therefore will not need any support. Furthermore, many of those who were previously jobless may not need such significant interventions. The Skills Fund will therefore be capable of providing significantly greater benefit to the Anglesey and North Wales workforce. The balance of the Skills Fund is likely to support the education strategy within the Jobs and Skills Implementation Plan and could fund a range of activities including development of school resources, support for careers advice and student sponsorship for under- and post- graduate courses, all of which have been requested by IACC and Welsh Government. Gyrfa Cymru/Careers Wales will also be a key Educational partner acting as the conduit for business in to local schools.	
Q10.2.1 5	Tables 3-4 to 3-6 of the Jobs and Skills Strategy [APP-411] set out the time it would take to train for the different roles. Given the time taken for some of these positions when would this training commence?	The Jobs and Skills Implementation Plan priorities have been developed in accordance with, and are consistent with, training lead times and peak employment years identified in tables 3-3 on civil engineering and construction trades, 3-4 on mechanical and electrical engineering, 3-5 on site services and 3-6 on managerial and supervisory roles (in each case being tables in the Jobs and Skills Strategy), whilst also being mindful of the assumptions set out in table 3-7 for the potential for employment opportunities as a result. It is also informed by Table 3-1 Occupational Groups Workforce Breakdown of [ES Volume C - Project-wide effects App C1-2 - Socio-economic technical appendix which presents the profile of Home-Based Workers (HBW) if certain assumptions are made concerning the proportion of each occupational grouping likely to be taken by local people. As such, the two priority areas within the Jobs and Skills Implementation Plan on maximising HBWs relate to site services and civils labour since these are the occupational groupings with the greatest HBW potential. In the case of site services the Jobs and Skills Implementation Plan identifies training lead times of two weeks to 18 months towards an anticipated peak in Year 4 Q3. However, Horizon anticipates that these roles will be mobilised early in the programme and present a very good opportunity for HBW potential. As such the Jobs and Skills Implementation Plan sets out a range of activities commencing in September 2019 with a view to providing employment during the early phases of the programme and ramp up of these roles following DCO consent.	Horizon's response to this question is chiefly centred on the Jobs and Skills Implementation Plan (JSS IP). Some of the points made in its response are reassuring (for example that the training of laboring, carpentry and joinery roles would "align with on-site mobilization" and that scaffolding and steel fixing training would "enable HBW to be skilled to the required level") however the content of the draft JSS IP does not give confidence that these and other important measures would be achieved and would be adequately supported by Horizon. IACC has received a copy of a draft Jobs and Skills Implementation Plan. This is an incomplete working document and a limited assessment only can be given. While it sets out some dates and timings the majority of information is insufficiently clear to assess. In many cases it is simply too brief, however there are some contributory factors that are explained below. The JSS IP contains brief descriptions of activities, some related to training for different roles. The descriptions themselves are not presented in a consistent format and many refer to investigations or other planning tasks rather than actual provision of training. Where actual training provision is referred to, these are not related to the timing of the build up of actual jobs at Wylfa Newydd, except in a few cases in very broad terms which cannot be verified. Timings expressed within the JSS IP are all given in terms of calendar dates but are not related to the project itself (for example by identifying an assumed start date). This is important because the DCO submissions and the Tables 3-4 to 3-6 (and Figure 4-1) of the Jobs and Skills Strategy set out timings relative to the project start only. As a result Horizon's answer to the question "when would this training commence" which refers to the JSS IP cannot be assessed by IACC. Horizon's response says that the JSS IP is proposed to operate for the "duration of the construction period", however the draft JSS IP proposes a plan that has a three-year 'life'. This three year life has also already started and since the project start is likely to be some time away (if approved) the three year JSS IP plan will still be at an early mobilization stage when it expires. Any activities after expiry are subject to review and although some input by other parties is referred to the arrangements are unclear and incomplete and do not offer sufficient clarity to assess them. While it is fully acknowledged that some flexibility is needed in terms of some detail delivery, there are important measures that can and should be planned on a long term basis and this short term approach is wholly unacceptable and fundamentally at odds with the long-term nature of the project and the long timescales over which education operates. Further concerns include: • The draft JSS IP refers to an "Education Strategy" being developed by July 2019. It is unclear what status this document may have or what its purpose is. It is unclear why an education strategy has not been provided already (see Q10.5.3 in this document). • The draft JSS IP proposes implementation from July 2018, however as of December 2018 it exists only as an incomplete draft. • The plan addresses the period to June 2022 and the completion dates for many of the 'Key Actions' listed are towards the end of this period with more than 1/3rd being in the final year. Since many of the Key Actions concern planning and gathering information and would have little effect before their completion, it appears many could therefore be active for only a brief time. A further difficulty in assessing the timings in the Jobs and Skills Strategy and comparing them with the JSS IP is that quantification of jobs are expressed chiefly in terms of the number employed at the point of 'peak' (the maximum) either for each occupation category as in the tables referred to in the question, or more commonly in relation to the 'peak' of the aggregate of all construction jobs. Some graphical information on numbers before and after the peak for different occupations is provided (see Figure 2-1 and 2-3 in the Jobs and Skills Strategy [APP-411] or Figure C1-4 and C1-

			5 of the Socio-Economics Volume C [APP-088]) but the majority of Horizon’s analysis is confined to the figures for the ‘peak’ point only. For some purposes this highly simplified approach is adequate, but not others. For example it does not convey any information about the expected duration of contracts or projected turnover of employees, the approximate number and timing of vacancies, or the way these are expected to change during the periods before and after the single ‘peak’ point. This makes assessments that depend on details such as these more difficult, particularly in the early stages of the project when it is critical that as many vacancies as possible are filled by HBW due to these offering potentially the longest duration of employment (with a similar effect in reverse towards the end of the construction phase when it is important that HBW are kept on as long as possible). The draft JSS IP also does not appear to properly acknowledge or address: • the importance of the pipeline of young people emerging from school education to enter FE, HE or employment to achieving the shared goal of maximizing the employment of Anglesey residents. This is not consistent with Horizon’s stated high-level goals to: Inspire young people to study STEM subjects. Engage young people about the future opportunities offered by Horizon or to equip young people with key employability skills. • the importance of training being provided locally and readily accessible to local people. • the importance of recruitment strategy tiered to the supply chain. Additionally, the scope and quantum of mitigation funding in the s106 must be demonstrated to be adequate to provide effective responses in the event these strategies prove ineffectiveparticularly in relation to the Supply Chain Fund and Skills Fund.

	In relation to Civils labour, the Jobs and Skills Implementation Plan sets out activity to maximise HBW in labouring, carpentry and joinery roles, steelfixing and scaffolding based on the anticipated peaks of labour and need to establish training provision well in advance of these peaks that would allow for the development of the requisite skills – typically at Level 2 over and 18 month to two year period – in advance of their mobilisation on site. For labouring, carpentry and general ops roles there is current provision in local providers that with input on employers needs could relatively easily result in a tailored curriculum to meet demands for the WN project. These are scheduled for development over the period to 2020 with a view to establishing a rolling training programme to align with on-site mobilisation. In the case of scaffolding and steelfixing, recognising the need for more specialise training equipment, the JSS IP identifies additional steps to potential fund through the skills fund specialist provision that would enable HBW to be skilled to the required level such that they can access roles as the mobilise through to a peak slightly later in the programme compared to those mentioned above. The Jobs and Skills Implementation Plan is proposed to operate for the duration of the construction period, with both it and the associated Skills Fund operating early in the development. Further work is being done to consider appropriate triggers although it is already proposed that a significant proportion of the Skills Fund is released early to deliver training and skills opportunities well before peak construction.																						
Q10.2.1 6	It would appear from table 3-7 of the Jobs and Skills Strategy [APP-411] that the majority of opportunities for home based workers would be in site services. Can the applicant outline what is being done to maximise opportunities for home based workers in the other fields where there would be better rates of pay and longer term opportunities? <table><tr><td></td><td>% of HB</td><td>HB No.</td></tr><tr><td>Site services, security & clerical</td><td>34%</td><td>689</td></tr><tr><td>Civils labour</td><td>34%</td><td>675</td></tr><tr><td>Mechanical & electrical labour</td><td>10%</td><td>208</td></tr><tr><td>Professional</td><td>12%</td><td>237</td></tr><tr><td>Operations</td><td>10%</td><td>191</td></tr><tr><td>Total</td><td>100%</td><td>2,000</td></tr></table> As is set out in the Jobs and Skills Strategy (JSS), there are a number of entry level, semi-skilled and skilled trades where many workers will be required, where there are existing skills shortages and where there is a		% of HB	HB No.	Site services, security & clerical	34%	689	Civils labour	34%	675	Mechanical & electrical labour	10%	208	Professional	12%	237	Operations	10%	191	Total	100%	2,000	Information provided by Horizon suggested that the bulk of jobs going to non-locals will be the higher skilled and higher paid engineering and managerial jobs. Over a third of 'local' jobs at peak construction will be in “site services, security and clerical staff” roles. IACC would like to see more of the higher skilled roles made available to local workers, and by extension measures put in place to help achieve that.
	% of HB	HB No.																					
Site services, security & clerical	34%	689																					
Civils labour	34%	675																					
Mechanical & electrical labour	10%	208																					
Professional	12%	237																					
Operations	10%	191																					
Total	100%	2,000																					

		reasonable prospect of local residents being trained and therefore subsequently enjoying a sustainable long- term career in the construction industry. As also set out in the JSS, local residents will be matched with suitable vacancies at all skill levels through the Wylfa Newydd Employment and Skills Service (WNESS). There will also be significant higher skilled opportunities in the operational phase. Further detail on Horizon's proposals and what has been agreed with the Construction Skills Working Group is set out in answers to several other questions: • Q10.2.13 sets out how the draft Implementation Plan includes activity to upskill potential HB workers into civils roles – based on the training lead time for general labouring roles, scaffolding, steel fixing – and back office professional roles, as well as into site service roles such as cleaning, catering. • Q10.2.14 sets out how the Skills Fund will support both people moving from unemployment into employment (mainly in entry level jobs) and training and upskilling for apprenticeships and people already in work. • Q10.2.8 sets out the number of people already in work who have used the pilot version of the WNESS.	
Q10.2.17	How would the Wylfa Newydd Employment and Skills Service be funded?	It will be funded from a combination of resources from Horizon (which will be secured through the Draft DCO s.106) and DWP resources.	The s106 elements of this funding are in negotiation but not yet agreed
Q10.2.18	Can you provide an update on the development of your apprenticeship scheme and/or are you still providing funding to Cwmni Prentis Menai? Is the Horizon apprenticeship scheme predicated on the financial support provided by the Government for apprenticeships?	The apprentice scheme has continued to attract a number of high calibre candidates and will increase intake sizes following the Final Investment Decision (FID). The apprenticeship scheme is currently being enhanced through the provision of more nuclear training to ensure that technicians graduating from the scheme are more closely aligned with Horizon's training needs. This is additional to the work in the curriculum. Following the FID it is likely that the electrical, control and instrumentation and mechanical intakes will be streamed to offer different qualifications and for a short period to cope with initial staffing needs, the scheme will be expanded to include radiation protection and chemistry. These plans are based on the current level of support provided by Welsh Government who specify available apprenticeship frameworks. Horizon works in collaboration with the local Welsh Government funded training provider to identify specific apprenticeship pathways to develop technician level skills to meet Wylfa Newydd Operational needs, these apprenticeship frameworks and pathways are available to all relevant employers	IACC has not been informed of the planned increases in intake sizes, selection criteria or other details which would be helpful in order to assess how this will affect the opportunities for local residents who may wish to enter these courses or pursue jobs of this kind. IACC remains concerned at the lack of firm commitments from Horizon concerning post-16 training and apprenticeships including those it has supported with Cwmni Prentis Menai. While its actions to date and in advance of the FID are encouraging, and the DCO submissions describe a range of possible measures that could be helpful that other organisations could provide, it is notable that there are no clear commitments or definition of the support Horizon itself would provide beyond the FID and in the longer term. The draft JSS IP and draft documents concerning the WNESS service and the Jobs and Skills Working Group provide some further indication of the role and commitments that Horizon envisages it could take, however these documents are incomplete and their approach raises a number of further concerns and questions (see also IACC's response to Q10.2.15).

		who can provide the necessary practical experiences to achieve the associated National Vocational Qualification.	
Q10.2.1 9	Horizon would only be a principal employer for operational staff. What contractual measures are proposed to ensure that during construction and decommissioning contractors maximise the opportunities for the recruitment of local people?	Overview and Assessment- Local Jobs for Local People Please see chapter C1 of the Environmental Statement, which assesses the project-wide socio-economic effects of the Wylfa Newydd DCO Project, including effects on the local labour market. Horizon estimates that around 2,000 home-based workers would be employed during the peak period of construction. Those are workers who currently live within the Daily Construction Commuting Zone (DCCZ), being the area defined by a 90 minute travel time to the Wylfa Newydd Development Area. The 2,000 home- based workers would deliver major beneficial changes to employment in the construction sector in the DCCZ. An estimated 1,260 of these home-based workers are expected to be drawn from Anglesey, ensuring beneficial effects on the labour market on Anglesey itself are delivered during the construction phase. There would also be significant beneficial effects on the economies of Anglesey and north Wales as a result of the investment to be made by the Wylfa Newydd DCO Project from the additional earnings of employees, from contracts with local businesses and investment in infrastructure, and from workers spending their income at local businesses. An expected investment of between £200 million and £400 million within north Wales over the construction period would lead to the provision or safeguarding of the equivalent of 120 to 350 Full Time Equivalent jobs over that period. During operation of the Power Station it is estimated that a workforce of 850 will be required and Horizon estimates that around 85% of those employed would already be resident within the DCCZ. This represents a significant contribution to local employment opportunities and to the long-term population stability on Anglesey. Given the magnitude of change in local employment, the long-term nature of the positions, and the potential to reduce outward migration trends, alongside the importance of the local labour market, this would represent a major beneficial effect on the labour market on Anglesey. Currently, Horizon is investing early in education to maximise opportunities for local people. Horizon currently promotes STEM (science, technology, engineering and mathematics) teaching and subjects and career preparation through its Educational Outreach programme 'Futures/Dyfodol' in local secondary and primary schools, as well as already investing in an apprenticeship scheme with Coleg Menai. Horizon retains ultimate responsibility, oversight and control of its arrangements as a licence and permit holder. It has engaged a Training Support Partner to train and qualify all utility personnel at Wylfa Newydd	

	Power Station. The Training Support Partner forms part of Horizon’s Operating Partner network which ensures that Horizon has sufficient and adequate reachback’ to existing nuclear plant operators globally to be able to perform a variety of functions. Some of these functions related to people include the ability to be able to provide new employees with practical experience on a nuclear facility, bespoke training and access to operating experience to inform the training programme. Construction- Local Recruitment Measures. In order to facilitate the recruitment of local people, Horizon has several measures during construction, these are described in more detail below: • Wylfa Newydd Employment and Skills Service (Secured though Section Draft DCO s.106) • Skills Fund (Secured though Draft DCO s.106) • Employment and Skills Portal (Secured through the Draft DCO s.106) • Welsh Language and Culture Mitigation and Enhancement Strategy (WLCMES) (Secured though Draft DCO s.106) • Supply Chain Charter, Action Plan and Service (Secured though Draft DCO s.106) • Community Involvement Officer/ Economic Development Officer (Secured though Draft DCO s.106) • Principles about recruiting local workforce (Secured in the Workforce Management Strategy and Requirement PW8). Horizon will establish and maintain an Employment and Skills Service. This is secured through the Draft DCO s.106. The service is a collaboration between Horizon and key stakeholders with the aim of promoting and sourcing local employment opportunities for Wylfa Newydd thus demonstrating Horizon’s commitment to optimising local recruitment and be a potential key mitigation against displacement effects. Horizon’s Employment & Skills Service is aimed at sourcing local (within 90mins) persons for employment at Wylfa Newydd. It will also support the upskilling of persons for the project if the need exists and also support any displacement issues. It will aim to retain skilled workers and young people and attract local people back who have had to move away for work. This will be implemented alongside the current "business readiness" initiatives for local and regional North Wales companies that Horizon is involved in. Horizon will establish and maintain a Supply Chain Portal, a web-based procurement platform as part of the Employment & Skills Service to allow people to gain employment on the Wylfa Newydd DCO Project. It will capture vacancies with the Project’s contractors	

	Paragraph 8.1.4 of the Jobs and Skills Strategy states that “<i>in order to enhance local employment opportunities Horizon will establish a Skills Fund to support a range of education, training and employment initiatives relating to both the construction and operational phases of the project.</i>” This is secured through the Draft DCO s.106, with a number of objectives including initiatives for upskilling the existing construction works in the local area. The Draft DCO s.106 also secures two Economic Development Officer. This role would have number of roles with the Employment and Skills Service and Supply Chain service, support inward investment and help to realise the economic growth locally, but would also represent the Council and Local businesses in engaging with supply chain. The Welsh Language and Culture Mitigation and Enhancement Strategy (WLCMES), which is secured through the Draft DCO s.106, also has a number of measures to support local recruitment: • Consideration of Welsh Language skills needs of each post (Measure 2): • Continue to distribute information on job opportunities to young people (Measure 4) • Target recruitment at Welsh speakers as part of broader recruitment strategies (Measure 5) • Ensure information on local contractors is distributed throughout supply chain (Measure 11) Horizon's Supply Chain Charter establishes the strategic principles and headline expectations that will apply to the conduct of Horizon, and all members of the supply chain for the Project. This charter will require compliance by all contractors, where practical and possible, this will be contractually enforced. Horizon is also developing a Supply Chain Action Plan jointly with IACC, the North Wales Economic Ambition Board (NWEAB), and the Welsh Government. One of the aims of the Action Plan is to maximise opportunities for businesses within the local area. Horizon has signed a Statement of Common Ground with the NWEAB which sets out how they will work collectively with the organisations that form part of the NWEAB to maximise benefits for North Wales. The Supply Chain Action Plan, as, which is secured through the Draft DCO s.106, will set out strategic objectives and desired outcomes into the detailed actions and processes required to deliver Horizon's goals. This aims to maximise opportunities in the local area, support implementation of the Employment and Skills Service and a number of other objectives. A Supply Chain Service, which is secured in the Draft DCO s.106, which will oversee the delivery of the Action Plan.to clarify what Horizon expect from its suppliers, Horizon has developed a Supplier Code of Conduct which is secured through the Draft DCO s.106 and the Workforce Management Strategy, to supplement the Supply Chain Charter and clearly specify what behaviours, practices and regulations it expects to see demonstrated and complied with, this includes the	

		promotion of local recruitment during construction. This code of conduct will require compliance by all contractors, where practical and possible, this will be contractually enforced. The Workforce Management Strategy through its principles and code of conduct will need to be adhered to by contractors. One of the key principles (BP11) in section 2.3, which relates to employer obligations states, <i>“Employers will seek to maximise local employment, through the involvement in apprentice and trainee programmes, engagement of local suppliers, and recruitment in accordance with relevant Key Performance Indicators (KPIs) set out in planning agreements. Employers will regularly report to Horizon on achievement of identified KPIs”</i>. Using the strategies, charters and services referred to above, which will be led by Horizon, a number of the obligations will be passed to Contractors/Employers during construction and will support Horizon to maximise the recruitment of local people for the Wylfa Newydd Project. Decommissioning- Local Recruitment Currently, decommissioning is not considered as authorised development in the Draft DCO, as only for Construction, Maintenance and Operation of the development is being considered.	
Q10.2.2 0	Can you explain how your Graduate Development Scheme specifically encourages applicants from North Wales and/or who might be a Welsh speaker?	The Jobs and Skills Strategy refers to Horizon's Graduate Development Scheme. This scheme was launched in 2016 and also recruited graduates for specific areas in the preceding years. The current Graduate Development Scheme provides an opportunity to attract high calibre recruits from North Wales and the wider area. The scheme offers graduates practical placements and the ability to work across Horizon's sites at Wylfa Newydd Power Station in Wales and the Sunrise House location in Gloucester. Horizon have recently reviewed the Graduate Development Scheme in preparation for the 2019 intake. The renewed aim is to 'develop top graduate talent who are motivated to support Horizon with operating Wylfa Newydd Power Station'. In order to achieve this we are currently working towards redeveloping our graduate talent pipelines with a focus on attraction in the North Wales area, as well as others that develop industry specific skills. All graduates joining our programmes moving forward will have an opportunity to develop their Welsh language skills further. Also complementing this initiative are the enhancement and mitigation measures identified in the Welsh Language Impact Assessment. During operation, around 850 workers would be employed, it is expected that 85% of those would be local workers from within the Daily Construction Commuting Zone so are local in nature from Welsh speaking catchments. These enhancement measures include: • Training and development;	It is important that all education and training provided in connection with Wylfa Newydd is available in both English and Welsh. It is not clear whether this scheme would meet these requirements, or whether Horizon shares this goal. In relation to the final paragraph, it should be noted that Horizon's support for STEM education is limited and on a scale that IACC believes is far from adequate. It is unclear what Horizon's commitment to this is going forward. Horizon's contribution to support the WNESS initiative is welcomed and the IACC look forward to continued collaboration in going forward to develop and refine further.

Q10.2.2 1	(a) Is the school engagement work undertaken in both Welsh and English?	• Knowledge transfer; • School engagement including science, technology, engineering and Mathematics activities; • Apprenticeships; • Work placement and work experience; • Graduate programmes; • Engagement with the long-term unemployed and ex-armed forces Personnel; and • The inclusion of experienced people from the existing labour market. Effective primary and secondary education programme is an important element of building a sustainable stream of suitably educated future recruits, and encouraging candidates for the Graduate Scheme. Horizon will continue to work closely with external stakeholders (IACC, EIP, Coleg Menai, Anglesey Head teachers, education agencies) to communicate future opportunities. Horizon is investing early in education to maximise opportunities for local people. Horizon currently promotes use of STEM (science, technology, engineering and mathematics) teaching and subjects, as well as already investing in an apprenticeship scheme with Coleg Menai. Horizon will also be introducing a 'Wylfa Newydd Employment and Skills Service' to improve Horizon's local recruitment strategy to help promote roles and opportunities and encourage more people to apply for Wylfa Newydd jobs. It will aim to retain skilled workers and young people and attract local people back who have had to move away for work. (a) Yes. Horizon's Education Programme Co-ordinator leads on school engagement activity, which is undertaken in the preferred language of the school (Welsh or English). Classroom materials resources developed by Horizon in partnership with schools and other partners are also available in Welsh and English at the following links: Welsh https://www.horizonnuclearpower.com/addysg English https://www.horizonnuclearpower.com/education Measure 14 of the Welsh Language and Culture Mitigation and Enhancement Strategy (WLCMES) (WLIA appendix B4-1), which will be secured in the Draft DCO s.106 Agreement, commits that: 'Horizon will continue to develop and provide bilingual educational support for primary and secondary pupils as well as Further Education students'	

	(b) Would the Education Officers be bi-lingual?	(b) Horizon's Education Programme Co-ordinator is a Welsh speaker and able to deliver activities in Welsh or English.	
Q10.2.2 2.	Given that the creation of local jobs and supply chain opportunities would be one of the major benefits that would be delivered by the scheme why hasn't the supply chain action plan been further developed?	In order to ensure the most effective commercial delivery of the Wylfa Newydd DCO Project, Horizon has recently revised the commercial strategy to change from an Engineering Procurement and Construction (EPC) model with one tier 1 contractor responsible for the work to a construction management approach with the appointment of a Project Management Contractor (PMC) to support the delivery of construction activities on behalf of Horizon. After a tendering period in August 2018, Bechtel were announced as the successful Contractor to undertake this role. The appointment of the PMC contractor has been a key step in securing the commercial delivery of the Wylfa Newydd DCO Project. The PMC will support Horizon in delivery of the Supply Chain Action Plan (SCAP) and therefore ensuring that they were in place first was key before it was developed further. This was a key step in ensuring that they were able to buy in to the SCAP and enable opportunities to be maximised for local suppliers and local people. Notwithstanding this, during the procurement activity for the PMC, Horizon continued to engage with Welsh Government, IACC and other key delivery partners to develop the principles of the SCAP. Horizon first shared these principles with IACC and Welsh Government in August 2017. Since then, Horizon has been working with Welsh Government to develop these, and the framework for the supply chain engagement and development of the supply chain service, further including through meetings on: • 08/02/2018 – Economic Development and Supply chain with IACC • 05/03/2018 – Economic Development and Supply Chain with Welsh Gov; • 31/08/2018 – SoCG Workshop with Welsh Gov – Economy & Supply Chain; • 11/10/2018 – IACC workshop – Local employment, skills and supply chain; • 02/05/2017 – Wylfa Newydd Focus Group – Economic Development, Supply Chain and Skills. Welsh Gov. These principles build upon the commitments of the Supply Chain Charter and its aims are set out in Chapter C1 of the Environmental Statement at paragraphs 1.4.17 to 1.4.21. The Supply Chain Action Plan will be secured through the Draft DCO s.106 Agreement and is delivered by the Supply Chain Service. Currently the terms of reference for the supply chain service are in the process of being agreed with its members (IACC, Welsh Gov, NWEAB, Horizon supported by selected partners) and were circulated for discussion in 2018.	The IACC recognises and acknowledges that Horizon moving from an EPC to a PMC model restricted the detailed development of the SCAP. However, the Council considers that more work to develop the principles, values and fundamental framework of any SCAP could and should have been developed and agreed. That only 3 meetings – 02/05/2017, 08/02/2018 and 11/10/2018 – were undertaken with the IACC is disappointing due to the need to implement early any interventions to deliver meaningful local involvement. Further work has commenced on establishing an agreed outline for a SCAP in early December.

		The commitment is clearly made by Horizon, in the DCO, to maximise the opportunities within the local area with respect to jobs and supply chain opportunities. The Draft DCO s.106 agreement shared with IACC and Welsh Government secures the SCAP and it is intended that the SCAP will be annexed to the Draft DCO s.106. Horizon have demonstrated how this has worked in practice for the applications determined under the Town and Country Planning Act 1990 and for other local contracts with regards to the recent engagement for the Online Highways work, Site Preparation and Clearance and the reopening of the café at Wylfa site where local engagement has taken place with a number of companies engaged and supporting the works. Horizon is committed to delivering the SCAP and will ensure that it is developed so that it can be annexed to the final Draft DCO s.106 agreement to be submitted to the Examining Authority. A draft SCAP will be shared with relevant stakeholders including Welsh Government and IACC in early December 2018.	
Q10.2.2 3	You state that there would be no or very limited displacement of existing workers – what evidence, in particular drawn from other similar projects such as Hinckley C, have you to support this claim?	Displacement is as defined in the HM Treasury Green Book to mean: <i>“Displacement is the degree to which an increase in economic activity promoted by an intervention is offset by reductions in economic activity elsewhere.”</i> Displacement does not therefore arise simply because a local resident chooses to change jobs but only if the economic activity ceases. For most situations where someone changes job this will not be the case – the economic activity will continue with services provided by new staff, or by existing staff working longer hours and overtime. Workers on the Wylfa Newydd DCO Project will come from three different sources: 1. Those already employed by businesses that win contracts on the project 2. Those that are entering (or re-entering) the labour market 3. Those that change job to work for a contractor on the project Of these, 1 will be the largest. Horizon will seek to let contracts to businesses that already have a workforce capable of delivering the project. Many of these will be large, national businesses, but many will also be local businesses. When new vacancies do occur, depending where we are in the economic cycle, between 40% and 52% of new jobs are filled by people who were not previously working. Some of these will be registered as unemployed and some will not. Some will need help to get into work, others will not. The corollary of this is that up to 60% of new vacancies will be filled by people who change job.	Displacement is a major concern to the IACC. There is potential that the Wylfa Newydd Project will be adopting the NACEI Hinkley Pay Deal Rates. An example as per Q10.4.1 demonstrates that a carpenter will be earning 33% higher than a comparable role outside of the project. please see the IACC’s LIR – Economic Development (Local Employment) Chapter.

	This is the normal operation of the labour market and the choices of individuals within it and is not directly related to the impacts of the development. It is therefore not appropriate or necessary for it to be regulated by the planning system. This is partly because the supply of labour is not fixed. When new jobs are created, it encourages more people to start work and enables those who are in work to increase their hours. It also allows people who currently have to travel out of the area to change jobs to something closer and more convenient. All of these are likely to happen in Anglesey. A problem in Anglesey is that it does not have enough jobs and in particular it does not have enough full- time, year-round jobs. Anglesey has the third lowest level of jobs per 1,000 working age residents in Wales (390 – only Bridgend and Blaenau Gwent are lower at 370). This compares to the average in Wales of 550 jobs per 1,000 residents. Anglesey would require an additional 9,000 jobs to achieve the average for Wales (and 11,000 to match Gwynedd). At present, over 8,000 Anglesey residents commute off the island every day (with only just over 3,000 travelling the other way). In its representations to Horizon, IACC has been clear that without more jobs, the increased provision of housing that it is planning for and delivering will lead to an increase in out-commuting. The lack of jobs has been recognised by the fact that Anglesey is designated by the Welsh Government as one of eight Enterprise Zones. The first objective of the Enterprise Zones is to “Grow the local economy and provision of new jobs”. The Anglesey Enterprise Zone is focused on the energy sector. Horizon is helping to deliver a key government policy. The Wylfa Newydd DCO Project is therefore an important part of the solution to the main labour market problem facing Anglesey. Horizon has acknowledged that there is a risk that some vacancies could become harder to fill. However, given the flexibility of the labour market and the relative lack of jobs on Anglesey, this is not a likely significant impact requiring specific additional mitigation beyond that proposed through the Jobs and Skills Strategy and supported by the Skills Fund.	

		Horizon recognises that some training and support for businesses might be necessary to avoid and manage this risk and has therefore set out measures to address it in the form of the WNESS job brokerage service to help employers backfill any vacancies, supported by the Skills Fund which can pay for training. The JSS will support local people to be trained for roles where there is likely to be more opportunity for local residents to access work and will seek to broker them into those roles through the WNESS. There will therefore be a range of candidates on the WNESS database who are trained and ready for roles both at Wylfa or at local employers who lose equivalent staff to Wylfa. Evidence on displacement (as defined by the Treasury) from other projects is very limited. The Somerset Councils around Hinkley Point C (HPC) have reported workers changing jobs and some of those vacancies being hard to fill, but we are not aware of any evidence of actual displacement. HPC is specifically monitoring impacts on tourism and that has not yet identified any impacts arising as a result of the project. The latest monitoring report stated <i>“No concerns to raise to SEAG [Socio-economic Advisory Group] at present. All metrics suggest continued growth and development and the tourism business survey shows no detrimental impact on visitor perception as a result of HPC.”</i>	
Q10.2.2 5	In para 6.3.26 the Applicant discusses a “fair wage”. What is the Applicant’s intentions regarding the UK Living Wage?	Paragraph 6.3.26 of the Sustainability Statement. states that <i>“Horizon’s ongoing programme of contract review will seek to ensure movement towards a position that, where appropriate, contractors’ staff receive a fair wage reflecting the environment in which they work, and that they enjoy contractual terms that represent reasonable minimum standards and that provide for family-friendly, flexible and diverse working environments.”</i> This sets out Horizon's intention; however, the actual terms of contractual agreements will be discussed with the relevant contractors post-grant.	More detail on how a fair wage is to be calculated would be useful. Additionally, as stated in the IACC’s LIR Economic Development chapters, the IACC are mindful that the increased rates in salaries following the NACEI agreement down in Hinkley will cause displacement. HNP’s answer to Question 10.4.4 is contradictory to their response in Q10.2.25 where they explain that “Detailed benefit packages are subject to negotiation with employee representatives. The National Agreement for the Engineering Construction Industry 2016-18 sets out the basic framework for allowances which are applicable to this project. Therefore it is important to understand what the fair wage actually means and whether these “additional benefits” are included as these could attribute to attracting local workers to work on Wylfa Newydd Project. The IACC is eager to see local people working and securing a higher standard of living by working on the Wylfa Newydd Project, however, appropriate measures need to be in place to ensure that posts are backfilled to ensure that other elements of the economy is not at a loss.
Q10.2.2 6	The applicant indicates that up to 690 staff would be required to manage the facilities, including the site campus. What measures(such as training programmes) is the Applicant proposing to ensure that there would be sufficient staff available with the relevant skills to manage the facility without causing staff shortages for existing service businesses particularly those in the tourism sector?	The Environmental Statement chapter C1 – Project-wide effects Socio-economics identifies that the 690 jobs will provide beneficial effects to the local economy, providing additional employment and expenditure in an area with relatively few jobs, and highly seasonal employment. Tourism businesses will also benefit from increased year-round demand from workers for accommodation and food and drink that will help them retain their staff throughout the year. As set out in our response to Q10.2.23, workers on the project will come from three different sources: 1.Those already employed by businesses that win contracts on the project 2.Those that are entering (or re-entering) the labour market 3.Those that change job to work for a contractor on the project	

	Horizon has not yet decided on its approach, but it is likely that the majority of staff will work for contractors providing these supporting services. It will be the responsibility of these contractors to provide staff to work on the project which will be a key factor in their ability to win contracts. It is therefore likely that a large number of workers will be in the first category. Horizon is also proposing a Skills Fund and the Wylfa Newydd Employment and Skills Service (WNESS). These will: i) Help more people enter the labour market ii) Match people with jobs that suit their skills iii) Identify and support workers with training needs so that they are ready to work on the project or in backfilling roles iv) Support businesses with vacancies that need backfilling to do so from the pool of people who have registered with the WNESS The Skills Fund is proposed to be spent in line with the Jobs & Skills Implementation Plan (proposed to be secured under the Draft DCO s.106 agreement). Initially this will cover the first three years of the Wylfa Newydd DCO Project and specifically includes activity to support training in roles that are outside mainstream construction and would include site services roles, including facilities management. That spending would be agreed with the Construction Skills Working Group and would align with regional priorities. The regional aspect to this is important. Whilst the Wylfa Newydd DCO Project is a large individual project, it is relatively small in comparison to the North Wales economy. The 2,000 home-based workers at peak represent only around 10% of employment on Anglesey and less than 1% of the jobs across the North Wales Economic Ambition Board Area (Anglesey, Gwynedd, Conwy, Denbighshire, Flintshire and Wrexham). Skills planning therefore has to be done in the context of the wider skills needs of the economy, rather than for individual projects. UK Government policy is to maintain labour market flexibility so individuals and businesses are free to make their own decisions and to allow labour markets to adjust easily. As set out in the response to Q10.2.23, people changing jobs is part of the normal operation of the labour market and the choices of individuals within it and is not directly related to the impacts of the development. It is therefore not appropriate or necessary for it to be regulated by the planning system. Horizon recognises that some training and support for businesses in some sectors might be necessary to avoid and manage the risk of increased demand for workers on those sectors and has therefore set out measure to address it in the form of the WNESS job brokerage service to help employers backfill any	

		vacancies, supported by the Skills Fund which can pay for training (whether to work at Wylfa or in other roles). As set out in the response to Q10.2.23, evidence on displacement (as defined by the Treasury) from other projects is very limited. Hinkley Point C is specifically monitoring impacts on tourism and that has not yet identified any impacts arising as a result of the project. The latest tourism monitoring report from July 2018⁴ stated <i>“No concerns to raise to SEAG [Socio-economic Advisory Group] at present. All metrics suggest continued growth and development and the tourism business survey shows no detrimental impact on visitor perception as a result of HPC.”</i>	
Q10.3.2	Prescriptions are free in Wales for all those registered with a Welsh GP. How would the cost of prescriptions for workers registered with the on-site campus GP be covered?	A contract will be agreed with a local pharmacy to provide prescription and pharmacy services to the Site Campus Medical Centre. The prescriptions that will be written by the Site Campus Medical Centre clinicians will be private prescriptions which Horizon will subsidise. In this way all workers will be able to use prescriptions without paying a fee. This will remove the incentive of free prescriptions that might otherwise persuade some non-home-based workers to register with a Welsh GP. An estimated demand, and a means of monitoring, will be set up through the Health and Well-being Engagement Sub-group (Item 0097 Mitigation Route Map secured through the Draft DCO s.106, Draft Heads of Terms for Planning Obligations).	This issue of prescription costs for WN workers illustrates one instance of a wide group of situations in which HNP proposes to bear a direct cost which otherwise would be borne by existing public sources. Its proposal cannot guarantee that all WN workers will use the Site Campus Medical Centre and so there remains a risk of adverse effects of increased cost to the public subsidised prescription service and collateral and indirect effects of wider health service provision. S106 obligations need to be in place to respond to such adverse effects, but it cannot be right that HNP has a decision making role in whether or not to deploy such s106 resource that it is funding when it would at the same time have, and be seen to have, a direct financial benefit deriving from instances where its workers do not use its Site Campus Medical Centre for prescriptions.
Q10.3.4	The Emergency Services have concerns regarding the pressure that could be placed on the services they provide and the potential loss of experienced/skilled staff to the project. How would this be addressed?	Horizon are committed to working with the emergency services during the construction and operation of the Wylfa Newydd development. Horizon is working with the Welsh Government and members of Team Wales through the Statement of Common Ground process in respect of this topic (including training and service provision). Mitigation in this respect will be included in the Draft DCO s.106 Agreement as it develops. The Draft DCO s.106 provides that WNESS will assist in the recruitment of new employees to the labour market; train and upskill both new entrants and others; and provide a brokerage service by filling vacant posts to support businesses which encounter difficulty finding appropriate replacements when workers move on to the Wylfa Newydd DCO Project. Through the WNESS, Horizon will seek to (among other matters) support any employers who lose employees to the Wylfa Newydd Project to backfill their roles.	

		A Jobs and Skills Implementation Plan is being agreed with stakeholders and will be attached to the Draft DCO s.106. The Jobs and Skills Implementation Plan will (among other matters) require monitoring of labour displacement Finally, a Skills Fund is proposed in the Draft DCO s.106 to fund employment and training initiatives.	
Q10.3.6	Applicant - Would any increase in demand for support services relating to alcohol, smoking, drugs or communicable diseases (in particular STDs) be provided by the on-site healthcare provision or through the use of existing off-site services? BCUHB and PHW - If off-site services were used do they have the capacity to deal with any increase in demand? All - Would these services be available in the Welsh language?	The HIA Report (at B.6.7 and B.6.8) sets out the measures arising from the Wylfa Newydd DCO Project that would complement BCUHB and PHW initiatives that promote health and well-being (including no smoking policies and the provision of sexual health awareness initiatives). These will be secured through the specification that will be agreed by Horizon with Betsi Cadwaldr University Health Board (BCUHB) and with Public Health Wales (PHW) and which is currently being discussed through the SOCG process. Due to the provision of on-site services it is not expected that there will be a need for additional contributions relating to the use of off-site sexual health services. It is recognised that there may be some use of NHS sexual health services by the construction workforce. Through the Draft DCO s.106 Agreement, Horizon is proposing to establish an external stakeholder group (Health and Well-being Sub-Group). As per the Draft DCO s.106 Agreement shared with relevant stakeholders on 26 October 2018, this sub-group would sit under Wylfa Newydd Major Permissions Oversight Panel (WNMPOP). Part of the function of the Health and Well-being Sub-Group will monitor the effects of the Wylfa Newydd Project on local health services. There is also provision in the Draft DCO s.106 Agreement for a Health (Contingency) Fund, under which there is the potential for additional funding to be provided where there has been significant additional demand on local health services as a result of the Wylfa Newydd Project. The specific mechanisms for this fund have been shared with relevant stakeholders. Staffing of the on-site medical centre will be in accordance with Horizon's Polisi Iaith Gymraeg/Welsh Language Policy which among other things, obliges staff members to demonstrate linguistic courtesy.	As per Question 10.3.2 above, IACC would wish to be a member of the sub-group. For IACC's wider position with regard to the sub-group please see the LIR Chapter 15, paragraphs 2.3.18 – 2.3.20. The issue of sexual health and sex work is addressed within LIR Chapter 15. In summary, IACC considers it inevitable that there will be an increase in sex work during the course of the project. Horizon needs to put forward specific, targeted measures to address this issue and must co-operate with existing support structures operating in North Wales.
Q10.3.8	Applicant – when would the bi-lingual Community Involvement Officer be appointed? BCUHB and PHW - Could this role be carried out successfully by one person?	The Draft DCO s.106 agreement provides at <i>Schedule 14 -Community Involvement Officers</i> that Horizon will employ 1 Community Involvement Officer (CIO) and fund IACC to employ 1 CIO during the construction period. Both CIOs would be bilingual. The CIOs would work to deliver a Community Impact Joint Work Plan, a draft scope of which is set out in the Draft DCO s.106 agreement.	Please see IACC's LIR Chapter 15 paragraphs 2.13.12 to 2.3.14 with regard to the number of CIO's required and the role they should perform.

Q10.4.1	The Supply Chain Charter (and Action Plan) envisages business development opportunities for local (Ynys Môn) and regional (North Wales) businesses. (a) Has any work been undertaken to review whether the businesses needed to supply the applicant are available either locally or regionally? (a) Horizon engages with businesses, governmental and industry bodies to utilise their databases and understand the local/regional supply. These organisations include: • North Wales Economic Ambition Board (NWEAB) • CBI North Wales/Wales • Federation of Small Businesses (FSB) • North Wales Chamber of Commerce • Cheshire Chamber of Commerce • Welsh Government • IACC • Gwynedd • Wales Nuclear Forum • Mersey Dee Alliance The Welsh Government undertook a ‘nuclear related’ supply chain survey in 2014 with respect to the suitability of companies in North Wales/wider area which Horizon have incorporated into their supply chain approach. A comprehensive review into the amount of supply that can be met locally/regionally is planned as part of the Supply Chain Action Plan (SCAP). The SCAP will appended to the Draft DCO s.106 agreement, <i>Horizon is committed to delivering the SCAP and will ensure that it is developed so that it can be annexed to the final Draft DCO s.106 agreement to be submitted to the Examining Authority. The timetable for developing it has been agreed with IACC and Welsh Government as follows:</i> • Share initial thoughts on SCAP – include date of initial workshop 25th October 2018 • Share draft SCAP with relevant stakeholders including Welsh Government IACC – 11th December 2018 • Share final draft SCAP for comment from stakeholders ahead of appended to Draft DCO s.106 agreement – 31st January 2019 • Final publication of SCAP in a form that will be annexed to final Draft DCO s.106 agreement –14th February 2019 (b) Horizon’s current engagement on site and its endeavours to engage the local market shows that a reasonable proportion of the supply is met by local/regional businesses, for future works but this will not fully be known until the SCAP and procurement strategy are complete. Part of the SCAP is to conduct a comprehensive review of capabilities locally/regionally.	The IACC has answered this question as part of its response to Deadline 2. However, Horizon state in their response to Q10.4.4 the NAECI rates on Hinkley Point C but do not confirm that they will be used at Wylfa Newydd. Unite’s announcement following the deal that “this is a landmark agreement which will now set the benchmark for pay rates on flagship construction projects throughout the UK” it would be expected that these rates would be required on Wylfa Newydd as Unite is a member of the NJC which sets and agrees the NAECI rates.

	(c) If suppliers are not available locally because companies are too small/ have limited resources/limited skills what support/help is proposed to enable existing companies to have the potential to supply/bid for work? (d) Is there sufficient office space, warehouse space, and small business units to meet the needs of the organisations/companies that would supply the project? (e) There are 11 construction companies on Ynys Môn – what measures are proposed to protect these businesses and to ensure that they can maintain their workforce during the construction period?	<i>Horizon have demonstrated how this has worked in practice for the applications determined under the Town and Country Planning Act 1990 and for other local contracts with regards to the recent engagement for the Online Highways work, Site Preparation and Clearance and the reopening of the café at Wylfa site where local engagement has taken place with a number of companies engaged and supporting the works.</i> (c) This will be developed by the Supply Chain Service and the collaborative approach with the Welsh Government, IACC and the North Wales Economic Ambition Board together with Horizon and its partners will look to help prepare the local supply chain/SME's to take advantage. As outlined within paragraph 1.4.19 of chapter C1, the Supply Chain Service will oversee the delivery and implementation of the Supply Chain Action plan and will be jointly formed of stakeholders and key delivery partners from the Wylfa Newydd supply chain. The Supply Chain Service will be secured through a Draft DCO s.106 Agreement. The draft Terms of Reference (ToR) for the Supply Chain Service have been shared with IACC, Welsh Government and North Wales Economic Ambition board who will all be represented at the Supply Chain Service. (d) In the Draft DCO application, Horizon have accounted for the space (office etc.) it requires for the development and will work with stakeholders to support any opportunity for other developments as a result of the project however ensuring that third party businesses have sufficient space in which to operate is not the responsibility of Horizon. (e) Horizon via the Supply Chain Service and Wylfa Newydd Employment and Skills Service will monitor to mitigate appropriately against any potential adverse effects on services as a result of the Wylfa Newydd DCO Project.	
Q10.4.2	Paragraph 1.5.89 of the ES [APP-088] refers to deterioration of tourism accommodation due to long term occupancy, reduced maintenance and lower expectations for accommodation. What pro-active measures are proposed to minimise any degradation of	Degradation of stock was included in the ES at the request of local stakeholders. As set out in the remainder of Paragraph 1.5.89 of the ES, it is not a likely significant impact. As shown in Table 6.2 of the Workforce Accommodation Strategy, the supply of tourist accommodation is large compared to the demand. Across the Key Socio-economic Area (KSA) there are 6,950 bedspaces in serviced accommodation, 6,400 in self-catering and over 45,000 in caravans. This compares to peak demand of 450 in serviced and self-catering and 650 in caravans.	The IACC disagree with Horizon's assumption on supply of tourism accommodation. These figures are vastly exaggerated. See Section 5.17 and 5.18 of the Housing Chapter of the LIR. Horizon over-estimates 'spare capacity' in the sector by using all-Wales occupancy data, which is lower than that for Anglesey. This is compounded by the failure to apply an access moderator to the self-catering sector, which has the highest peak-period occupancy rates (88%). Horizon's calculations are also drawn from the whole Key Socioeconomic Area (KSA) and utilise accommodation stock data drawn from both Anglesey and the Menai Mainland (table 4). This inflates the estimated number of bed-spaces and amount of stock available in each sector by 25,636 (44%), yet Horizon's calculations estimate that this will only play a very minor role in workers' accommodation choices (e.g. 8% of caravan sector). Paragraph 5.17.8 of the LIR Housing Chapter highlights a transference of accommodation out of the tourism sector, which will degrade the accommodation stock.

	this stock and to ensure that when it is vacated by workers it would be of a standard that is suitable for tourism lets?	As a result, it is unlikely that any individual accommodation would be used continuously and providers would only let a proportion of their accommodation to workers. This is supported by responses to the IACC Bedstock Survey. This found that larger operators were more interested in letting to workers than smaller ones (where workers could take all the capacity). Finally, even if some accommodation is used continuously, it would be a very small proportion of the total supply and the effects of any “degradation” would not be significant in the context of the overall tourism market. For the reasons set out above it is not envisaged that any pro-active measures are required to ensure that accommodation once vacated by workers would be of a standard that is suitable for tourism lets.	
Q10.4.3	The ES [APP-088 –paragraph1.5.98] states that the food and drink sector could also significantly benefit by the facilities management and catering contracts required through the entire lifecycle of the project: (a) What measures are proposed to ensure that these contracts are awarded to local companies rather than large contract catering companies? (b) Given that there will be on-site catering facilities which will service the needs of the development what realistic opportunities would there be for the local food and drink sector to benefit from the scheme?	(a) An action plan will be in place to ensure that local companies are engaged during the construction and operation of the Wylfa Newydd DCO Project, this includes the food and drink sector. This Supply Chain Action Plan (SCAP), which will be secured through the Draft DCO s.106 Agreement, and delivered by the Supply Chain Service, will enable opportunities to be maximised for local SME and local people. (b) Horizon have already engaged local food suppliers at site (Elleanor Jane site catering, Tepot Pridd – construction workers on site food retail, Anglesey Spring – meeting room water and currently engaging with Mon Larder). Also, Horizon recently held a local food suppliers Expression of Interest briefing session relating to on site ‘Caffi Wylfa Newydd Cafe’ offer on the 9th November with both IACC and WG providing information on interested suppliers. As the SCAP develops and is implemented, engagement with local SMEs will also progress.	(b) Paragraph 1.5.26 of the LIR Tourism Chapter deals with this issue. Displacement in the supply chain could weaken the links between the tourism sector and local producers on Anglesey, undermining the distinctive offer and support for farming, fishing and local craft producers, which has been built up over recent years and been further developed by the Anglesey Food Tourism Strategy.
Q10.4.4	Regarding labour churn: (a) What is the median wage of a construction worker working on a similar project such as Hinckley C and how does this compare to the median wage for KSA residents?	(a) According to press reports (https://www.employeebenefits.co.uk/issues/may-2018/construction-staff-pay-deal/) Hinkley Point C staff receive pay levels that are (in the case quoted) 36% more than the minimum pay rates agreed by the Construction Industry and Joint Council. Minimum hourly rates of pay for craft workers, such as carpenters, bricklayers and painters, are £12.31 an hour and minimum rate of pay for labourers is £9.26 an hour. For an average 40-hour week this equates to wages of around £670 for carpenters etc and £500 for labourers. The Annual Survey of Hours and Earnings (ASHE) shows that median wages rates for	

	(b) What other 'benefits' could an employee of the scheme expect eg subsidised/free accommodation, subsidised meals, private healthcare, free or subsidised sports and leisure facilities etc?	skilled construction and building trades in Wales are £470 a week and for building finishing trades are £420. Median wages for full time male workers in IACC are approximately £500 a week, Gwynedd £440 a week and Conwy £440 a week. (b) Detailed benefit packages are subject to negotiation with employee representatives. The National Agreement for the Engineering Construction Industry 2016-18 sets out the basic framework for allowances which are applicable to this project.	
Q10.4.5	Reference is made to a future intention by Horizon to provide a Visitor and media reception centre near the Power Station Site which would provide a focal point in the north of the island and a local community facility. How would the provision of this facility be secured?	The Draft DCO s.106 Agreement issued to stakeholders on 26 October 2018, obliges the Applicant to use reasonable endeavours to secure planning permission for the facility. A timeframe commitment is still under consideration and discussion with stakeholders.	HNP's answer to this questions deals only with obtaining planning permission and does not address the full question of how a Visitor Centre would be secured. IACC is seeking funding through the s106 to ensure that a temporary facility is provided during construction moving to provision of a permanent facility.
Q10.4.6	A Tourism Fund is proposed to address any material effects on the local tourism sector in Ynys Môn. Are there any further details available as to how this would operate, the funding available to it and how it would be secured?	The Tourism Fund is secured through the Draft DCO s.106 Agreement. In the draft issued to stakeholders on 26 October 2018, allocation of the funds is set out in 'Schedule 3 – Tourism' of the Agreement as follows: 1) A Tourism (Annual) Contribution payable by the Applicant to IACC annually for the construction period. The council would be required to allocate this money to: • safeguarding and enhancing the image and perception of North Anglesey as a visitor destination; • a programme of measures or works to attract greater visitor numbers to North Anglesey; • collation of monitoring data such as such as tourism attractions data, STEAM data, or other related or equivalent data on the tourism sector on Anglesey; and • other such matters agreed as between the Council and the Developer which promote or support Anglesey as a tourism destination. 2) A Tourism Officer Contribution, payable by the Applicant to IACC for the construction period manage the council's obligations under the agreement. 3) Tourism (WG Monitoring) Contribution to be paid by the Applicant to the Welsh Government for the purposes of contributing to the Welsh Government costs of part-sponsoring the existing Welsh Government: Tourism Barometer Survey, Wales Visitor Survey, and the Wales Tourism Accommodation Occupancy Survey.	See LIR Tourism Chapter 1.5.28. Horizon acknowledge a 10% visitor loss to the Island. This would result in a minimum annual loss to the Island of £30m - but the cumulative impacts of this would be worse. See LIR Tourism Chapter 1.6.2. Effective brand-building and damage limitation in tourism destination marketing is founded on early, sustained interventions to address problematic issues. It would be expected that the Tourism Fund would operate on a scope and scale exceeding that of the HTAP, reflecting the greater importance of tourism to the Island. Crucially, it must be underpinned by a commitment to enhance, protect and prevent rather than monitor and mitigate. Surveys will only report the views of visitors who have already come to the island, not those who have not.

		4) A Tourism Contingency Fund which would be available throughout the construction period. The fund would be released either at the direction of the WNMPOP at the recommendation of the Accommodation, Tourism and Leisure Sub-Group, where a significant adverse effect (or forecast effect) on the tourism sector within Anglesey may be shown by evidence demonstrating: • changes (material reductions) in visitor numbers to or visitor spend; • changes in the quality and availability of tourism accommodation; • a decrease in attendance numbers at tourist attractions and events; and • negative impacts on tourism businesses. Provision is also made for Gwynedd Council and Conwy Council to apply to the Accommodation, Tourism and Leisure Sub-Group for funds where evidence indicates of significant adverse effects or which forecasts trends that are likely to lead to significant effects on tourism in Gwynedd and Conwy.	
Q10.4.7	The proposed off-line Highways Improvements would result in the bypassing of a number of villages. What measures are proposed to mitigate any business that would be affected as a result of a drop in passing trade?	There are no significant adverse effects reported within Chapter G3 – Socio-economics [APP-306] in respect to changes in passing trade and future commercial business viability as a result of either the construction or operation of the proposed A5025 Off-line Highway Improvements. Nevertheless, Good Practice mitigation outlined in Table G3-16 of Chapter G3 – Socio-economics will assist with mitigating any potential drop in passing trade during the construction of the A5025 Off-line Highways Improvements and into its operation. Such measures are secured within the Wylfa Newydd CoCP and A5025 Off-line Highway Improvements sub-CoCP and comprise of the following: • Chapter 6 of the Wylfa Newydd CoCP outlines that access to/from residential property, local businesses and local services and agricultural interests will be maintained throughout the construction period by means of signed diversions, where necessary. The estimated duration and location of these diversions will be communicated to affected parties, as required, before they are put in place; • Chapter 3 of the A5025 Off-line Highways Improvements sub-CoCP outlines the consultation strategy, which includes engagement with affected landowners and occupiers to discuss the local and timing of planned works to reduce disturbance, where practicable, taking into account the overall construction programme; and • The Wylfa Newydd CoCP and the A5025 Off-line Highways Improvements sub-CoCP are secured by DCO requirement.	We welcome Horizon's confirmation that they will provide some mitigation towards minimising any potential drop in passing trade for affected businesses. The IACC has answered this question as part of its response to Deadline 2. The IACC identified additional mitigation proposals to overcome adverse impacts

Q10.5.1	In your RR [RR-041] you state that measures are necessary to protect the Welsh language – can you provide further detail as to what measures you consider would be necessary?	The Welsh Language Impact Assessment (WLIA) has identified the need for various enhancement and mitigation measures which are set out in the Welsh Language and Culture Mitigation and Enhancement Strategy (WLCMES) (WLIA appendix B4-1, and would be secured by planning obligation (through the Draft DCO s.106 Agreement). The full range of measures proposed are set out in volume A and B of the WLIA (WLIA appendix B4-1,. Horizon considers these to be the necessary measures for mitigating and enhancing the effects on the Welsh language.	IACC considers that the range of enhancement and mitigation measures proposed by Horizon in volume A and B of the WLIA (WLIA appendix B4-1) do not fully address all the measures necessary to protect the Welsh language. Further details as to the additional measures IACC considers essential are set out in Section 6 of Chapter 9 of IACC's Wylfa Newydd Local Impact Report (December 2018; PINS Ref: EN010007). IACC is in alignment with Welsh Government who have expressed their “concerns that the mitigation measures are simply principles at the moment” and require further development (see WG response to Q10.5.12). Gwynedd Council, as set out in its representations and Statement of Local Impact also maintains that some of the WLCMES measures need refinement/ strengthening (See GC response to Q10.5.23). IACC also concurs with Gwynedd Council's description of the additional limitations to some of the WLCMES measures as described in GC's response to Q10.5.24.
Q10.5.2	In your RR [RR-028 and RR-041] you have stated a concern regarding the availability of Welsh Language trainers/teachers and the length of time it takes to train a Welsh language trainer/teacher – can you: (a) provide details of the number of registered Welsh trainers/teachers that there are; (b) the length of time it takes to train a language trainer/teacher; and (c) examples regarding issues with recruitment eg how difficult has it been to recruit Welsh speaking teachers to the local schools?	(a) The Education Workforce Council publishes data on the number of registered school teachers by Welsh language ability. The most recent data is published at an all-Wales level in their ‘Education workforce summary data’ here. The Education Workforce Council has also published data for the regional education consortium covering the six local authorities of Conwy, Denbighshire, Flintshire, Gwynedd, Isle of Anglesey, and Wrexham which shows that 3,948 teachers (52.8%) were able to speak Welsh and 3,450 (46.2%) were Welsh-medium teachers. The data is available here. (b) Initial Teacher Education for language teachers usually takes between 1 and 3 years, depending on the route chosen by the trainee candidate. Most teachers undertaking Initial Teacher Education follow the Postgraduate Certificate of Education route, which usually takes one year. However, some choose to undertake undergraduate degrees in education, which typically take three years. A smaller number of teachers enter the profession via employment-based routes such as Teach First or Graduate Training Programme, which usually takes two years. (c) Welsh Government has published data on the number of applicants for teaching roles in 2016/17 by local authority subject here. The data for Anglesey shows that on average, there were 4.7 applicants per primary school teaching post, 4.5 applicants per secondary teaching post and 8.0 applicants per Welsh first language teaching post in 2016/17.	(a) The concern for IACC is not recruitment of all teachers, rather it is where there are acute shortage of teachers in certain subjects that are important in connection with Wylfa Newydd and the problem of attracting teachers in these subjects with sufficient Welsh language skills (or confidence in their skills) to teach in the medium of Welsh is a further obstacle and a serious challenge. The Education and Skills Local Impact report contains a range of impact assessments, proposals and references to further research and data relating to the challenges of teacher recruitment A recent report into Welsh medium ITE commissioned by Welsh Government shows this problem clearly – see below. This is part of a wider and long-standing problem. https://gov.wales/docs/caecd/research/2018/180928-evaluation-welsh-medium-provision-initial-teacher-education-summary-en.pdf (b) The timings given by Horizon are broadly correct. It should be noted that the current Graduate Training Programme and Teach First routes have significant limitations and have little impact on alleviating teacher shortages. (b) (c) these figures do not give a clear indication of the ease or difficulty of appointing teachers. This number of applicants is considered low, and applicants are not necessarily appointable.
Q10.5.3	The IACC consider that an Educational Strategy is necessary, was such a strategy considered and if it was why it was concluded that such a strategy was not necessary?	Horizon's approach to education has three components: - Measures to support the provision of school places - Measures to support Welsh Language - Measures to promote the project and career opportunities with schools, including actions to promote STEM.	IACC continues to wish to see an Education Strategy, as promised by Horizon at the earlier consultation stages. Some brief comments on Horizon's response are shown below, however the Education and Skills Local Impact Report sets out full details of IACC's position. The three components of the approach described omit important areas of mitigation relating to education. For example measures relating to supporting education are confined to Welsh language and “promotion”. Promotion is important but it falls far short of what is necessary to optimize the preparation of young people on the Island for employment and training as set out in the Education and Skills Local Impact Report.

			The Jobs & Skills Strategy contains very little detail in relation to education strategy. Any commitments are given in very broad terms making it impossible to assess the scale or form of actual support provided by Horizon. Documents relating to Welsh Language assessment do not address issues concerning general education. Horizon’s DCO submissions do not set out commitments concerning school places in an acceptable form – please refer to the Education and Skills Local Impact Report sections 7.1 and 7.2. Measures relating to Welsh Language are considered insufficient and inadequate, for example measures centred on ‘information’, ‘monitoring’ and ‘dialogue’ alone do not address specific actions and commitments that can be planned now – please refer to the Education and Skills Local Impact Report sections 7.3, 7.5 and 7.6. The ‘Work Insight Week’ and peripatetic teacher service proposals are small-scale, are not expected to be adequate and are not part of a coherent and credible strategy. As mentioned above, the Jobs & Skills Strategy contains little clarity regarding education strategy and although the Skills Fund is mentioned the document contains no clear indication of the level of funding or how it would be managed or applied. The three key strands highlighted in Jobs & Skills Strategy the response are welcome as high level statements, however the document does not explain how these will be achieved or what part Horizon would play in this – please refer to the Education and Skills Local Impact Report sections 11.0 and 11.4

	The first two are secured through the Draft DCO s.106 agreement. The third will be supported through the Skills Fund (which is secured through the Draft DCO s.106) but the specific interventions may change overtime so these are not secured. As a result, Horizon’s education strategy is not set out in a single standalone document, but is set out in the following DCO application documents: the Jobs & Skills Strategy, the Draft DCO s.106 agreement and the Welsh Language Impact Assessment. Horizon has committed to monitor and mitigate the effects on school place demand as a result of workers bringing children through the proposed early Education Contribution, and through the separate Education Contingency Fund, secured under the Draft DCO s.106 agreement. Horizon has also committed to a range of Welsh Language measures in the Welsh Language and Culture Mitigation and Enhancement Strategy appended to the Welsh Language Impact Assessment. Such measures include: • information on career opportunities at Wylfa Newydd to and young people including the bilingual Wylfa Newydd ‘Career Route Maps’ and Job Profiles and role model activities such as case study video clips, written materials, presentations in schools. • Monitor data on partners and children moving to the KSA with construction and operational workers include numbers of children, ages and Welsh language skill levels to provide information for education and early years planners. • Horizon will maintain the Project apprenticeship scheme and continue to provide the ‘Work Insight Week’, or an equivalent scheme, to young people • fund a peripatetic teacher service (pro-rata as detailed below) that would support current immersion education capacity on Anglesey (and potentially Gwynedd if required) across primary and secondary schools • Horizon will engage and facilitate ongoing dialogue with IACC, Gwynedd Council, Mudiad Meithrin (Welsh-medium early years representative body) and Menter Iaith Môn to discuss the inflow of pre-school age children and the impact on local Welsh medium provision and measures to mitigate this impact. As part of this dialogue, Horizon will monitor on an ongoing basis the number of workers bringing families, including those of preschool age. This data will be used to identify the appropriate mitigation required to mitigate the effect on Welsh-medium provision. Horizon’s education strategy, as a whole, is summarised in Section 7 of the Jobs & Skills Strategy (JSS) and will be funded through the Skills Fund which is provided for under the Draft DCO s.106 agreement.	

		It sets out two overarching objectives (to support Horizon's long-term recruitment and to enhance regional stakeholder support as part of its community benefits plan) and the three key strands to: • Inspire young people to study STEM subjects. • Engage young people, key stakeholders and the local community about the future recruitment opportunities offered by Horizon. • Equip young people with key employability skills. It then sets out a range of activities that are currently underway and which will continue if the Draft DCO is granted; such as engagement with schools and promotion of STEM subjects to encourage students to get involved in subjects that may increase opportunities to work on the Wylfa Newydd DCO Project.	
Q10.5.4	The Daily Construction Commuting Zone (DCCZ) is a 90 minute drive time from the main power plant site. Can you provide information on the percentage of Welsh speakers that reside within this area?	In 2011, 42.7% of the population aged three and over in the DCCZ spoke Welsh. Please see section A.6 'Welsh language profile' of the Welsh Language Impact Assessment [APP-430]. The 2011 Census provides the most up to date data regarding the number and proportion of Welsh speakers at national, county, ward and parish level across Wales.	The IACC agrees that the 2011 provides the most up to date data on the number and proportion of Welsh speakers below national level.
Q10.5.5	Reference is made in the documentation to Horizon providing a peripatetic teacher service (paragraph 6.2.28 of the Planning Statement [APP-406]) and indicates that initially two teachers would be funded (paragraph 7.4.27). (a) Does a peripatetic teacher service for Welsh language currently exist on Ynys Môn? (b) If it doesn't how would the service operate; who would manage it and how long would it run for eg during construction only? During construction and a time limited period of operation? During construction, operation and decommissioning? (c) Would two teachers be sufficient – given that it has been indicated that any service may potentially need to extend into Gwynedd?	(a) Horizon understands that the language immersion service on the Isle of Anglesey is primarily a centre-based model, operating from two centres in Holyhead and Moelfre, with some peripatetic outreach provision to supplement the centre-based provision. Horizon understands that the service employs five full-time language immersion teachers and that the current pupil to teacher ratio of this service (based on annual data) is around 1 teacher to 16 pupils. (b) Mitigation measure 16 of the WLCMES (WLIA appendix B4-1), is proposed to be secured through the Draft DCO s.106. Horizon proposes that this service would be managed by IACC, building on the current Welsh language immersion service, but could also operate in Gwynedd if required. (c) Measure 16 of the WLCMES (WLIA appendix B4-1), as proposed to be secured in the Draft DCO s.106 would deliver two peripatetic teachers who could operate flexibly across Anglesey and Gwynedd based on the number of dependents moving to the area with workers. Numbers of dependants would be monitored	Horizon's response is inadequate and does not address the issue of how long the proposed the service should run. IACC believes that it will also be necessary for Horizon to invest in further capacity during the operation and decommissioning phases to address issues of churn in the workforce and to provide an on-going service to non-local workers and their families. In this regard IACC is in alignment with Gwynedd Council's position (see GC response to Q10.5.5 and Q10.5.24)

		by the WAMS (as proposed to be secured in the Draft DCO s.106). Horizon considers funding for two teachers commensurate with numbers of dependants forecast. Horizon notes that the Draft DCO s.106 Agreement also proposes a Housing Contingency Fund from which funding could be drawn for additional provision if demand indicated there was a need. Measure 13 of the WLCMES (WLIA appendix B4-1, has been designed to monitor the number of dependents.	
Q10.5.6	Paragraph 6.2.41 of the Planning Statement [APP-406] states that 85% of the operational workforce would be local people. (a) Please define what is meant by a local person or where in the documentation this definition can be found. (b) Given that the operational workforce would be 850 people would 85% be achievable and if so how this would be achieved without disrupting the workforce of other businesses on Ynys Môn?	(a) As outlined in paragraph 1.5.118 of Chapter C1 of the Environmental Statement, it is expected that around 85% of those employed would already be resident within the DCCZ, so would be local in nature. (b) Horizon will be working to achieve or exceed this target by undertaking a range of measures and activities, as outlined in part (c) of this response, to foster and incentivise a workforce that is closely representative of the local community and not disruptive to other businesses. As a result of the measures set out in (c) below Horizon believe the 85% target is achievable. Horizon believe that this is achievable without disrupting the workforce of other businesses on Anglesey (Ynys Môn) due to the current characteristics of the Anglesey labour market. A fundamental problem for Anglesey's labour market is that it does not have enough jobs and in particular it does not have enough full-time, year-round jobs. Table 4-11 (Comparative Job Densities by Area) in ES Appendix C-1 Socio-economic Baseline Report [APP-095] shows that Anglesey has far fewer jobs per working age residents (0.63) than either North Wales (0.79) or Wales as a whole (0.74). Anglesey would require an additional 3,500 jobs to achieve the average for Wales (and 5,000 to match North Wales). At present, over 8,000 Anglesey residents commute off the island every day (with only just over 3,000 travelling the other way). In its representations to Horizon, IACC has been clear that without more jobs, the increased provision of housing that it is planning for and delivering will lead to an increase in out- commuting. The lack of jobs has been recognised by the fact that Anglesey is designated by the Welsh Government as one of eight Enterprise Zones. The first objective of the Enterprise Zones is to	Horizon's response is unclear and inadequate as to how it defines a local person. In its response to question (b) - where Horizon addresses the likely scenario as it affects Ynys Môn - it appears to be defining local people as the workforce residing on the Island. In its response to question (c) it appears to be defining a local person as a person living within the KSA.. These are at variance with the response to question (a) where it defines DCCZ residents as being "local in nature". The responses undermine the IACC's confidence in the WLIA's assessment of where the additional 850 people are likely to reside, their likely effects on the Welsh language and culture on Ynys Môn and Horizon's claim that the mitigation measures proposed in the WLCMES are sufficient. Comment is made below on how "local" should be defined. IACC has also raised concerns that the positive impact through job creation is currently reduced by the potential for labour displacement effects which would have a negative impact on the Island's overall economy and key sectors within the Anglesey economy. IACC's concerns are set out in the IACC, LIR, Economic Development Chapter 3, Section 1. IACC does not consider Horizon's response to be fully adequate and identifies the additional measures required to address its concerns in section 1.7.6. The 850 operational new jobs will bring a major long term positive impact to the Anglesey economy. Aside from the employment itself, these jobs are likely to be highly productive. These highly productive jobs are also likely to provide above average wages, which should go some way towards improving the gap between average wages in Anglesey and the Welsh average (both resident and workplace measures). Furthermore, resident wages in Anglesey have been consistently higher than workplace wages since 2003, indicating that Anglesey residents can earn higher salaries by commuting elsewhere for work. Securing as many of the operational jobs at Wylfa Newydd as possible could help push up workplace-based wages and provide higher paid local job opportunities for residents. The IACC supports Horizon's commitment to achieving 85% local employment when Wylfa Newydd is operational; however the Council believes this should be a minimum target. IACC's support for Wylfa Newydd has been predicated on the creation of these highly skilled, well-paid, long-term jobs for local people. The success of the project locally will be determined on whether this is achieved. The IACC also submits that clarification is required on how a person will be defined as 'local'. The IACC requests that a definition is adopted which acknowledges that workers who have resided on Anglesey only for a short period during construction in order to work on the project and who have no pre-existing local connection are not 'local' for this purpose. The definition of local should encompass the pre-construction resident population and those with a local connection returning to or relocating to the Island but not simply any person whose address at time of application is given as with the Key Study Area (KSA). The IACC wish to ensure that the 85% target during operation is taken up by current local residents, or former residents attracted back, who are more likely for example to speak Welsh; thus making a positive language and cultural contribution. Further detail and certainty is required on how this target is to be achieved (for example whether there is significant investment in apprenticeship schemes and up-skilling of local people), by when, and what strategies will be implemented. It is noted that operational jobs are created over the construction period and therefore the capability and skills are gradually built up. The strategies, programmes, resources required need to be defined, agreed and secured. Without this detail, only limited weight can be given as the mechanisms are not secured.

		<i>“Grow the local economy and provision of new jobs”⁵</i> The Anglesey Enterprise Zone is focused on the energy sector. Horizon is helping to deliver a key government policy. The Wylfa Newydd DCO Project is therefore an important part of the solution to the main labour market problem facing Anglesey and would not disrupt the workforce of other businesses. Horizon also note that by creating these jobs, Horizon is entirely in line with policy and so further mitigation is not required.	
	(c) What mechanisms are proposed that would ensure that 85% of the workforce are local people and what penalties are proposed if this target was not met?	(c) Horizon is confident that it can achieve 85% of its operational workforce at the Wylfa Newydd DCO Project being local people due to a number of factors: • There will be a degree of overlap in terms of those workers, especially professional workers, involved with the Wylfa Newydd DCO Project during its construction period that will stay on or evolve within roles through the interim period in which the Wylfa Newydd DCO Project transitions from construction phase to operation; • Horizon’s STEM schools outreach programme, called ‘Dyfodol/Futures’, covers both primary and secondary schools across Anglesey, north Gwynedd and Conwy County Borough (i.e. the majority of these areas comprise the DCCZ). Additionally, Horizon participates in regional STEM events and as a partner/fund provider for European funded projects, such as STEM Gogledd (North), that reach a wider secondary school audience from across North Wales. These programmes are ensuring that there will be an appropriately qualified local workforce; • Around one-third of the operational workforce will be required to be skilled to a technician level, requiring apprenticeships to play an instrumental role in terms of ensuring that such requirements are met. Entrants onto Horizon’s 3-year Apprenticeship programme are more likely to be local to the power station given the unlikelihood of individuals travelling from afar to undertake such training, therefore Horizon intends to maximise opportunities available to apprentices to ensure that the Wylfa Newydd Power Station workforce is closely representative of the local community; and	

⁵ <https://gov.wales/topics/businessandeconomy/growing-the-economy/enterprisezones/?lang=en>

		Horizon will also continue to work with Grwp Llandrillo Menai and industry skills bodies to ensure that the apprentice provision is constantly adapted and improved to meet the needs of the Wylfa Newydd DCO Project. Horizon is confident that this benchmark will be achieved given the demographic profile of the population within the DCCZ, and the measures to foster and incentivise a workforce that is closely representative of the local community and not disruptive to other businesses. Horizon notes that a similar benchmark was achieved during the operational phase of the existing Magnox Power Station. As a result, it is not considered appropriate to impose penalties on Horizon in respect of this 85% benchmark.	
Q10.5.8	The work of the proposed Welsh Language and Culture Coordinator is seen as key to the development and implementation of the Welsh language and culture mitigation and enhancement measures (Planning Statement [APP-406] paragraph 6.4.474). (a) When would this appointment be made? (b) Given the scope of the role could it realistically be covered by one person?	The Welsh Language and Culture Coordinator has been appointed and has been in post since early November 2018. This is further secured in the Draft DCO s.106 agreement which requires in Schedule 1- Welsh Language and Culture that the Applicant employ a Welsh Language and Culture Coordinator from the date of the agreement for the duration of the operational period. The role of the WLCC is defined in the Draft DCO s.106 agreement to: (a) establish a Welsh language skills competency framework and assessment tool; (b) ensure delivery of the Welsh Language and Culture Mitigation and Enhancement Strategy; (c) focus on the development and implementation of Welsh language and culture mitigation and enhancements; (d) monitor, measure and evaluate community benefit activities and associated mitigation measures; (e) sit on and report to the Welsh Language and Culture Sub-Group; (f) work closely with the Community Involvement Officers to deliver the Community Impact Joint Work Plan; and (g) assist the Council to operate the community translation service established under the Draft DCO s.106. Horizon is confident that these roles can be carried out by one person. The Draft DCO s.106 agreement acknowledges that the role of the Welsh Language and Culture Coordinator would change as between the construction period and the operational period. In addition to the Welsh Language and Culture Coordinator, as secured via the Draft DCO s.106 agreement, Horizon will establish a management group which will have oversight of and be accountable for the delivery of this Welsh Language and Culture Mitigation and Enhancement Strategy as well as Horizon's Corporate Welsh Language Policy.	IACC welcomes the appointment of the Welsh Language and Culture Coordinator. IACC is not concerned that the role be undertaken primarily by one individual. That the WLCC be accorded high profile and authority within Horizon's company structure is crucial to the success of the role. IACC has also made explicit in its LIR, Chapter 9, Section 6, paras 6.9.1.3 – 6.9.1.7 that a development of the magnitude of Wylfa Newydd requires broader ownership of the Welsh language across the organisation for the policy and mitigation measures to be effective. Central leadership and management buy-in will be required and it is expected that the Senior Management Group accountable for the delivery of WLCMES and Horizon's Corporate Welsh Language Policy (WLCMES, Measure 21) would draw together representatives from across the various operational areas of the Wylfa Newydd Project and would be responsible for implementing and monitoring the various measures, sharing good practice, collating data and monitoring progress in order to report on progress to the Welsh Language Commissioner at the end of each year. Assistance from within the HR department will be required to develop the Welsh language skills competency framework and assessment tool and its implementation as part of standardized HR procedures. IACC does not agree that the role of WLC Coordinator be restricted to the construction and operational phases only. IACC expects Horizon's commitment to safeguarding and enhancing the Welsh language to be sustained throughout all its construction, operation and decommissioning phases and that therefore a WLC Coordinator be in post during all of these phases. IACC anticipates that the role of the WLC Coordinator to remain similar across all three phases of the project albeit with some modification depending on developing circumstances. If the WLC Coordinator role was only requisite for the construction and decommissioning phases, this would lead to: - a lack of responsibility and accountability on behalf of Horizon regarding the treatment of the Welsh language as a Golden Thread in all aspects of the Wylfa Newydd project - a decline in the use of Welsh within the company - a lack of responsibility for the ongoing WLCMES / Voluntary Welsh Language Promotion Plan (cf. Q10.5.23 below). IACC's response to bullet point 3 is covered in its response to WCLMES Measure 3 in Chapter 9 of the Council's LIR (ENO 100007, section 6.9.3.3 page 30) and summarized as: - It is imperative that the majority of the Wylfa Site Office staff speak Welsh and that critical roles such as HR staff have the advanced Welsh language skills necessary for all aspects of their roles to be able to be conducted through the medium of Welsh. - It is also important for all Horizon headquarter staff in Gloucester to undertake Language Awareness Training as part of their induction training and for individuals in selected key roles that require close liaison with Wylfa newydd site staff to be encouraged to develop their ability to speak and use Welsh. - IACC believes that Horizon's adoption of a Welsh Language Strategy for the workplace that accords with current best practice would include provision for language choice to be offered for interviews. Ideally, panels should include more than one Welsh speaker, who should be well briefed on their role in the skills assessment element of the interview. - Increasing the numbers of Welsh speakers within Horizon's central HR will be crucial to the implementation of this mitigation measure. With regard to question (b) IACC expects Horizon to use Welsh mainly to interview all candidates whose preferred language is Welsh regardless of whether the role they are applying for is not a designated 'Welsh essential' role. It would be appropriate for one or more questions to be asked in English in order to ascertain the candidates ability in English as well as Welsh. See IACC's comments on the importance of developing the Welsh speaking capacity of the HR team in LIR (ENO 100007, section 6.9.3.3 page 30). IACC's response to bullet point 4 is covered in its response to WCLMES Measure 12 in the Council's LIR (ENO 100007, Chapter 9, section 6.9.12.11 page 41)

			IACC agrees with the actions described in this measure and note that this aspect of the WLCMES should be monitored and developed further throughout all construction, operation and decommissioning stages of the Project. This will ensure that the WLCMES evolves in response to any change in the levels of impact and the effect of mitigation and enhancement strategies throughout the lifecycle of the Wylfa Newydd project Linguistic courtesy typically includes the ability to recognise and pronounce Welsh personal names and place names correctly and exchange simple greetings. There are free on-line resources available which IACC expects Horizon to require all of its staff to learn and use.

Q10.5.9	Paragraph 6.4.476 of the Planning Statement [APP-406] sets out a number of proposed mitigation measures: Bullet point 3 refers to ensuring that a Welsh- speaking member of staff is included on interview panels where candidates are required to have Welsh language skills. (a) How many jobs does Horizon envisage will be ‘required’ to have Welsh language skills? (b) what provisions are proposed for interviewing candidates whose first language is Welsh for roles that are not ‘required’ to have Welsh language skills? Bullet point 4 refers to providing language ‘awareness’ training – can you provide further information as to: (a) what will constitute ‘language awareness’ training;	Questions referring to bullet point 3 (a) It is not yet known how many jobs will be required to have Welsh language skills. However, the Draft DCO s.106 agreement issued on 26 October 2018 requires that the Welsh Language and Culture Coordinator establishes a Welsh language skills competency framework and assessment tool, which Horizon will use to: • Enable it to assess the Welsh language skills requirements for job roles when developing construction and operational job profiles at Wylfa Newydd. • Provide relevant recruitment managers with training to use the Welsh language skills competency framework and assessment tool to determine the language requirements of construction and operational roles. • Record the level of Welsh language skills required for each post as part of the recruitment process and will include this information within the advertised job profile. (b) Horizon is still considering what provisions could be made for interviewing candidates whose preferred language is Welsh for roles that are not required to have Welsh language skills. Responses to questions on bullet point 4 (a) Measure 12 of the WLCMES (Appendix B4-1 of the Welsh Language Impact Assessment, notes that: ‘Horizon will provide language and culture awareness training to all construction and operational staff and require staff to demonstrate linguistic courtesy and awareness of Horizon’s Welsh language corporate policy.’ Section 4 of the WLCMES (Appendix B4-1 of the Welsh Language Impact Assessment, includes further detail on this measure, noting that: ‘Horizon will create a requirement for all Horizon Wylfa Newydd staff to be able to demonstrate linguistic courtesy and be aware of Horizon’s Welsh language corporate policy. This measure will strengthen Horizon’s current commitment by including compulsory language awareness raising as part of the corporate induction programme for staff at Wylfa Newydd, including both construction and operational staff. The WLCMES measures are incorporated into the Draft DCO s.106 Agreement. The Draft DCO s.106 agreement issued on 26 October 2018 requires that: • Horizon will provide the workforce attending site induction with the following Welsh language materials: • Welsh language briefing packs and/or induction materials;	

	(b) how this differs from learning the Welsh language training; and (c) how ‘awareness training’ will protect and/or grow the use of the Welsh language? Bullet point 6 - why is it that the collection of data ‘may be’ rather than ‘will be’ linked to the Worker Accommodation Management Service?	- the "Byw mewn gwlad ddwyieithog/Living in a bilingual nation" Welsh Language booklet produced by the Welsh Government dated 2017; - any other materials agreed by the Developer and the Council. These materials will be provided for the purpose of raising awareness of and respect for the Welsh language and culture, and Welsh speaking among the contractors and the workforce. (b) Welsh language and culture awareness training would aim to provide participants with an increased understanding and knowledge of the situation of the Welsh language and culture in the local area. The purpose of such training would be to enable participants to demonstrate linguistic courtesy. The language awareness training may include an introduction to some basic words or phrases, pronunciation advice and information on learning Welsh. However, its primary purpose is not language acquisition. This differs to Welsh language training, which does aim to develop participants’ linguistic skills at a pre-defined level (e.g. Foundation, Intermediate). (c) Welsh language and culture awareness training will help ensure that workers demonstrate linguistic courtesy when dealing with Welsh speakers or encountering situations where the Welsh language is spoken. It will also help raise awareness of the benefits of bilingualism and encourage workers (and their families) to consider learning Welsh or choosing Welsh-medium education for their children. It could also help reduce the likelihood of conflicts arising from workers interacting with Welsh speakers in the community. During consultations to develop the WLCMES (Appendix B4-1 of the Welsh Language Impact Assessment, Welsh language Stakeholders considered that all Wylfa Newydd DCO Project staff should be able to demonstrate linguistic courtesy and be aware of Horizon’s Welsh Language Policy. The training will enable the Wylfa Newydd DCO Project to achieve this. Response to question on bullet point 6 The collection of data will be undertaken through the Worker Accommodation Management Service (subject to availability of data and Data Protection Legislation), as required by the Draft DCO s.106 agreement issued on 26 October 2018.	Linguistic courtesy typically includes the ability to recognise and pronounce Welsh personal names and place names correctly and exchange simple greetings. There are free on-line resources available which IACC expects Horizon to require all of its staff to learn and use. IACC welcomes this commitment
Q10.5.1	(a) Can you provide details of when the	(a)	IACC disagrees with Horizon’s proposals for evaluation of the project as set out in WLCMES measure 23 (see See IACC’s LIR (ENO 100007,Chapter 9 Section 6.9.19.51) and see response (a) below. (a) See IACC’s LIR (ENO 100007,Chapter 9 Section 6.9.19.51) for IACC’s Response to WLCMES Measure 23. IACC views these arrangements for evaluation as completely inadequate for the following main reasons: - The impact must be assessed at several more local levels in addition to the KSA; - Monitoring and review needs to take place on an annual basis; - The evaluation of the impact of the WLCMES must be commissioned from an independent specialist by the Welsh Language and Culture Sub-Group but paid for by Horizon - Evaluation needs to take place at timely intervals throughout the three phases supported by a robust monitoring and review process. IACC’s insistence that the impact of Wylfa Newydd and the implementation of the WLCMES is monitored in an ongoing manner and reported upon in an annual monitoring report is in alignment with Gwynedd Council’s position that “The mitigation scheme set out in the condition is expected to include provision of an annual report to record progress in achieving the measures” (GC response to Q10.5.23) If the Examining Authority agreed with Horizon’s initial proposal to conduct one interim and one final phase impact evaluation could result in: - Failure to identify and adequately mitigate unforeseen impact consequences - the consequence of not monitoring annually being a decline in the Welsh language especially if no further interventions/measures are implemented in response to annual monitoring - Given that IACC, Welsh Government and Gwynedd Council share concerns with the limitations of the WLIA and baseline data, key risks to the Welsh language could remain unidentified. (b) IACC believes that one of the main objectives of the evaluation work should be to understand what was accomplished and how it was accomplished so that feedback and lessons are provided for future action. The proposed Project has substantial likely impacts on the Welsh Language and Culture, both positive and negative, and these impacts and the effectiveness of mitigation and enhancement strategies and actions need to be fully understood. Should this not be established at the outset with a suitable and acceptable research and evaluation

0	evaluation of the impact of the project on the Welsh language in the KSA will be completed		framework then it would prove difficult to establish relevant, useful and timely findings and draw proper conclusions and formulate a suitable recommendations and proposed actions at appropriate stages. Horizon needs to commit to this evaluation framework from the outset.

	(paragraph 6.4.480 of the Planning Statement [APP-406])? (b) Would the evaluation also include recommendations and if so how would they be implemented?	Paragraph 6.4.480 of the Planning Statement makes reference to measure 23 of the Welsh Language and Culture Mitigation and Enhancement Strategy (see appendix B4-1 of the Welsh Language Impact Assessment). Horizon will complete an evaluation of the impact of the Project on the Welsh language in the KSA. The precise terms of reference, timing and methodology for this evaluation will be agreed by Horizon and the Welsh Language and Culture Sub-Group. Horizon proposes that the evaluation would include an interim phase (e.g. mid-way through the construction phase) and a final phase (e.g. at the end of the construction phase). The evaluation would be able to examine how the actual effects of the Project compare to anticipated effects. (b) This is not known at this stage and would be decided when developing the evaluation's terms of reference. The precise terms of reference, timing and methodology for this evaluation will be agreed by Horizon and the Welsh Language and Culture Sub-Group.	
Q10.5.1 1	Can you explain why a Welsh Language and Culture Mitigation and Enhancement strategy is only proposed during the construction period of the project (paragraph 6.4.480 of the Planning Statement [APP-406]) – should this be extended to include operation and decommissioning?	The Welsh Language Impact Assessment (WLIA) assesses the likely effects of the construction, operation and decommissioning stages of the Wylfa Newydd DCO Project. The WLIA has identified the need for various enhancement and mitigation measures to be secured through measures set out in the Welsh Language and Culture Mitigation and Enhancement Strategy (WLCMES) (WLIA appendix B4-1) and secured by planning obligation (through a Draft DCO s.106 legal agreement). The full range of measures proposed are set out in volume A and B of the WLIA, with a summary provided in sections 5.3, 5.4 and 5.5 of the WLIA NTS (Application Reference Number: 8.20) [APP-830]. This is now sought to be secured in the Draft DCO s.106 agreement Horizon is committing to a number of key measures during operation, The following measures are secured in the Draft DCO s.106 to continue during operation: • Employment of the Welsh language and culture co-ordinator • Maintenance of Horizon's internal Welsh Language Management Group; • Maintenance of its Polisi Iaith Gymraeg/Welsh Language Policy where that policy will contain and require: • Details on what types of internal communications will be made available bilingually. • Public-facing permanent and temporary signage on the Sites relating to the Wylfa Newydd DCO Project are bilingual (save where safety or other material considerations require that signage is in English only). • Provision of language and culture awareness training to the Workforce.	See IACC's response to this question in LIR (ENO 100007) Chapter 9, Section 6 IACC do not considers that Horizon's response adequately addresses IACC key points, summarised as: • To establish procedures to monitor and evaluate annually throughout all three phases of the project. • To commit to a suitable and acceptable evaluation framework (see response to Q10.5.10 above) • To implement the WLCMES and annual action plans throughout the construction, operation and decommissioning periods; • To require an WLCMES for the Operations Phase to be approved prior to commissioning of unit 2. The same principle would apply to decommissioning where a strategy for that stage should be developed and approved towards the end of operation. Understanding and managing the ongoing risks and benefits of Wylfa Newydd to the vitality of Welsh language and culture on Anglesey can only be conducted with accurate data and impact evaluation tools on an ongoing basis. IACC, Gwynedd Council and Welsh Government are in alignment that data for measuring impact is not provided in full by Horizon. (see GC response to Q10.5.24 and WG response to Q10.5.7). Should the Examining Authority not concur with IACC's position then the ability to effectively monitor and respond to impacts throughout the full duration of the project will be rendered ineffectual.

	• Staff members to demonstrate linguistic courtesy and awareness of the Welsh Language Policy. • Development of a programme of Welsh language training for the Workforce operational staff where this is a relevant requirement within a job-role (as determined by the Welsh language skills competency framework • Establishment of a Welsh language mentoring scheme for learners. • Maintenance of the Developer's Welsh speaker badge scheme and using reasonable endeavours to ensure that its contractors operate an equivalent scheme. • Ensure a Welsh-speaking member of staff is included on interview panels for jobs where candidates are required to have Welsh language skills. • An annual review of the policy. • Developing and using the Welsh language skills competency framework and assessment tool to: assess the Welsh language skills requirements for operational job roles; provide relevant recruitment managers with training to use the Welsh language skills competency framework and assessment tool to determine the language requirements of construction and operational roles; and record the level of Welsh language skills required for each post as part of the recruitment process and will include this information within the advertised job profile. • Commitments to notifying/ publicising/advertising vacancies to the Wylfa Newydd in Welsh and English • Maintaining the applicant's existing programme of educational support being its: bilingual educational support for primary and secondary pupils as well as Post-16 education; Wylfa Newydd Project Technical Apprenticeship Scheme; and delivery of the existing 'Work Insight Week', or an equivalent scheme, to young people The WLIA sets out how the assessment has addressed the decommissioning stage. Due to the limited information available at present regarding decommissioning, the assessment is presented against the five key aspects of community life, taking into account the matters assessed as part of the 18 checklist questions, without setting the assessment out against the 18 checklist questions. The level of detail available about decommissioning is not considered sufficient in order to undertake an assessment of effects on Welsh language and culture set out against the 18 checklist questions. Before decommissioning starts, Horizon will need to obtain consent from the Office for Nuclear Regulation (ONR) under the Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999. This would require a period of consultation relating to the submission of a decommissioning proposal and supporting Environmental Statement. In line with current planning policy on the Welsh language , it is anticipated that a review of the potential effects on Welsh language and culture would be undertaken as part of a WLIA alongside the Environmental Impact Assessment (which would in turn, if necessary, identify enhancement and mitigation measures).	

Q10.5.1 3	Can you confirm that the information boards mentioned at bullet point four of paragraph 4.4.1 of the WNCocP [APP-414] would be bi- lingual?	Horizon can confirm that as per 3.2.41 of the Wylfa Newydd Code of Construction Practice, all permanent and temporary public signs will be bilingual. This would include the information boards mentioned at bullet four of paragraph 4.4.1. the Wylfa Newydd Code of Construction Practice Measure 7 of Appendix I1 of the WLIA, the Welsh Language and Culture Mitigation and Enhancement Strategy (WLCMES), also notes that ‘Permanent and temporary public signs relating to the Project will be bilingual.’	IACC does not have any further comments to make on Horizon’s response. See LIR (ENO 100007) Chapter 9, Section 6
Q10.5.1 4	Can you confirm that the signage relating to the diversion of footpaths and in particular for the Lôn Las Copr (paragraph 6.2.6 of the MPSS Sub CoCP [APP-415]) would be bi- lingual?	Horizon can confirm that as per 3.2.41 of the Wylfa Newydd Code of Construction Practice, all permanent and temporary public signs will be bilingual. This would include those for footpath diversions as noted at 6.2.4 of the same document. Measure 7 of Appendix I1 of the WLIA, the Welsh Language and Culture Mitigation and Enhancement Strategy (WLCMES), also notes that ‘Permanent and temporary public signs relating to the Project will be bilingual.’	IACC welcomes HNP’s confirmation on this matter and the IACC does not have any further comments to make on Horizon’s response.
Q10.5.1 5	Is there any information available regarding the effect that the construction and operation of Wylfa A has had long term on Welsh language and culture, the local and regional economy and the housing market? If there is, was this information taken into account, in particular in terms of lessons learned, when the Application was being drawn up?	The Welsh Language Impact Assessment (WLIA) considered potential effects from the Existing Power Station when establishing the baseline. The assessment of relevant baseline information is set out in Q1 of volume B of the WLIA, This presents an assessment of project-wide effects on population, acknowledges the decline in the percentage of Welsh-speaking population between 1951 and 2011. Although the proportion of Welsh speakers declined between 1951 and 2011 (from 80.0% to 57.2%), the total number of Welsh speakers increased slightly (from 38,443 to 38,568). The overall growth in Anglesey’s population in this period was in part the result of economic migration attracted by major employment developments in the 1960s (Existing Power Station and Anglesey Aluminium), although other factors such as tourism and retirements are also relevant. While this dynamic is complex, this overall growth arguably sustained the economic viability of communities thus supporting the existing Welsh speaking population (enabling some natural growth of Welsh speaking population rather than economic migration away from the island in search of work). In addition, the Education Act of 1944 (which gave pupils the right to receive education according to the wishes of their parents) underpinned a growth in the number of pupils in Welsh- medium education at primary and secondary level.” Consideration was given to the baseline evidence relating to 1961 to 1971 (the period during which the Existing Power Station was built) as part of undertaking the Welsh Language Impact Assessment . When looking at the Census data for 1961 and 1971, a number of coastal areas on Anglesey had less than 80% of the population who could speak Welsh, including the parish of Llanbadrig, where the Existing Power Station is located [RD46]. During the 1960s, the road transportation links with England were improved and an increase was experienced in vehicle ownership which lead to an increase in tourism and in the number of people moving to coastal areas to retire [RD46]. It is possible that some of the increase in population during the 1960s was due to the construction of the Existing Power Station; however, this cannot be proven [RD46].	See IACC’s response to this question submitted as part of Written Questions by Deadline 2 (4 December 2018) In particular the IACC’s conclusion is: “It is not apparent from HNP’s Welsh Language Impact Assessment how this information was taken into account, in particular in terms of lessons learned, when the Application was being drawn up.” IACC agrees with Gwynedd Council’s position in its response to the Written Questions by Deadline 2 in that this matter “was raised during early meetings of the Welsh Language Steering Group established to inform the WLIA of the Project. The Group were not able to identify any such studies. There is no record that Horizon pursued the matter.” Horizon’s response underlines IACC’s point that measures to monitor and evaluate the impact of a large development on Welsh language and Culture have in the past been inadequate. It is disappointing to note that the response fails adequately to acknowledge that lessons have not been learnt from having an inadequate research and evaluation framework and that the WLCMES still does not include sufficiently robust measures to monitor and evaluate the impact of the present proposal so that future lessons might be captured. IACC’s requirements for procedures to monitor and evaluate the impact of Wylfa Newydd and the effectiveness of its mitigation and enghancement measures is set out in LIR, Chapter 9, Section 6, paras 6.9.19.41 – 6.9.19.60. The consequences of the Examining Authority not concurring with IACC’s position regarding effective monitoring is set out in response to Q10.5.10 above.

		The majority of the parishes and wards on Anglesey experienced a reduction in the percentage of Welsh speakers between 1961 and 1971, but some saw an increase in the number of Welsh speakers. Llanbadrig experienced a decrease in the percentage of Welsh speakers (-15 percentage point) between 1961 and 1971 but an increase in the number of Welsh speakers (+43 people) [RD46]. In this regard, Anglesey was different to the majority of Wales [RD46]. Aitchison and Cater noted within The Welsh Language 1961-1981 An Interpretative Atlas, whilst discussing Wales as a whole “Within the main Welsh-speaking areas, isolated but notable increases were recorded by such communities as Llangejni, Llanfairpwllgwyngyll and Amlwch on the Isle of Anglesey” [RD46, p.3]. Census data shows that the population of the Isle of Anglesey as a whole increased by 15.6% between 1961 and 1971 and the percentage of Welsh speakers fell by 9 percentage points. However, the number of Welsh speakers increased slightly over the same period. The population of the Isle of Anglesey also increased by 9.9% between 1971 and 1981, with the percentage of Welsh speakers falling by 5 percentage points but the number of Welsh speakers increasing by 5%. Based on this analysis, it was not possible to establish a direct connection between the construction and operation of the Existing Power Station and the effects on Welsh language and culture. Some information is available to the public regarding the economic impact of the Existing Power Station, however as the local and regional effects of Wylfa Newydd result from key project parameters, which are not necessarily comparable to the Existing Power Station, the effects as defined in the Environmental Statement (Examination Reference Number: [APP-088], [APP-122], [APP-241], [APP-268], APP-306 and APP-357) are based on projections based on today’s economic and the specific Wylfa Newydd DCO Project parameters. In terms of lessons learned, the mixed picture which emerges from the evidence above has been taken into account when developing the WLCMES (Appendix B4-1 of the Welsh Language Impact Assessment. In particular, it has informed decisions to include several monitoring measures within (e.g. Measures 13 and 21-24) within the WLCMES in order to provide more robust evidence in future. These measures are to be secured through the Draft DCO s.106 Agreement.	
Q10.5.1 6	Of the 47 primary Schools and 5 secondary schools on the island how many of these are Welsh medium schools?	The Welsh Language Impact Assessment (WLIA) states at B.4.360 (analysis of the baseline/evidence) that education in all local authority primary and secondary schools in the key socio-economic study area (on the island) is provided bilingually offering Welsh-medium education.	Horizon’s response is not completely accurate. All but two primary schools on Anglesey are bilingual schools that conduct end of Foundation Phase and KS2 assessments through the medium of Welsh. These schools are primary Welsh medium schools in accordance with the Welsh Government definition. In the two primary schools that are an exception (Caergeiliog and Santes Fair), Welsh is a priority area for both schools. All 5 secondary schools on Anglesey are bilingual. All primary and secondary school aged children who move to Anglesey will need Welsh immersion support regardless of the school they choose to attend. Those who arrive aged 7 and over may also need additional English as an Additional Language support (See IACC’s LIR Chapter 9, Section 6.9.16 for details).

Q10.5.1 7	The primary Welsh language immersion centre (WLIC) is currently at full capacity – how will these capacity issues be addressed? (APP-433) What is the provision for secondary aged children?	Measure 16 of the Welsh Language and Culture Mitigation and Enhancement Strategy – see Appendix B4- 1 of Welsh Language Impact Assessment, as secured in Schedule 1 of the Draft DCO s.106 Agreement, advises that Horizon will fund a peripatetic teacher service (pro-rata as detailed below) that would support current immersion education capacity on Anglesey (and Gwynedd), which would be able to work in primary and secondary schools across the local authorities as well as in immersion centres. This measure is proposed to be secured in the Draft DCO s.106 Agreement. Funding will be available so that two language immersion teachers will be available to work with pupils from early in the construction programme. The level of this service will be proportionate to the number of workers that will bring their families and increase or decrease in response to demand. The number of workers bringing families will be carefully monitored through collection of data. Horizon (and other organisations as appropriate) will collect socio-demographic information from workers as part of the induction process which will include their permanent and temporary address, linguistic capabilities, number and age of dependants moving to the KSA with them and their intentions in terms of applying for local school places. Each worker would be given a unique ID so that anonymised data could be transferred to local authorities without breaching data protection laws. This measure will be secured via Schedule 1 of the Draft s.106 Agreement. In addition, under the Draft s.106 Agreement in respect of the Site Preparation and Clearance works, the proposed Community Resilience Contribution is able to be accessed, including to enhance the potential benefits including in respect of education and skills.	IACC has indicated in response to Q10.5.3 that Horizon's current proposals for addressing Welsh language immersion capacity are severely inadequate. Details on current capacity and provision requirements for both primary and secondary aged children are set out in detail in IACC's LIR Chapter 9, Section 6 paras 6.9.16.4 – 6.9.16.10 and discussed further in LIR Chapter 7 (Education and Skills).
Q10.5.1 8	When considering the effect that additional workers needed by the proposal may have on the Welsh language and culture was it only workers that were directly involved in the construction of the proposal and the associated development that were considered or were the facilities workers, additional workers required by supply chain businesses, tourism and needed to construct the additional permanent housing also included?	The Welsh Language Impact Assessment is based on a construction workforce of 9,000 at peak for the Wylfa Newydd DCO Project, which includes the workers required for the construction of the Wylfa Newydd DCO Project. However, this does not include the indirect workers in relation to the supply chain, tourism businesses and local businesses. Please see figure B-1 of the Welsh Language Impact Assessment. It is anticipated that indirect workers in relation to the supply chain, tourism businesses and local businesses will be local workers. Horizon has committed to various measures in the Jobs & Skills Strategy and the Welsh Language and Culture Mitigation and Enhancement Strategy to support this. The Jobs & Skills Strategy will support Horizon's supply chain and help it to recruit local people. Measures to support this include: - Wylfa Newydd Employment and Skills Service (Secured through the Draft DCO s.106) - Skills Fund (Secured through the Draft DCO s.106) - Welsh Language and Culture Mitigation and Enhancement Strategy (WLCMES) (Secured through the Draft DCO s.106), - Supply Chain Charter, Action Plan and Service (Secured through the Draft DCO s.106)	Horizon's response highlights deficiencies in the scope and detail of its WLIA and the limitations of Horizon's Gravity Model as a reliable tool for measuring worker impact as reported by IACC in its LIR, Chapter 9 and Chapter 3. Indirect workers cannot all be assumed to be local workers who live and work on Anglesey. IACC's response to Q10.5.6 has already indicated that Horizon is inconsistent in its definition of a 'local worker'. Furthermore, the proportion of local workers who are Welsh speakers cannot be assumed. In terms of the risks and benefits to the Welsh language posed by the additional workers, this represents an additional unknown element to the existing lack of detail concerning Wylfa Newydd's direct workforce. This is impacted by the fact that Horizon cannot ensure accurate and full data about all direct and indirect workforce in a timely manner. IACC anticipates that either additional or enhanced mitigation measures would need to be implemented where more/ less Welsh speaking workers than anticipated reside in any ward and the impact on Welsh language exceeds that initially assumed and assessed. This makes the need for a more robust baseline data to be established in advance of construction and for the annual monitoring regime proposed by IACC in IACC's LIR Chapter 9, section 6, paras 6.9.19.51 – 6.9.19.60 to be adopted. The standard of available data from Horizon on the scope of additional workers supports the need for mitigation steps to: - address the Welsh speaking worker displacement issues raised in IACC's LIR Chapter 3 - assess the possible negative impact on the Welsh Language and the concomitant need for additional mitigation measures / funding.

		- Community Involvement Officer/ Economic Development Officer (Secured through Draft DCO s.106) - Principles about recruiting local workforce (Secured in the Workforce Management Strategy). The Welsh Language and Culture Mitigation and Enhancement Strategy (WLCMES) (WLIA appendix B4- 1), which is secured via Schedule 1 of the Draft DCO s.106 Agreement also includes measures to support local recruitment within the supply chain: - Continue to distribute information on job opportunities to young people (Measure 4); - Target recruitment at Welsh speakers as part of broader recruitment strategies (Measure 5); and - Ensure information on local contractors is distributed throughout supply chain (Measure 11).	
Q10.5.1 9	Whilst the various language strategies outline proposals for workers and school aged children what proposals would there be for dependents such as partners/spouses and non-school age children who may relocate to Ynys Môn with workers?	Proposals relating to dependents such as partners/spouses The Welsh Language and Culture Mitigation and Enhancement Strategy WLCMES (WLIA appendix B4-1) includes a number of proposals focused on integrating workers and their families, which will be secured through the Draft DCO s.106 Agreement.	In the main, IACC agrees with a number of Horizon’s proposals but requires further detail and additional commitments as described in IACC’s response to this question submitted as part of Written Questions by Deadline 2 (4 December 2018). Further details regarding IACC’s requirements for the integration of spouses /partners and pre-school aged children are set out in IACC’s LIR, Chapter 9, Section 6.9.19. IACC agree that the development and circulation of welcome packs is appropriate. Further detail is needed however: - to specify how HNP will adapt the content of the WG welcome packs for spouses/partners who will not necessarily be able to speak / read English - IACC expect HNP to commit to funding ‘welcome sessions’ specifically for the partners/spouses of workers which could include language awareness training to raise awareness of the benefits of Welsh-medium education and advise parents and carers on how to be supportive of their children’s acquisition of the language IACC agrees with the establishment of the role of Community Involvement Officers but finds the scope of this role as proposed by Horizon to be too limited. Justification for IACC’s position is provided in IACC’s LIR, Chapter 9, Section 6.9.19 IACC views the role of the CIOs as encompassing the following: - developing an intimate knowledge of the community networks, voluntary groups, community services within each of the 5 catchment areas - monitoring community well-being, community cohesion and reporting any matters of tension to a higher level monitoring group - data collectors - collecting additional language profile data to build upon and supplement IACC’s initial language profile presented in Appendix 1. There is a need to add to IACC’s initial community language profiling in order to establish robust baseline data before the start of construction and to continue to collect data as part of ongoing monitoring and mitigation activities. - identify gaps in community provision in Welsh / bilingually - provide training on Language Awareness Training and running bilingual activities among local groups - lead on the implementation of Gweithredu’n Lleol / Local Action micro language planning within communities in their catchment areas. IACC notes that Horizon’s WLCMES Measure 18 refers to Community Involvement Officers in the plural and not one individual as presented in the response to this question. One CIO would not be sufficient for meeting the community integration needs associated with the Wylfa Newydd project. IACC’s justification for requiring Horizon funding for 5 CIO’s based in each of the islands 5 secondary school catchment areas is provided in IACC LIR Chapter 9, section 6.9.19. If only one CIO be appointed rather than the 5 required by IACC, the consequences would be: - Ineffective community cohesion due to lack of intimate knowledge of the community networks, voluntary groups, community services within each of the 5 secondary school catchment areas on Anglesey - Risks that community well-being and community cohesion issues/ tensions are not identified early and mitigated early to avoid escalation - Lack of detailed and robust ward level baseline language profiling data necessary for effective ongoing impact assessment and mitigation and enhancement planning - Welsh language use in the community declines due to lack of detailed ward within

		In terms of proposals following recruitment, the WLCMES includes the following: 'Horizon to develop and circulate welcome packs to all families of Project workers who move to the KSA. These will draw on information in the Welsh Government's planned Welcome Packs and will provide information on local services and the community.' This measure is secured via Schedule 1 of the Draft DCO s.106. In addition, the Draft DCO s.106 Agreement provides for Horizon to fund an IACC Community Involvement Officer and to itself an employ a Community Involvement Officer, who roles include: • Supporting the integration of the workforce and dependants • Promoting community cohesion • Supporting the integration of incomers into host communities. Proposals relating to non-school age children Paragraphs 4.4.11 to 4.4.13 of the WLCMES (WLIA appendix B4-1), provide details regarding the proposed support to early years education provision.	secondary school catchment area language profile data to evidence negative and positive impacts of Wylfa Newydd and WLCMES interventions. • no mechanism for identifying gaps in Welsh / bilingual community provision • no mechanism for developing community resilience within Welsh-speaking networks through community micro language planning strategies • no mechanism for developing community resilience within Welsh-speaking networks through Language Awareness training As mentioned in response to Q10.5.3 above, Horizon's commitment to 'engaging and facilitating ongoing dialogue' with pre-school provision providers is wholly inadequate. The reasons for IACC's position are set out in IACC, LIR, Chapter 7 and Chapter 9, Section 6, paras 6.9.19.25 – 6.9.19.28. Reactive planning based on emerging data on the number and location of pre-school aged children is not appropriate. Funding from Horizon is necessary to create additional Welsh-medium pre-school childcare and education capacity based on reasonable worst case scenario planning.

		Measures to mitigate any potential effect on the Welsh-medium early year sector will require an ongoing dialogue between Horizon and IACC, Gwynedd Council, Mudiad Meithrin (Welsh-medium early years representative body) and Menter Iaith Môn to discuss the inflow of pre-school age children and mitigate the effect on local Welsh-medium provision. As set out above, mitigation Measure 13 of the WLCMES (WLIA appendix B4-1), relates to Horizon collecting and sharing anonymised information on the numbers of children moving to the KSA with Project workers. This measure is secured via Schedule 1 of the Draft DCO s.106 Agreement. This information will enable IACC (and Gwynedd Council) with information for planning early years services (e.g. numbers of pre-school children moving to different areas and taking up provision) in collaboration with key early years providers such as Mudiad Meithrin and Menter Iaith Môn. Implementing these measures will enable an assessment of the effect of the Project on early years provision and the development of more detailed mitigation. Measure 19 of the WLCMES (WLIA appendix B4-1), states that 'Horizon will engage and facilitate ongoing dialogue with IACC, Gwynedd Council, Mudiad Meithrin (Welsh-medium early years representative body) and Menter Iaith Môn to discuss the inflow of pre-school age children and the impact on local Welsh-medium provision and measures to mitigate this impact. As part of this dialogue, Horizon will monitor on an ongoing basis the number of workers bringing families, including those of pre-school age. This data will be used to identify the appropriate mitigation required to mitigate the effect on Welsh-medium provision within early years education.' Schedule 1 of the Draft DCO s.106 Agreement obliges Horizon and the Council to share their monitoring data with these groups.	
Q10.5.2 0	The Health Impact Assessment NTS [APP- 428] paragraph 2.4.39 refers to a mitigation commitment relating to community identity including initiatives to enhance and celebrate local identity. What initiatives are proposed?	As noted in Item 1053 in the Mitigation Route Map Horizon will appoint a bi-lingual Community Involvement Officer. This will be secured by the Draft DCO s.106 Agreement. Item 1053 lists some areas in which the CIOs could be active. This includes supporting cultural initiatives to enhance and celebrate local identity. This is not intended to be prescriptive but to allow the CIOs and community groups and residents to decide what is most appropriate to enhance and celebrate local identity. The Community Involvement Officer will be involved in managing and establishing community language services (including development of appropriate training materials) to support the integration of incomers and develop capacity in the local community. This type of training could include a focus on issues such as: • how to introduce the Welsh language and culture to incomers; • developing community leadership skills in a bilingual context; • how to run a bilingual event successfully; • chairing a meeting bilingually; • planning bilingual community activities e.g. groups, arts activities, sports clubs.	IACC has stated within its LIR, Chapter 15, paragraph 2.3.13 that it considers there to be a minimum requirement for 5 CIOs. IACC would agree that the type, number and frequency of initiatives need to be agreed in consultation with the local communities. Whilst the Welsh language is an essential element of local identity it is important to remember that identity is also formed by local history, the natural environment and the physical and emotional connections within and between communities for example. IACC agrees that supporting cultural initiatives to enhance and celebrate local identity is one of the areas CIOs could be active. IACC's expectations regarding the role of the CIOs is set out in brief in its comments on Q10.5.19 above and in full in its LIR, Chapter 9, Section 6, paras 6.9.19.15 – 6.9.19.20.

Q10.5.2 2	Welsh language training is proposed where ‘this is a relevant requirement within a post’ (APP-433). What opportunities/support/encouragement would there be for workers where it is not ‘a relevant requirement’ to learn the language?	Measure 9 of the Welsh Language and Culture Mitigation and Enhancement Strategy (WLCMES) (WLIA appendix B4-1, as secured in Schedule 1 of the Draft DCO s.106 Agreement, notes that ‘Horizon will distribute information to contractors and all personnel on the Welsh language and culture as part of recruitment materials.’ Section 4 of the WLCMES notes that ‘As part of this measure, Horizon will include background information on the Welsh language on the Isle of Anglesey and north west Wales within recruitment packs for posts. Information distributed will include basic background on the Welsh language and culture on the Isle of Anglesey and north west Wales, information on the local education system, the benefits of bilingualism and opportunities to learn the language.’ In terms of providing opportunities for workers to learn the language, measure 12 of the WLCMES (WLIA appendix B4-1, as secured in Schedule 1 of the Draft DCO s.106 Agreement, notes that: ‘Horizon will provide language and culture awareness training to all construction and operational staff and require staff to demonstrate linguistic courtesy and awareness of Horizon’s Welsh language corporate policy. These measures are included in Schedule 1 to the Draft DCO s.106 Agreement.	In addition to the measures listed by Horizon, the most effective way of getting all members of staff to demonstrate linguistic courtesy is to undergo basic Welsh Language training – there are free on-line courses and resources available which could form part of worker induction training alongside the Welsh language and culture awareness training. IACC expectation for the development of at least some knowledge of Welsh among all employees is set out in LIR, Chapter 9, Section 6.95.
Q10.5.2 3	The majority of the proposed mitigation and enhancement measures would be secured via a S106 – do you consider: (a) That this is the appropriate mechanism? and (b) Would it meet the test for planning obligations?	Horizon notes Technical Advice Note 20: Planning and the Welsh Language supports the use of the Draft DCO s.106 agreements for securing Welsh language mitigation and enhancement measures. The Response to Q.4.0.111 provides a response to how the planning obligations meet the tests.	In principle IACC agrees that the s106 agreement is the appropriate place for securing the majority of mitigation and enhancement measures relating to the Welsh language and could meet the tests for planning obligations. However, as indicated in its response to ExA Q 4.0.111, the IACC considers that it is unable to answer this question on the basis of the heads of terms as they are too undefined to allow meaningful consideration. The IACC has provided detailed comments on the section 106 at this stage in its Written Representation at section [10]. The IACC suggests that this point is revisited once the draft section 106 is further advanced as that drafting includes consideration of this point and a joint submission with other parties is likely to be achievable at a later stage.
Q10.5.2 4	The strategy with regards to the Welsh language is predicated on the employment of a certain percentage of Welsh speakers what mitigation is proposed/necessary if these targets cannot be met?	The assessment of effects in the Welsh Language Impact Assessment during construction uses the peak construction workforce numbers as the basis of the assessment. The construction workforce is anticipated to peak at around 8,500 workers. However, to ensure that the Wylfa Newydd DCO Project can be flexible to the pressures of unforeseen increased demand, the assessment is based on a peak of 9,000 workers. Based on an assessment of the labour market and available skills, up to 7,000 of these workers would be non-home-based construction workers, and an estimated 2,000 of the peak workforce are expected to already reside in the DCCZ. In 2011, around half (48.1%) of the construction workforce in the DCCZ spoke Welsh (64.8% on Anglesey). The linguistic ability of the Wylfa Newydd DCO Project construction workforce is not known; however, for the purposes of assessment in the WLIA, it has been assumed that all non-home-based workers and their families would be non-Welsh speakers. This represents an absolute worst-case scenario. No assumptions	See IACC’s response to this question submitted as part of Written Questions by Deadline 2 (4 December 2018) IACC’s position that targets should be set for the employment of a certain percentage of Welsh speakers is further set out in its LIR, Chapter 9, Section 6, paras 6.9.5.5 – 6.9.5.10. IACC’s position aligns with that of Welsh Government regarding the need to define targets (WG response Q10.5.24). If there are no specific targets for the recruitment of Welsh speakers, the resulting consequence will be: • A lack of targets will not ensure that there is ample opportunity for Welsh speakers to be employed and therefore to use the language on a daily basis. • It will be more difficult to monitor and strengthen mitigation strategies if necessary. Horizon’s response again underlines the importance of developing and adopting a robust, independent monitoring and evaluation framework with a commitment to take action on lessons learnt as the project progresses. These may include further appropriate risk management strategies (avoidance, tolerance, mitigation, enhancement, compensation) should targets or other intended results not be met. If the Examining Authority does not concur with IACC on the necessity of these revisions and further details, Horizon’s existing commitment to the importance of the Welsh language and culture will remain inadequate. In particular, • the ongoing monitoring and evaluation of Wylfa Newydd’s impact on the Welsh language and culture throughout the project’s duration will not be sufficiently robust. • existing mitigation and enhancement commitments will not be adequate to safeguard and strengthen the Welsh language and culture on Ynys Môn.

	have been made (or targets set) regarding the linguistic abilities of the estimated 2,000 of the peak workforce expected to already reside in the DCCZ. However, according to the 2011 census 42.7% of the DCCZ population (154,927 people) were able to speak Welsh; 61% of the KSA population are able to speak Welsh. The assessment of effect in the Welsh Language Impact Assessment during operation is based on an estimated workforce of 850 at full operation, with 85% of those expected to be home-based workers from the DCCZ. Economic opportunities are considered to be an important aspect of maintaining and strengthening communities and therefore the status and use of the Welsh language and culture. Horizon is confident that this benchmark of 85% of operational workers being home-based workers can be achieved given the demographic profile of the population within the DCCZ, while a similar benchmark had been achieved during the operational phase of the existing Magnox Power Station. Please see response to Q10.5.6 (for more detail on this point). Horizon does not propose any specific mitigation should the targets not be met. However, the Draft DCO s.106 agreement issued on 26 October 2018 includes measures to promote the recruitment of Welsh- language speakers, including the following: • The Welsh Language and Culture Coordinator will establish a Welsh language skills competency framework and assessment tool, which Horizon will use to: ○ enable it to assess the Welsh language skills requirements for job roles when developing construction and operational job profiles at Wylfa Newydd; ○ provide relevant recruitment managers with training to use the Welsh language skills competency framework and assessment tool to determine the language requirements of construction and operational roles; and ○ record the level of Welsh language skills required for each post as part of the recruitment process and will include this information within the advertised job profile; • Horizon will promote career opportunities at the Wylfa Newydd Project by: ○ distributing information on career opportunities at the Wylfa Newydd DCO Project (including the bilingual Wylfa Newydd 'Career Route Maps' and Job Profiles or other such equivalent schemes developed by the Developer from time to time) to local communities and young people on a regular basis; ○ developing role model activities and resources to encourage awareness of career opportunities within the community where: · Welsh-speaking Horizon staff (including Welsh learners) and local suppliers will be involved in such activities; and · staff and contractors will take part in various 'role model' activities and resources such as case study video clips, written materials, presentations in schools;	

		- Horizon will typically notify all external vacancies to the Wylfa Newydd Employment and Skills Service which will publicise them in Welsh and English; and - Where the Developer or its sub-contractors also advertise any such vacancies outside of the Wylfa Newydd Employment and Skills Service the Developer will ensure that they are advertised in Welsh and English through recruitment channels including local and national partners that engage with a Welsh-speaking audience.	
Q10.5.2 5	(a) Which groups and organisations would be invited to be members of the management group that would oversee the Welsh Language and Cultural Mitigation and Enhancement Strategy and the stakeholder group that would monitor this strategy? (b) Who would these groups be accountable too? (c) Given many of the Welsh language and cultural groups are voluntary organisations what resources would be made available to them to enable	(a) Horizon proposes that two groups (one internal and one external) will have oversight of delivery of the Welsh Language and Culture Mitigation and Enhancement Strategy (as secured in the the Draft DCO s.106 agreement). The internal Welsh Language Management Group will provide a focus for accountability within the business. The role of the Welsh Language Management Group is to: - provide internal oversight of the Developer's Welsh language commitments and performance including its Welsh Language Policy; and - to assist the Welsh Language and Culture Coordinator in the delivery of the Welsh Language and Culture Mitigation and Enhancement Strategy. The Draft DCO s.106 seeks recognition that the roles and responsibilities of the Welsh Language Management Group may be updated from time to time to respond to the demands of the Wylfa Newydd Project. (a) and (b) The Draft DCO s.106 also envisages the constitution of an advisory Welsh Language and Culture Sub- group. The Welsh Language Sub-group will have a relationship with the Wylfa Newydd Major Permissions Oversight Panel (WNMPOP) and monitor of the Welsh Language and Culture Mitigation and Enhancement Strategy. Membership of the sub-group is proposed to IACC, Welsh Government, Gwynedd Council, Menter Mon and Llais Ni, and Horizon, as a continuation of the existing steering group for the Welsh Language Impact Assessment. (c) It is intended that the sub-group would be a continuation of the Welsh Language Impact Assessment Steering Group which already includes all of the bodies that it is anticipated would attend the sub-group. This group has been meeting regularly to inform the development of the Welsh language mitigation. Horizon will continue to facilitate this group meeting, however no direct financial support is proposed to now be offered.	See IACC's response to Measure 21 and 22 in its LIR (Chapter 9 addressed in Section 6.9.19 and summarised in paragraphs 7.32 and 7.33) As stated in its LIR, Chapter 9, section 6, IACC expects the Welsh Language Sub-group, to be drawn from a wider stakeholder group (including the Welsh Language Strategic Forum), to be convened by IACC and chaired independently, without which the robustness of independent stakeholder scrutiny and HNP accountability to local stakeholders would be compromised. As stated in its LIR IACC expects Horizon to cover the costs associated with running the WLC Sub Group. If not, financial support would have to be incurred by IACC and other members – this is not affordable and not not acceptable.

Q10.5.2 6	In your RR [RR-020] (paragraph 5.14.1) you state that in your opinion the dDCO does not reflect the current commitment of the applicant in advocating the Welsh language as a 'golden thread' throughout all aspects of the project. What amendments to the dDCO would you wish to see to ensure that this commitment is realised?	Horizon is committed to protecting and promoting the Welsh language and culture as part of the Wylfa Newydd DCO Project, ensuring compliance with relevant legislation, national and local policy and guidance. The effect of the Wylfa Newydd DCO Project on Welsh language and culture has been considered within the Draft DCO including by way of a Welsh Language Impact Assessment and other Draft DCO documents. Whilst it is not within the role of the Environmental Statement to include Welsh language and culture as a receptor, Horizon considers it to be relevant and necessary to sign-post where consideration has been given to Welsh language and culture within other documents including throughout the Environmental Statement [APP-055] to [APP-400], Health Impact Assessment, Equality Impact Assessment and Community Impact Report [APP-435]. Horizon fully embraces the importance of Welsh language and culture to the communities of Anglesey and North Wales. Horizon is committed to supporting and enhancing Welsh language and culture across all aspects of the Wylfa Newydd DCO Project throughout its duration, including through the development of measures to mitigate adverse effects and enhance beneficial ones. This will be identified in the Welsh Language Impact Assessment and associated Welsh Language and Culture Mitigation and Enhancement Strategy. Horizon acknowledges that the Welsh language and culture are intrinsically linked and that the Welsh language is an essential part of the cultural identity and character of Wales, which defines the Welsh as a nation – within communities and as individuals. Consideration of Welsh culture and heritage therefore goes hand-in-hand with consideration of Welsh language.	The IACC recognises Horizon's current engagement and commitment in advocating the Welsh language as a 'Golden Thread' throughout all aspects of its project and therefore Horizon's position is in general compliance with national and local policies. However, IACC does not consider Horizon's documentation to adequately reflect this commitment and is therefore not fully compliant with these policies. IACC's position is set out in LIR, Chapter 9, Section 6 and summarised in Section 7, para 7.7 – 7.36 The Welsh Language and Culture Mitigation and Enhancement Strategy (WLCMES) proposed by HNP contains 24 measures for the enhancement and/or mitigation of the likely impact of Wylfa Newydd on the Welsh language and culture. While IACC welcomes these commitments, in order to for Horizon's WLCMES to demonstrate that it advocates the Welsh language as a 'golden thread' throughout all aspects of the project, the revisions and further details to that strategy set out in IACC's LIR, Chapter 9, Section 6 are required. In this regard IACC's position is in alignment with Welsh Government (WG response to Q10.5.12) and Gwynedd Council (GC response to Q10.5.24). If Horizon's existing commitment to the importance of the Welsh language and culture remains inadequate - the ongoing monitoring and evaluation of Wylfa Newydd's impact on the Welsh language and culture throughout the project's duration will not be sufficiently robust. - existing mitigation and enhancement commitments will not be adequate to safeguard and strengthen the Welsh language and culture on Ynys Môn.
Q10.5.2 7	The Applicant has been asked to prepare a Statement of Common Ground with organisations that representation the Welsh Language and have submitted a Relevant Representation. Which organisations do you consider the Applicant should include?	Whilst the question is not directed to Horizon as the applicant, the following response is provided by Horizon at this stage: Horizon has engaged with IACC and Gwynedd Council to identify appropriate organisations that represent the Welsh language and that have submitted Relevant Representations. Having taken into account these views, Horizon is engaging with Fforwm Iaith Mon who are the umbrella organisation which has the purpose of increasing the number of speakers and overall use of Welsh language on the island and includes all four parties previously identified by Horizon as appropriate for entering into an Statement of Common Ground with. Horizon has contacted Fforwm Iaith Mon, initially through their Chair, to seek their views on preparing a Statement of Common Ground with Horizon and will provide a update on progress to the Examining Authority at subsequent deadlines.	See IACC's response to this question submitted as part of Written Questions by Deadline 2 (4 December 2018). This details all the organisations represented by Fforwm Iaith Môn. This aligns with the organisations identified by Welsh Government and Gwynedd Council in their responses to the ExA's First Written Questions submitted by Deadline 2 (4 December 2018)
Q10.6.1	Concerns have been raised through the RR regarding safety for residents particularly for women and children. Can the applicant	The DCO application has considered the impact of a predominantly male workforce on the local community in the Health Impact Assessment. HIA Report section C.7 assesses safeguarding. Table C-8 of the HIA Report sets out additional HIA mitigation relevant to their being healthy and safe communities during	Horizon references the measures proposed with regard to Safeguarding set out in its Health Impact assessment and also in its Workforce Management Strategy and code of conduct for the workforce. Whilst these measures are welcome, they do focus upon prevention and monitoring, rather than ensuring an adequate and effective response. As Horizon themselves point out in their Health Impact Assessment, issues of modern slavery are most likely to arise in conjunction with activities that occur around the workforce, such as illegal drug

			abuse and the sex trade and these cannot be addressed just through their workforce management strategy or other arrangements internal to Horizon. Also, as the North Wales Police point out in their response (para 55): “..there is a strong positive correlation between population and reported incidents of crime; meaning that areas with larger populations experience more reported incidents and crime.” We would suggest that the same applies to safeguarding and that with such a large workforce and turnover of staff, safeguarding issues and incidents will arise as the workforce interacts with the local population and that Horizon need to accept the need for (and the responsibility for funding) further measures in supporting local agencies to ensure that when Safeguarding issues do arise, they are dealt with as quickly and effectively as possible to minimise adverse impacts.

	provide details of their safeguarding policies or highlight where in the documentation this information can be found.	construction. This mitigation is in addition to that discussed in other assessment documents such as the Workforce Management Strategy, which sets out the principles for a Code of Conduct for the workforce in respect of expected behaviours. The HIA mitigation includes an ongoing monitoring role for the Health and Well-being Monitoring Group related to safeguarding vulnerable adults and children. This is secured via the Draft DCO s.106 agreement. Horizon would safeguard the welfare of its employees and its supply chain and, in relation to the activities of its construction workforce, the general public. This would be in accordance with the Hitachi Group Code of Conduct and the Horizon 'Modern Slavery Act 2015 Statement' and secured through the Workforce Management Strategy. A Principle in the Workforce Management states that contractors will <i>"enforce Horizon's personnel screening and management system processes to identify any of the workforce which may pose a risk to vulnerable adults and children in accordance with Hitachi Group Codes of Conduct and the Horizon Nuclear Power 'Modern Slavery Act 2015 Statement. In such cases where a potential risk is identified, further checks will be carried out."</i> In addition there is a Principle in the Workforce Management Strategy that ensures that all workers must respect others and the local community and be fit and proper to conduct work. The following principles will be implemented by Horizon and its Employers and will be the basis for a Code of Conduct: • <i>"All personnel to be aware of and comply with policies regarding drug and alcohol use including:</i> ○ The making, selling and use of any unlawful drugs is strictly prohibited and will result in immediate dismissal. ○ All personnel will drink responsibly and avoid the excess consumption of alcohol both on-site and off-site. ○ All personnel will be <i>subject to random drug and alcohol testing and related searches."</i> • <i>"Appropriate security checks will be carried out on all construction personnel, such as Basic Disclosure Certificate and Confirmation of Right to Work in the UK, National Security Vetting, Baseline Personnel Security Standard and Counter-Terrorist Check".</i> • <i>"All personnel must treat others with respect and refrain from anti-social, criminal, violent or discriminatory behaviour or sexual harassment and understand that these behaviours will not be tolerated at any time."</i> • <i>"All personnel must be courteous to members of the public and respect and support the needs of the communities in which they work. "</i> Compliance with these principles will be secured through Requirement PW8 of the Draft DCO. Horizon considers that the above measures will support Horizon to minimise the effects of the workforce and safeguard vulnerable people within the local community.	

Q10.6.2	Can the applicant provide further detail as to how the Neighbourhood Support Scheme would work given concerns highlighted in the RR as to its adequacy?	Horizon’s Neighbourhood Support Scheme was developed to provide support for residents living nearest to the Power Station Site who wish to sell their property but where the property sale price has been impacted by the development. The scheme originally had two components: 1. Horizon’s Property Price Support plan (PPS) and 2. Disturbance Mitigation Plan (renamed as Local Noise Mitigation Strategy (LNMS) in the Wylfa Newydd DCO Application). Property Price Support Plan The Property Price Support plan provides for residents who wish to relocate to be paid out the difference between the value of the property with and without the Power Station proposals (i.e. the loss in value), plus a sum of £5,000 towards the costs of moving and professional fees (including valuations) incurred. Horizon believes that the PPS remains a valuable tool in supporting the local communities most directly affected by the Wylfa Newydd DCO Project. Horizon continues to engage with the local community to ensure all qualifying properties get appropriate financial support via the Property Price Support plan. For more information regarding the PPS including the edibility criteria, please see Horizon's response to Q.10.1.27. Local Noise Mitigation Strategy The Local Noise Mitigation Strategy (LNMS), secured by the Wylfa Newydd Code of Construction Practice will offer noise insulation to properties most likely to be affected by noise as a result of the construction activities associated with the Wylfa Newydd DCO Application, both around the WNDA and along the A5025. To assist in the delivery of the LNMS, Horizon is undertaking with IACC via the Draft DCO s.106 agreement for the site preparation and clearance planning permission to prepare and implement an SPC Noise Survey Scheme. The SPC Noise Survey Scheme is intended to provide for certain noise survey works to be undertaken in advance of the Wylfa Newydd Draft DCO being granted such that once the Draft DCO is granted and implemented, noise reduction works including the noise insulation measures secured by the LNMS can be deployed as soon as reasonably practicable. As a result of feedback from Relevant Representations, Statements of Common Ground and in light of Requests for Non-Material Change currently being consulted upon, Horizon has decided to extend the eligibility area and qualifying noise criteria for the LNMS. This update will ensure all major adverse noise effects identified at residential receptors within the Environmental Statement are made aware of their	The principle of both PPS and LNMS are supported by IACC. Elements of the LNMS remain subject to discussion as part of the SP&C s106 that has not yet been finalised. Allowance still needs to be made for the potential for adverse effects remaining that are not adequately dealt with by both schemes when operational, for which additional mitigation steps will have to be available through the s106.

		potential eligibility for the scheme. Further details regarding the administration of the LNMS, Horizon's commitments, and what residents will need to do to claim eligibility will be issued by Deadline 4(17 January 2019). It should be noted that the contents of the LNMS compare favourably with similar schemes undertaken by large scale infrastructure projects. Horizon is confident that the LNMS together with the PPS, provide adequate support for property owners near to and affected by construction of the Wylfa Newydd Project.	
Q10.6.4	Can the Applicant confirm whether the Community Liaison Group meetings will have the facility to be bi-lingual? Paragraph 3.2.29 of the WNCaCP [APP-414] advises that nearby residents will be provided with information packs. Can the Applicant advise: (a)What they mean by 'nearby'? (b) How often the information packs would be provided? (c) Whether the list should be expanded to include amongst other things hours/days of working and routes/times of delivery vehicles? (d)Whether the packs would be bi-lingual? Do the IACC/IP have any comments they may wish to make on the form	Paragraph 3.2.32 of the Wylfa Newydd CoCP confirms that notifications will be bi-lingual in Welsh and English. Horizon can also confirm that Community Liaison Group meetings will have the facility to be bi- lingual and this update to the Wylfa Newydd CoCP will be made at Deadline 4 (17 January 2019). (a) The definition of 'nearby' will be influenced by the potential area affected by the issues listed in paragraph 3.2.29 of the WNCaCP. The area is yet to be defined to allow flexibility in terms of provision of notification of information to those impacted. (b) The information packs will be provided as required in accordance with paragraphs 3.2.29 and 3.2.30 of the WNCaCP. (c) Horizon does not consider it necessary to expand the list 3.2.29 of the WNCaCP. The list provides an indication of key notification matters but it is recognised that this list is not exhaustive. However, the information packs provided in respect of any construction works, the subject of notification, will reflect the potential impacts on those affected in the area as stated in paragraph 3.2.30 of the WNCaCP. (d) The applicant can confirm that the information packs would be bi-lingual. Paragraph 3.2.32 of the WNCaCP states that notifications will be bi-lingual in Welsh and English.	a) IACC would wish to agree the defined area with Horizon; b) The intention to notify at least two week in advance is supported. For construction processes of a long duration there may be a requirement to provide additional, interim notification. c) IACC recognizes that the list is not exhaustive but would request that reference should also be made to any PRow or Highway diversions or closures. Contact information should also be provided to allow local businesses who might be affected by the proposed works, to request 'business as usual' or similar signage. d) IACC recongises the commitment to provide bi-lingual notifications.

	and content of information packs?		
Q10.6.8	Can the applicant provide any evidence/data from other similar projects (including Wylfa A) as to the number of construction workers who relocate with their families to the area during construction?	Evidence in respect of the number of construction workers who relocate with their families during the construction of other projects of a similar nature is outlined within Section 2.3 and 3.7 of document ES Volume C - Project-wide effects App C1-2 - Socioeconomic technical appendix. No evidence base is available for the Existing Power Station on the number of workers who relocated their families. When that station was constructed working patterns were significantly different to today. Also the ease and cost of travel was significantly different. As a result, it is likely that more people relocated families then, than would be expected today. Of the examples in the Technical Appendix, Sizewell B is the most relevant and a study of its construction in the 1990s suggested that around 25% of professional and managerial staff, around 4% of operatives and around 80% of operational staff, were likely to be 'family type' households (i.e. with dependents/non-single households). The examples considered in the Technical Appendix did not all provide consistent information which would have enabled an average across the examples to be identified. Rather, the Sizewell B figures were taken as the best available, while also recognising they are not from a recent example. The full methodology used to estimate the number of families likely to come to the area during construction, which includes the application of the above benchmarked figures is outlined in Section 2.4. 32 of document ES Volume B – Introduction to the environmental assessments B2 – Socio-economics [APP-067].	
Q10.6.10	The ES Non-Technical Summary [APP-401] states that (paragraph 3.3.8) a Community Infrastructure Fund would be set up to provide additional resource to manage or offset effects during construction that cannot yet be predicted and therefore mitigated including impacts on community facilities and education. (a) If they cannot yet be predicted how has the amount needed for the fund been calculated? (b) Are the IACC and GCC satisfied that there would be sufficient money in the fund to cover the necessary mitigation? (c) Who will be monitoring the need for this fund? and	The Community Fund is proposed to be secured through the Draft DCOs.106 Agreement; it currently sits in <i>Schedule 12 – Community Fund</i> (a) The amount of the Community Fund is not yet determined. An appropriate sum will be agreed between Horizon and IACC, having regard to the Draft DCO s.106 obligations and mitigation provision as a whole. (b) Not responded to by the Applicant (c) and (d) The need for the fund is agreed with IACC and the principle for the fund is established within the current Draft DCO s.106 agreement. Monitoring of how the fund is released is currently proposed by Horizon to be overseen by the Wylfa Newydd Major Permissions Oversight Panel (WNMPOP) to enable local and regional	The quantum and scope of the proposed Community Fund are still under negotiation. These terms are dependent upon other aspects of the s106 also under negotiation and the confidence that can be placed on those other matters meeting the need for mitigation that arises. The operation of the Community Fund does need to reflect the Proximity Principle and the likelihood that impacts will be felt most keenly in proximity to the main site campus and other AD sites. As to how decisions on funding should be made, reference should be made to IACC's Written Representation, paras 10.2 a and b that <i>IACC's position remains that it is inappropriate for HNP to have any formal status as decision maker in respect of any Contingency Fund or the Community Fund. If the Contingency or Community Funds are to be of significant strategic importance to the discharge of the Council's statutory responsibilities in securing mitigation for adverse impacts arising from the development control of it cannot be passed to a body that would have the ability to largely or even totally frustrate the Council's future use of those funds.</i> <i>The possible accommodation of a formal role for any third parties in the decision making process about how any or all of the future liability for mitigation payments is to be determined, is however the subject of on-going negotiations. IACC are participating in these negotiations without prejudice to these objections in principle.</i>

	(d) How will payments be agreed and paid?	perspectives. The Draft DCO s.106 agreement is structured so that applications can be made for the release of the Community Fund. The draft agreement proposes criteria to establish who is likely to be an "eligible applicant" and what is likely to be an "eligible project". This for example directs funding towards social purpose organisations, and organisations with clear goals. Eligible projects should for example be located within the KSA, demonstrate mitigation and deliver value for money. In this way the allocation and need for the fund will be monitored. Further, regular reporting on the expenditure of the Community Fund is also secured in the Draft DCO s.106 agreement.	
Q10.6.1 1	Apart from backfilling positions (Paragraph 1.6.6 of the ES [APP-088]) what other measures are proposed to ensure that there would be sufficient trained volunteers or full time fire and rescue officers available to provide sufficient cover for Ynys Môn?	Horizon are committed to working with the emergency services during the construction and operation of the Wylfa Newydd development. Horizon is working with North Wales Fire and Rescue Service through the Statement of Common Ground process in respect of this topic (including training and service provision). Mitigation in this respect will be included in the Draft DCO s.106 Agreement as it develops. Horizon acknowledges that some people may choose to move from other sectors to work on the Wylfa Newydd DCO Project and intends to support backfilling of any vacancies through Wylfa DCO Newydd Employment and Skills Service (WNESS). The Draft DCO s.106 provides that WNESS will: will seek to (among other matters) support any employers who lose employees to the Wylfa Newydd DCO Project to backfill their roles A Jobs and Skills Implementation Plan is being agreed with stakeholders and will be attached to the Draft DCO s.106. The Jobs and Skills Implementation Plan will (among other matters) require monitoring of labour displacement. Finally, a Skills Fund is proposed in the Draft DCO s.106 to fund employment and training initiatives.	HNP has not relied specifically on adequacy of numbers of volunteer/full time fire and rescue officers. More general comment on the scope and adequacy of mitigation funding through the s106 is dealt with in Q10.2.6
Q10.6.1 2	The Codes of Construction Practice would rely on an overarching Programme Board and a series of engagement sub-groups (including for accommodation and tourism). (a)How would these boards/sub-groups work in particular who would they be accountable too? (b)Would they have a code of governance? (c) It is indicated that you would be asked to be represented on these boards do you have the resources and the relevant personnel available to attend these boards?	Horizon note that this question is for others, however, Horizon wishes the Examining Authority to be aware that Horizon has now shared draft terms of reference for the Programme Board (now re-named as the Wylfa Newydd Major Permissions Oversight Panel - WNMPOP) and sub-groups to Welsh Government and IACC for initial comment. It is anticipated that these could be shared with the wider Team Wales group following initial consultation with Welsh Government and IACC. Horizon is proposing some changes to the Wylfa Newydd CoCP to reflect the amended terms of reference and this will be reflected in the update to the CoCP to be submitted to the Examining Authority. The draft terms of reference envisage that the WNMPOP would be secured by the Wylfa Newydd CoCP but its functions would be secured by the Draft DCO s.106 Agreement, including circumstances under which it	Section 11 of IACC's Written Representations provided commentary on the Codes of Construction Practice and sub Codes of Construction Practice (CoCP/sCoCP) providing both general commentary by IACC on the approach adopted by HNP; and specific highlighted matters that require further information from HNP, in default of which the terms on which the development consent order should be approved. Revised documents issued at Deadline 2 by HNP included the : Main Site Sub CoCP (Document 8.7) Marine Works Sub CoCP (Document 8.8) Off Site Power Station Facilities Sub CoCP (Document 8.9) Park and Ride Sub CoCP (Document 8.10) A5025 Offline Improvements Sub CoCP (Document 8.12) Wylfa Newydd CoOP (Document 8.13) In summary terms, the changes made to these documents have the effect that: - There is substantially more content on air quality monitoring, targets and action to remedy exceedance, the most detail applying to the main site and reducing the further away one gets. There is some more detail on noise monitoring locations, focussed on the main site only, but of less substance than that on air quality. - There is a multiplicity of single line additional controls on a wide range of subjects from HGV movement to ecology that do not have a unifying theme as to why they are offered in some instances but not in others. None of these changes look significant overall. - The vast majority of changes are tidying up acronyms and correcting grammar. The main points made by IACC in its Written Representations about the weaknesses in the content of the CoCP series of documents, s106 and monitoring arrangements are unaffected by these changes.

	would approve the release of contingency funds in the Draft DCO s.106 Agreement. Once terms of reference are agreed for the WNMPOP these would be annexed to the final signed Draft DCO s.106 Agreement to be submitted to the Examining Authority, in accordance with the programme outlined in the Draft DCO s.106 Position Statement submitted to the Examining Authority at Deadline 1. The draft terms of reference provide for governance arrangements, including membership, voting rights and dispute resolution. The draft terms of reference also provide an indication of the organisations that Horizon consider would be appropriate to attend the WNMPOP and sub-groups and invites further views from stakeholders on attendees. The redacted Draft DCO s.106 agreement which was shared with IACC and Welsh Government on 25th October 2018 included provisions for appropriate funding for attendance at the WNMPOP and sub-groups	

Q10.6.1 3	Please respond to the concerns raised by Interested Parties [RR-127 and RR-129] regarding the effect (e.g. on transport and power networks) of an evacuation zone for a major incident if one were to occur.	The Environmental Statement at appendix D14-2 (analysis of accidental releases, Examination Reference Number: [APP-234]), sets out the emergency planning arrangements and an assessment of effects from potential accidental release scenarios for the Power Station based on the UK Advanced Boiling Water Reactor (UK ABWR) design. All of the scenarios were assessed as having a negligible environmental impact, even the identified severe accident scenario. This document also details the implementation of emergency arrangements and the utilisation of appropriate countermeasures in the event of accidental releases. As set out at 5.2 of appendix D14-2 of the Environmental Statement (Examination Reference Number: APP- 234), The Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPPIR) regulate emergency arrangements for nuclear power plants in the UK. REPPPIR establishes a framework of emergency preparedness measures to ensure that members of the public are: - properly informed and prepared, in advance, about what to do in the unlikely event of a radiation emergency occurring; and - provided with information if a radiation emergency actually occurs. Horizon will be responsible for preparing an on-site emergency plan, while the local authority (in this case IACC) will be responsible for preparing an emergency plan within an off-site area. The local authority is required to prepare an off-site emergency plan according to Office for Nuclear Regulation's determination for the defined emergency planning areas with the purpose of protecting the public and minimising any potential radiation exposures. This plan will identify the appropriate protection measures which can be taken, such as sheltering, the taking of stable iodine tablets and evacuation, in order to reduce radiation exposures to members of the public within all or parts of this area. A key component of the nuclear site licensing process undertaken by the Office for Nuclear Regulation is the nuclear safety case. This is a set of documents that describe the radiological hazards of a facility and its modes of operation (including potential undesired modes) and the measures that prevent or mitigate against harm being incurred. The safety case must demonstrate that relevant standards have been met and that risks to persons have been reduced to As Low As Reasonably Practicable (ALARP). Horizon will need to have an approved safety case before a nuclear site license is granted for the Power Station. In addition, an assessment of scenarios relevant to the Control of Major Accident Hazards Regulations 2015 (COMAH Regulations) will be undertaken for the Power Station. It is expected that the site will be managed so that the COMAH Regulations do not apply during the construction stage, and that at operation, the site will be a Lower Tier COMAH site.	IACC notes the resourcing for emergency response services that will be made available through the s106. Emergency services will need to be able to respond to a wide range and scale of situations, from local incidents through to REPPPIR scale situations. IACC maintains its position that payment of monies through the s106 should all be channelled through IACC as the enforcing body, which is reinforced by the fact that in this example of emergency services, a wide range of agencies and responsibilities might be encompassed in the responses that might be required by the WN development. Efficient and effective enforcement of the s106 is best achieved by having one central point of reference for doing so being the local planning authority that has wide experience in dealing with such matters. The IACC would confirm that at this stage, the "defined emergency planning areas" are not yet determined and as such, the geographical area that an off siteplan will be applicable to is not yet known. With regards to HNP's confirmation that the Emergency plan will identify the appropriate protection measures which can be taken, such as sheltering, the taking of stable iodine tablets and evacuation The off-site plan would also need to identify Food and Water advice / and or restrictions as a public protection counter measure.

		NPS EN-6 provides that when considering a DCO application the decision-maker should act on the basis that it should not duplicate the consideration of matters that are within the remit of the nuclear regulators, including the GDA and nuclear site licensing processes. The Draft DCO s.106 agreement will also include provision for the ensuring adequate resourcing for emergency services in respect of direct effects from the Wylfa Newydd DCO Project. Horizon are committed to working with the emergency services during the construction and operation of the Wylfa Newydd DCO Project. Horizon is working with North Wales Fire and Rescue Service through the Statement of Common Ground process in respect of this topic. Details of proposed mitigation in this respect will be included in the Draft DCO s.106 agreement.	
Q10.6.1 4	Paragraph 5.1.6 of the WAMS [APP-412] states that there are just under 62,000 people across the DCCZ in 'nuclear relevant' occupations. Can you define what is meant by a 'nuclear relevant' occupation?	The term 'nuclear relevant occupations' was used to describe the occupational groupings falling within the occupational categories outlined within Table 1 of the 'New Nuclear Build Employment Scenarios' Report developed by Construction Skills (the skills and training board for the construction industry). This report (and list of relevant occupations comprising of 'nuclear relevant occupations') can be accessed online via the following link: https://www.citb.co.uk/documents/research/nuclear_new_build_employment_scenarios_report_web_tcm17-27989.pdf. The list of relevant occupations comprising of 'nuclear relevant occupations' is also outlined within Appendix 7 (7-1.1) of document 6.3.9 ES Volume C - Project-wide effects App C1-2 - Socioeconomic technical appendix.	

ExA Ref.	Question	Horizon's Response to Question	IACC Comments / Response
Q11.1.1	Paragraphs 4.3.34 and 4.3.37 of the Planning Statement [APP-406] indicate that it would take 18 months to construct the proposed Park and Ride facility and 15 months to construct the Logistics Centre. Can the applicant: (a) Advise why they will take this length of time to construct? (b) What interim arrangements will be in place to manage construction vehicles whilst the logistics centre is under construction? And (c) Whether the transport modelling took account for these additional vehicle movements before these facilities comes on- line? Does the IACC/Highways Authority have any comments to make?	(a) The programme period of 18 months to construction the Park and Ride facility and 15 months for the Logistics Centre incorporates the design and construction phases for each facility and has been based on a phased approach aligned to project demands in terms of the anticipated ramp up of workforce numbers and construction vehicle movements. (b) Before the Logistics Centre is open construction vehicles will travel direct to each work site associated with the Wylfa Newydd DCO Project. It is anticipated that Horizon will implement interim traffic management arrangements including control and management of delivery slot times for the Wylfa Newydd Development Area and Associated Development. Horizon will work closely with the Project Management Contractor and wider project supply chain to deconflict deliveries to ensure deliveries are managed in line with the transport strategy presented in the Draft DCO [REP1-005] application. More specifically, paragraphs 5.2.1 to 5.2.6 of the Logistics Centre sub-Code of Construction Practice [APP- 414] indicate the technology which Horizon will employ during the construction period of the Wylfa Newydd DCO Project in order to manage construction vehicles before and after the Logistics Centre becomes operational. These management arrangements will include a deliveries management system, employing a Distribution Management Asset Tracking System (DMATS) to track construction vehicles and pre-book delivery slots to the site. The text provided in these paragraphs is now also incorporated into the revised version of the Wylfa Newydd Code of Construction Practice (submitted at Deadline 2 (4 December 2018)) to confirm that these arrangements will be in place before the Logistics Centre becomes operation. (c) The transport modelling presented in the Transport Assessment [APP-101] assumes the Logistics Centre and Park and Ride facilities are open. This is described in paragraph 7.2.1 of Appendix G Strategic Traffic Model Method Statement [APP-108] of the DCO Transport Assessment. The purpose of the Logistics Centre is to hold and release construction vehicles in controlled time intervals and therefore regulate construction vehicle deliveries throughout the working day. The Logistics Centre will therefore not change the total number of vehicle movements to the WNDA or the Associated Development	(a) Further information is required on these timescales. IACC does not accept the early years phasing strategy and the lateness of the delivery of the Park and Ride and Logistics Centre. (b) It is anticipated that Horizon will implement interim traffic management arrangements..." This is in inadequate response. Horizon need to commit to providing interim traffic management arrangements which need to be agreed with IACC and Welsh Government in advance of commencement of construction. More clarity needed in relation to the DMATS arrangement before the Logistics Centre is completed. Section 5.2 of the Logics Centre CoCP describes the deliveries management and the DMATS, but this is based on vehicles registering and waiting at the Logistics Centre. Proper control is needed over where vehicles register and wait in the absence of the Logistics Centre? (c) Whilst the transport modelling has taken account of comparable/higher levels of traffic, there isn't a specific assessment of the traffic flows and impacts on the road network in the interim period before the completion of the Park and Ride and Logistics Centre. This further emphasizes the need for an Early Years Strategy as per the IACC's Traffic and Trasnport LIR chapter.

		sites. Overall, construction traffic volumes prior to the opening of the Logistics Centre opening are expected to be the same or lower than those reported in the Transport Assessment. This is because construction activity increases gradually in the early years of the Project as shown in Figure 7-6 of DCO Transport Assessment. In addition, before the Logistics Centre opens construction vehicles will not be required to travel the additional distance from Junction 3 (which provides access to the A5025 and the Project work sites) and Junction 2 (which provides access to the Logistics Centre). This means that before the Logistics Centre opens, this distance will not be driven and hence the overall distance driven by construction vehicles will be lower.	
Q11.1.2	Paragraph 6.2.12 of the Planning Statement [APP-406] refers to a proposed workforce of 850 at the Power Station Site – on this basis why is it necessary for 1,100 permanent parking spaces as proposed by WN16 of the dDCO [APP-029] and how does this fit with the statement at paragraph 5.3.7 of the WNCocP [APP-414] that states that parking spaces at the Power Station Site will be restricted to encourage the use of Park and Share and shuttle buses and reduce the number of private vehicles being driven to the site?	The Draft DCO and the Planning Statement contained errors in respect of the car parking spaces cited. Horizon proposes 700, rather than 1100, permanent car parking spaces. This has been corrected in the Draft DCO submitted at Deadline 2 (4 December 2018), in which Requirement WN16 now refers to: a) 500 permanent and 200 temporary spaces in the southern car park b) 800 temporary spaces in the northern car park c) 200 permanent spaces at the simulator and training car park As noted at paragraph 5.1.58 of the DCO Transport Assessment, the Wylfa Newydd Development Area (WNDA) (excluding the simulator and training building, which is discussed further below) will have provision for 500 car parking spaces for workers during the operational phase of the project. During periods of outage, there will be a further 1,000 temporary car parking spaces made available. This level of car parking matches the assumed number of workers during the operational phase assuming car sharing and an average of 1.5 workers per car. Paragraph 7.7.2 of the DCO Transport Assessment states that there will be up to 850 operational workers at the Wylfa Newydd Development Area on any one day with 100 of these working on a shift basis and the remaining 750 working office hours. A further temporary 1,000 workers are expected during an outage. This means that there are 500 car parking spaces for approximately 750 daily workers which means that some workers will be required to car share with an expected average number of 1.5 workers per car. This assumption is described in paragraph 2.6.2 of Appendix A of Appendix G - Strategy Traffic Model Methodology. This approach is in line with the requirements of the Operational Travel Strategy, which are set out at paragraph 5.3 in the Wylfa Newydd Code of Operational Practice [APP-421]. The Operational Travel Strategy aims to encourage operational staff and visitors to travel to the site by sustainable modes, in order to mitigate the anticipated increase in motor traffic created by the development on the local road	The IACC notes the correction provided by Horizon. However, the IACC seeks clarification on how will the temporary parking spaces be managed so they are not used as permanent spaces. Further to this, Horizon shall confirm if the temporary parking spaces will be removed following each outage period. As per the IACC's concerns with the car sharing strategy during the construction phase of the project, the IACC believe that the provision of additional Park & Share (P&S) facilities at strategic locations would mitigate potential fly-parking and enable more sustainable travel patterns during the Operational phase to the Wylfa Newydd site.

		network. Sustainable travel will be achieved by encouraging and promoting car sharing, using local bus services, cycle parking and key walking routes. Please note that paragraph 5.3.7 of the Wylfa Newydd Code of Construction Practice relates to the construction, rather than operational phase. The Park and Ride facility would not operate during the operational phase, and likewise Horizon does not propose the use of shuttle buses during the operational phase. <u>Simulator and training building</u> As the simulator and training building is located some distance from the Power Station Site, it has been provided with its own car park of 200 parking spaces for those workers running and attending the training facility. This provision has been calculated on the requirements of the building, with a contingency in the number of car parking spaces provided to accommodate people arriving and departing while training is ongoing. The inclusion of the car park spaces associated with the simulator and training building brings the total number of permanent car parking spaces during the operational phase of the Project to 700.	
Q11.1.3	Paragraph 6.2.17 of the Planning Statement [APP-406] states that the off-line highways improvements would deliver a number of benefits in specific locations but then only cites one example. Can the applicant outline where else, other than Llanfachraeth, they consider would benefit from these works? In Llanfachraeth a 60% reduction in traffic levels is envisaged – given this is a relatively small village in a rural area what are the existing traffic levels in Llanfachraeth and are they at such a level as to classify the proposed reductions as an improvement?	As described in paragraph 5.1.37 of the DCO Transport Assessment the introduction of the Wylfa Newydd DCO Project will increase traffic flows along the A5025 between Valley and the Wylfa Newydd Development Area. To help reduce the impact on local residents and facilities along the corridor, five off-line highway improvements are proposed. As Paragraph 6.2.17 of the Planning Statement [APP-406] also notes, the A5025 Off-Line Highway Improvements would reduce traffic noise and air pollution in the communities of Valley, Llanfachraeth, Llanfaethlu and Llanrhuuddlad (at Cefn Coch). In summary, the five sections are as follows: • Section 1: A5 east of Valley Junction to north of Valley Junction – comprising a proposed four arm roundabout and a bypass connecting the A5 with the A5025 to the east of the existing A5/A5025 signalised junction in Valley. This is 1.06km in length. This enables vehicles associated with the Wylfa Newydd DCO Project to avoid the existing A5/A5025 signalised junction in Valley helping reduce delays to all traffic. The roundabout would be located away from the village of Valley in order to reduce the effects of noise, vibration, air quality and street lighting. • Section 3: North of Llanyngghenedl to north of Llanfachraeth – comprising a proposed bypass east of Llanfachraeth. This is 2.28km in length. This enables vehicles associated with the	The IACC welcomes Horizon's acknowledgment that air quality and noise resulting from increased HGV traffic can have an adverse impact on receptors (such as the houses and school) located adjacent and near to the A5025. The IACC also welcomes Horizon's acknowledgment that the road width and parking arrangements within Llanfachaeth currently mean that two large vehicles cannot pass each other at the same time, which lead to traffic delays. The above issues identified by Horizon reinforces the IACC's requirement for an Early Years Strategy, in the interest of road safety and environmental effect, as described in the Traffic and Transport LIR.

Wylfa Newydd DCO Project (and other traffic) to avoid travelling through the village of Llanfachraeth where there are road width restrictions and there are many residences and a school fronting the A5025. Locating the bypass away from the village will also reduce the impact of noise and vibration post-construction. The northern section of the bypass would be constructed in a cutting to reduce noise pollution and vibration levels for Llanfachraeth village.

- Section 5: South of Llanfaethlu to north of Llanfaethlu – comprising proposed improvements to two existing substandard bends on the A5025 in Llanfaethlu. This is 1.43km in length. This enables all vehicles to travel more safely along this section of the A5025. The proposed improvements would also reduce through traffic from passing the new school at Llanfaethlu, Ysgol Rhyd y Lla, which opened at the end of 2017.
- Section 7: North of Llanrhuddlad to north of Cefn Coch – comprising a proposed bypass to provide a straighter section of road and bypass two existing substandard bends in Llanrhwydrus. This is 1.3km in length. This enables all vehicles to travel more safely along this section of the A5025.
- Power Station Access Road Junction – north of Cefn Coch – comprising a proposed three- arm roundabout junction linking the existing A5025 to the proposed Power Station Access Road. The enables vehicles to travel to and from the Wylfa Newydd Development Area.
- The location of these proposed schemes is shown in figure 5-9 of the Transport Assessment and further details (including details of any highway stopping up requirements) are provided in chapter G1 (Proposed Development) of the Environmental Statement [APP-304].

These schemes are expected to begin construction in year 1 and be open after 18 months. They will remain following completion of the construction of the Power Station and hence provide a legacy benefit for residents and the wider economy along the A5025 corridor.

60% reduction in traffic at Llanfachraeth Table 4-1 of the DCO Transport Assessment presents a summary of existing traffic flows on the road network examined as part of the Wylfa Newydd DCO Project. Traffic flows are provided for the “A5025 north of Valley” which are equivalent to traffic flows through Llanfachraeth. The northbound traffic flow is 140 vehicles per hour in the AM peak and 330 vehicles per hour in the PM peak. In the southbound direction the traffic flow is 290 vehicles per hour in the AM peak and 220 vehicles per hour in the PM peak.

The introduction of the A5025 Off-line Highway Improvements will enable traffic to avoid passing through Llanfachraeth. Significant benefits are anticipated (as defined by the thresholds used within the Environmental Statement – see paragraphs 3.4.36 and 3.4.37 of Chapter B3 Traffic and Transport [APP- 068] as traffic flows are expected to reduce by more than 60% which in turn will provide benefits in terms of

		reduced noise and air quality impacts to the receptors (such as the homes and school) located adjacent and near to the A5025. In addition, the road width and parking arrangements within Llanfachaeth currently mean that two large vehicles cannot pass each other at the same time, which lead to traffic delays. The reduction in traffic flows will reduce the frequency of times when two large vehicles need to pass each other at the same time at the locations where the road width is constrained. Further details of traffic flows are provided in ES Volume C: App C2-3 – Traffic Flows [APP-100]. Details for Llanfachraeth are provided in Section 12.	
Q11.1.4	(a) Who currently provides bus services on Ynys Môn? (b) When were they awarded the contract and when will it be up for renewal? (c) Was the possibility of using existing bus services or the existing bus provider considered for the workforce and in-particular the connection between the Park and Ride and the WNDA? (d) Has the possibility of opening up the workforce buses to the wider community been considered?	(a) Currently, bus services on Ynys Môn are provided by Arriva (https://www.arrivabus.co.uk/wales). (b) Horizon are guided by IACC with regards Arriva's contract but would note that as Arriva is a private operator they can operate the service as long as it is considered profitable although they may get some subsidy for some services. (c) Section 4.12 of the DCO Transport Assessment provides information on the existing bus network. This states that public bus services across Anglesey reflect rural levels of demand, with frequencies of less than one bus per hour. The bus network of routes is shown in figure 4-11 of the DCO Transport Assessment. Paragraph 4.12.2 summarises typical bus service frequencies which pass close to the Wylfa Newydd Development Area e.g. Service number 60 operates three times per day, service number 61 which operates every two hours and service number 62 which has four services per day. This low level of service provision together with the start and end times of the shifts for the construction workers of the Wylfa Newydd DCO Project means that construction workers are not expected to use the existing bus network to travel to and from the Wylfa Newydd DCO Project. This is described in paragraph 7.3.20 of the DCO Transport Assessment. (d) The potential for opening up the shuttle bus network to the general public has been considered but this is not considered practical for several reasons. These include the need to ensure sufficient capacity is available to transport workers to the Wylfa Newydd DCO Project each day, the additional complexity of serving paying passengers, issues associated with insurance and liability and the fact that the shuttle bus network will connect residential areas with the Wylfa Newydd DCO Project rather than other locations which members	

	(e) Is the applicant proposing any measures to enhance/support the current bus service provision on the island so that the local workforce is encouraged to travel sustainably?	of the public might wish to visit e.g. town centres. For example, a shuttle bus from Bangor would be expected to make limited stops after leaving Bangor and would not be expected to visit other locations of interest to the general public. Allowing the general public to use the shuttle bus network could also potentially affect demand on existing bus services and reduce demand and revenue for existing operators. (e) The workforce for the Wylfa Newydd DCO Project will be able to travel to work in a sustainable way by using the proposed bus shuttle network, car sharing or living at the Site Campus. There are no proposed measures from Horizon to enhance or support the existing bus service provision on Anglesey given the existing rural nature of the network (see responses to part c) of this question). The Transport Sub-Group will though monitor transport arrangements for the Wylfa Newydd DCO Project and they have access to funds to enable transport mitigation measures, potentially including changes to the bus network.	The importance of access to funding for transport mitigation measures, including changes to the bus network underscores the importance of those s106 arrangements being fully in the control of IACC.
Q11.1.5	Concerns have been raised in a number of the RR regarding the fact that the Menai and Britannia bridges occasionally have to shut. Can the IACC/GCC provide details of: (a) How frequently the Menai and Britannia Bridges have shut over the last five years? (b) How often both bridges were shut at the same time? (c) What measures are currently in place when a bridge shuts eg how and where is traffic diverted or held and how does this effect travel times/congestion? (d) The structural state of both of the bridges and whether any maintenance/repair work is planned during the construction phase of the project which would result in either partial or full closure of either of the bridges? Can the applicant confirm: (a) Whether bridge closures were factored into their transport assessment/modelling? (b) What measure they propose during construction and operation to manage traffic if one or both of the bridges has to close?	This answer refers to the latter part of the question above - “can the applicant confirm” sections (a) and (b) - only. (a) The temporary closure of the Menai Bridge and/or Britannia Bridge is a rare occurrence and the traffic modelling of the Wylfa Newydd DCO Project has not considered this eventuality. (b) The temporary closure of one or both bridges would be expected to be classified as a traffic incident. Section 5.5 entitled ‘Traffic Incident Management’ of the submitted Code of Construction Practice, [APP-419] states the role of Horizon in managing Wylfa Newydd DCO Project traffic during an incident (such as the closure of a bridge). This includes providing key points of contact in the instance of an incident and relaying incident- related information to construction traffic operators. Following discussions with stakeholders, Section 5.5 of the Wylfa Newydd CoCP, as updated and submitted at Deadline 2 (4 December 2018), has been replaced with the following text in relation to Horizon’s involvement in a traffic incident: “Horizon and its supply chain have no statutory authority in the event of a traffic incident on the road network. However, Horizon and its supply chain will assist with incident management planning through the following measures: • Maintaining a site-based delivery management team as a contact point for contractors, emergency services and the highway authorities. This team will help manage and coordinate Horizon and its supply chain's response to an incident.	Horizon has added text to the Section 5.5 of Code of Construction Practice which includes the identification of a site based delivery management team which will provide a point of contact; the control of HGVs on the network; a communications protocol; and holding HGVs and buses at appropriate locations. Further measures could include liaison with IACC, Welsh Government and NWP to identify traffic incident management protocol options and should be secured via an IACC approved Traffic Incident Management Plan.

		- Controlling the number and frequency of Heavy Goods Vehicles (HGVs) on the designated HGV routes. - Establishing an appropriate communications protocol for workers, bus drivers transporting construction workers and HGV drivers. - Communicating incident management information to all workers, contractors making a delivery and bus operators transporting workers. - Holding HGVs and buses at appropriate locations, including the Logistics Centre, during an incident."	
Q11.1.6	The proposal is that the majority of freight would be moved by sea using the MOLF. Could the applicant advise if the TA includes any modelling for times when the MOLF may not be available due to bad weather/storm damage and in particular whether this would result in an increase in traffic movements on the road network and the impact that this would have.	Whilst the question is not directed to Horizon as the applicant, the following response is provided by Horizon at this stage: A Request for Non-Material Change (number 2 [AS-021]) to increase the upper daily limit for marine vessel movements from four to 16 movements per day, will support programme recovery following delays, for example after bad weather. Any temporary additional deliveries by road will be made within the limits defined in paragraph 5.4.13 of the Wylfa Newydd Code of Construction Practice, ensuring the total number of construction vehicle movements to the WNDA does not exceed the assessed threshold. A supply of construction materials will be maintained on site in-line with good construction practice and commercial requirements. This will assist in minimising the impact of adverse weather on the MOLF.	Horizon has requested a non material change for an increase from 4 to 16 vessel movements per day to support programme recovery but specifies that temporary additional deliveries by road would be within the limits set out in the CoCP – not exceeding a maximum of 40 HGV deliveries (80 movements) per hour and 160 HGV deliveries (320 movements) per day. In the technical report titled ‘Request for Non-Material Change no.5 – HGV Movements’ (November 2018 [Rev 1]) which supports the proposed change it is stated in paragraph 1.1.2 that the extension of the delivery window is to provide a more flexible logistics management arrangement. Paragraph 2.2.4 of the document states that the total number of HGVs would not change as a result of the extended delivery window. In paragraph 2.3.5 it is stated that the hours extension would provide the opportunity to extend the current delivery programme and to potentially deliver the Project ahead of schedule which would reduce the length of time that the community is exposed to construction-related effects. IACC’s response to the consultation is that it would seek to prohibit this proposal until the completion of the A5025 offline improvements. It is noted that there is no assessment of environmental effects of the proposal, that the proposal will affect the amenities of local communities into the evening and on a Saturday, therefore it is misleading to suggest that the proposal would reduce exposure to construction related effects. The IACC seeks clarification on the HGV caps identified in the CoCP as they do not reflect the HGV AADT figures for the Project as set out in Appendix C2.03.
Q11.1.8	In order to minimise vehicular movements did the applicant explore the possibility of removing waste from the site via the MOLF and if they did why was this dismissed as an option?	The potential for removing conventional waste via the MOLF was considered as part of the development of the Wylfa Newydd DCO Project. However, the relatively low volume of conventional waste generated by the Wylfa Newydd Development Area (WNDA) and Associated Development sites and the need to stockpile waste into sufficiently large volumes for removal by ship makes this an unviable option. The proposed HGV movements associated with removing conventional waste from the WNDA are only a small proportion of the overall number of construction vehicles and details are provided in the Strategic Traffic Model. Paragraphs 2.4.2, 2.6.2, and 7.3.2 detail projected volumes of delivery and servicing vehicles, which include the removal of conventional waste from the site.	
Q11.1.9	Can the applicant confirm that the transportation of waste generated from construction from all of the sites by road was included in the traffic modelling and highlight	The transportation of waste generated from construction from all of the sites by road was included in the traffic modelling. Details are in the Strategic Traffic Model. Paragraphs 2.4.2, 2.6.2, and 7.3.2 detail projected volumes of delivery and servicing vehicles, which include the removal of conventional waste from the site.	

	where in the documentation this information can be found.		
Q11.1.1 0	The traffic modelling/assessment is predicated on the basis that the MOLF will enable delivery of the majority of materials direct to the site. Is there any modelling/contingency that deals with the potential increase in vehicular movements should construction of the MOLF be delayed. In particular would the road network have the capacity to take any additional movements that may result and if there is an increase in movements how would this affect local residents?	The construction of the MOLF will require the delivery of materials by road using Heavy Goods Vehicles (HGVs). The estimated number and profile of these HGV movements along the A5025 is presented in Figure 7-6 of the DCO Transport Assessment. If the delivery of the MOLF were to be delayed then this would mean that the number of HGVs travelling to the WNDA associated with the construction of the MOLF would be spread over a longer period. Should the MOLF opening be delayed, any additional construction vehicles bringing materials to the WNDA by road will be managed so as not to exceed the daily cap, as specified in paragraph 5.4.13 of the Wylfa Newydd Code of Construction Practice, of 160 construction vehicle deliveries per day to the WNDA. To show the likely impact of a delay in delivering the MOLF, the potential impact of a six-month delay in delivering the MOLF has been assessed based on the following assumptions: • No change to the start date of MOLF construction. • End date of MOLF construction delayed by six months beyond that assumed in the Draft DCO application. • Total number of construction vehicles required to build the MOLF is unchanged. • General shape of HGV delivery profile kept consistent between baseline and scenario with a six-month delay. • The resulting impact on the delivery profile of HGVs is shown in Figures 2 and 3 below. These figures show: • The peak number of construction HGVs associated with the MOLF decreases – falling from 745 vehicles per month in the Draft DCO submission to 414 per month with a six-month delay (see Figure 2). • For overall HGV movements, for months 23 to 31 inclusive, there are fewer vehicles per month when the MOLF is delayed (because the HGVs associated with the MOLF are spread over a longer period) (see Figure 3). • This reverses in months 32 to 42, when there are more overall HGVs per month when the MOLF is delayed. The total number of HGVs is though similar to the total assessed in the Draft DCO (approximately 3,500 HGV deliveries per month) (see Figure 3).	The principle of assessing the effects as a result of delay to the delivery of key project components is welcomed by the IACC. However, the findings of this assessment does not address concerns raised previously by the IACC. The project control documents must address:- Delay to the delivery of the MOLF resulting in a delay to the commencement of First Nuclear Concrete Unit 1 Control of increase in HGVs in the later months of a delay to the MOLF, given the situation at Hinkley Point C where a 50% increase was needed. Delay to the delivery of the A5025 Off-line Improvements, as well as the cumulative impact of delay to the delivery of both the A5025 improvements and MOLF.

Overall, this assessment shows that delaying the delivery of the MOLF by six months does not affect the conclusions of the transport analysis presented in the Draft DCO application.

Figure 1 – DCO Transport Assessment

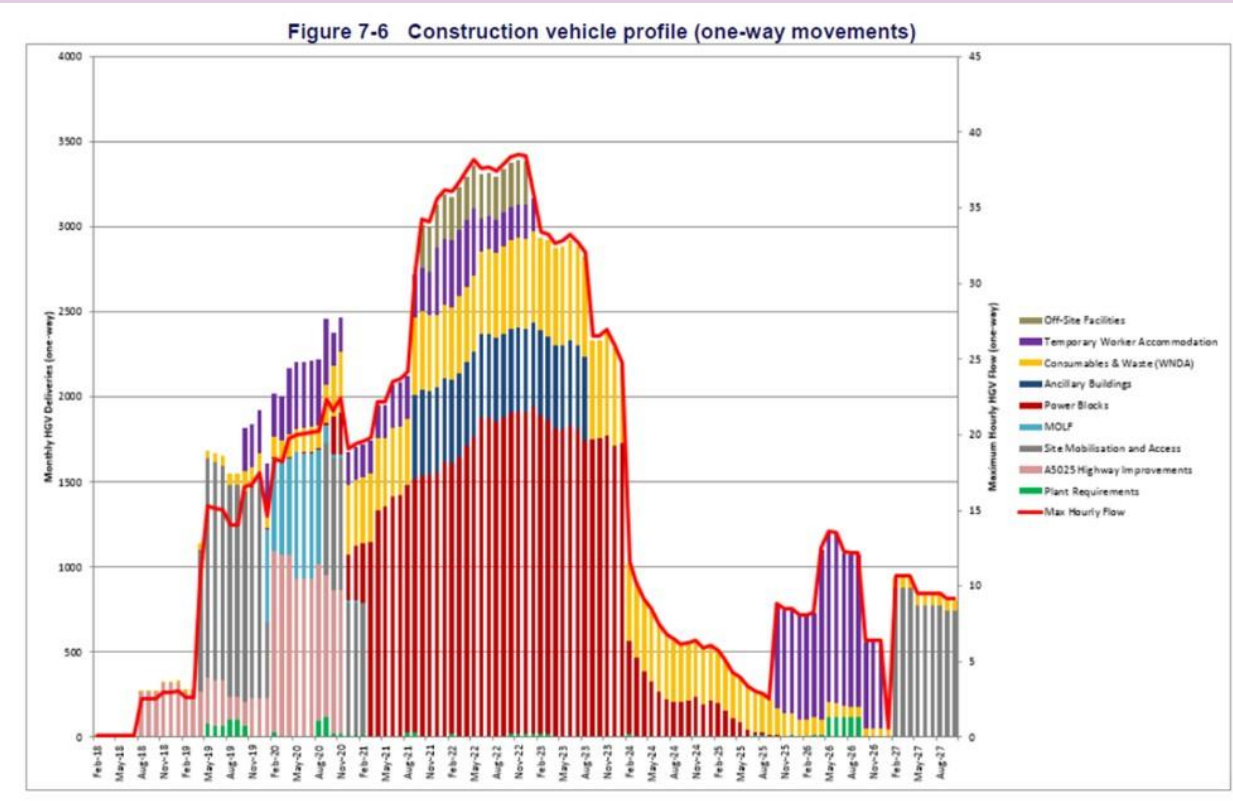


Figure 2 – Effect of six-month delay in delivery of MOLF on HGV deliveries related to MOLF

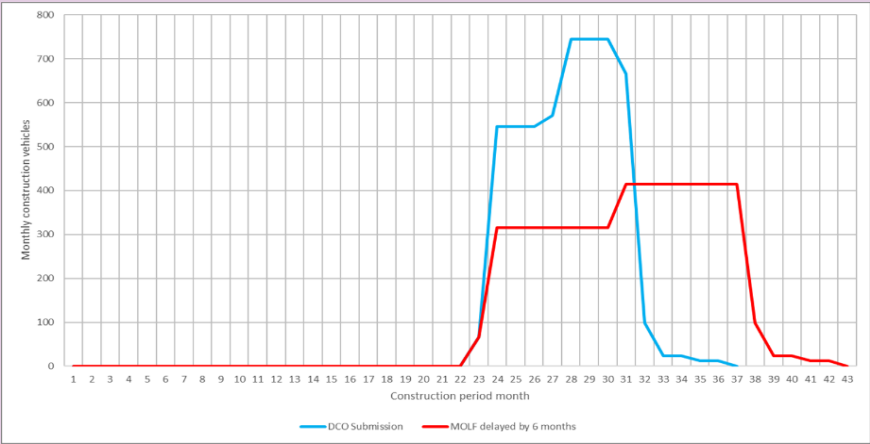
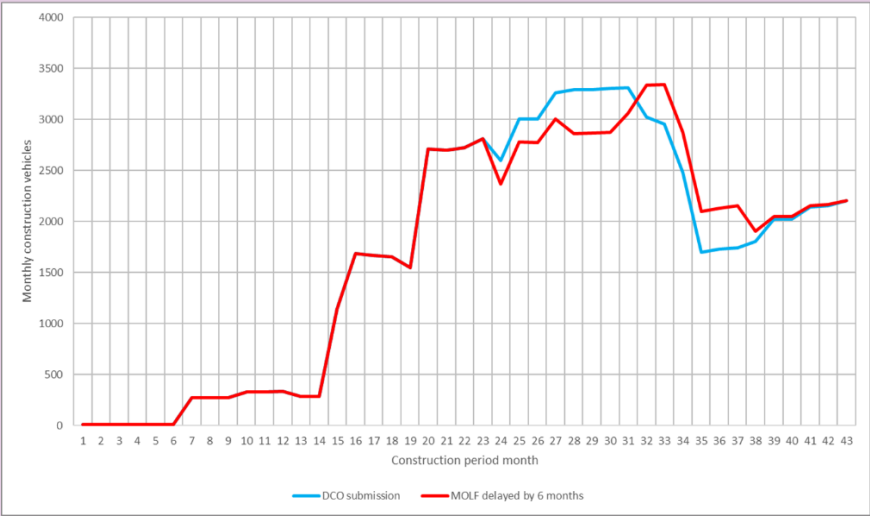


Figure 3 – Effect of six-month delay in delivery of MOLF on all HGV deliveries



Q11.1.1 1	A 50% increase in capacity of the Holyhead- Dublin Ferry is proposed by 2020. Was the increase in the number of vehicles using this service included in the traffic modelling?	The transport analysis of the Wylfa Newydd DCO Project is based on baseline traffic flow surveys undertaken at many sites across Anglesey and North Wales. These surveys capture vehicles movements to and from Holyhead. Details of these surveys are provided in DCO Transport Assessment, Appendix D - Traffic Data Report [APP-105] and the existing situation for the road network is presented in Section 4.3 to Section 4.8 of the DCO Transport Assessment. These traffic flows have been growthed to represent background baseline traffic flows in 2020, 2023 and 2033 using Department for Transport growth factors and this is described in Section 9.2 of the DCO Transport Assessment. These growth factors assume that light goods vehicle traffic will increase by 19% between 2016 and 2023 and heavy goods vehicle traffic will increase by 5% over the same period. This increase can be considered (in part) to reflect the expected increased use of Holyhead port by vehicles travelling to and from Ireland. The actual implementation of the new ferry service responds to the expected increase in freight traffic incorporated in the traffic flows used in the assessment of 2020, 2023 and 2033. The actual timing of the new ferry service is currently unknown and hence traffic impacts due to vehicles leaving an arriving ferry are difficult to determine. However, it can be expected that the situation will be similar to existing arrangements with vehicles leaving Holyhead in a steady flow and spreading out as they approach the Britannia Bridge which is approximately a 20- to 25-minute drive to the east. It should be noted that an increase in the size of a ferry (or ferries) operated from Holyhead does not necessarily mean that the daily vehicle capacity of the service increases at the same rate. This is because the operator may operate these larger ferries less frequently than a service which uses smaller ferries. Timetable information (and hence overall route capacity) for 2020 and beyond is not available at this time and furthermore the ongoing Brexit negotiations add further uncertainty to the forecasts for future demand and capacity on the Holyhead to Ireland route.	
Q11.1.1 2	Construction traffic associated with the proposed North Wales Grid Connection Project has been excluded from the modelling on the basis that it would be relatively limited (20 vehicles per hour per direction) and there is a degree of uncertainty over movements. In your opinion given the relatively low levels of traffic on Ynys Môn should these movement be included in the modelling?	Construction traffic associated with the proposed North Wales Grid Connection Project (NWGCP) has not been excluded from the traffic modelling undertaken as part of the DCO Transport Assessment. At the time of the preparation of the DCO Transport Assessment there was only limited information available about the traffic associated with the NWGCP. Sufficient traffic information was though provided near the finalisation of the DCO Transport Assessment to enable a sensitivity test to be undertaken to examine the traffic impacts of the NWGCP and Wylfa Newydd DCO Project on the operation of the Britannia Bridge. This traffic modelling assessment of the operation of Britannia Bridge was undertaken using the VISSIM traffic modelling software. The results are presented in Table 2.2 of the DCO Transport Assessment, Appendix L – Supplementary Information [APP-113]. Further details about the North Wales Grid Connection Project and	The assessment in DCO Transport Assessment, Appendix L underestimates the two-way movements (17 LGVs and 23 HGVs). The construction traffic from the National Grid Connection Project should be included irrespective of the level of traffic as it will have a cumulative impact. Further to this, 20 HGVs per hour per direction would equate to 40 HGVs two way movements, or 480 HGVs over a 12 hour period, which is not a low level of traffic and can have a capacity impact on roads and junctions and an environmental impact on communities located alongside the construction routes, or users of those routes. Horizon's response notes that sensitivity testing was undertaken to assess the cumulative impact on Britannia Bridge. The IACC would request similar testing for the A5025 between Valley and WNDA

		its impact on the Wylfa Newydd Project can be found in Chapter 2 of Appendix L – Supplementary Information.	
Q11.1.1 4	What is the maximum height, width, length and turning circle of the largest vehicles (fully laden) that the applicant intends to use during construction and operation?	The standard vehicle for delivery of freight via Logistics Centre to Wylfa Newydd Development Area (WNDA) will be 44 Tonne Gross Vehicle Weight Curtain Sided Artic or Container & Trailer. Each vehicle will adhere to the current UK road limits, set out in full in the Road Vehicles (Construction and Use) Regulations 1986, specifications are as below: Weight: 44 tonnes for lorries with 6 axles; drive axle(s) must not exceed 10500kg and have road friendly suspension OR have a maximum axle weight not exceeding 8500kg. - Each part of the combination must have 3 axles and the trailer must have road friendly suspension. 40 tonnes for lorries with 5 axles with maximum axle weight limit of 11.5 tonnes length Length: 12 metres for a rigid vehicle 16.5 metres for an articulated vehicle if the articulated combination can turn within a concentric radii of 12.5 metres. 18.75 metres for a road train (a combination of a lorry and a trailer) Width: - Standard 2.55 metres wide, excluding driving mirrors - refrigerated vehicles are permitted to be 2.6 metres wide to allow for the extra thickness of the insulation Height: - no limit, but wherever possible a maximum of 4.95 metres should be adhered to in order to make maximum use of the motorway and trunk road network. The proposed design parameters for all legal vehicle combinations, as per road regulations, is that they are capable of being driven within two concentric circles with radii of 12.50 metres and 5.30 metres such that no part of the vehicle or the combination of vehicles projects outside the area contained between these two circles; Horizon will ensure that all our vehicles comply with this regulation, as applicable.	
Q11.1.1 5	(a) Given the rural nature of the road network is the Highways Authority satisfied that the road network (following the proposed road	Whilst the question is not directed to Horizon as the applicant, the following response is provided by Horizon at this stage:	Horizon's calculation of Congestion Reference Flow (CRF) based on TA46/97 for the local road network and conclusion of adequate capacity with the addition of the Wylfa Newydd DCO Project traffic must address the more detailed level concerns identified in the IACC LIR and written response. Horizon's response also states that Section 5.2 of the A5025 CoCP sets out the requirement for Condition Surveys on a limited section of the A5025, however, there is no inclusion of this requirement in the overarching CoCP. Although the IACC welcomes this in principle, there is a need for the wider network that will be used by construction traffic to be considered in terms of monitoring structural damage and increased maintenance requirements, and this should be set out in the overarching CoCP.

	improvements) is capable of taking the volume of traffic and loads proposed and would not be damaged as a result of the use by construction traffic? (b) If the road network is damaged by construction traffic who would be responsible for its repair? (c) Are there any requirements that the Highways Authority would suggest to minimise the effect of construction traffic on the road network and maintain existing road conditions over and above those already suggested by the applicant?	In respect of the volume of traffic and loads to be using the road, capacity of the local roads has been assessed using the Congestion Reference Flow (CRF) methodology outlined in TA46/97 “Traffic flow ranges for the use of assessment of New Rural Roads” from the Design Manual for Roads and Bridges. The CRF is an estimate of the total AADT (Average Annual Daily Traffic) flow, takes into account the width of the roads, numbers of lanes, percentages of HGV in peak flow, proportion of daily traffic occurring at peak, directional splits etc. Based on the CRF, the local road network has been assessed as having an estimated capacity of 19,768 vehicles. In appendix AC2-3 - Traffic Flows of Volume C - Road traffic-related effects (project-wide), Horizon has calculated volumes of traffic associated with background traffic flows and the Wylfa Newydd DCO Project in 2033 at approximately 11,480 vehicles AADT. Therefore, the local road network is capable of accommodating construction traffic associated with the Wylfa Newydd DCO Project. In respect to any damage to the road network during construction, section 5.2 of the A5025 Off-Line Highway Improvements sub-CoCP [APP-420] provides that Horizon will undertake joint surveys with IACC Highways to assess the condition of the highway. Horizon will carry out periodic joint inspection throughout the life- cycle of the works. If repair works are required then the assumption is that IACC highways maintenance team would carry out this work, financed by Horizon. Compliance with the sub-CoCP is required under Requirement OH1 of the Draft DCO [APP-029]. Horizon considers that this is sufficient to ensure that any damage to the road network as a result of construction traffic use is dealt with appropriately.	
Q11.1.1	Do the local authorities agree with the	Whilst the question is not directed to Horizon as the applicant, the following response is provided by Horizon at this stage: The baseline situation regarding traffic flows is presented in detail in the DCO Transport Assessment, Chapter 4. The scope of the Transport Assessment is detailed in Appendix B – Scope [APP-103] and this was discussed with the Isle of Anglesey County Council, the Welsh Government and Gwynedd County Council. The scope of the baseline traffic surveys used for establishing the baseline was agreed with the Isle of Anglesey County Council in December 2017, as recorded in the draft Statement of Common Ground with IACC, submitted at Deadline 2 (4 December 2018).	Following further review of the TA, the IACC seek clarification of the HGV AADT figures set out in Appendix C2.03 as these show high and very varied growth levels between the 2016 baseline and reference flows for each of the years which don't reflect the traffic growth factors identified in Table 9.1 of the Transport Assessment. In some cases the HGV growth is as high as 71% between 2016 and 2020.
6	applicant's description of the baseline situation regarding traffic flows and can they confirm whether they were involved in scoping the transport surveys for establishing the baseline?		
Q11.1.1	Paragraph 6.5.10 of the Planning Statement [APP-406] states that there is sufficient capacity in the strategic rail network to accommodate the increase in demand in the early years of the project – can you:	(a) Section 4.11 of the DCO Transport Assessment describes existing rail services on Anglesey and in North Wales. Potential future improvements are also described. Paragraph 7.3.20 of this document then goes on to state that it is not expected that any construction workers will utilise existing public transport services for daily commuting purposes (DCO Transport Assessment, this	Horizon has added that the new franchisee, Keolis Amey, will provide an additional train per hour from Bangor to Manchester which will double the existing service. Horizon confirms that Bangor will be served by the proposed shuttle buses, and that Valley will be served if demand required (as shown in Figure 5.5 of the DCO TA). Elements such as these within HNP's control must be secured and provision for loss of service should be made for elements outside HNP's control.

	(a) Provide further detail of what will happen for the remainder of the project to ensure sufficient capacity, particularly during the peak of construction, is available; (b) Confirm whether developer contributions may be required to achieve this and what they would be used for? And (c) Confirm whether there would be a bus service connecting the railway station at Valley either direct to the WNDA or to the Park and Ride so that rail users can utilise the shuttle buses to the WNDA?	includes commuting by rail. This is because of the low frequency and timing of train services calling at Valley which is approximately 17 kilometres from the Wylfa Newydd Development Area. These timings do not match the expected shift times for the Wylfa Newydd DCO Project. For example, in the westbound direction (i.e. for travel from the mainland towards Bangor) the first train in the morning arrives at Valley at 09:08 which is after the start of main construction activities at the Wylfa Newydd Development Area. Some construction workers are expected to use the rail network to travel to and from Anglesey and North Wales at the start and end of the proposed 11-day shift cycle. This 'weekend travel' is described in Section 7.4 of the DCO Transport Assessment. Paragraphs 7.4.14 and 7.4.15 provide further details for the expected weekend rail demand in the year of peak construction. This analysis shows that there are expected to be up to 420 rail trips per week during the peak year of construction. These rail trips are expected to start (or end) at the main stations at Bangor or Holyhead which provide access to the long-distance rail services to other parts of the UK. Both Bangor and Holyhead are served by the proposed shuttle bus network (see Figure 5-5 of DCO Transport Assessment). The impact of these additional rail trips is described in paragraphs 11.7.3 to 11.7.8 of the DCO Transport Assessment. Since the preparation of this document further information concerning the new franchise arrangements for North Wales have been released. The new operator for the franchise for the North Wales railway line is Keolis Amey. The new operator took over from Arriva Trains Wales in October 2018. As part of the franchise, Keolis Amey has committed to increasing capacity on the North Wales line in the form of one additional train per hour from Bangor to Manchester Airport from 2022. This effectively doubles the weekday departures to/from Bangor and England. This means that there is expected to be sufficient rail capacity to accommodate the additional rail travel associated with the weekend travel of construction workers. (b) Given the expected low level of rail demand, developer contributions are not required to provide additional passenger capacity on the rail network. (c) The shuttle bus network is expected to pass Valley rail station as shown in Figure 5-5 of DCO Transport Assessment and hence construction workers could potentially use the shuttle bus network to access rail services at Valley if demand required. However, given the low frequency and timing of rail services at Valley it is expected that construction workers would more likely use the shuttle bus network to access the more frequent, long-distance rail services at Holyhead or Bangor.	

Q11.1.1 9	Paragraph 5.2.3 of the WNCOP [APP-414] deals with the management of deliveries to the site can the applicant: (a) Confirm what will happen once the A5025 off-line highway improvements become operational in terms of delivery times? (b) Explain why restrictions on deliveries during school start/end times are only proposed for the initial stages of construction (page 12 of the TA [APP-101]). (c) Advise whether to minimise congestion, restrictions should also be in place during the evening peak eg 17.00-18.30? (d) Explain what is meant by 'restrictions'. (e) Confirm what the delivery hours would be – the WNCOP [APP-414] infers 07:00-19:00 but the TA [APP-101] states that the period from 19:00 to 23:00 'could be used'	(a) Once the A5025 Off-line Highway Improvements become operational, restrictions associated with having no deliveries around school opening and closing times will be removed. (b) Restrictions on deliveries during school start/end times are only proposed for the initial stages of construction because the existing A5025 provides the direct access to a school in Llanfachraeth and a school in Llanfaethlu. There is a further school in Llanrhyddlad which is near the A5025 but its access is provided from a side road. The A5025 Off-line Highway Improvements, once opened, will enable HGVs associated with the Wylfa Newydd DCO Project (and other traffic) to avoid directly passing the schools in Llanfachraeth and Llanfaethlu which are located adjacent to the A5025. Wylfa Newydd-related construction traffic will therefore then not pass these two schools and so the delivery window restrictions for school start/end times can be lifted without generating adverse effects on the operation of these schools. (c) The DCO Transport Assessment presents the traffic impacts of the Project in the AM and PM peak hours for the 2020, 2023 and 2033 assessment years. The analysis shows that no traffic congestion impacts are expected to occur on the A5025 during the peak year of traffic construction (2023) and hence no additional delivery restrictions are considered necessary. The shift pattern timings have been developed to avoid shift changeovers impacting the AM and PM peak traffic hours as far as practicable. (d) The term “restrictions” means that there will be no construction vehicle movements to or from the Wylfa Newydd Development Area which pass either of the two schools adjacent to the A5025 during the restricted hours. (e) The delivery hours are as proposed in paragraph 5.2.3 of the Wylfa Newydd Code of Construction Practice. This states: “The delivery window would run from 07:00 to 19:00, Monday to Friday, with restrictions during school start times (between 08:00 and 09:00) and end times (between 15:00 and 16:00) in advance of the A5025 Off- line Highway Improvements being operational. It is anticipated that deliveries may occasionally be undertaken outside of these times, but they will be limited, whenever practicable.”	(c) Following further review of the TA, the IACC seek clarification of the HGV AADT figures set out in Appendix C2.03 as these show high and very varied growth levels between the 2016 baseline and reference flows for each of the years which don't reflect the traffic growth factors identified in Table 9.1 of the Transport Assessment. In some cases the HGV growth is as high as 71% between 2016 and 2020.

	(f) Explain why the logistics centre would need to operate on a 24 hour basis if deliveries would be restricted to 07:00-19:00 (or 23:00) Does the IACC/Highways Authority/Welsh Government have any comments on these arrangements?	Please note however, that Horizon is consulting until 8 December on a potential non-material change to HGV movements comprising deliveries 1900 to 2300 Monday to Friday (limited to 20 HGV movements in each direction) and 0800 to 1300 Saturday (limited to 50 HGV movements in each direction). (f) The Logistics Centre would need to operate 24 hours a day in order to manage the efficient arrival and departure of construction vehicle movements. Construction vehicles which travel overnight will arrive and wait at the Logistics Centre until they can be released in a regulated way after 07:00 the following morning. This means that the Logistics Centre will act as a holding area for incoming construction traffic each night, and will therefore need to remain operational 24/7.	f) Horizon's response needs clarification as it is implying that vehicles will arrive overnight and wait at the Logistics Centre. What is the level of overnight deliveries expected and how does this relate to operational hour restrictions which will be in place?
Q11.1.2 0	Paragraph 5.3.5 of the WNCocP [APP-414] refers to the provision of a dedicated shuttle bus service for construction workers living in Ynys Môn but then includes Bangor and Caernarfon which are on the mainland. Can the applicant confirm: (a) Whether a dedicated bus service is proposed for workers based in Bangor and Caernarfon? (b) Would this service be free or subsidised? (c) Would this require the instillation of new or improvements to existing bus stops and if so how would this be funded?	(a) A dedicated shuttle bus service is proposed for workers living in Bangor and Caernarfon as described in paragraph 5.1.15 of the DCO Transport Assessment, and secured by the Wylfa Newydd Code of Construction Practice (see paragraph 5.3). (b) The shuttle bus services are likely to be free to use for construction workers associated with the Wylfa Newydd Project. (c) The shuttle bus network is proposed to use the network of existing bus stops to pick up and drop off workers. As part of the Wylfa Newydd Project a new bus stop is to be constructed on the A5 adjacent to the proposed Dalar Hir Park & Ride facility. This will allow workers to transfer from the local public bus network to the proposed shuttle bus service from Dalar Hir to the WNDA. This is described in paragraph 5.1.26 of the DCO Transport Assessment, and is secured through the Design and Access Statement Volume 3 [APP-410], Appendix 1-3 Park and Ride (see Masterplanning Principle 3.4.24). Travel to and from the Wylfa Newydd Project will be monitored as described in Section 5.6 of the Wylfa Newydd Code of Construction Practice. The proposed Transport Sub-Group will review the operation of the transport strategy and it can recommend the implementation of changes to the shuttle bus network (including potential provision of new stops or changes to existing bus stops) using funds provided through the Draft DCO s.106 agreement.	(a) Requirements sought in relation to shuttle bus services are described in the Traffic and Transport chapter of the LIR. (b) The IACC would note that introducing a fee for using the shuttle bus services may result in a significant change in construction worker travel mode to what has been assessed in the Transport Assessment. Adequate control of this or mitigation to answer effects from it must be provided. (c) Requirements sought in relation to shuttle bus routes and stops are described in the Traffic and Transport chapter of the LIR.

	(d) Has the potential of opening this service up to the wider community been considered? (e) Would the service continue once the plant is operational to enable workers to travel sustainably and minimise road traffic?	(d) The potential for opening up the shuttle bus network to the general public has been considered but this is not considered practical for several reasons. These include the need to ensure sufficient capacity is available to transport workers to the Wylfa Newydd DCO Project each day, the additional complexity of serving paying passengers, issues associated with insurance and liability and the fact that the shuttle bus network will connect residential areas with the Wylfa Newydd DCO Project rather than other locations which members of the public might wish to visit e.g. town centres. For example, a shuttle bus from Bangor would be expected to make limited stops after leaving Bangor and would not be expected to visit other locations of interest to the general public. Allowing the general public to use the shuttle bus network could also potentially affect demand on existing bus services and reduce demand and revenue for existing operators. (e) It is assumed that once the Project is operational, the demand for the shuttle bus network in place during the construction phase of the Project will reduce due to the much lower number of workers required during operation (typically 850 workers compared to a peak of 9,000 construction workers). For this reason, it is not proposed that the shuttle bus network continues operation once the Project is operational. Horizon will continue to promote sustainable travel through the implementation of a car sharing scheme. This is described in paragraph 7.7.5 of DCO Transport Assessment.	(d) Noted. (e) It is noted that in the response to Q11.1.2, As HNP has specified that based on the number of workers and the level of (permanent) operational parking with a car sharing assumption of 1.5 workers per car the Code of Operational Practice must make the same provision and demonstrate that this is a sustainable transport target.
Q11.1.2 1	Reference is made to the use of shuttle buses between the Park and Ride and the construction sites. Can the applicant: (a) Confirm what they mean by 'shuttle bus' as it would appear from other references within the documentation that minibuses are proposed.	(a) Shuttle buses are proposed to move construction workers to and from the Wylfa Newydd DCO Project from locations across Anglesey and the mainland. This is described in paragraphs 5.1.15 to 5.1.9 of the DCO Transport Assessment, and secured by the Wylfa Newydd Code of Construction Practice (see paragraph 5.3). It is assumed that shuttle buses serving the Park & Ride facility at Dalar Hir and towns such as Bangor, Holyhead and Caernarfon to the WNDA would have a capacity of 50 passengers. Shuttle buses travelling to and from other locations are assumed to have a capacity of 32 passengers. These assumptions are specified in the DCO Transport Assessment, Table 1-1. Minibuses are proposed to be used by Horizon to move facilities management staff to and from their respective worksites. This is described in paragraph 7.2.8 of the DCO Transport Assessment. Minibuses are proposed because there are far fewer of these facilities management workers than construction workers and they operate on different shift patterns. It is expected that 50% of facilities management workers living on Anglesey will use the minibus service to travel to their place of work. This is described in paragraph 8.1.15 of the DCO Transport Assessment.	(a) The IACC has no issues with Horizon's definition of 'shuttle bus', however would seek to re-iterate its stance on the need to agree frequency, bus routes and stops (with improvements to certain stops), as described in the Traffic and Transport chapter of the IACC's LIR.

	Smaller buses (for example, minibus-sized vehicles) could be used as part of the shuttle bus network to serve areas of low demand from construction workers or locations where roads have width restrictions. (b) If minibuses are not proposed can you explain why parking for 50 minibuses at the Park and Ride site is proposed and what the minibuses would be used for? (c) If buses are proposed can you please explain where these would be parked/stored and if an outside provider is proposed have the journeys to and from the depot to site been included in the traffic modelling? (d) Provide details of how many passengers a shuttle bus could accommodate. (e) Explain what is meant by 'low emissions' technology for buses and confirm whether the use of electric or hybrid 'shuttle buses' has been considered? (f) Indicate how frequently the buses would run and how many journeys it is envisaged that the buses would make over the course of a day.	(b) Minibus parking spaces are proposed at the Park and Ride facility at Dalar Hir to provide overnight parking for the minibus fleet. This is described in paragraph 5.1.2 of the DCO Transport Assessment (c) Buses will be procured by Horizon through a competitive tender process. Bus operators will be expected to provide adequate storage and maintenance facilities to support the contract. However, as the operator is unknown at this stage, it is difficult to estimate how an operator might implement their contract and where their depot might be located. There are existing facilities available for local operators, however additional facilities may be required to serve the contract, the locations of which would be determined by the operator themselves. In terms of travel to and from the depot at the start and of the day these trips can be expected to be outside the times of peak traffic on the local road network and hence traffic impacts will be low. (d) It is assumed that shuttle buses serving the Park & Ride facility at Dalar Hir and towns such as Bangor, Holyhead and Caernarfon to the WNDA would have a capacity of 50 passengers. Shuttle buses travelling to and from other locations are assumed to have a capacity of 32 passengers. These assumptions are specified in the DCO Transport Assessment, Table 1-1. (e) 'Low emission' technology for the provision of buses refers to the potential use of hybrid and electric traction, liquified petroleum gas (LPG) and alternative fuel engine technology such as hydrogen fuel cells. The Wylfa Newydd Code of Construction Practice requires that all buses procured for the Wylfa Newydd DCO Project will meet a minimum standard for emissions, at least Euro IV diesel engines. (see paragraph 5.3.6). (f) The shuttle bus network will develop to match the demand generated by the number of construction workers on the Project and their accommodation. The shuttle bus services will be focused around the periods of peak demand associated with the start and finish times of the main shifts (see Table 1-1 of the DCO Transport Assessment. Figure 7-3 of this document presents information about the expected number of shuttle bus movements in the peak year of construction. This shows that 32 buses per hour are expected to operate on the shuttle bus network to transport workers from nearby towns (e.g. Bangor and Holyhead). This calculation is based on an average number of 24 workers per bus which means that this is a conservative estimate of	(b) Noted. (c) The IACC acknowledges the difficulty in estimating how an operator might implement their contract and where their depot might be located at this stage. However this matter reinforces the IACC's request for contingency funding for any adverse or unavoidable impacts not predicted at this stage including those resulting from inadequate baseline or predictive information at the application stage. (d) Noted. (e) The IACC fully supports the use of buses that utilise 'low emission' technology for transferring workers from Park and Ride facilities and local accommodation across Anglesey and Gwynedd to the Power Station Site, which is in line with policies aimed at reducing greenhouse gases set out in the Wales Transport Strategy (2008). (f) From recent discussions with Horizon, it is understood that every worker will be allocated a mode of travel which will apply from the beginning of construction to ensure that Integrated Transport Strategy travel behaviours and patterns are implemented from the commencement of the construction works. It is also understood from Horizon that workers would be allocated a bus stop based on the location of their place of residence. Enforceability of such controls must be demonstrated and mitigation funds offered to cover the effects of inability to enforce or opther ineffectiveness of such controls.

	the number of shuttle buses on the network. If each shuttle bus carried 50 workers then 15 buses per hour would be required. There will be an estimated additional 11 buses per hour serving the Park and Ride facility. This is based on the 560 workers per hour who are assumed to travel via this service on buses with a capacity of 50 passengers (the value of 560 is taken from Figure 7-3 of the DCO Transport Assessment). These buses will approach the Wylfa Newydd Development Area from both directions. In practice the number of shuttle buses will reflect actual demand and larger buses (with a lower frequency of operation) could be used to serve towns such as Holyhead and Bangor.	
(g) Confirm whether users would be required to pay for parking?	(g) Users of the Park & Ride facility at Dalar Hir would not be required to pay for parking.	(g) Noted.
(h) Confirm whether the shuttle bus would be free or subsidised?	(h) The shuttle bus services are likely to be free at the point of use for construction workers only.	(h) As above, the IACC would note that introducing a fee for using the shuttle bus services may result in a significant change in construction worker travel mode to what has been assessed in the Transport Assessment.
(i) Confirm that the shuttle buses would be capable of accessing the routes shown on Figure 5-5 of the TA [APP-101]	(i) Figure 5-5 of the DCO Transport Assessment presents an indicative shuttle bus network. This network is expected to be operated by buses with vary sizes and smaller buses would be used for sections of the bus network operating on rural roads which have width restrictions. Comparing Figure 5-5 with Figure 4-11 of the DCO Transport Assessment shows that the indicative shuttle bus network uses routes which are currently used by public bus services.	(i) The IACC acknowledges that bus shuttle services will operate on a demand basis, however this reinforces the IACC's request to agree bus routes and stops (with improvements to certain stops) in the interest of road safety as described in the Traffic and Transport chapter of the IACC's LIR.
(j) Explain why no shuttle buses are currently proposed for the east and south of the island?	(j) Figure 6-8 of Appendix F – Integrated Traffic & Transport Strategy [APP-107] shows the expected distribution of construction worker home locations across Anglesey. This shows that a low density of construction workers is expected in the south of Anglesey and hence a shuttle bus service is unlikely to have sufficient demand to justify its implementation. Areas in the east of Anglesey also have an expected low density of workers and a shuttle bus service is not considered appropriate. However, it should be noted that Figure 5- 5 of the DCO Transport Assessment which shows the shuttle bus network is indicative and if there is sufficient demand the shuttle bus network will serve areas in the east of Anglesey (and elsewhere where there is demand). This is described in paragraph 5.1.15 of the DCO Transport Assessment.	(j) As per the answer above (i).
Paragraph 4.2.4 of the Park and Ride sub CoCP (PRSCoCP)[APP-418] appears to be contradictory stating that the Park and Ride would operate from 06:00 to 20:00 but that it		

	would also operate 24 hours, seven days a week. Can you: (a) Confirm the hours of operation and (b) Explain how users would access this facility if the service is not 24/7.	PARK AND RIDE (a) The Park and Ride facility at Dalar Hir is expected to operate 24 hours per day. This is described in 5.1.23 of the DCO Transport Assessment and paragraph 4.2.4 of the Park and Ride sub CoCP [APP-418]. The main hours of usage of the Park and Ride facility will coincide with the start and end of the shifts for the construction workers. (b) As above, the Park and Ride facility is expected to operate 24 hours per day.	(a) Noted (b) Noted
Q11.1.2 2	An automatic number plate recognition (ANPR) system is proposed for vehicles using the Park and Ride. Can the applicant confirm whether they also propose a barrier entry/exit system? Can the IACC/Highways Authority/Welsh Government advise whether they are satisfied that the use of ANPR would prevent vehicles queuing on the highway? IACC – in your RR [RR-020] you have questioned the resilience of the highway network at junction 4 of the A55 – can you explain what your concern is?	Horizon can confirm that the proposal assumes a barrier entry and exit system. As illustrated on the site layout plan for the Park and Ride (WN0902-HZDCO-ADV-DRG-00033) [APP-023], which has been submitted for approval, all entrances and exits to the Park and Ride facility have a secure gate and barrier. In addition, the requirement for gated access to the site has been included as a key design principle for the Park and Ride facility in the Design and Access Statement (Volume 3) [APP-408]. In response to the question asked of IACC/Welsh Authority /Welsh Government on whether ANPR would preventing queuing on the public highway, Horizon would like to note that the roundabout solution proposed together with the road length of the access road up to the proposed entry barrier has been designed to avoid queuing on the existing highway.	The IACC have answered this question as part of their Deadline 2 response to the Written Questions. Additionally, as reflected in the IACC's Dalar Hir LIR Chapter, consideration should be given by the ExA to modifying the proposed roundabout in favour of the alternative options that are preferred (on basis of undertaking a review of HNP's traffic modelling data)
Q11.1.2 3	Due to its location the Park and Ride scheme has the potential to flood. Can the applicant outline what would happen if the facility flooded including what, if any, the alternative parking arrangements would be? Can the IACC/Highways Authority comment on what measures they consider would be appropriate in the event that the Park and Ride flooded?	The design of the Park and Ride has been updated to mitigate the effect presented in the Draft DCO application. Please see the response to FWQ8.0.24. As no car parking spaces will be flooded with the detailed design, no alternative car parking arrangements are required.	As confirmed in our response to q8.0.24, the IACC acknowledges that HNP has undertaken further flood mitigation modelling and that the results are presented in the Park and Ride - Addendum to Flood Consequence Assessment, which has also been submitted at Deadline 2 (4 December 2018). However the IACC did not receive a copy until the 14th December and has therefore not completed its review.
Q11.1.2 4	Can the applicant: (a) Provide examples of other schemes where the proposed Distribution Management Asset	(a) Distribution management systems (DMS) have successfully been used on many major infrastructure projects examples are for London 2012 and at London Heathrow Airport. Iterations of DMS are used by couriers for	(a) The IACC welcomes the principle of utilising a Distribution Management Asset Tracking System (DMATS). Further control is needed on how Horizon will control the discharge of HGV's from the WNDA to avoid convoying and any undue impact on Britannia Bridge.

	Tracking System (DMATS) has been successfully used? (b) Advise whether there is a cost attached to the use of the system for suppliers and whether this could preclude the use of smaller local suppliers? (c) How will vehicles be prevented from turning up early to the logistics centre or from waiting on the surrounding road network until their allotted arrival time? Is the IACC/Highways Authority/Welsh Government satisfied that the use of DMATS will manage deliveries as envisaged by the applicant?	tracking domestic deliveries. Including an asset tracking (AT) system is relatively new and is a benefit for the client and supply chain in knowing where goods are as they are moved from point of origin to final installation. The AT side of the system will have no impact on the management of the traffic flow. (b) The cost to the supply chain should be minimal but a supplier would need to have access to the internet to be able to use the web based systems Horizon are considering. This detail would be made clear in any contracts and tenders put out for the work. (c) The aim of the Logistics Centre is to manage traffic. The Logistics Centre is open 24 hours, as such vehicles do not have slot times for the Logistic Centre and can arrive as they require to support their driver requirements. The slot time is based on leaving the Logistic Centre for site and the arrival at site. This enables significant control of HGV traffic on the A5025. If vehicles are found to be waiting around on local roads there will be a system of measures to mitigate against such behaviour within the supply chain contract.	
Q11.1.2 5	The Wylfa Newydd Code of Operational Practice (WNCOP) [APP-421] sets out a series of measures which aim to minimise trips to the site by car. What measures are proposed to minimise trips to the site by car for the outage workforce? Are the IACC/Highways Authority/Welsh Government satisfied with the details contained within the proposed Operational Travel Strategy as set out in section 5 of the WNCOP?	Paragraphs 5.3.14 to 5.3.16 of the Wylfa Newydd Code of Operational Practice present the car share strategy for the operational phase of the Project. This includes outage workers. An average of 1.5 workers per car is assumed for all operational workers (including outage workers) and this is stated in paragraph 2.6.3 of the Appendix G Strategic Traffic Model Overview.	IACC reiterates the issues raised in the LIR on the effectiveness of reliance on car sharing.

Q11.1.2 6	Does the TA include modelling for the impact on the road network of the additional 1,000 workers that would be required every nine months to deal with outages?	The Transport Assessment does include modelling for the impact on the road network of the additional workers that would be required every nine months to deal with an outage. This is described in paragraph 10.1.4 of the DCO Transport Assessment. Results for the operation of the road network in 2033, when there are assumed to be two outages, are then presented in Chapter 11 of the DCO Transport Assessment. Detailed junction modelling results are also provided in Appendix H Junctions Assessment [APP-109] of the DCO Transport Assessment. Further details of the modelling assumptions are provided in Section 7.4 of the Strategic Traffic Model Overview. Table 7.32 shows that the chosen year of assessment (2033) includes a double outage i.e. two outages during the same calendar year, when both reactors experience an outage. This therefore provides a worst-case assessment of the traffic impact of the outages.	Noted. The IACC seeks clarification on traffic generation and distribution assumptions for the peak operational year and whether it includes the full 1,850 workers.
Q11.1.2 7	The proposal would result in the need to close or divert a number of Public Rights of Way (PRoW). In addition to the proposed physical measures such as signage, has a website/link to the IACC website been considered where these closures/diversions and information regarding alternative routes and timescales for how long they will place could be advertised?	Horizon confirm that, in addition to the measures outlined in Section 6 of the Wylfa Newydd Code of Construction Practice and in the sub-CoCPs, contributions will be made to Isle of Anglesey County Council via the Draft DCO s.106 agreement in relation to Public Rights of Way. This includes contributions towards signage and publicising the permanent diversion of the Copper Trail Cycle Route. It is considered that the contributions detailed in the Draft DCO s.106 agreement could be used by Isle of Anglesey County Council to publicise information on closures and diversions via their website. Please see further detail on the proposed contributions in the Horizon response to FWQ11.1.29. Details of Horizon's 'Communications and community/stakeholder liaison management strategy' are provided in Section 3 of the Wylfa Newydd Code of Construction Practice. This includes a commitment to provide updates on the Wylfa Newydd Project website through the construction phase.	IACC will provide further comment (if necessary) having seen the detail in the draft s.106 Agreement.
Q11.1.2 8	The existing power station (Wylfa A) is in the process of being decommissioned. Can the applicant confirm that the effect of these works including the associated traffic movements have been taken into account in the ES and TA for the application?	The traffic movements associated with the decommissioning of the Existing Power Station have been taken into account as part of the transport analysis of the Wylfa Newydd DCO Project. Section 4.5.7 of the Strategic Traffic Model – Overview states that the Strategic Traffic Model includes the traffic associated with existing decommissioning staff at the existing power station. These travel movements are captured as part of the baseline traffic surveys. Section 7.1.1 of this document then describes how the Strategic Traffic Model has incorporated the effect of the ongoing decommissioning activities at the Existing Power Station.	

		Further details of the number of decommissioning staff, their expected home locations and the number of HGV movements to the Existing Power Station are provided in Section 5.2 of the Strategic Traffic Model Assumptions Report (which is Appendix A of the Strategic Traffic Model Methodology report, which is itself Appendix G of the DCO Transport Assessment). The outputs of the Strategic Traffic Model [APP 108] are also used to inform the assessments of project- wide traffic related effects (Chapter C3 - Public access and recreation effects of traffic [APP-090]; Chapter C4 - Air quality effects of traffic [APP-091]; Chapter C5 - Noise and vibration effects of traffic [APP-092]. As a result, the traffic movements associated with decommissioning traffic for the Existing Power Station have been taken into account in the environmental impact assessment and recorded in the Environmental Statement. Chapter I5 of the Environmental Statement [APP-388] also assesses the cumulative effects of the Wylfa Newydd DCO Project and decommissioning of the Existing Power Station more generally.	
Q11.1.2 9	A contribution to fund improvements to the PRoW network is proposed in order to reduce the effect of the loss of the 32 PRoW to moderate adverse. Applicant – how much funding is proposed? IACC – What would this funding be spent on and would it be sufficient to reduce the effect to moderate adverse as advocated by the applicant? If not why not?	The Draft DCO s.106 [REP1-010] agreement issued on 26 October 2018 did not include the quantum of the financial contributions as these remain under development. Horizon can confirm however that the agreement as issued, sets out in Schedule 13 – Public Rights of Way, that the Applicant will pay to the Council: • A PRoW (First Capital) Contribution, early in the development, and a second PRoW (Second Capital) Contribution on implementation of the DCO. These contributions can be allocated by the Council for improvements to the local PRoW network including creating new PRoW and upgrading existing PRoW, installing information/interpretation boards on or near the "PRoW Network" (as defined in the Draft DCO s.106 agreement to refer to PROW in the vicinity of the WNDA) which give information about the local area including its history and ecology; additional signage and directional signage for the PRoW Network; additional signage for nature trails; benches; • A one off PRoW Maintenance Contribution. • Additional contributions towards signage and publicising the permanent diversion of the Copper Trail cycle route.	IACC will provide further comment (if necessary) having seen the detail in the draft s.106 Agreement.
Q11.1.3 1	New PRoW are proposed within the WNDA during operation in addition to a nature trail, provision of picnic tables, a new car park and interpretation boards. How would these be secured?	The Landscape and Habitat Management Strategy (LHMS) [APP-424] includes a number of principles relating to the provision of new Public Rights of way (PROWs) and associated infrastructure within the WNDA). For example, the LHMS includes principles requiring: • new ProWs to be created outside the Power Station and link to the Wales Coastal Path, the existing PRoW network and Cemaes; • a new network of footpaths to be provided to replace extinguished paths. Footpaths should be accessible and maintain access to the coast, where practicable.	Please refer to the IACC's Tourism chapter of the LIR which provides further information on the impact as a result of diverting the Wales Coastal Path at the WNDA.

		provision of interpretation boards, benches, picnic and car parking areas and a nature trail. The LHMS also shows, indicatively, how these design principles could be applied in practice including where new PRoWs could be located within the WNDA (refer to Figure 6-26 of the Landscape and Habitat Management Strategy (LHMS) (Part 2-2) [APP-425]). As no detailed designs have been submitted for approval as part of the Draft DCO, Requirement WN9 requires Horizon to submit a final landscape and habitat management scheme for the WNDA to IACC for approval 12 months prior to the Unit 2 commissioning date. WN9(2) requires that this scheme must be prepared in accordance with the principles in the LHMS (including those that relate to PRoWs) as well as requiring that details of proposed permanent PRoWs must be provided as part of the proposed designs. This requirement ensures that the principles contained in the LHMS are secured and will form part of the detailed design for the landscaping and PRoWs within the WNDA during operation of the Power Station.	
Q11.1.3 2	At peak construction HGV flows along the A5025 would be increased by between 71- 101% (twice current levels). Applicant: (a) The TA estimates that ‘at peak’ there would be 40 HGV movements per hour/per direction i.e. a movement every 45 seconds. Can you confirm what you mean by ‘at peak’ and how long i.e. a week/month/year it is envisaged that this would occur. (b) Confirm whether the transport modelling for the traffic along the A5025 included the movements generated by the park and ride shuttle buses? (c) Can you confirm that the proposed off-line highways improvements have been designed to accommodate these levels of traffic? IACC/Highways Authority can you: (a) confirm whether you consider that the design of the proposed off-line highways works is satisfactory? (b) In your RR you request that there should be a cap/threshold placed on the number of HGVs that would use the A5025. Can you	(a) The peak and duration of peak in HGVs is presented by the HGV Profile in Figure 7-2 of App C2-4 - DCO TA Appendix F - Integrated Traffic and Transport Strategy. This shows the peak during 2022 on the A55. (b) Confirmed - The traffic modelling of traffic movements along the A5025 includes the movements generated by the Park and Ride shuttle buses. This is explained in Section 4.6 of the Strategic Traffic Model - see the section on “Main Construction Activity” – sub-bullet six on “Park and Ride bus shuttling”. (c) The road pavement for the improved length of the A5025 between Valley and the new Wylfa site access has been designed (in line with DMRB standards) to accommodate the additional construction traffic. A two year peak construction period has been assumed. The road pavement for the A5025 On-line Improvement Works has a design period of 20 years 6 msa (million standard axles) whilst the road pavement for the A5025 Off-line Highway Improvement Works has a design period of 40 years (14msa) in line with HD 24/06 of the Design Manual for Roads and Bridges. These design periods have been agreed with the Highways Authority. The design capacity of the A5025 Off-line Highway Improvements is sufficient to accommodate the traffic flows associated with the Wylfa Newydd DCO Project.	(a) The IACC deems that the Construction Vehicle Profile in Figure 7-2 of App C2-4 - DCO TA Appendix F - Integrated Traffic and Transport Strategy is not of a sufficient quality or precision for sole reliance on determining the duration of peak HGV traffic. Provision should be made for additional information or different peak figures that might be experienced. (b) Noted. (c) Noted.

	explain why you think such a cap would be necessary and if it is necessary what it should be and how it should be imposed.		
Q11.1.3 3	Paragraphs 3.3.5-3.3.9 refers to Planning Policy Wales 9 (PPW9) in particular with regard to the proposed Park and Ride. Does this section need to be updated to reflect the emerging PPW10 and if so would it affect any of the assumptions or conclusions?	The Planning Statement paragraphs 5.4.35 to 5.4.45 set out the relevance of Welsh national planning policy to the Project, including Planning Policy Wales (PPW) Edition 9 (2016). The Planning Statement Appendix D Park and Ride paragraphs 4.4.181 to 4.4.199 provide an assessment of the proposed Park and Ride facility against the NPS EN-1 and EN-6 and relevant Welsh national policy including PPW9. PPW9 contains a range of broad objectives that are relevant to the Park and Ride facility and which are also policy objectives in the NPSs, for example promoting sustainable transport options and reducing the volume of traffic, seeking to minimise impacts of new transport infrastructure on the environment and local communities, providing mitigation measures to minimise any impacts caused by the construction and operation of transport infrastructure. The draft PPW10 (published in 12th February 2018 for consultation) continues to promote these broad objectives which have been taken into consideration in the application and which the proposed Park and Ride facility meets through minimising impacts on the existing road infrastructure by reducing the number of traffic movements on the A5025 that are associated with the construction of the Power Station. In conclusion, the draft PPW10 does not affect the assumptions and conclusions within the Transport Assessment in the Environmental Statement Volume C.	
Q11.1.3 5	Paragraphs 3.4.15-3.4.26 of the TA [APP-101] refer to the IACC's Supplementary Planning Guidance (SPG) for the new nuclear build at Wylfa. If the 2018 draft SPG has been adopted does this section need to be updated and if so would it affect any of the assumptions or conclusions?	The Planning Statement paragraphs 5.4.48 to 5.4.7 set out the relevance of Welsh local planning policy and guidance to the Project, including the New Nuclear Build at Wylfa SPG published in 2014 (2014 Wylfa SPG). The Planning Statement also provides an assessment of the Project against the NPS EN-1 and EN-6 and relevant Welsh local policy and guidance including the 2014 Wylfa SPG. The 2014 Wylfa SPG sets out a broad range of objectives that are relevant to the Project and some of which are also policy objectives in the NPSs. These are summarised in paragraph 3.5.3 of the Transport Assessment. For example, a reduction in the volume of road-based traffic, particularly HGVs and private cars, associated with both construction and operation of the Power Station through the promotion of a MOLF, Park and Ride facility, Site Campus and shuttle bus services. Horizon submitted representations to the January 2018 draft of the Wylfa Newydd SPG. The IACC subsequently amended the SPG prior to adoption through a series of Focused Changes (May 2018) and adopted the SPG in May 2018. Horizon's Written Representation provides an update on the SPG to reflect	

		the adoption of the May 2018 version. Horizon's Written Representation will be submitted as a separate document at Deadline 2 (4 December 2018). The adopted Wylfa Newydd SPG 2018 continues to promote the objectives which have been taken into consideration in the Transport Assessment. In conclusion, the Wylfa Newydd SPG 2018 does not affect the assumptions and conclusions within the Transport Assessment in the Environmental Statement Volume C. It should be noted that the adopted Wylfa Newydd SPG includes a new Guiding Principle GP15 on Transport which sets guidance which supports the Marine Off Loading Facility (MOLF) and proposes that this be delivered prior to commencement of construction of the Power Station. The Applicant would note that this is a guiding principle, rather than a policy requirement and would also draw the Examining Authority's attention to the Phasing Strategy [APP-447] submitted with the Draft DCO application. It is not clear what "construction of the Power Station" is meant in the context of the SPG, however, the MOLF is a complex piece of infrastructure which would not be delivered until the start of Year 3 of the construction period. This is in advance of First Nuclear Concrete for Unit 1, which the Applicant assumes would meet the expectations of the SPG. The Applicant also notes that the locational guidance in the SPG is generally permissive, in that it sets out areas which may be suitable for particular development, rather than setting requirements, for example, in relation to the location of transport infrastructure.	
Q11.1.3 7	Covered and secure cycle parking is proposed at the site campus to encourage sustainable travel options for leisure purposes (para 5.1.44 of the TA [APP-101]). This is reliant on site campus based workers bringing bikes with them. Would Horizon consider providing bikes to encourage sustainable travel patterns?	Horizon does not propose to provide cycles for workers. Cycle parking spaces will be provided for workers to park their personal cycles.	Noted. The IACC would note that providing bikes to the construction workers would encourage sustainable travel.
Q11.1.3 9	In your RR [RR-020] you have indicated that you would wish to see more park and share options in other suitable strategic locations. Can you please confirm: (a) What you mean by park and share? (b) How this would differ from the car sharing proposed by the applicant. (c) Where are the strategic locations you would wish to see such facilities located: and	Whilst the question is not directed to Horizon as the applicant, the following response by Horizon is provided at this stage: Horizon's is confident that its Draft DCO application contains all the necessary parking (at the Wylfa Newydd Development and at the Park and Ride facility at Dalar Hir) to meet the requirements of the Wylfa Newydd DCO Project and thereby minimises the traffic and transport impacts. However, Horizon will work with IACC to consider the use of proposed Park and Share facilities, on the basis that the scheme is delivered by others, as a complementary component of the transport strategy for the Wylfa Newydd DCO Project. If a	Previous discussions with Horizon concluded that S.106 funds could be allocated to the delivery of the Park & Share sites should the car share strategy fail to achieve its targets or fly-parking becomes evident. There was agreement in principle by all parties and all agreed that further consideration and discussion is required between HNP and IACC on the detail. Please refer to IACC's Traffic and Transport chapter of the LIR which confirms the Council's stance on Park & Share. The s106 should include this detail.

	(d) What proportion of the workers traffic would you wish to see use such a facility?	scheme is delivered, Horizon recognise that it could potentially provide flexibility, for example as park and share facilities which could be available for workers car sharing.	
Q11.1.4 1	The applicant has indicated that facilities management workers would be expected to car share. However, given that the majority of these are likely to be homebased workers do you consider that this assumption is correct? If not, why not?	Whilst the question is not directed to Horizon as the applicant, the following response by Horizon is provided at this stage: Details concerning the expected travel arrangements for facilities management workers can be found in paragraphs 7.3.11 to 7.3.19 of the DCO Transport Assessment. These paragraphs state that it is expected that 50% of facilities management workers living on Anglesey will use the proposed minibus service to reach their workplace. The remaining 50% of facilities management workers living on Anglesey are expected to travel by car. All facilities management workers living on the Welsh mainland are expected to travel by car (see paragraph 7.3.14) given the expected wider geographic distribution of worker home locations. Facilities management workers travelling by car are expected to car share and an average of 1.5 workers per car is assumed. Overall 58% of facilities management workers are expected to travel by car and 42% of facilities management workers are expected to travel by minibus. This is described in paragraph 7.3.15 and 7.3.16 of the DCO Transport Assessment.	The IACC's concerns relating to the assumptions of car sharing applies to both construction site workers and facilities management workers. For example, Horizon assumes that 149 parking spaces at the WNDA will be sufficient for 350 site campus management workers. Provision should be made over the expected percentage of car travel (58%) and assumed car share ratio (1.5 per car), and a lack of parking provision should either of these assumed targets fail. IACC's Traffic and Transport chapter of the LIR expands on the issue around car sharing.
Q11.1.4 2	Facilities management workers for the Site Campus assumes a split of 70% for day shift and 30% for night shift. However, given the majority of construction workers would be using the facilities at night is this assumption correct? The Transport modelling would appear to use a figure of 350 facilities workers. However, elsewhere in the documentation a figure of 690 is given for peak year 5 (paragraph 2.4.13 of the Health Impact Assessment Non-Technical Summary [APP- 427]). Can you confirm that the traffic modelling and parking calculations accounted for this number of facilities staff?	The assumption that 70% of facilities management for the Site Campus will be identified as working a day shift is correct. These shifts may be early or late but are not required to work through the night. This is because the majority of the maintenance, cleaning and catering works will be undertaken as part of a day shift. Facilities management required for a night shift will include security and a low-key reception/catering/service staff. Paragraph 7.3.13 of the DCO Transport Assessment states that there are estimated to be 350 facilities management workers at the Site Campus. Facilities management workers are also expected at the Associated Development sites and paragraph 7.3.11 of the DCO Transport Assessment states that up to 400 facilities management workers will be required to support the construction of the Wylfa Newydd DCO Project. This is also described in Table 7.29 of the Strategic Traffic Model Overview. These numbers are the basis of the transport analysis presented in the DCO Transport Assessment and Table 7-2 and Table 7-3 of the DCO Transport Assessment presents the number of car parking spaces allocated to facilities management workers (188 car parking spaces in total).	

		Paragraph 2.4.31 of the Health Impact Assessment Non-Technical Summary [APP-427] states that in the peak year (year 5), the Project will require up to 690 security, site services and clerical staff for work on- and off-site. This is a typographic error and the value of 400 should be used as per the information provided in the DCO Transport Assessment.	
Q11.1.4 3	The TA has been undertaken on the basis that 1,500 workers would be non UK based. Has any modelling been undertaken to assess what the implications for the TA would be if, as a result of Brexit, it is not possible to recruit workers from Europe and as a result more workers from the UK and Ireland would be required?	In the DCO Transport Assessment, Table 8-5 presents the forecast permanent home locations of construction workers who are expected to move to Anglesey to work on the Wylfa Newydd DCO Project. This table shows that 1,500 construction workers are expected to originate from (mainland) Europe and 750 workers are expected to originate from Ireland. This means that a total of 2,250 workers are expected to originate from outside the UK. The potential impact of Brexit on the UK's construction workforce currently remains unclear. It is possible that it may become more difficult to employ EU workers on construction projects such as the WylfaNewydd DCO Project and this may mean that more UK workers would be employed. This could lead to increased travel by workers within the UK, as UK workers can be expected to travel to their permanent home more frequently than EU-based workers. Conversely, it may become easier to employ workers from outside the EU and this could lead to reduced travel impacts as these workers can be expected to travel to their permanent home less frequently than EU-based workers. Throughout the construction of the Wylfa Newydd DCO Project the accommodation and travel arrangements of workers will be monitored in accordance with Section 5.6 of the Wylfa Newydd Code of Construction Practice and this enables recruitment and travel management arrangements to be updated and refined to reflect the actual arrangements of construction workers.	The IACC acknowledges the difficulty in estimating the potential impact of Brexit at this stage. However this matter reinforces the IACC's request for contingency funding for any adverse or unavoidable impacts not predicted at this stage including those resulting from inadequate baseline or predictive information at the application stage.
Q11.1.4 4	(a) Would Abnormal Indivisible Loads (AILs) particularly those requiring an escort be scheduled to occur outside of the morning and evening peaks? (b) Can you confirm whether AILs would be required to go via the Logistics Centre or would they go direct to the WNDA? (c) If they are to go direct to the WNDA how would they be managed to ensure that they	(a) Abnormal Indivisible Loads (AILs) particularly those requiring an escort would be scheduled to occur outside of the morning and evening peaks. AIL's will require authority from North Wales Police. (b) AILs would not be required to go via the Logistics Centre and would travel directly to the WNDA. The routing and timing would need approval from the North Wales Police before travel. (c) As set out in the Wylfa Newydd CoCP (APP-414), AILs defined by the Road Vehicles (Authorisation of Special Types) (General) Order 2003 will be subject to correct implementation of procedures for their use	(a) Noted. (b) Noted. (c) The IACC (as Highway Authority) should be consulted as part of the AIL implementation procedure.

	would not cause congestion on the A5025 for other construction traffic?	on the road network between their origin and the Wylfa Newydd Development Area and Associated Developments. Deconfliction with other Wylfa Newydd DCO Project construction traffic would be managed by the logistics team during periods when AILs are on the road network.	
Q11.1.4 5	With regards to the park and ride facility, Chapter F1 para 1.1.7 states that the facility works include a new roundabout. [11] It is unclear whether this roundabout would be retained or decommissioned following construction of the power station. Can the Applicant clarify?	The Proposed Restoration Plan– drawing ref WN0902-HZDCO-ADV-DRG-00040, which has been submitted for approval, shows that the roundabout that is created as part of the Park and Ride Facility will be removed at decommissioning of the site, and the highway layout returned to its current layout. As noted in the Post-Operation Strategy in Chapter 9 of Part B of Appendix 1-3 Volume 3 of the Design and Access Statement only cycle and footway improvements and the removal of the lay-by on the A5 Holyhead Road would remain in situ following operation. Both these would be an improvement on the existing highways layout, and their retention has been welcomed by the IACC.	IACC's Dalar Hir Park & Ride chapter of the LIR explains the issues associated with the proposed highway layout. With a projected eight-year life for the facility IACC's position on the appropriateness of the proposed reinstatement may change as national and local planning policy changes and as opportunities for legacy present themselves. Reinstatement or retention of the facility and its associated access arrangement may be the most appropriate end use for the site following the cessation of the park and ride. Horizon should submit a scheme for approval for the post-operational use of the site twelve months from its intended closure.
Q11.1.4 6	In relation to the A5025 offline highway improvement works, Chapter G1 makes numerous references to the reinstatement of compounds (e.g. para 1.5.24, 1.5.27, 1.5.36, 1.5.55, 1.5.60, 1.5.75, 1.5.80, 1.5.100) although reinstatement does not appear to be secured in the dDCO. Can the Applicant confirm how reinstatement would be secured?	Reinstatement of the temporary construction compounds for the A5025 Offline works will be secured through Chapter 4 of the A5025 Offline Highway Improvements Sub Code of Construction Practice, this states that on completion of the works any land required temporarily for construction works will be returned to its original condition. Compliance with the A5025 Offline Highway Improvements Sub Code of Construction Practice is secured through Requirement OH1 in the Draft DCO. Chapter 4 also provides that where stone walls require removal as part of construction, their loss will be mitigated by rebuilding them using the stone from the dismantled stone walls, where practicable. In addition, the detailed designs for the A5025 Off-Line Highway Improvements [APP-019], [APP-020], [APP- 021] and [APP-022] that have been submitted for approval do not show any construction compounds remaining as part of the final highway design.	Chapter 4 of the Sub Code of Construction Practice rev 2.0 contains, in its entirety, the following with regard to site reinstatement: 4.5 Site reinstatement 4.5.1 On completion of works, any land required temporarily for construction works will be returned to its original condition. 4.5.2 Where stone walls require removal as part of construction, their loss will be mitigated by rebuilding them using the stone from the dismantled stone walls, where practicable. A more detailed scheme for approval is required commencing with preparation by Horizon of a photographic record of the land temporarily required. Details should also include (but not be restricted to) the length of time to be taken to complete the reinstatement works, taken from the point at which the A5025 works become operational; details of the soft and hard landscaping to be provided to reinstate the land temporarily occupied (including species, standards, density etc) and measures to remove any underground services and drains for example. There should be an additional DCO requirement for reinstatement. This would require Horizon to submit a reinstatement plan and method statement to IACC six months in advance of the intended operation date for the A5025 works. This plan and statement should be approved by IACC prior to reinstatement taking place.
Q11.1.4 8	Explain the planning status of Parc Cybi (Logistics Centre).	Whilst the question is not directed to Horizon as the applicant, the following response by Horizon is provided at this stage: The planning status of Parc Cybi is explained in detail in the Planning Statement Appendix E Logistics Centre. Section 3.3 of the Planning Statement Appendix E Logistics Centre sets out the planning history for the Logistics Centre site and demonstrates that the site has previously been supported as a suitable location for business and industrial uses. An outline planning permission for the wider Parc Cybi site was granted in March 2005 for the development of a mixed-use scheme comprising employment uses, a hotel, office uses, leisure uses and industrial units (reference: 19/C842A/EIA).	

		In December 2009, a full planning application for the construction and operation of an office complex and industrial/warehousing facilities on two separate plots at Parc Cybi was submitted to the IACC. This included the proposed site for the Logistics Centre. Permission was granted in 2010 on the site of the proposed Logistics Centre for the construction of four units in warehouse and office use (reference: 19/C842J/ECON). An access road to the Logistics Centre site has already been constructed and one of the plots associated with the above 2005 planning permission (ref: 19/C842A/EIA) has been built out (The Road King Truckstop), which is to the west of the proposed Logistics Centre site (reference: 19/C842Y). As set out in section 4 of the Planning Statement Appendix E Logistics Centre, the proposed site at Parc Cybi is allocated in the Anglesey and Gwynedd Joint Local Development Plan (JLDP) for employment purposes. The Parc Cybi site lies within Holyhead settlement boundary which the Wylfa SPG directs towards logistics/freight uses. The area is being supported by the Welsh Government as an Enterprise Zone and has been set aside for strategic employment land by the IACC. A further detailed description of the Logistics Centre is also provided in Chapter H1 - Proposed Development of the Environmental Statement [APP-355] and volume 3 of the Design and Access Statement [APP- 409]/[APP-410].	
Q11.1.4 9	Explain further the reasoning behind separate sites for the logistics centre and the Park and Ride site. Why could the two sites not be co- located?	The rationale behind the selection of the Logistics Centre and Park and Ride sites, their suitability in operational and planning terms and the extent to which alternative sites have been considered is set out in detail in the relevant Site Selection Reports (SSR) Volume 5 Park and Ride [APP-440] and Volume 6 Logistics Centre (APP-441). In summary, both uses have different operational and planning requirements which mean that they have been considered differently in terms of order of preference for each use. The site at Parc Cybi has been demonstrated to be the appropriate location for the Logistics Centre, with no other sites offering a preferable option. The suitability of this site has been rigorously tested as explained in the SSR Volume 6 (APP-441). In summary, Parc Cybi is allocated for employment use in the JLDP and benefits from an extant major planning permission for employment development. The site complies with Policy PS11 of the JLDP which advises that the Logistics Centre should be located on a safeguarded or allocated employment site. The site accords with the JLDP and locational guidance in the Wylfa SPG, fully meets Horizon's functional requirements and is easily accessible from the A55 and near to the southern end of the A5025. Parc Cybi also lies to the west of causeway to Holy Island, which enables HGVs carrying construction materials arriving through the Port of Holyhead to travel via the Logistics Centre to the Power Station Site, without having to travel further east than they need to, and thus reducing traffic movements on the road. The establishment of a Logistics Centre between Valley and Holyhead, where deliveries to the Power Station	

		Site are managed effectively, is central to the Wylfa Newydd DCO Project's strategy to control deliveries to site and minimise impacts on the local road network at set out in the Integrated Travel and Transport Strategy (ITTS). The site at Dalar Hir has been demonstrated to be the appropriate location for the Park and Ride facility, with no other sites offering a preferable option. The suitability of the site has been rigorously tested as explained in the SSR Volume 5. Although located on land allocated within the countryside in the JLDP, the site is located adjacent to the A55 and in close proximity to existing development. The principle of the Park and Ride facility is supported in JLDP policy PS12 which advises that the facility should be located along or close to the A5/A55. The Dalar Hir site is located on the strategic road network at an appropriate point in order in intercept construction workers travelling from the mainland, south of the island and more remote areas and whilst the other short-listed sites are closer to Valley, Dalar Hir is preferable for other material reasons. The SSR Volume 5 paragraph 3.2.24 explains that sites on Holy Island, including those complying with the other criteria associated with the Broad Area of Search (refer to the SSR Volume 5 for a description of this), were omitted due to the separate dedicated shuttle bus service to the Power Station site that is to serve Holyhead. Furthermore, any workers not living on Holy Island would be required to travel further west into Holyhead, before moving back east on a bus to travel to the Power Station site. Therefore, Horizon did not consider it appropriate to locate the Park and Ride facility on Holy Island or to be co-located with Parc Cybi. The location of Dalar Hir adjacent to the strategic road network of the A55 at Junction 4 will reduce demand on Junction 3, where traffic leaves the A55 to travel along the A5025 to the Wylfa Newydd Development Area, helping to ensure resilience in the road network. Further information is provided in the Transport Assessment and ITTS. In addition to the sites only being able to located on their chosen sites, it was not considered preferable in planning terms to co-locate the Logistics Centre at Dalar Hir, as this would have meant using additional green field land at Dalar Hir and the site would not provide the benefits for the Logistics Centre being located at Parc Cybi in terms of proximity to Holyhead Port and other industry in Holyhead or kick-starting the delivery of the Enterprise Zone.	
Q11.1.5 0	The Welsh Government recently announced the preferred route for a third crossing across the Menai with construction indicated to start in 2021. Welsh Government - can you provide further details of the proposed route and	Whilst the question is not directed to Horizon as the applicant, the following response by Horizon is provided at this stage: When the Draft DCO application was submitted, the Third Menai Crossing project was in the early stages of development with no single preferred option or programme for construction. It was therefore omitted from the cumulative impact assessment within the DCO Transport Assessment.	Q 9.0.12 comment and Chapter 2 of the LIR outline that HNP should take the potential effects of this RFFP into account within the scope of the cumulative impact assessment, as per the IACC's response to the Examining Authority's First Set of Written Questions

	construction programme and any comments on how it may affect the application? Applicant – you do not include the third crossing in the list of ‘Reasonably foreseeable future projects short list sites’ [APP-397] – can you explain why the crossing was not included and whether it should now be included? The crossing is currently scoped out of the ES (ES Volume 1 – Cumulative effects 12 – Scope page 16) subject to further discussions with the Welsh Government – Please provide an update on these discussions and whether this document and/or the ES needs to be updated in light of them. IACC – do you have any comments?	The justification for the exclusion of the traffic effects from the assessment is listed in the RFFP long list in Cumulative Effects I2 - Scope [APP-385] table I2-2, page 16: “Until environmental and traffic information relating to a preferred option becomes available, it will not be possible to include this proposed project in the CEA [Cumulative Effects Assessment]. Further discussions will be held with the Welsh Government as the project develops.” After the preferred route for the Third Menai Crossing was announced by the Welsh Government, they also confirmed that a full Environmental Impact Assessment would be undertaken and an Environmental Statement would be produced, as the scheme is a “relevant project” under Regulation 48 (1) (a) of the Conservation (Natural Habitats etc) Regulations 1994 (SI 1994/No 2716) in relation to Article 6(3) of the EU Habitats Directive 92/43/EEC. However, there is no further environmental information available as to the scope or likely content of the Environmental Statement, or any likely further environmental surveys that will be undertaken. Therefore, there is insufficient information currently available on the Third Menai Crossing for the basis of a cumulative assessment, and this means it is not possible to update the Wylfa Newydd cumulative assessment to take the Third Menai Crossing into account.	

ExA Ref.	Question	Horizon's Response to Question	IACC Comments / Response
Q12.0.1	Edit Chapter D12 [APP-131] para 12.4.14 to refer to Figure D-12.	The reference to (see figure D1-9) in paragraph 12.4.39 of Chapter D12 Coastal processes and coastal geomorphology [APP-131] will be corrected to refer to Figure D1-12 in the errata which will be submitted at Deadline 6 (19 February 2019).	
Q12.0.2	Edit Chapter D12 para 12.4.39 to refer to Figure D-3.	The reference to (see figures D1-2) in paragraph 12.4.39 of Chapter D12 Coastal processes and coastal geomorphology will be corrected to refer to Figure D1-3 in the errata which will be submitted at Deadline 6 (19 February 2019).	
Q12.0.3	Chapter D12 para 12.5.60 can the Applicant clarify the meaning of "If required, additional procedures such as settlement would be provided to meet this limit in chapter D1" [APP-120]	Paragraph 1.7.52 in chapter D1 [APP-120] refers to the following limit in respect of suspended solid concentrations: "Suspended solid concentrations of the marine dewatering components (with the exception of the initial dewatering of the inner harbour) would be limited to the concentrations proposed in the construction Environmental Permit (70mg/l during normal rainfall events), with discharges direct to the marine environment." Horizon is now proposing to give further definition to what is meant by "additional procedures" in Chapter D12. These procedures, which will be included in the updated Marine Works sub-CoCP [APP-416] which will be submitted at Deadline 4 (17 January 2019), would be implemented, in consultation with NRW by the contractor as part of the temporary works and could include the following procedures (as necessary): • Preventing water from entering the excavated area behind the coffer dam, by using cut-off ditches for example; • Using pump sumps in excavations; • Supporting inlet hoses above the bed to avoid fine sediment being "sucked in"; • Use of appropriate pumping rates to avoid disturbance to the excavated bed; • Protection of the pump inlet to avoid drawing in aquatic life and other debris; • Excavating temporary ponds to allow sediment to settle out; and • Minimising disturbance of any standing water.	
Q12.0.5	NRW advises in its RR [RR-088] that further information is required to demonstrate that changes in coastal processes due to the presence of the marine structures will not affect the Cemlyn Lagoon shingle ridge. Would the Applicant provide this information?	In response to the RR-088 issued by NRW a technical memo was produced (see response to FWQ-Q5.0.5) to provide the additional information requested. This memo was then discussed at a meeting with NRW (27 September 2018) and subsequently updated. The final memo titled Supplementary Information on coastal processes to support Wylfa Newydd EIA (WN0902-HZDCO-PAC-REP-00025) has been submitted at Deadline 2 (4 December 2018) for reference. The main themes and findings are summarised below.	

	Coupled wave-bed shear stress modelling Coupled wave-bed shear stress modelling of a north-west 99th percentile storm event has been undertaken and the results were presented to NRW on 27 September 2018. They show that the resuspension of bottom sediments, swash processes (that could modify gravel ridge morphology) and cross-shore sediment transport associated with the north-west 99th percentile storm event during and following the construction of the marine structures would not change significantly from the baseline situation. That is, for Esgair Gemlyn, any changes to bed shear stress and coastal processes compared to the baseline would be negligible. This is set out in Supplementary Information on coastal processes to support Wylfa Newydd EIA (WN0902- HZDCO-PAC-REP-00025). Waste water outfall protective structures The design and location of the protective structure proposed to surround the waste water outfall pipe during the construction phase (in the Marine Licence application) is still under consideration. However, it is a minor structure, no more than 1m in height, adjacent to the breakwater and of a scale that the coastal process model grid resolution cannot pick up. To this end, its influence on coastal processes in Cemlyn Bay and Esgair Gemlyn (the shingle ridge) is expected to be insignificant in comparison to the breakwater (the effects of which have been modelled and found to be negligible).	

ExA Ref.	Question	Horizon's Response to Question	IACC Comments / Response
Q13.0.1	Concerns have been raised that the names used for the application site are incorrect and that the correct names for the whole site are Cors Tyddyn Waen, Cors Tŷ Coch and Cors Bron Haul. Could the Applicant/IACC advise what are, in their opinion, the correct names and ensure that going forward any documentation/correspondence uses the correct place names.	The question is not specific about which areas within the Order Limits or work areas it is referring to. However, for the purposes of providing a response Horizon have assumed that the question relates to the wetland habitat creation and enhancement compensation sites (Tŷ D, Cors Gwawr and Cae Canol-dydd) associated with the potential impacts on the Tre'r Gof Site of Special Scientific Interest (SSSI). The names of these sites have been identified for the following reasons: - Tŷ Du (meaning 'black house') is named after the building to the northeast of the site. It also comes from the name of the Wildlife Site designation which applies to the site: Tir Lleidiog Tŷ Du; - Cae Canol-dydd (meaning 'mid-day field') is named after the river which runs through the site. The site comprises a number of different landholdings with multiple names, so Horizon selected a suitable physical feature which linked them all; - Cors Gwawr (meaning 'dawn marsh') also comprises a number of different landholdings, but with no clear landscape feature or obvious existing property name to use. We therefore gave it a new name, with the 'dawn' component providing a link to 'mid-day' at Cae Canol- dydd which is located to the west. Horizon, where relevant, has used Welsh names for all the sites within the Order Limits and has proactively discussed the naming of the sites with NRW and IACC.	
Q13.0.2	Can the Applicant confirm that the buildings – in particular the reactor and spent fuel storage buildings – have been designed to minimise the potential for damage/destruction through either unique climatic events (such as Tsunami) or terrorist attack?	For new nuclear designs, the safety, environmental, and security aspects of a generic reactor design are assessed under the Generic Design Assessment (GDA) process, overseen by the Office for Nuclear Regulation (ONR) and the environment agencies. In December 2017, ONR, the Environment Agency and Natural Resources Wales granted Design Acceptance Confirmation and a Statement of Design Acceptability for the UK ABWR design which will be utilised for the Power Station. NPS EN-6 provides that when considering a DCO application the decision-maker should act on the basis that it should not duplicate the consideration of matters that are within the remit of the nuclear regulators, including the GDA and nuclear site licensing processes. Nevertheless, Horizon can confirm that it has taken into consideration the potential for damage and destruction through either unique climatic events or terrorist attacks in the design of the buildings forming the Power Station	

		Specifically, Horizon confirms that the Wylfa Newydd DCO Project has taken into consideration the following aspects when preparing the design for the scheme. A detailed tsunami hazard assessment has been undertaken in support of the Wylfa Newydd Pre- Construction Safety Report, prepared as part of the Safety Case for the Nuclear Site Licencing process. The tsunami hazard assessment considered all credible initiators including earthquakes, landslides, volcanoes, extra-terrestrial impacts, meteorological and man-made. While the report is classified as sensitive material, it concludes. that the credible tsunami wave height is sufficiently small that it poses no significant threat to nuclear safety. Horizon confirms that the threat to nuclear safety from tsunami is negligible. The marine flooding risk to site is dominated by high tides in combination with storm surge and significant wave heights. An extreme combination of these hazards has been adopted as the design basis for the Power Station sea defences. The main site platform level is sufficiently high that marine flooding (run-up and overtopping) does not pose a significant threat to nuclear safety. In drawing these conclusions, reasonably foreseeable and credible maximum climatic event scenarios have been included which account for the entire life of the Power Station. The tsunami hazard assessment and marine flooding assessment have been undertaken in line with the expectations of the UK Office for Nuclear Regulation. In addition the Environmental Statement at appendix D14-2 (analysis of accidental releases) [APP-234], sets out an assessment of effects from potential accidental release scenarios for the Power Station based on the UK Advanced Boiling Water Reactor (UK ABWR) design. All the scenarios were assessed as having a negligible environmental impact, even the identified "severe accident scenario". In accordance with the Nuclear Industries Security Regulations 2003, Horizon has, and will continue to, implement security measures associated with the Wylfa Newydd DCO Project to mitigate any potential threats to security. The arrangements are described in Nuclear Site Security Plans reviewed and approved by the Office for Nuclear Regulation Civil Nuclear Security. The Power Station Site will also be protected by the Civil Nuclear Constabulary, who are deployed at all civil licensed nuclear sites in the UK.	
Q13.0.3	Please provide an update on the progress of the bid for Dark Sky status and if this has been successful the implications for any lighting strategy for the proposal?	The Applicant is not in a in a position to provide an update on the progress of the bid for Dark Sky Reserve Status. However, Horizon is currently preparing a Lighting Strategy which will be incorporated into the relevant CoCPs and CoOPs that will be revised and submitted at Deadline 4 (17 January 2019). The strategy will,	HNP's Lighting Strategy is awaited.

		as far as reasonably practical in accordance with operational and security constraints, aim to minimise light pollution to mitigate effects on Dark Sky Reserve Status if granted.	
Q13.0.4	Can you provide a reference document/glossary that lists all the main abbreviations used throughout the application documents such as WAMS, CoCP, CEMP, WAS etc in one place?	The General Glossary [APP-006] was submitted as part of the DCO application and is intended to be used as a reference document for Wylfa Newydd DCO Project abbreviations, acronyms and definitions.	
Q13.0.5	There are several references throughout the Code of Construction Practice documents to work not occurring on Bank Holidays (eg paragraph 4.2.2 of the Park and Ride sub CoCP [APP-418]). Can the Applicant confirm that they mean Bank and Public holidays and amend the documents as necessary?	The original intent behind the reference to 'Bank Holidays' within the A5025 Off-line Highway Improvements sub-CoCP [APP-420], Logistics Centre sub-CoCP [APP-419] and Park and Ride sub-CoCP [APP-418] was to include what can be considered as 'Public Holidays' in Wales as far as those days include: • New Year's day; • Easter Good Friday; • Easter Monday; • Christmas Day; and • Boxing Day. These days are in addition to the Bank Holidays that consist of: • Early May Bank Holiday; • Spring/late May Bank Holiday; and • Late summer/August Bank Holiday. Accordingly, Horizon confirms the addition of Public Holidays will be made to the above three sub-CoCPs at Deadline 4 (17 January 2019).	The IACC reserves the right to comment until the revised CoCPs have been submitted by HNP at deadline 4.
Q13.0.6	Construction workers would be mobile between sites. Is there an issue that contamination could be transferred between sites by workers and if so what measures do you propose to ensure that this would not happen?	Horizon's waste and materials management strategy, including soils and land contamination, is based on the controls set out in the Wylfa Newydd Code of Construction Practice [APP-414] and relevant sub-CoCPs. In particular, in order to manage risks, paragraph 11.2.42 of the CoCP obliges Horizon, in relation to invasive non-native plant species (INNS), to manage the risks. Horizon will prepare one (or more) Biosecurity Risk Assessment (s) and Method Statement (s) to cover all activities and will consider in general measures that will be undertaken to control and eradicate INNS within the area of works and measures or actions that aim to prevent INNS being introduced to the site for the duration of the construction phase.	IACC notes HNPs response.

ExA Ref.	Question	Horizon's Response to Question	IACC Comments / Response
Q14.0.1	Explain why there are no Detailed Design Drawings in Part 6 of Schedule 2 of the dDCO [APP-029] for any of the proposed buildings and structures on the Main Site out with the Power Island site.	No detailed design drawings for buildings and structures within the Power Station Site have been provided because, at this stage of the Wylfa Newydd DCO Project, the design requirements of these elements are not known (and will not be known until after grant of the DCO). Because of this, Horizon has adopted a 'parameters approach' which identifies defined envelopes for the construction of these elements within the Requirements in Schedule 3 of the draft DCO which outline locations, number and maximum and where relevant minimum dimensions of these elements. These parameters will form the basis of the design details submitted to IACC for approval under Requirement WN3. The reason for adopting this approach is to ensure that Horizon has sufficient flexibility to accommodate any design changes that may be required between the DCO being granted and construction commencing. These design changes may be required as a result of the nuclear site licence or design development processes alongside commercial procurement considerations. The use of parameters within DCOs, also known as the 'Rochdale envelope', is well established and the Planning Inspectorate has confirmed that it is appropriate in this instance. Experience to date on the implementation of granted DCOs (in particular, the Hinkley Point C (Nuclear Generating Station) Order 2015) also demonstrates the need to be able to accommodate such changes. Requirement WN3 also requires that the detailed designs for the Power Station Site must be prepared in accordance with the design and landscaping principles set out in the Design and Access Statement (Volume 2) [APP-408]. Although no detailed plans have been submitted for approval, Horizon has, as part of its DCO application, provided illustrative plans for all buildings within the Main Site in Wylfa Newydd Development Area and Power Station Site Plans (Part 1 or 2) [APP-014] and Wylfa Newydd Development Area and Power Station Site Plans (Part 2 or 2) [APP-015] to provide an indication of the potential design and layout of these elements within the Power Station Site.	The IACC accepts that the parameter approach is suitable for use on the main site in relation to the number, size and general arrangement of buildings and structures. This general position is however subject to more detail and further control of those details being provided now. For example more detail on the landscaping, including minimum heights as well as maximums for mounds, and on proposals for and the impacts of bold or naturalistic colour schemes for the exteriors of buildings are required to allow the landscape impacts of the envelope to be properly considered. Where a naturalistic colour scheme is required to minimise visual impact the option of a bold colour scheme should be excluded from the detailed design stage. The Council has set out the elements is considered to need further definition in the main site chapter of the LIR.
Q14.0.2	In respect of the Power Station site and the Design and Access Statement, Vol 2 [APP-408]: (a)	(a) Requirements WN3 to WN5 of the draft DCO [APP-029] require that the detailed designs for the Power Station Site must be prepared in accordance with identified parameters in Schedule 3 of the draft DCO and the design and landscaping principles set out in the Design and Access Statement (Volume 2) [APP-408].	

	Are the design principles set out in Part 5 adequate to meet the 'Criteria for Good Design for energy infrastructure' in respect of 'aesthetics' set out in section 4.5 of EN-1 and would they be adequately secured in the dDCO [APP-029] (b) Is the concept of a 'Grid Framework' (para. 4.1.9) to underpin the approach to design, layout and master planning appropriate and is it well realised in the design and layout proposals set out in the Design and Access Statement Vol. 2 [APP-408];# (c) Are the proposed indicative landscape palette (Section 6.2); overarching materials palette (Section 6.4) and the colour palette (para. 4.1.22 ff) satisfactory and would they be adequately secured in the dDCO [APP-029]?	Horizon considers that Design Principles 26, 28, 30-40, 44, 55, 60, 61 and 64 found within the Design and Access Statement (Volume 2) [APP-408] would secure the delivery of good design, particularly in terms of visual aesthetics. Section 6 of the document demonstrates one way in which these design principles could deliver good design. In addition to Section 4.5 of NPS EN-1, paragraph 2.8.1 of NPS EN-6 confirms that the need to ensure the safety and security of a nuclear station and to control the impacts of its operation should be given substantial weight in determining whether or not the principles of 'good design' under NPS EN-1 have been achieved. Therefore, while good design is an important principle for the development of the designs of the Power Station Site (and are secured through Requirements WN3 to 5), good design must be balanced against the functional, operational, safety and security needs of the power station. (b) The concept of a 'Grid Framework' creates a synergy between the existing and proposed Wylfa power stations, helping to integrate the developments by visually aligning them. Within the Power Station security fences, the Grid Framework would help create a sense of place and hierarchy within a heavily developed and functional area. Seeking to align and structure the power station buildings and structures, would reduce visual clutter and aid both legibility and the visual aesthetics of the power station as a whole. Beyond the security fences the concept gives way to naturalistic drumlin landforms and landscaping that help to integrate the power station into its surrounding context. This concept is introduced in Section 4, secured in Section 5 (Design Principle 26) and illustratively explored in Section 6 of the Design and Access Statement (Volume 2) [APP-408]. (c) The colour strategy identified in the Design and Access Statement (Volume 2) [APP-408] has been informed by public consultation, where feedback generally expressed a preference to blend-in many parts of the Power Station with the surrounding context as far as reasonably practicable, with contrasting colours added where appropriate. This option was consulted upon during the Stage 2 Consultation through the 'Main Site Masterplan' consultation document. Design Principles 31, 32 and 62 require the development of a palette based on natural colours found in the landscape and seascape setting, with contrasting elements and the use of traditional materials where practicable. Design Principle 35 requires a higher quality of materials to be used on particular support buildings that would have higher footfall and would be likely to be located in the most prominent parts of the Wylfa Newydd Development Area.	

		Horizon considers that these design principles deliver the preferences of consultees and adequately secured through Requirement WN3. Illustrative examples of how the principles could be applied in practice are set out in Sections 4 and 6 of the Design and Access Statement (Volume 2) [APP-408].	
Q14.0.3	In respect of the proposed buildings on the Power Station site outside of the Power Island (the 'office-type' and 'industrial' buildings): (a) Would the right mechanisms be in place to achieve architectural excellence; (b) Should arrangements be secured to ensure continuing design review of these elements as the project progresses; and (c) Would there be value in holding design or architectural competitions to achieve buildings of excellence that complement the significant investment in power generation and add value to the employee, visitor and resident experience?	(a) As set out in Requirements WN3 to WN5 in Schedule 3 of the draft DCO [APP-029], detailed designs for the Power Station Site must be delivered in accordance with identified parameters and the Design Principles set out in the Design and Access Statement (Volume 2) [APP-408]. Section 6 of the Design and Access Statement (Volume 2) [APP-408] illustrates how each of the Design Principles would deliver "Good Design" in accordance with NPS EN-1 and NPS EN-6. The Design Principles in the Design and Access Statement (Volume 2) [APP-408] would secure the delivery of good design whilst also ensuring that the safety, security and operational requirements are met. The Design Principles have also been developed following public consultation on the proposed design of the Power Station where the majority of responses expressed a preference for the Power Station buildings to "blend in", rather than be prominent. (b) Horizon's internal management arrangements will ensure that design of configured structures, systems and components follows a robust multi-disciplinary design review process as the project progresses. (b) and (c) Further mechanisms to secure continuing design reviews or architectural competitions are likely to challenge the Power Station design and construction schedule. Horizon would support early engagement with IACC prior to submitting detailed drawings for approval.	
Q14.0.4	Does the approach to design and the proposals for the WNDA meet the project objectives set out in section 2.3 of the Design and Access Statement Vol.1 [APP-407] with respect to: (a)	Horizon's responses to how each of the project objectives will be achieved through the final design and management are set out below: (a) Section 5 of the Design and Access Statement: Volume 2 identifies which design principles satisfy the theme of sustainability in accordance with good design for energy infrastructure as set out in NPS EN-1	

	Integrating sustainability into all physical designs; (b) Developing a green and sustainable approach in the development management of the buildings and operational activities; and (c) Ensuring that all the elements are designed to connect with the varied beauty and character of Ynys Môn and conserve and enhance the natural environment as far as possible? If not, what more should be done and how could it be secured?	and NPS EN-6. As noted in response to Q14.0.2, EN-6 confirms that good design principles, including sustainability, must be balanced against the operational and security needs of the power station. Examples of design principles that promote sustainability include Principles 25 and 42 which require the footprint, scale and massing of buildings and structures on the Power Station Site and Marine Works will be as small as reasonably practicable, including temporary buildings and structures; and Principle 76 which promotes electric charging points. In accordance with Requirement WN3, the detailed designs for the Power Station on the WNDA must be in accordance with all of the design principles contained in Volume 2 of the Design and Access Statement. On this basis the draft DCO will secure the integration of sustainability into the physical design of the WNDA. (b) The principles contained in the Landscape and Habitat Management Strategy which will be secured by requirements WN9 and WN11, corresponding to the final landscape and habitat scheme promote and support the integration of green and sustainable management principles during the operational phase. (c) A number of principles in section 5 of the Design and Access Statement: Volume 2 and the Landscape Habitat Management Strategy seek to ensure integration of the Power Station with the surrounding environment and enhance the natural character. Examples include Design Principles 31 and 44 which seek to integrate the development into the surrounding environment through the use of natural colours and appropriate materials and Design Principle 37 which ensures screening of industrial plant where practicable. In addition the Landscape and Habitat Management Strategy [APP-424/425] includes a number of principles relating to the conservation of character and the natural environment. These principles are not repeated here but will be secured by Requirement WN9 in the draft DCO. In accordance with Requirements WN3 and WN9, and the principles which secure good design in the Design and Access Statement (Volume 2) [APP-408] and the Landscape and Habitat Management Strategy [APP-424 and APP-425], it is considered that the WNDA proposals meet and secure the project objectives as set out in section 2.3 of the Design and Access Statement (Volume 2) [APP-408] .	Much more could be done to ensure that the elements are designed to connect to the varied beauty and character of Ynys Môn and to conserve and enhance the natural environment as far as possible. The requirement to submit detailed designs to IACC for approval will enable final “tweaks” to the designs but more mitigation needs to be offered and incorporated into the DCO at this stage in order to facilitate this.
Q14.0.5	Are the Power Station Design Principles set out in the Design and Access Statement Vol.2 [APP-408] Section 5 (page 700 ff), appropriate and sufficient to achieve the following objectives set out in para. 1.5.2 of this document [APP-408] and if not what can be done about it:	Horizon considers that the design principles set out in the Design and Access Statement (Volume 2) [APP- 408], together with other control documents, are appropriate and sufficient to achieve the objectives set out in paragraph 1.5.2. How each objective would be achieved is set out below. (a) The power station design would reflect the importance of its setting in Ynys Môn in the following ways:	

	(a) Reflect the importance of its setting in Ynys Môn; (b) Uphold the unique culture and language of Ynys Môn; (c) Integrate sustainability into all physical designs; (d) Develop a green and sustainable approach in the development and management of the buildings and operational activities; (e) Build on the legacy of the Existing Power Station, and help to create a positive for Ynys Môn; (f) Ensure that all the elements are designed to connect with the varied beauty and character of Ynys Môn and conserve and enhance the natural environment as far as possible?	- Design Principle 33: Creating the reactor buildings as distinctive structures in a part of Ynys Môn known for electricity generation; - Design Principle 25: Minimising the footprint, scale and massing of the power station as far as reasonably practicable; - Design Principle 31: Use building materials that are based on a palette of colours found in the landscape or seascape setting and help integrate the buildings into the landscape, where this is compatible with operational and safety requirements; - Design Principle 32: Using contrasting colours in the power station design where appropriate to provide interest; and, - Design Principle 62: Using traditional landscape materials, native planting, or a colour palette inspired from the local landscape setting where practicable. (b), (c) and (e) Please see response to Q14.0.4 above. (e) The power station builds on the legacy of the Existing Power Station, and helps to create a positive for Ynys Môn through the longer term legacy benefits set out in the Planning Statement [APP-406].and Horizon's Written Representation which has been submitted at Deadline 2. (f) Please see response to Q14.0.4 above.	
Q14.0.6	Explain how the design principles for and the implementation of lighting proposals on all sites will respond to the IACC bid for Dark Sky Reserve Status and propose principles and policies that positively respond to this initiative?	As outlined in the Main Power Station Site sub-CoCP section 4.4 [APP-415], construction lighting will be designed to reduce sky glow, glare and light spill onto sensitive receptors, as well as night time human-time human viewers, for example, local communities or those enjoying views of dark skies to below thresholds where significant effects are predicted, where practicable. Horizon is currently preparing a lighting strategy which will be incorporated into the relevant Wylfa Newydd CoCP and sub CoCPs and CoOPs that will be revised and submitted at Deadline 4 This strategy will, as far as reasonably practical in accordance with operational and security constraints, aim to minimise light pollution to mitigate effects on Dark Sky Reserve Status if granted.	IACC expects Horizon to produce detailed lighting designs for the WNDA and for all the AD sites and will comment on these when received.
14.0.7	Bearing in mind its location adjacent to the boundary of the Anglesey AONB, do the Design and Access Statement [APP-409]; the	Although this question is not directed to Horizon as the applicant, the following response has been provided at this stage:	

parameter plans identified in Schedule 2, Part 4 and the Requirements in relation to Off-site Power Station Facilities Work Number 5, in Schedule 3 of the dDCO [APP-029] meet the planning policy objectives in respect of achieving high quality, sustainable development for the Off-site Power Station Facilities; with reference to: (a) Design principles; (b) Master planning strategy; (c) Environmental sustainability; (d) Hard and soft landscaping proposals – including planting proposals; (e) Building and structure footprint, height and massing; (f) Materials and colour palettes; (g) Surface treatments; (h) Lighting; (i) Boundary treatments; (j) Accessibility; (k) Community safety; (l) Maintenance regimes; and (m) Illustrative design proposals. And if not what should be done about it?	The need for "good design" is set out in the Off-Site Power Station Facilities Design and Access Statement [APP-409] Volume 3, Appendix 1-1, Section 3.4. Sections 4.2 and 4.3 of the Appendix B 'Off-site Power Station Facilities' of the Planning Statement also set out an assessment of the principles of development and site specific planning policy issues against relevant NPS policy and relevant Welsh national and local policy and guidance. This section includes a landscape and visual impacts of the Off-Site Power Station Facilities related to the AONB. While there is no hierarchy in the principles of good design, both NPS EN-1 and EN-6 recognise that the nature of energy infrastructure developments can limit the choice an applicant may have in respect of the visual appearance of buildings. For these reasons, the policies recognise that the achievement of good design goes beyond visual aesthetics and that the functionality of infrastructure is just as important. In this respect, Horizon is satisfied that the Off-Site Power Station Facilities are functional and sustainable, and having regard to regulatory and other constraints, are aesthetic, durable and adaptable and are in accordance with NPS EN-1 and EN-6. Chapter 4, Planning for Sustainability, of Planning Policy Wales (PPW), seeks to promote sustainability through good design. PPW notes that design is taken to mean the relationship between all elements of the natural and built environment. To create sustainable development, design must go beyond aesthetics and include the social, environmental and economic aspects of the development, including its construction, operation and management, and its relationship to its surroundings. Horizon are confident that each of the elements identified as (a) to (m) in this question have been considered in creating a high quality sustainable design that accords with PPW. To this end, Section 3.4 of the Design and Access Statement (Volume 3) [APP-409] demonstrates how each of the design principles for the Off-Site Power Station Facilities underpin the delivery of good design and will ensure high quality and sustainable development. Parts (a) to (m) of this question are all considered in the Design and Access Statement (Volume 3) [APP-409] within the following sections: a) Design principles (section 3.4) b) Master planning (sections 3.3 and 3.4) c) Environmental sustainability (chapter 5) d) Hard and soft landscaping (section 4.2) e) Building and structure footprint, height and massing (chapter 4)	

		f) Materials and colour palettes (chapter 4) g) Surface treatments (chapter 4) h) Lighting (section 4.5) i) Boundary treatments (sections 3.4 and 4.2) j) Accessibility (Chapter 7) k) Community safety (chapter 6) l) Maintenance (sections 7.3, 8.4) m) Illustrative design proposals (Part B – chapters 4 to 9). These design principles will be secured by Requirement OPSF2 in Schedule 3 of the draft DCO which requires the designs for the Off-Site Power Station Facilities to be prepared in accordance with the design principles in the Design and Access Statement (Volume 3) [APP-409]. Consideration of the AONB The location of the proposed Off-Site Power Station Facilities adjacent to the AONB boundary is considered in the Environmental Statement Chapter Volume E - Off-Site Power Station Facilities: AECC ESL and MEEG E10 (APP-248). Paragraphs 4.3.152 to 4.3.157 of the Appendix B 'Off-site Power Station Facilities' of the Planning Statement also set out an assessment of landscape and visual impacts of the Off-Site Power Station Facilities against relevant NPS policy and relevant Welsh national and local policy and guidance. As described in Volume 3 of the Design and Access Statement the Off-Site Power Station Facilities have been sensitively designed to minimise the potential impact on the Isle of Anglesey AONB, particularly in terms of landscaping. The proposed buildings would also be positioned, designed and orientated to reduce their effect on the surrounding areas as far as is practicable. The required locations of the buildings comprising the Off-Site Power Station Facilities are shown on the Parameter Plan (WN0902-HZDCO-ADV- DRG-00001) [APP-025]. The effects of the development on the AONB would be localised and are not considered to have a detrimental effect that would compromise the purpose of the designation in compliance with Paragraph 5.9.12 of NPS EN-1.	
Q14.0.8	With respect to the Off-site Power Station Facilities proposals described in the Design and Access Statement [APP-409]: (a) Explain why it is necessary to permanently park four ISO containers (stacked in pairs) in	(a) In response to item (a) as presented in section 1.3 of the Site Selection Reports - Volume 3 – Off-Site Power Station Facilities [APP-438]. The Off-site Power Station Facilities are a requirement of a Nuclear Site Licence and therefore Horizon must provide adequate facilities to respond to an emergency prior to bringing fuel to the Power Station Site. The Off-Site Power Station Facilities have to be physically separate from, but local to, the Power Station Site in order to provide resilience against severe events with very low probabilities. The four ISO containers are part of the site's proposed emergency arrangements, as they	This equipment for rapid deployment would be needed throughout the operational life of the Power Station, ie 60 years. It would be better (functionally and aesthetically) if these were kept within one of the buildings or in a building specifically provided for their storage and rapid deployment.

	the open on the site and whether alternative options, for example, within the Power Island, have been investigated? (b) Could provision be made for cycle parking/storage and electric vehicle charging on site?	store emergency equipment to be rapidly deployed if needed to support an incident and in the primary emergency facilities within the Power Station Site become unavailable (such as severe flooding or seismic events). (b) In response to item (b) as presented in section 1.5.14 of ES Volume E – Off-Site Power Station Facilities: AECC, ESL and MEEG E1 – Proposed development [APP-239], the daily operational traffic of the Off-site Power Station Facilities would primarily be associated with the day-to-day operation of the Environmental Survey Laboratory (ESL) comprising four HGV trips, four light goods vehicle or minibus trips and two car trips. It is acknowledged that whilst there is a policy requirement for cycling provision, the nature of the use of the facility, the number of car trips associated with its daily use, and its location in the context of cycle paths etc is such that the likely use of cycles to access the facility is extremely limited. It is therefore not proposed to install specific cycle storage provision although the garage-like design of the facility is such that cycles could be accommodated within the buildings if required. With regards to electric car charging points, a similar argument in respect of usage is pertinent. It is also relevant that IACC does not currently have a policy requirement for charging points to be provided. Design principles for other sites, such as the Park and Ride facility, do include the requirement to provide electric car charging points due to the large scale of that facility and its proposed use.	The IACC considers that it would be reasonable to provide electric car charging points
Q14.0.10	Do the Design and Access Statement [APP- 409]; the parameter plan identified in Schedule 2, Part 4 and the Requirements in relation to Site Campus Works Work Number 3, in Schedule 3 of the DCO [APP-029], including the maximum dimensions shown in WN20, meet the planning policy objectives in respect of achieving high quality, sustainable development for the Site Campus; with reference to: (a) Design principles; (b) Master planning strategy; (c) Environmental sustainability; (d) Hard and soft landscaping proposals – including planting proposals;	Although this question is not directed to Horizon as the applicant, the following response has been provided at this stage: The need for "good design" is set out in the Site Campus Design and Access Statement Volume 3, Appendix 1-2, Section 3.4. Sections 4.2 and 4.3 of the Appendix C 'Site Campus' of the Planning Statement also set out an assessment of the principles of development and site specific planning policy issues against relevant NPS policy and relevant Welsh national and local policy and guidance. While there is no hierarchy in the principles of good design, both NPS EN-1 and EN-6 recognise that the nature of energy infrastructure developments can limit the choice an applicant may have in respect of the visual appearance of buildings.	

	(e) Building and structure footprint, height and massing; (f) Materials and colour palettes; (g) Surface treatments; (h) Lighting; (i) Boundary treatments; (j) Accessibility; (k) Community safety; (l) Maintenance regimes; and (m) Illustrative design proposals. If not what should be done about it?	For these reasons, the policies recognise that the achievement of good design goes beyond visual aesthetics and that the functionality of infrastructure is just as important. In this respect, Horizon is satisfied that the Site Campus as a temporary development is functional and sustainable, and having regard to regulatory and other constraints, is aesthetic, durable and adaptable and is in accordance with NPS EN-1 and EN-6. Chapter 4, Planning for Sustainability, of Planning Policy Wales (PPW), seeks to promote sustainability through good design. PPW notes that design is taken to mean the relationship between all elements of the natural and built environment. To create sustainable development, design must go beyond aesthetics and include the social, environmental and economic aspects of the development, including its construction, operation and management, and its relationship to its surroundings. Horizon are confident that each of the elements identified as (a) to (m) in this question have been considered in creating a high quality sustainable design that accords with PPW. To this end, Section 3.4 of the Design and Access Statement demonstrates how each of the design principles for the Site Campus underpin the delivery of good design and will ensure high quality and sustainable development. Parts (a) to (m) of this question are all considered in the Design and Access Statement within the following sections: a) Design principles (section 3.4) b) Master planning (sections 3.3 and 3.4) c) Environmental sustainability (chapter 5) d) Hard and soft landscaping (section 4.2) e) Building and structure footprint , height and massing (chapter 4) f) Materials and colour palettes (chapter 4) g) Surface treatments (chapter 4) h) Lighting (section 4.5) i) Boundary treatments (sections 3.4 and 4.2) j) Accessibility (Chapter 7) k) Community safety (chapter 6) l) Maintenance (sections 7.3, 8.4) m) Illustrative design proposals (Part B – chapters 4 to 9). These design principles will be secured by draft Requirement WN19 in Schedule 3 of the draft DCO, which requires the designs for the Site Campus to be prepared in accordance with the design principles in the Design and Access Statement.	

Q14.0.1 1	In relation to the proposals for the Site Campus set out in the Design and Access Statement [APP-409]: (a) Identify the proposed location for the Site Campus health facility and explain how it will be accessed by service vehicles and ambulances? (b) Explain the material from which the proposed 'timber effect cladding panels' would be made; how they would be fixed to the buildings and the standards they meet for dealing with extreme weather conditions and fire safety? (c) Describe proposals for the Site Campus buildings' foundations and the mechanism by which they would be removed and the ground re-instated during decommissioning of the Site Campus?	(a) As set out in the Volume D - WNDA Development D1 - Proposed development of the Environmental Statement (APP-120), the Site Campus health facility would be located in close proximity to the Amenity Building within the ground floor of the first accommodation block to be constructed at the Site Campus (ensuring services are in place before the non-home-based workforce arrives). At the peak of construction, the Site Campus Medical Centre could, if required, encompass the entire ground floor of the accommodation block (approximately 700m²). Requirement WN18 in Schedule 3 of the DCO [APP-029], requires Horizon to submit detailed designs for the health facility to IACC for approval prior to occupation. These detailed designs will include details of proposed access and transfer arrangements for emergency services and vehicles. (b) Timber effect cladding would be a standard industry cladding solution such as a fibre cement weatherboard or PVC cladding. These are standard cladding solution used on buildings. The materials allow the selection of a range of colours and will retain these colours through the life time of the campus. These cladding solutions meet the required fire requirements and have low maintenance requirements. Design of the cladding support and fixings would take consideration of the exposed location in determination of the wind loading. The ability to select colour ranges allows the individual buildings to be blended into the surround landscape for long distance views. For residents the texture of the cladding and the ability to use colour for different areas will enhance the environment in which they will live. Matters related to the final appearance and design of the Site Campus would be considered at the detailed design stage and secured in accordance with requirement WN19 in Schedule 3 of the DCO [APP-029]. (c) Due to the varying ground conditions different foundations solutions will be bespoke for individual buildings. Potential solutions and their reinstatement proposals are outlined below: • Buildings founded on rock at a shallow depth are likely to have concrete pad foundations. These pads are likely to be removed when the Site Campus is decommissioned. • Building which require deeper foundations are likely to have pads constructed on mass concrete infill. This will allow the pads at a shallow depth to be removed and the mass fill covered with fill and top soil. The detailed design will also look at the potential to use removable piles. • For deeper piled foundations the piles are likely to be left in-situ and the piles caps will be removed during decommissioning.	IACC would require details of the proposed health care facility as part of the detailed designs submitted under DCO requirement WN18. IACC would require details of the cladding materials, colours, fixings, etc as part of the detailed designs submitted under DCO requirement WN19

	(d) Describe how roof top plant on the Site Campus accommodation blocks would be hidden from view, including long distance views	These matters will be considered during the detailed design stage which will be secured in accordance with Requirement WN19 in Schedule 3 of the DCO (APP-029). In addition Requirement WN23 requires a Site Campus decommissioning strategy to be submitted to IACC for approval prior to decommissioning commencing. (d) The design of rooftop plant would be subject to further detail design development post grant of DCO and submitted for IACC approval in accordance with Requirement WN19. In close-range views, rooftop plant is likely to be hidden in some views due to the height of the proposed blocks and angle of view. However, where visible in local views rooftop plant would be seen in the context of the Site Campus accommodation blocks as a whole and in the context of wider construction works taking place on the Wylfa Newydd Development Area. Although the Site Campus accommodation blocks would be perceptible in more distant views, rooftop plant is unlikely to be distinguishable from the accommodation blocks at such distances.	IACC would require details of the building foundations as part of the detailed designs submitted under DCO requirement WN19 and decommissioning of these foundations as part of the decommissioning scheme submitted under DCO requirement WN23. IACC would require details of the rooftop plant as part of the detailed designs submitted under DCO requirement WN19.
Q14.0.1 2	Do the Design and Access Statement [APP- 410]; the Parameter Plans identified in Schedule 2, Part 4; the Detailed Design Plans identified in Schedule 2, Part 6 and the Requirements in relation to Park and Ride Facility Work Number 6 in Schedule 3 of the dDCO [APP-029] meet the planning policy objectives in respect of achieving high quality, sustainable development for the Park and Ride facility at Dalar Hir; with reference to: (a) Design principles; (b) Master planning strategy; (c) Environmental sustainability; (d) Hard and soft landscaping proposals – including planting proposals; (e) Building and structure footprint, height and massing; (f) Materials and colour palettes; (g) Surface treatments; (h) Lighting;	The need for "good design" is set out in the Park and Ride Design and Access Statement [APP-410] Volume 3, Appendix 1-3, Section 3.4. Sections 4.2 and 4.3 of the Appendix D 'Park and Ride' of the Planning Statement also set out an assessment of the principles of development and site specific planning policy issues against relevant NPS policy and relevant Welsh national and local policy and guidance. While there is no hierarchy in the principles of good design, both NPS EN-1 and EN-6 recognise that the nature of energy infrastructure developments can limit the choice an applicant may have in respect of the visual appearance of buildings. For these reasons, the policies recognise that the achievement of good design goes beyond visual aesthetics and that the functionality of infrastructure is just as important. In this respect, Horizon is satisfied that the Park and Ride as a temporary form of development is functional and sustainable, and having regard to regulatory and other constraints, is aesthetic, durable and adaptable and is in accordance with NPS EN-1 and EN-6. Chapter 4, Planning for Sustainability, of Planning Policy Wales (PPW), seeks to promote sustainability through good design. PPW notes that design is taken to mean the relationship between all elements of the natural and built environment. To create sustainable development, design must go beyond aesthetics and	

	(i) Boundary treatments; (j) Accessibility; (k) Community safety; (l) Maintenance regime; and (m) Post-operation strategy. If not, what should be done about it?	include the social, environmental and economic aspects of the development, including its construction, operation and management, and its relationship to its surroundings. Horizon are confident that each of the elements identified as (a) to (m) in this question have been considered in creating a high quality sustainable design that accords with PPW. To this end, Section 3.4 of the Design and Access Statement demonstrates how each of the design principles for the Park and Ride underpin the delivery of good design and will ensure high quality and sustainable development. Parts (a) to (m) of this question are all considered in the Design and Access Statement within the following sections: a) Design principles (section 3.4) b) Master planning (sections 3.3 and 3.4) c) Environmental sustainability (chapter 5) d) Hard and soft landscaping (section 4.2) e) Building and structure footprint, height and massing (chapter 4) f) Materials and colour palettes (chapter 4) g) Surface treatments (chapter 4) h) Lighting (section 4.5) i) Boundary treatments (sections 3.4 and 4.2) j) Accessibility (Chapter 7) k) Community safety (chapter 6) l) Maintenance (sections 7.3, 8.4) m) Illustrative design proposals (Part B – chapters 4 to 9). These design principles will be secured by draft Requirement PR3 (2) in Schedule 3 of the draft DCO which requires the designs for the Park and Ride to be prepared in accordance with the design principles in the Design and Access Statement.	
Q14.0.1 3	Bearing in mind its location within the Anglesey AONB, do the Design and Access Statement [APP-409, APP-410]; the parameter plans identified in Schedule 2, Part 4; the Detailed Design Plans identified in Schedule 2, Part 6 and the Requirements in relation to Logistics Centre Work Number 7 in Schedule 3 of the dDCO [APP-029] meet the planning policy objectives in respect of achieving high quality, sustainable	The need for "good design" is set out in the Logistics Centre Design and Access Statement t Volume 3, Appendix 1-4, Section 3.4. Sections 4.2 and 4.3 of the Appendix E 'Logistics Centre' of the Planning Statement also set out an assessment of the principles of development and site specific planning policy issues against relevant NPS policy and relevant Welsh national and local policy and guidance. While there is no hierarchy in the principles of good design, both NPS EN-1 and EN-6 recognise that the nature of energy infrastructure developments can limit the choice an applicant may have in respect of the visual appearance of buildings.	

development for the Logistics Centre at Parc Cybi; with reference to: (a) The appropriateness of the proposed use for the site; (b) Hours of operation; (c) Design principles; (d) Master planning strategy; (e) Environmental sustainability; (f) Hard and soft landscaping proposals – including planting proposals; (g) Building and structure footprint, height and massing; (h) Materials and colour palettes; (i) Surface treatments; (j) Lighting; (k) Boundary treatments; (l) Accessibility; (m) Community safety; (n) Maintenance regimes; and (o) Post-operation strategy. If not, what should be done about it?	For these reasons, the policies recognise that the achievement of good design goes beyond visual aesthetics and that the functionality of infrastructure is just as important. In this respect, Horizon is satisfied that the Logistics Centre is functional and sustainable, and having regard to regulatory and other constraints, is aesthetic, durable and adaptable and is in accordance with NPS EN- 1 and EN-6. Chapter 4, Planning for Sustainability, of Planning Policy Wales (PPW), seeks to promote sustainability through good design. PPW notes that design is taken to mean the relationship between all elements of the natural and built environment. To create sustainable development, design must go beyond aesthetics and include the social, environmental and economic aspects of the development, including its construction, operation and management, and its relationship to its surroundings. Horizon are confident that each of the elements identified as (a) to (m) in this question have been considered in creating a high quality sustainable design that accords with PPW. To this end, Section 3.4 of the Design and Access Statement demonstrates how each of the design principles for the Logistics Centre underpin the delivery of good design and will ensure high quality and sustainable development. Parts (a) to (m) of this question are all considered in the Design and Access Statement within the following sections: a) Design principles (section 3.4) b) Master planning (sections 3.3 and 3.4) c) Environmental sustainability (chapter 5) d) Hard and soft landscaping (section 4.2) e) Building and structure footprint, height and massing (chapter 4) f) Materials and colour palettes (chapter 4) g) Surface treatments (chapter 4) h) Lighting (section 4.5) i) Boundary treatments (sections 3.4 and 4.2) j) Accessibility (Chapter 7) k) Community safety (chapter 6) l) Maintenance (sections 7.3, 8.4) m) Illustrative design proposals (Part B – chapters 4 to 9). These design principles will be secured by draft Requirement LC3 (2) in Schedule 3 of the draft DCO, which requires the designs for the Logistics Centre to be prepared in accordance with the design principles in the	

		Design and Access Statement (Volume 3) [APP-410]. Subject to future planning permission being granted, the site would be capable of accommodating future development proposals as a legacy benefit of the Wylfa Newydd DCO Project. In respect of appropriateness of the site, within an AONB, as set out in Q11.1.48, the site has previously been supported as a suitable location for business and industrial uses and is allocated in the Anglesey and Gwynedd Joint Local Development Plan (JLDP) for employment purposes. The site lies within Holyhead settlement boundary which the Wylfa SPG directs towards logistics/freight uses. The area is being supported by the Welsh Government as an Enterprise Zone and has been set aside for strategic employment land by the IACC. For these reasons, Horizon considers the proposed use of the site is appropriate.	
Q14.0.1 4	Should a revised layout be provided to mitigate concerns over the visual impact of the proposed Site Campus? If not, why not? How would delivery and phasing be secured through the dDCO?	Design and Access Statement - Volume 3 (Part 1 of 2) sets out the design rationale for the layout of the Site Campus, including the design evolution, including the <i>illustrative</i> architectural building design proposals at section 4.3. Section 4.3 explains that the layout has been based on the contours of the site to fit into the surrounding landscape. The context has been carefully considered to reduce the visual impact in conjunction with design studies to investigate options for massing and colour of the accommodation blocks. As stated in 8.6 of the Design and Access Statement (Volume 1) [APP-407] “<i>Horizon has proposed a parameter based approach for the construction of the Site Campus, with illustrative plans to demonstrate how the development could be delivered, in accordance with the parameters, design principles and other control documents.</i>” The parameters are sufficiently fixed and Volume 3 of the Design and Access Statement, illustrates how the site campus could be designed in accordance with the ‘building design and landscape principles’. As noted in section 3 of the Design and Access Statement, the proposed layout and design of the Site Campus has been driven by the following design principles: • The proposed development will limit the potential impact of the buildings and connect the site visually and physically to the scale and pattern of the surrounding landscape. • The proposals will seek to reduce the overall visual impact of the site, using the site contours and natural levels of the site to locate the accommodation buildings • Visually recessive natural colours and materials will be used to minimise the sense of scale and massing of the accommodation buildings and to help integrate them into the landscape using a similar approach to colours found within the surrounding landscape and on the Existing Power Station.	

	• The development will include a network of internal roads and footpaths to support the safe operation of the accommodation, and provide recreational areas within the site. • The precise position of the buildings within the parameters, will maximise the retention of key site characteristics. The Site Campus will provide a short and medium-term home for up to 4,000 workers. Its current layout provides a car free environment with accommodation blocks grouped to create communities with formal and informal space. Block spacing, and height have been balanced provide a sense of light and space between the accommodation blocks. The layout follows the existing topography to minimise the need for extensive reprofiling of the ground. The amenity block is centrally located for ease of access to entrance and from the accommodation blocks. The amenity block location also benefits from the stunning views over the bay. The proposed layout has taken into consideration the visual impact of the Site Campus with building height and colour being used to soften the visual impact of the Site Campus during the temporary period that it will be used. It is Horizon view that any revised layouts would not provide any better balance been the provision of a pleasant place to live and the visual impact than has been achieved with the current proposals. With regards the phasing and delivery of the campus, this is secured through the Phasing Strategy submitted with the DCO application. The Phasing Strategy [APP-447] is secured by Requirement PW2 Schedule 3 of the DCO [APP-029].	

ExA Ref.	Question	Horizon's Response to Question	IACC Comments / Response
Q15.0.1	Given the limited size of Wylfa A and the proposed limited footprint needed for the proposed power station complex (236 hectares) can the applicant either provide a statement or highlight where in the application documentation, other than paragraph 6.5.16 of the Planning Statement [APP-406], the justification can be found for the amount of land (407 hectares) required for the WNDA?	The indicative area that will be required for the permanent buildings and structures within Power Station Site is 145 hectares, as per chapter D1 [APP-120], which is less than the area of 236 hectares stated in the Planning Statement. The additional area within the ~400ha of the WNDA is required for the following reasons: - Power Station construction area, construction laydown areas and temporary mounding, total of all construction parameter zones 309 hectares (reference WN0902-HZDCO-MSP-DRG- 00008, Revision 1.0 [APP-014]) - Site Campus, work areas 3A and 3B, temporary use of up to 30 hectares (refer to 2.3 Work Plans [APP-011]) - Permanent mounding and landscaping for environmental mitigation, work areas 2A, 2B, 2C and 2D, permanent use of up to 192 hectares (refer to 2.3 Work Plans [APP-011]) The total area of the WNDA used during operations comprises the permanent buildings within Power Station Site (145 hectares based on the illustrative design) and the permanent mounding and landscaping (maximum of 192 hectares based on work areas 2A, 2B, 2C and 2D).	IACC notes HNPs response.
Q15.0.3	(a) Please provide a plan and if necessary an accompanying table that physically shows the location of the various Agricultural Land Classifications for the WNDA. (b) How much of the WNDA would be classified as Best and Most Versatile (BMV)? (c) Planning Policy Wales and Technical Advice Note 6 provide advice regarding BMV. How would the proposal comply with this advice?	Agricultural Land Classifications in the WNDA The Environmental Statement contains a plan depicting the Agricultural Land Classification (ALC) within the Wylfa Newydd Development Area (WNDA). This plan (reference RAC6753-4: Agricultural Land Classification) can be found at page 187 of Volume D - WNDA Development App D7-1 – Soils and Geology Baseline Conditions Report [APP-143]. Table D7-3 at page D7-8 of Environmental Statement Chapter D7 [APP-126] demonstrates the area and percentage of each ALC within the WNDA. This table is reproduced below.	

Table D7-3 ALC grades – spatial coverage (adapted from [RD5])					
Grade/ Subgrade	Description	Wylfa Newydd Development Area		Anglesey	
		Area (ha)	Percentage (%)	Area (ha)	Percentage (%)
1	Excellent quality	0	0	0	0
2	Very good quality	6.5	2.0	1,116.9	1.6
3a	Good quality	18.0	5.6	27,559.3	38.6
3b	Moderate quality	224.3	69.5		
4	Poor quality	0.1	<0.1	27,213.8	38.1
5	Very poor quality	38.0	11.8	10,398.4	14.6
-	Non- agricultural	35.8	11.1	5,072.6	7.1

Best and Most Versatile land within the WNDA

Best and Most Versatile (BMV) land is classified as land falling within ALC Grades 1 (“excellent”), 2 (“very good quality”) and 3a (“good quality”).

Table D7-3 provided above shows the area of each land classification within the WNDA and its relative percentage (Environmental Statement Chapter D7). The ALCs within the WNDA are also summarised as follows:

Grade 1 = 0 hectares / 0%
Grade 2 = 6.5 hectares /
2.0% Grade 3a = 18
hectares / 5.6% **Total =
24.5ha / 7.6% of the
WNDA**

Compliance with policy guidance

Planning Policy Wales (PPW) at paragraph 4.10.1 states that “*considerable weight should be given to protecting such land from development, because of its special importance. Land in grades 1, 2 and 3a*

	<i>should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations".</i> Technical Advice Note 6 (TAN 6) states that planning authorities should “<i>consider the quality of agricultural land and other agricultural factors and seek to minimise any adverse effects on the environment</i>”. These policy documents recognise that while it is important to protect quality agricultural land from inappropriate development; there may be instances of overriding need where such development is appropriate. Nevertheless, such development should seek to minimise any adverse effects on the environment. The Planning Statement [APP-406] sets out in detail the urgent need for nuclear power as demonstrated in NPS EN-1 and NPS EN-6 and further underpinned by the Oxera report commissioned by Horizon and submitted alongside the Planning Statement. As stated in paragraph 6.4.316 (p. 127) of the Planning Statement (and detailed in the response to question (b) above), the loss of BMV agricultural land as a consequence of the Wylfa Newydd DCO Project equates to 7.6% of the total area of the WNDA. This land is required for the delivery of the project. As the Planning Statement details, the loss of this land cannot be practicably avoided as it is an important area for landscape mitigation through mounding. It is therefore considered that losses have been minimised and justified in accordance with NPS EN-1, as well as paragraph 4.10.1 of PPW, the Joint Local Development Plan and TAN 6. The BMV agricultural land within the WNDA will be appropriately managed during the operation of the Power Station according to the controls in the Landscape and Habitat Management Strategy (LHMS) [APP-424] and [APP-423] which seek to deliver a net biodiversity benefit across the site, thereby minimising any adverse effects on the environment. These includes design principles that seek to ensure that “where practicable, land will be sensitively returned to agricultural use on completion of the final landscape scheme, in conjunction with ecological enhancement measure...” Summary The location of the BMV agricultural land within the WNDA lies outside of the main Power Station Site and comprises only 7.6% of the overall WNDA area. None of the BMV land constitutes Grade 1 classification, and only 2% falls within Grade 2. The urgent national need for nuclear power, as set out in NPS EN-1 and Horizon’s supporting evidence, for the project satisfies the “overriding need” test in PPW.	

		TAN 6 requires local planning authorities to seek to “minimise” impacts on BMV, which again has been satisfied through project design and layout, and the land being controlled during operation through the LHMS.	
Q15.0.4	Would any BMV land be lost as a result of the proposed A5025 Off-line highway improvements? Would the proposed A5025 Off-line highways improvements result in any severance issues for farms or businesses along the proposed route?	Land which is classified as Grades 1, 2 and 3a in the Agricultural Land Classification ("ALC") system is defined as best and most versatile agricultural land ("BMV"). The table below demonstrates that a total of 13.4 hectares of BMV land will be lost to sections 3, 5 and 7 of the Off-line Highway Improvements as follows: • Section 3: 9.2 ha of BMV land will be lost equating to 69% of the land in section 3; • Section 5: 2.1 ha of BMV land will be lost equating to 28% of the land in section 5; and • Section 7: 2.1 ha of BMV land will be lost equating to 20% of the land in section 7. No BMV land will be lost at section 1.	

Table 3.2 ALC Grades – spatial coverage1

Grade	Description	Section 1		Section 3		Section 5		Section 7	
		Area (ha)	% land	Area (ha)	% land	Area (ha)	% land	Area (ha)	% land
1	Excellent Quality	-	-	-	-	-	-	-	-
2	Very Good Quality	-	0%	1.30	10%	1.10	15%	-	0%
3a	Good	-	0%	7.90	59%	1.00	13%	2.10	26%
3b	Moderate Quality	4.60	38%	3.50	26%	3.90	53%	3.30	40%
4	Poor Quality	7.50	62%	0.70	5%	-	0%	0.70	8%
5	Very poor Quality	-	0%	-	0%	1.40	19%	2.10	26%
	Total Agricultural	12.10	100%	13.40	100%	7.40	100%	8.20	100%

Reference [APP-322]: Wylfa Newydd DCO Project 6.7.19 ES Volume G - A5025 Off-line Highway Improvements App G7-1 - A5025 Off-line Highway Improvements Baseline Condition Report Section 3.2

- Further information regarding the baseline conditions for soils and geology along the routes of the A5025 Off-line Highway Improvements as informed by, amongst other things, the results of the ALC surveys undertaken within the study areas and the Wylfa Newydd Development Area can be found in the following documents:
- ES Volume G - A5025 Off-line Highway Improvements G7 - Soils and geology [APP-310]
- ES Volume G - A5025 Off-line Highway Improvements App G7-1 - A5025 Off-line Highway Improvements Baseline Condition Report

Severance of farms and business because of the A5025 Off-line Highway Improvements

Horizon has worked with all relevant owners and occupiers to identify and mitigate potential severance issues and have incorporated these mitigation measures into the overall highway design. Where feasible and practical our approach has been to provide an alternative access and, where this has not been able to

Q15.0.5	How would potential short and long term breaches of agri-environment schemes caused by the Application be dealt with? Who would take the responsibility for dealing with any breaches, the Applicant or the signatory of the scheme, if it is the signatory is the Applicant proposing any support or advice to them?	be provided, those affected have been given a bridge or underpass to maintain access to their retained land. The table below summarises for each section the of mitigation measures for severance being proposed:															
		<table><tr><th>Section</th><th>Mitigation measures</th><th>Drawing Ref</th></tr><tr><td>1</td><td>Proposed Private means of field access created and improved</td><td>2.7 A5025 Off-line Highway Improvements - Section 1</td></tr><tr><td>3</td><td>Proposed Private means of field access created and improved Proposed farm track and underpass created to maintain movement of stock</td><td>2.8 A5025 Off-line Highway Improvements - Section 3</td></tr><tr><td>5</td><td>Proposed Private means of field access created and improved Proposed new farm access track Proposed farm track and underpass created to maintain movement of stock</td><td>2.9 A5025 Off-line Highway Improvements - Section 5</td></tr><tr><td>7</td><td>Proposed Private means of field access created and improved Proposed new farm access track Proposed farm track and underpass created to maintain movement of stock Proposed overbridge to maintain farm access</td><td>2.10 A5025 Off-line Highway Improvements - Section 7</td></tr></table>	Section	Mitigation measures	Drawing Ref	1	Proposed Private means of field access created and improved	2.7 A5025 Off-line Highway Improvements - Section 1	3	Proposed Private means of field access created and improved Proposed farm track and underpass created to maintain movement of stock	2.8 A5025 Off-line Highway Improvements - Section 3	5	Proposed Private means of field access created and improved Proposed new farm access track Proposed farm track and underpass created to maintain movement of stock	2.9 A5025 Off-line Highway Improvements - Section 5	7	Proposed Private means of field access created and improved Proposed new farm access track Proposed farm track and underpass created to maintain movement of stock Proposed overbridge to maintain farm access	2.10 A5025 Off-line Highway Improvements - Section 7
		Section	Mitigation measures	Drawing Ref													
		1	Proposed Private means of field access created and improved	2.7 A5025 Off-line Highway Improvements - Section 1													
		3	Proposed Private means of field access created and improved Proposed farm track and underpass created to maintain movement of stock	2.8 A5025 Off-line Highway Improvements - Section 3													
		5	Proposed Private means of field access created and improved Proposed new farm access track Proposed farm track and underpass created to maintain movement of stock	2.9 A5025 Off-line Highway Improvements - Section 5													
		7	Proposed Private means of field access created and improved Proposed new farm access track Proposed farm track and underpass created to maintain movement of stock Proposed overbridge to maintain farm access	2.10 A5025 Off-line Highway Improvements - Section 7													
		The proposed mitigation measures set out above allow the relevant owners and occupiers to continue to access and use their retained land.															
		There are two main types of agri-enviroment schemes that could be affected by the DCO application; 1. land management agreements in respect of Sites of Special Scientific Interest (SSSI) administered by NRW; and 2. Glastir, a sustainable land management scheme administered by Rural Payments Wales (RPW).															
		The obligations, restrictions and payments that are payable under these schemes will be specific to the agreement that exists between the responsible authority and the landowner/occupier. Similarly, what amounts to a breach of an agri-environment scheme will depend on the terms of the management															

	agreement. However, Horizon accepts that it is possible that activities relating to the Wylfa Newydd DCO Project may result in landowners in effect breaching their agri-environment schemes. Horizon will work with affected landowners/occupiers to ensure that appropriate support is made available to them to manage and deal with any anticipated or actual breaches. The Draft DCO s.106 [REP1-010] agreement provides for two Community Involvement Officers (one employed by Horizon and one employed by IACC) to be operating in the community throughout the construction period. These officers will be responsible for delivering the Community Involvement Officer Joint Work Plan which will include providing support and a communication channel for people who experience disturbance as a result of the Wylfa Newydd DCO Project. Further, pursuant to the Draft DCO s.106 agreement, Horizon has committed to setting up the Environmental Enhancement Fund. Pursuant to the Draft DCO s.106 agreement, landowners (and nature conservation bodies) may make applications to the Environment and Built Heritage Sub Group for release of monies under the Environment Enhancement Fund. The Draft DCO s.106 agreement anticipates that applications likely to receive funding include: • an agri-environment scheme targeted at farmers who own and manage land surrounding the Wylfa Newydd Development Area (WNDA) to undertake works to merge the new WNDA landscape with the surrounding area and provide habitat linkages to surrounding habitats; and • an agri-environment scheme for the Cemaes Bay catchment area to improve coastal water quality, re-establish Water Framework Directive compliance and restore the blue flag award for the Cemaes Bay beach.	

ExA Ref.	Question	Horizon's Response to Question	IACC Comments / Response
Q16.0.1	Paragraph 1.3.15 of the Planning Statement [APP-406] states that there have been no relevant changes in circumstances since EN-1 and EN-6 were adopted. Given these documents were adopted in 2011 can the applicant expand on this statement and provide further evidence as to how they reached this conclusion?	Paragraph 1.3.15 of the Planning Statement [APP-406] states: <i>“There have been no relevant changes in circumstances which would suggest that anything less than significant weight should be given to policy in NPS EN- 1 and NPS EN-6 and, if anything, the need for new nuclear power is now even greater than before. The policies contained in NPS EN-1 and NPS EN-6 are therefore both important and relevant to the SoS's decision and form the primary policy basis for a decision made on this application for development consent for the Wylfa Newydd DCO Project”.</i> As explained in section 1.3 and chapter 3 of the Planning Statement, the Government is proposing a new National Policy Statement (NPS) for nuclear power, applicable to single reactor capacity over 1 gigawatt deployable by 2035. Paragraph 5.3.11 of the Planning Statement states that: <i>“The new NPS, currently subject to the Consultation on Siting, will in draft form be considered as relevant to a decision under section 105 of the Planning Act 2008, provided that it has been published in advance of a decision on the DCO application”.</i> Consultation on the process and proposed criteria for the re-assessment of the sites was carried out by the Government in December 2017. Paragraph 3.2.22 in Chapter 3 of the Planning Statement states: <i>“the Consultation on Siting and Process makes it clear that the siting criteria have only been updated to reflect changes in law or policy. There have been no changes in law or policy which would affect the assessment of the Wylfa Newydd site against these siting criteria and therefore Wylfa Newydd continues to be strongly supported as a potentially suitable site for the deployment of a new nuclear power station. Local environmental considerations, including impact on European designated sites, remain to be taken into account through the DCO application process”.</i> The Government's view is that those sites listed in NPS EN-6 (including Wylfa) continue to be those sites which can deploy the soonest and are likely to be the only sites capable of deployment by 2035. The Government's approach therefore is to carry the list of potentially suitable sites from EN-6 through to the new NPS subject to them meeting updated siting criteria and updates of their environmental assessments. In July 2018, the Government published its response to the consultation, setting out, at Annex I, the finalised strategic siting criteria that the Government will use to assess whether sites listed in NPS EN-6 should continue to be listed in the new NPS. Developers of the sites listed within the NPS EN- 6 were invited to submit information to support the new assessments. In response to this, Horizon prepared a report in August 2018 entitled 'Wylfa Site: Supplementary Information Report' (which is attached as Appendix 16a to this response) to support a submission as part of Annex A: New NPS	

		Listing Guidance. This report demonstrates how the Wylfa site continues to meet the updated siting criteria. This report concluded that it is not considered necessary to make any changes to the Wylfa NPS Site boundary established in NPS EN-6. Given the very substantial progress made towards obtaining the relevant consents, it is considered that it is more than reasonable to conclude that the site can be licensed, constructed and deployed by 2035. The Draft DCO application has been submitted and accepted, which provides a substantial level of detail beyond the level of detail typically required at the strategic nomination. Finally, there is sufficient certainty, in advance of the detailed consideration through the DCO examination process that the Wylfa site continues – as it did in 2009 – to satisfy the siting criteria at the strategic level. In addition, Horizon commissioned Oxera Consulting LLP to examine the available evidence about the urgent need for new nuclear power. The Oxera Report, which is appended to the Statement of Reasons [APP-032], presents evidence for the continued need for new nuclear power to deliver the UK's energy requirements to 2025 and beyond, and concludes that the significant lead time for delivery of new nuclear capacity makes this need urgent. For these reasons, Horizon considers that there have been no relevant changes in circumstances since NPS EN-1 and NPS EN-6 were adopted.	
Q16.0.2	Paragraph 5.2.3 of the Planning Statement [APP-406] refers to reduction in electricity capacity with reference to coal. Whilst coal fired power stations are being retired a number are being converted to gas. Is this taken into account in this statement and if not how does this effect capacity?	Paragraph 5.2.3 of the Planning Statement refers to a 90% reduction in electrical capacity as a result of existing nuclear capacity and coal capacity being retired; however, the conversion of coal plants to gas is not taken into account in this 90% figure. To the best of Horizon's understanding, there are only two instances of existing coal plants being converted to gas: • Drax Power Station Units 5&6 (announced in January 2018), which is planned to increase its capacity from 1.3GW to 3.6GW in the process of the conversion; and • Eggborough Power Station (announced in September 2018), which is planned to increase its capacity from 1.9GW to 2.5GW in the process of the conversion. Therefore, accounting for planned conversions of existing coal sites to gas, capacity from existing coal sites is expected to decline by 45% by 2025*; although the decrease in nuclear capacity is not affected. This does not affect the conclusions on the need for nuclear power, which is still regarded as urgent.	

		*(1.5GW(unabated coal remaining till 2025) + 6.1GW(capacity of coal units converted to gas) /13.8GW(coal capacity as of 2017 — 1)	
Q16.0.3	Can the Applicant provide responses to paras 6.4.11 and 6.4.23 of the Appraisal of Sustainability of the revised draft Nuclear NPS: Main Report in its Sustainability Statement [APP-426]?	The Sustainability Statement [APP-426] refers to National Policy Statement EN-6 and its Appraisal of Sustainability (AoS) (2011) as a key policy document to inform development of the Sustainability Assessment (SA) framework. Horizon considers that this assessment adequately addresses all relevant sustainability issues.	IACC agrees that the revised draft NPS AoS addresses all relevant sustainability issues at the level of a National Policy Statement. There are additionally local sustainability issues which are better illustrated in detail through the JLDP and SPG policies.
Q16.0.4	In NPS-EN6 para 1.7.4 states that one of the main findings of the Nuclear Appraisal of Sustainability is that “Key inter-relationships between biodiversity and other sustainability effects were identified. These were most notably in relation to flood risk management, water quality and sustainable communities.” Can the Applicant report on these inter- relationships in the Sustainability Statement?	Flood risk management and water quality, including surface water and groundwater, are assessed in the Environmental Statement (ES) surface water and ground water chapters and associated appendices [APP-054, APP-150 to APP-157, APP-254, APP-281, APP-323, APP-370]. Cumulative effects arising from different developments within the Wylfa Newydd DCO Project are assessed within the ES chapter I-4 [APP-387], including those arising from surface water and groundwater. Building on the Sustainability Statement, which is based on the ES findings, has, through Objective 2 and Objective 13, assessed the sustainability implications of biodiversity, flood risk and water quality.	IACC refers the ExA to the LIR in terms of key inter-relationships between biodiversity and other sustainability effects in relation to flood risk management, water quality and sustainable communities, including (by way of example only) : Cemaes bathing water quality and flood risk issues on the A5025 offline improvements,

ExA Ref.	Question	Horizon's Response to Question	IACC Comments / Response
Q17.0.1	The Applicant has made an assessment of the proposed development against National Policy Statements (NPS) EN-1 and EN-6, as well as considering planning policy specific to Wales (PPW and TANS) and local development plan policies which are considered to be relevant to the development. (a) Are the IACC and the Welsh Government satisfied that the Planning Statement addresses all relevant aspects of National Policy Statements, Welsh policy and development plan policies? (b) Are the IACC and the Welsh Government in agreement with the applicant's conclusions that the 'Proposed Development complies with the relevant planning policy tests'?	(a) Although this question is directed to the Welsh Government and IACC, Horizon would like to provide the following response at this stage: The Planning Statement [APP-406] provides an analysis of each element of the Wylfa Newydd DCO Project against applicable NPS policy, and Welsh national and local policy as far as it is relevant. This is supplemented by the Written Representation [WN0902-HZDCO-PAC-REP-00044] submitted by Horizon at Deadline 2 (4th December 2018), which provides a more detailed analysis of the JLDP policies and the 2018 version of the Wylfa Newydd SPG which specifically deal with the Wylfa Newydd Project. Section 5 of the Planning Statement (and supplemented by the Horizon Written Representation) provides a summary of the relevant legislation and policy. This identifies why, in the context of section 105 of the Planning Act 2008, NPS EN-1 and NPS EN-6 continue to form the primary basis for deciding nuclear NSIPs. Whilst Welsh national and local policy are also matters that may be 'important and relevant' in the event of a conflict between these and an NPS, the NPS prevails for the purposes of decision making given the significance of the infrastructure. Horizon consider that all relevant NPS policies are addressed in the Planning Statement. The role of Welsh national policy and local planning policy is addressed in section 5 of the Planning Statement. Horizon consider that the Planning Statement and relevant additional analysis in the Written Representation address Welsh national and local policy in an appropriate and proportionate manner. (b) With regard to part (b) Horizon would emphasise that whilst compliance with Welsh national and local policies may be informative in preparing the IACC's Local Impact Report, and may form important and relevant considerations for Secretary of State, these are not determinative in the context of decisions for national infrastructure.	We refer the ExA to the response of the IACC to this question, including the policy analysis set out in each topic chapter in the LIR..
Q17.0.2	(a) Do the Welsh Government and the IACC accept the need case for the project is made, as set out in the Planning Statement?	(a) Although this question is directed to the Welsh Government and IACC, though Horizon would like to make the following comments at this stage: As set out at chapter 5, of the Planning Statement the principle of the need for new nuclear power stations, and confirmation that this need is urgent, is established in NPS EN-1 and NPS EN-6 ("NPSs"). The December 2017 Ministerial Statement is clear that these statements concerning need for nuclear power	We refer the ExA to the response of the IACC to this question but note that need can only be seen in the context of adverse impacts being reduced as far as possible and benefits being secured to an acceptable level .

	(b) In particular, that in principle, the project conforms with Planning Policy Wales (PPW9)?	continue to be relevant for projects which will deploy after 2025. The analysis undertaken by Oxera (at Appendix G of the Planning Statement) demonstrates that the need for nuclear power is at least as great as when the NPSs were published and probably greater. (b) With regard to part (b), the Planning Statement also considers the relevance of PPW9. As noted at para 5.4.42 those Welsh national policy documents that were adopted prior to NPSs are likely to attract less weight in decisions on nationally significant infrastructure projects, as those NPSs will have already taken such policy into account where appropriate; PPW has been updated five times since the NPSs (Edition 4 was extant at that time). The latest version (Edition 9) does not contain any specific policy relating to nuclear power generation. Whilst it does contain a range of broad objectives that are relevant to the Wylfa Newydd DCO Project (including promoting climate change resilience, protection of the environment and cultural heritage etc.), these were already policy objectives at the time that the NPSs were prepared and therefore, it can be concluded that they have been taken into consideration in their preparation.	
Q17.0.3	Could the IACC provide the following information: (a) The Development Plan policies that they consider relevant; (b) Any Development Plan policies with which the scheme is considered to conflict;	(a) Although this question is directed to the IACC, Horizon would like to make the following comments. The Planning Statement addresses the relevance of Wylfa Newydd specific local policy, and this is dealt with further in Horizon's Written Representation submitted at Deadline 2 (4th December 2018). Whilst NPS EN-1 and EN-6 form the primary basis for deciding DCO applications for nuclear NSIPs, local policy falls under section 105 (2) (c) of the Planning Act 2008 as matters that may be important and relevant. (a) and (b) With regard to parts (a) and (b) of the question, the Planning Statement provides a proportionate assessment of relevant policies in the Joint Local Development Policy ("JLDP") for each component of the Wylfa Newydd DCO Project. Horizon's Written Representation supplements the Planning Statement, providing a targeted analysis of those policies which specifically relate to Wylfa Newydd and related development – namely Policies PS9 (Wylfa Newydd and Related Development), PS10 (Wylfa Newydd – Campus Style Temporary Accommodation for Construction Workers), PS11 (Wylfa Newydd Logistic Centre) and PS12 (Wylfa Newydd Park and Ride and Park and Share Facilities). The Written Representation also provides an updated analysis in relation to the relevant policies in the Wylfa Newydd SPG (adopted 15 May 2018) and which is not reflected in its adopted form in the Planning Statement.	We refer the ExA to the response of the IACC to this question and also to the Policy Framework Chapter of the LIR and individual policy analysis in each LIR Chapter.

	(c) Whether any identified conflict would amount to a reason to refuse consent; and (d) Whether any further mitigation would be required and if it is what this should be?	(c) With regard to part (c) of the question, it is relevant that should the decision maker consider there is any conflict with local policy, this should be considered in the overall planning balance for the project, including the significant weight to be attached NPS EN-1 and EN-6 and to the urgent need for nuclear power and significant benefits of the project. In the context of the urgent need for new nuclear power, Horizon does not believe that any non-compliance with the JLDP would be sufficient to outweigh the its benefits. Horizon considers, however, that the Wylfa Newydd DCO Project is entirely consistent with the JLDP policies which specifically relate to Wylfa Newydd and related development, and has had regard to other development management policies in the plan as far as they are relevant. (d) In response to (d), Horizon considers that the mitigation secured by the DCO, including the draft DCO s.106 agreement, ensures that the development meets the policy tests in NPS EN-1 and EN-6 and addresses any important and relevant considerations in the Development Plan.	
Q17.0.4	Does the Application help deliver the following: (a) Climate Change Strategy for Wales (Welsh Government, 2010); (b) Low Carbon Revolution – Welsh Government Energy Policy Statement (2010); (c) Energy Wales : A Low Carbon Transition; (d) Economic Renewal: A New Direction (Welsh Government, 2010) (e) Cymraeg 2050: Welsh Language Strategy (2017)	The application for development consent delivers the objectives and goals set out in all relevant national and local policy and guidance including the documents referred to in this question. Further details are provided in the policy assessment in the Planning Statement and in the policy specific responses detailed below. (a) and (c) Regarding parts (a) and (c) of the question, the Sustainability Statement [APP-426] section 4.2 provides a list of relevant plans, policies and programmes that Horizon has reviewed to develop the Sustainability Assessment (SA) framework. This list includes the 'Climate Change Strategy for Wales 2010' (CCSW) and 'Energy Wales: A Low Carbon Transition 2012'. The Planning Statement Appendix G provides analysis and evidence prepared by Oxera in relation to the urgent need for low carbon energy such as new nuclear power, over and above that considered in NPS EN-1 and EN-6. This is summarised in section 5.2 of the Planning Statement. The Carbon and Energy Report [APP-423] also refers to the CCSW and the Welsh Government's vision in the CCSW is reflected in Horizon's Corporate Sustainability Policy (see section 2.2). The Energy Wales: A Low Carbon Transition 2012 document was also reviewed by Horizon to inform and set the context for the Carbon and Energy Report as set out in paragraphs 3.3.11 to 3.3.13 of the Carbon and Energy Report. (b) In 'A Low Carbon Revolution - The Welsh Assembly Government Energy Policy Statement 2010' referred to in part (b) of the question, the Welsh Government's key aim is to maximise the short and long-term	

	benefits for Wales' economic and society of the move to a low carbon energy system. While this document is not specifically referred to within the application documentation, the Sustainability Statement recognises the importance of low carbon energy. In addition, the Carbon and Energy Report sets out a number of existing carbon and energy management measures as an inherent element of sustainability which have been incorporated within the Project to date and which will be considered during iterative design development throughout the Project's lifecycle. (d) In response to part (d) of the question, the 'Economic Renewal: A New Direction 2010' is considered in the Environmental Statement chapter B2 [APP-067] in table B2-2 and in the Planning Statement paragraphs 4.2.285 and 4.4.171. The document sets out the role the Welsh Government can play in providing the best conditions and framework to enable the private sector to grow and flourish. The policy outlines the vision for the economic renewal of Wales. The Wylfa Newydd DCO Project will help deliver the five key priorities identified in the document: • investing in high-quality and sustainable infrastructure; • making Wales a more attractive place in which to do business; • broadening and deepening the skills base; • encouraging innovation; and • targeting the business support offered. (e) With regards to part (e) of the question, the Welsh Language Impact Assessment (WLIA) [APP-432 and APP-433] takes into account relevant legislation, national and local planning policy frameworks and strategies that recognise the importance of the Welsh language as a planning matter. These are listed in the WLIA tables A-1 to A-5 in section A.2 which specifically include 'Cymraeg 2050: A million Welsh speakers (2017)'. This document sets out a goal of having a million Welsh speakers by 2050 and that the Welsh language is used in everyday life. The WLIA has carefully assessed the potential project-wide impacts on the Welsh language and culture. It has identified the need for various enhancement and mitigation measures in the Welsh Language and Culture Mitigation and Enhancement Strategy (WLCMES) (contained in Appendix I1 of the WLIA) which will help to deliver the goal in Cymraeg 2050. The mitigation within the WLCMES is proposed to be secured through the s.106 agreement. In conclusion, the Wylfa Newydd DCO project would provide far reaching benefits with the generation of low-carbon electricity through nuclear energy contributing to the Welsh Government's low-carbon energy mix, reducing greenhouse gas emissions in Wales. The Wylfa Newydd DCO Project would also represent a significant investment in high-quality and sustainable energy infrastructure, contributing to the attractiveness of Anglesey to do business and providing employment opportunities for Welsh speakers with the potential to reverse the trend of young people moving away because of a shortage of well paid jobs.	

		These benefits, among others, would aid in meeting the objectives of the Welsh Government outlined in the policy documents that are the subject of this question.	
Q17.0.5	Is the Well-being of Future Generations (Wales) Act (2015) applicable to this application? And if it is, would the Application achieve the well-being goals set out in the Act and if it would not why would it not?	Although this question is directed to the Welsh Government, Horizon would like to make following comments at this stage: The duty introduced by the Well-being of Future Generations (Wales) Act 2015, to take steps to contribute to the achievement of the well-being goals, does not apply directly to Horizon (as it is not a specified public body). The 'specified public bodies' are defined in Section 6 of the Act. The Welsh Ministers, NRW, and IACC are specified public bodies, but the Planning Inspectorate and the Secretary of State are not. Horizon nonetheless wishes to support public bodies in discharging their duties in respect to the Act. Various documents in the DCO application contain information that will assist relevant public bodies in meeting their obligations under the Act in respect of the Wylfa Newydd Project. In particular, the Equality Impact Assessment (EqIA) [APP-434], the HIA Report [APP-429], the Welsh Language Impact Assessment [APP-432 and APP-433], the Carbon and Energy Report [APP-423], and the Sustainability Statement [APP- 426] demonstrate how the Wylfa Newydd DCO Project contributes towards these and other goals in the Act. By undertaking the EqIA, Horizon is seeking to identify how the Wylfa Newydd DCO Project would contribute towards the objectives of 'a more equal Wales' and 'a Wales of cohesive communities'. Table A-6 of the HIA Report sets out links between the HIA to the Well-being Goals of the Well-being of Future Generations (Wales) Act 2015 in order to support public bodies in discharging their duties in accordance with the Act when considering the HIA. The Welsh Language Impact Assessment [APP-432 and APP-433] addresses the goal of the Well-being of Future Generations (Wales) Act 2015 of achieving “<i>a Wales of vibrant culture and thriving Welsh language</i>”. The Carbon and Energy Report (at paragraph 3.3.6) and the Sustainability Statement (at paragraph 7- 1.1.15) note that the Wylfa Newydd DCO Project, has the potential to make a substantial contribution to several of the objectives that support the well-being goals.	The Well Being of Future Generations (Wales) Act (2015) places specific duties upon local authorities in Wales in determining planning applications and in considering and responding to applications for development consent. The IACC's approach to the Wylfa Newydd DCO application takes this legislation fully into account and the IACC contends that, for the purposes of this Examination, it should be an important and relevant matter for the Examining Authority and for the Secretary of State in making his determination. Achievement of well-being goals should depend on 'satisfactory mitigation' and should also include the principles of compensation and enhancement within this definition.
Q17.0.6	The applicant states in the Planning Statement [APP-406] that the Technical Advice Notes (TANs) that were in place prior to the adoption of EN-1 and EN-6 are considered to attract less weight than those that were adopted subsequently. This would include:- TAN 11: Noise (1997)	Although this question is directed to the IACC, Welsh Government and NRW, Horizon would like to provide the following response at this stage. Horizon's position on the role of Welsh national policy in decision making for NSIPs is set out in section 5 (from paragraph 5.4.42) of the Planning Statement. It is not considered that the earlier TANs have less weight per se, but by virtue that NPS EN-1 and EN-6 make it clear that existing TANs were already taken into account when they were prepared.	We refer the ExA to the policy analysis of IACC in response to this question.

	- TAN 15: Development and Flood Risk (2004) - TAN 18: Transport (1997) Can the parties comment on the weight they consider should be given to these documents? Of the relevant TANs that post-date the NPSs are there any aspects of the application that the parties consider fail to conform with or contradict these TANs?		
Q17.0.7	Provide an update on the progress of the Welsh National Marine Plan?	Although this question is directed to the Welsh Government, Horizon would like to provide the following response at this stage. The Welsh Government completed consultation on a draft Welsh National Marine Plan in March 2018. As this document is still draft, there is currently no relevant marine policy document in effect that the decision maker can have regard to in accordance with section 59 of the Marine and Coastal Act 2009.	
Q17.0.8	Can the Welsh Government provide an update on the progress of Planning Policy Wales Edition 10 (PPW10)? Can the applicant advise whether paragraph 5.4.45 of the Planning Statement (APP-406) needs to be updated to reflect the policy contained within the emerging PPW10?	The Planning Statement notes (in the footnote to paragraph 5.4.41) that a Draft PPW: Edition 10 was published on 12th February 2018 and subject to consultation until 18th May 2018. PPW10 remains in draft form and, like PPW9, does not contain any specific policy relating to nuclear power generation. Whilst (like PPW9) the draft contains a range of broad objectives that are relevant to the Wylfa Newydd DCO Project (including promoting climate change resilience, protection of the environment and cultural heritage etc.), these were already policy objectives at the time that NPS EN-1 and EN-6 were prepared and therefore, it can be concluded that they have been taken into consideration in the preparation of the NPSs. Horizon submitted a response to the Welsh Government's consultation on draft PPW 10. In this representation, Horizon noted that the policies in PPW may be informative in identifying potential for adverse effects. These representations, among other things, noted the need for greater emphasis on a strong economy in promoting well-being goals and ensuring that there was not greater emphasis on environmental well-being goals than those which seek to encourage sustainable economic growth. As clarified in Horizon's Written Representation submitted at Deadline 2 (4th December 2018), it is not necessary to update the Planning Statement further in light of the draft PPW10, particularly as it does not contain any policies that specifically relate to nuclear power generation and because the consultation draft is still at a very early stage.	PPW 10 has been published. The IACC consider that the planning statement should be updated to address the central role which has been given to well-being in that new edition and provide Horizon's assessment of how they comply with the well-being driven revisions. Given the life of the propped development, the effects will be felt over multiple generations. It is accordingly not disproportionate to ask the applicant to give a meaningful update addressing the now current Welsh policy which reflects welsh legislation which was already in place when the application was developed and to which the applicant was specifically asked to have regard to.

Q17.0.9	Applicant - in paragraph 5.4.51 and 5.4.5-5.4.7 of the Planning Statement you state that parts of the revised SPG are, in your opinion, inconsistent with JLDP and advice from the Planning Inspectorate on SPG's for NSIPs. Can you: (a) Provide further explanation of where you consider the draft SPG is inconsistent with these documents?	This response addresses parts (a), (b) and (c) of the question addressed to the Applicant. (a) Part (a): The comments made in the Planning Statement at paragraph 5.4.1 reflected the January 2018 draft of the SPG. Horizon's representations to the SPG consultation set out Horizon's view on the areas of inconsistency between the draft SPG and the JLDP. Following consultation on the draft SPG, IACC amended the SPG prior to adoption through a series of Focused Changes (May 2018) and adopted the SPG in May 2018. 1.1.1 Given the SPG was in draft form at the time of writing the Planning Statement, the analysis within the appendices relates to the 2014 SPG which, following adoption of the new SPG in May 2018, is now superseded. Horizon's Written Representation, submitted at Deadline 2 (4 December 2018), provide an updated in relation to the new Wylfa Newydd SPG. As the Examining Authority will see from Horizon's representation to the SPG consultation, Horizon's principal concern was that the draft SPG appeared to give a preference towards temporary worker accommodation being located on consented sites in Holyhead, whereas Policy PS10 in the JLDP guided the Applicant to a sequential approach, where existing accommodation and provision of permanent accommodation capable of re-use are considered first, before considering temporary worker accommodation (see analysis in the Planning Statement and Written Representation). The JLDP also gives equal preference to temporary worker accommodation being located on the Site Campus and on sites located adjacent or well related to settlements, which Horizon did not consider was clear in the draft SPG.	(a) The Wylfa Newydd SPG does not give preference towards temporary worker accommodation being located on Land and Lakes. The Wylfa Newydd SPG provides both thematic and locational guidance on the way in which the policies within the JLDP will be applied. It does not direct development to specific locations or sites, it provides guidance on broad 'Areas of Search' as will be explained below. In relation to TWA, Guiding Principle GP10b provides guidance for campus style temporary construction workers accommodation outwith the main Wylfa Newydd site. This guidance specifically states "proposals for campus style temporary construction worker accommodation must accord with the sequential approach to preferred development locations and other provisions in JLDP Policies PS9 and PS10". The Wylfa Newydd SPG is split into 'Thematic' and 'Site Specific' sections. GP1 to GP26 deals with 'Thematic' matters and Section 5 onwards (GP27 – GP36) provides locational guidance. Within each of the 'Locational Guidance Areas of Search' (e.g. Holyhead, Llangefni, Amlwch etc) there is guidance on TWA in accordance with the sequential approach as defined in Policy SP9 and PS10 of the JLDP. GP34 provides locational guidance for Holyhead. Within this section, reference is made to Land and Lakes under the heading 'Opportunities' (paragraph 5.2.36). This states that "in accordance with the JLDP requirement to use consented sites, given that all of the impacts of such sites have been assessed and (with mitigation) deemed acceptable, it remains the County Council's view that the consented Land and Lakes development is a preferred opportunity to deliver construction worker accommodation that provides a lasting legacy benefit beyond the construction period of Wylfa Newydd (in the form of housing, major tourism development, employment and community facilities and services). This does not provide preference to Land and Lakes, it simply outlines the opportunity which existing within this 'Area of Search' in accordance with JLDP requirement to consider sites with existing consent. In direct response to Horizon's concerns on Guiding Principle GP10b, the IACC developed a new Guiding Principle (GP28b) which provides guidance specifically (and only) for the on site campus. This, along with every other locational guidance in the SPG, provides guidance on TWA and how the policies of the JLDP should be applied in that area. It is therefore entirely consistent with the JLDP and provides no preference for one site over another. (b) The Wylfa Newydd SPG is consistent with National, Regional and Local planning policy (including the NPS). The IACC are therefore of the view that the Wylfa Newydd SPG is an important and relevant consideration in the determination of the DCO. The JLDP contains specific policies in relation to workers accommodation, park and ride and logistic centre. Horizon inputted into the drafting of these policies and the Wylfa Newydd SPG is consistent with the JLDP. It is therefore not 'too prescriptive' and does not 'curtail the choice of options' for the location of associated developments. The reference by Horizon to paragraph 3.4 of Advice Note Two is therefore unnecessary. The Wylfa Newydd SPG is not only applicable to Horizon, but is also relevant to any other third party developer or applicant. The Wylfa Newydd SPG provides detailed thematic and locational guidance to influence and inform any future application which may be made in relation to Wylfa Newydd and therefore needs to be able to respond to a wide range of potential applications. (c) The IACC have provided a response to this question

	(b) Advise whether the SPG and relevance of SPG on pages 60 and 61 of the Planning Statement needs to be updated to reflect any progress made on the adoption/approval of the SPG? (c) In light of the above what weight do you consider should be given to the SPG? IACC – Please respond to the applicants comment with regards to the alleged inconsistencies between the SPG and the	(b) Part (b): Horizon's Written Representation provides an update on the SPG to reflect the adoption of the May 2018 version. The position expressed at paragraph 5.4.6 and 5.4.7 of the Planning Statement is still fully applicable. (It should be noted that there is an error in paragraph numbering of the Planning Statement which will be addressed in the errata schedule, but for the meantime Horizon has referred to the paragraph numbers as they are written in the Planning Statement. (c) Part (c): Whilst the 2018 SPG may be an 'important and relevant' consideration in the context of s105 of the 2008 Act (and/or inform the Local Impact Report) if there is any conflict between a designated NPS and any local planning document, the policies in the NPS will prevail. NPS EN-1 and EN-6 remain the primary policy basis for the determination of applications for development consent for nuclear power. Horizon therefore considers that weight should be given to the 2018 SPG to the extent that it accords with NPS EN-1 and EN- 6 and local policy in the JLDP. To this extent, there is some helpful guidance in the SPG on considerations	

	JLDP and advice provided in the PINS Advice Note 2? IACC: (a) Provide an update on the draft Wylfa Newydd Supplementary Planning Guidance 2018 (the SPG) that is referred to in paragraphs 5.4.48 to 5.4.1 of the Planning Statement [APP-406]? (b) Provide a copy of the most recent version of the SPG and indicate what weight you consider it should be given. (c) If the SPG has been adopted, outline what you consider are the implications for the Application?	that would apply to the Local Authority's consideration of the Site Campus in their Local Impact Report, which generally reflect the considerations in the NPS with regard to environmental impact. Given that Horizon's site selection process was carried out prior to the publication and adoption of the 2018 SPG, Horizon is clear in the Site Selection Reports [APP-436 to APP-442] that the guidance in the 2018 SPG was therefore not informative in the selection of sites, but Horizon's view is that the Associated Development sites do accord with the 2018 SPG. Please see the updated analysis in Horizon's Written Representation submitted at Deadline 2 (4 December 2018).	
Q17.0.10	Please respond to the suggestion made in Relevant Representations (including RR-004 and Clare RR-069) that in the context of National Policy Statement EN-5 section 2.3, the generating station and any associated new grid connection should be the subject of a single application.	While section 2.3.1 of NPS EN-5 makes the statement that where reasonably practicable, applications for generating stations and associated infrastructure should be contained in a single application, section 2.3.2 of NPS EN-5 goes on to state: <i>"However, particularly for generating stations and the related electricity networks, this may not always be possible or represent the most efficient approach to the delivery of new infrastructure."</i> The electronic transmission system to connect Wylfa Newydd Power Station to the national grid is dealt with by the 'North Wales Connection' project, which is the subject of a separate DCO application by National Grid Electricity Transmission Plc which was accepted by the Planning Inspectorate on 4 October 2018. Horizon also notes that the same approach has been taken by other projects, such as in respect of the Hinkley Point C Nuclear Power Station and Hinkley Point C Connection applications. Paragraph 4.9.1 of NPS EN-1 states that <i>"it is for the applicant to ensure that there will be necessary infrastructure and capacity within an existing or planned transmission or distribution network to accommodate the electricity generated"</i>. Horizon considers that, together with the North Wales Connection Project, the DCO application includes the necessary infrastructure and capacity to accommodate the generation anticipated by the Project. Paragraph 4.9.2 in NPS EN-1 states that the effects of any necessary grid connection can be assessed separately, though where there are separate applications the first should contain "some information" about	

		the second. The Electricity Grid Connection Statement [APP-403] provides further details on the grid connection for the Wylfa Newydd DCO Project. The cumulative effects of the Wylfa Newydd DCO Project together with the North Wales Connection Project have been assessed and are reported in volume I, chapter 5 Inter-project cumulative effects of the Environmental Statement (ES) [APP-388]. The DCO application for the North Wales Connection Project submitted by National Grid Electricity Transmission Plc also includes a cumulative effects assessment in its Environmental Statement [APP-292]. The cumulative effects assessments both assess the situations in which both projects affect the same receptors.	
Q17.0.1 1	Do the parties consider that within the Welsh national context, there are any other present or forthcoming future policies, strategies or initiatives that are relevant to the examination and should therefore be considered by the ExA during the examination?	Although this question is directed to the Welsh Government, IACC and NRW. Horizon is not aware of other present or forthcoming future policies, strategies or initiatives that are relevant to the examination. Horizon do note the emerging National Development Framework (NDF) which underwent Issues, Options and Preferred Option consultation in April 2018. Consultation on a draft NDF is not scheduled until mid – late 2019. Horizon do however draw the Examining Authorities attention to the objectives of the NPF in relation to Climate change, decarbonisation and energy, which are: • To enable the transition to a <i>low-carbon</i> economy. • To enable management of and adaption to the consequences of climate change. • To support decarbonisation in Wales and help deliver the Welsh Government's greenhouse gas emissions and renewable energy targets. Horizon would like to draw the Examining Authority's attention to paragraph 1.3.16 of the Planning Statement which quotes paragraph 4.1.5 of NPS EN-1 which confirms that in the event of a conflict between any other documents and an NPS, the NPS prevails for purposes of decision making given the national significance of the infrastructure. The December 2017 Ministerial Statement confirms that NPS EN-1 and NPS EN-6 should continue to be given significant weight in respect of projects that will deploy post-2025). Therefore, whilst other and emerging policies, strategies or initiatives may form important and relevant considerations, NPS EN-1 and NPS EN-6 together continue to form the primary basis for deciding applications for nuclear NSIPs.	We refer the ExA to the IACC policy analysis in response to this question.
Q17.0.1 2	Paragraph 3.14.1 of National Policy Statement EN-6 notes that electricity transmission issues were not taken into consideration in the Strategic Siting Assessment ('SSA'). Noting the context provided by Application Reference Number:	Paragraph 3.14.2 of NPS EN-6 states that "<i>When considering a development consent application pursuant to this NPS, the IPC should refer to Section 4.9 of EN-1 in respect of the grid connection</i>". Paragraph 4.9.1 of NPS EN-1 states that "<i>it is for the applicant to ensure that there will be necessary infrastructure and capacity within an existing or planned transmission or distribution network to accommodate the electricity generated</i>".	

	7.1 – Electricity Grid Connection Statement [REF] and the network transmission reinforcement works summarised in section 4 of that document, what impacts reasonably could be expected to result from these associated works? (CS)	Paragraph 4.9.2 in NPS EN-1 states that the effects of any necessary grid connection can be assessed separately, though where there are separate applications the first should contain “some information” about the second. The Electricity Grid Connection Statement provides further details on the grid connection for the Wylfa Newydd Project (known as the ‘North Wales Connection’ project). The cumulative effects of the Wylfa Newydd DCO Project together with the North Wales Connection Project have been assessed and are reported in volume I, chapter 5 of the Environmental Statement (ES). The DCO application for the North Wales Connection Project submitted by National Grid Electricity Transmission Plc also includes an EnS which presents the outcome of the Environmental Impact Assessment for that project. A cumulative effects assessment is included in the North Wales Connection Project ES. The cumulative effects assessments in both the Wylfa Newydd ES and the North Wales Connection ES assess the situations in which both projects affect the same receptors.	
Q17.0.1 3	Paragraphs 1.6.47-1.6.49 of Application Reference No.: 6.4.1 ES Volume D – WNDA Development D1 – Proposed Development [REF] indicate that four circuits would link to the existing 400kV connection. Paragraph 1.6.47 highlights the responsibility for the substation, including wider network reinforcements, lies with National Grid. However (and in the absence of relevant actions or decisions taken by others), do the demands on the transmission network from other energy developments (either existing or planned) on or around the island have any potential impacts on the deliverability of this proposal? (CS)	Horizon has entered into a Bilateral Connection Agreement with National Grid [A/NP/08/1-96EN(0)] which sets out the terms on which the project will connect to the transmission system. National Grid has certain obligations under its transmission licence, including maintaining the transmission system for both existing and future transmission systems users. The Bilateral Connection Agreement sets out the transmission system modifications that National Grid considers are required and the demands on the transmission system from other energy developments are not considered to have any material potential impacts on the deliverability of this Project.	
Q17.0.1 4	Several references have been made regarding the need for the application to deliver a long term legacy for Ynys Môn. Can the IACC explain where this aspiration is set out in adopted policy such as the JDLP and whether in their opinion the proposal would comply with such a policy and if not, why not?	In order to assist the Examination Authority's attention is drawn to the Written Representation which has been submitted by Horizon at Deadline 2 (4 December 2018). This Written Representation provides a summary of long term legacy benefits of the Wylfa Newydd DCO Project as set out in the DCO application and the anticipated Draft DCO s.106 agreement. These represent benefits of the Wylfa Newydd DCO Project which weigh in its favour in the planning balance.	We refer the ExA to the IACC policy analysis in response to this question.

ExA Ref.	Question	Horizon's Response to Question	IACC Comments / Response
Q18.0.1	Provide the vessel simulation study referred to in APP-080 and referenced in the Navigational Risk Assessment APP-235.	The vessel simulation study referenced in the Navigational Risk Assessment is appended as FWQ-Q18.0.1_APP1.	
Q18.0.2	Is the Marine Works Permanent Aids to Navigation Plan APP-017 the plan that has been approved by Trinity House? If not, what is the status of the plan and what plan has been approved by Trinity House?	Trinity House has been consulted during the process of designing the Aids to Navigation (AtoN). The Marine Works Permanent Aids to Navigation Plan [APP-017] has been amended during this process and the latest version reviewed by Trinity House. The plan shows AtoN type, locations and light characteristics. Captain Trevor Harris, Trinity House's navigation manager has confirmed that: 'Trinity House has no concerns regarding the suggested changes and the reasoning behind them'. Trinity House in its role as General Lighthouse Authority is a statutory consultee for the Marine Licence and draft DCO application. There will be continued consultation with Trinity House on any AtoN plan changes. Formal approval by Trinity House of the Marine Works Permanent Aids to Navigation Plan will be requested once the design is finalised. The approved plan will be submitted into the examination once this approval has been obtained.	
Q18.0.3	Confirm the width of the channel at the entrance to the harbour.	The width of the channel at the entrance of the harbour between the lateral marks identified on the plans in [APP-017] is 100.0 m.	
Q18.0.4	What is the maximum size of vessel in terms of tonnage, length and draft that can berth at the harbour? Please signpost within the existing documentation or provide details of the modelling that has been undertaken in respect of these vessels.	Paragraph 1.7.37 of Chapter D1, of the Environmental Statement [APP-120] confirms that bulk vessels of up to approximately 8,000 deadweight tonnage will use the harbour and have been assessed in the Environmental Statement. Horizon envisages that these bulk vessels, with length and draft of up to approximately 120m and 7m respectively, will use the berth. Typically, the Ro-Ro vessels would take the form of barges, sized to suit the dimensions of the individual AILs.	
Q18.0.5	What allowance has been made for unloading berthed vessels and ro-ro vessels? Please signpost within the existing documentation or provide details of where the modelling that has been undertaken in respect to	Modelling completed for the draft DCO application has not examined the time required for unloading vessels. However, Horizon has made qualitative assumptions for unloading berthed vessels and ro-ro vessels in the draft DCO application. Assumptions used are in the order of 2 to 4 hours depending on the type of materials and vessels, with the full circle of a vessel entering and leaving the harbour typically being in the order of 8 hours. Paragraph 1.1.4 of the Request for Non-Material Change No 2 (Marine Vessel Movements) [AS-013] states that the change proposed is to increase the upper daily limit from four movements per day (two	

	unloading.	vessels) to 16 movements per day (eight vessels) within the total vessel movements described and assessed in the Wylfa Newydd DCO application. This is based on each vessel taking approximately 8 hours for entering the harbour, berthing, unloading and departing during busy times.	
Q18.0.6	Is the Applicant intending to apply the International Ship and Port Facility Security Code (the ISPS Code)? If so, provide details. If not, why not?	Horizon intends to apply the International Ship and Port Facility Security Code to the Marine Off-Loading Facility (MOLF and associated vessels). The ISPS Code applies to vessels of 500 gross tonnage (and larger) on international voyages and the port facilities serving such vessels. It sets out minimum security arrangements for certain parties including shipping personnel and port facilities (with which Horizon will comply) in order to "detect security threats and take preventative measures against security incidents".	IACC has no comment on the answers given to Questions 18.0.6 to 18.0.12 and 18.0.19 at this stage other than to reserve the ability to comment on any overlap with its responsibilities for existing and future harbour management, including increased costs in discharging those duties arising from the WN development.
Q18.0.7	Is the Applicant intending to apply to become a Port Security Authority? Port Security Regulations 2009 If so, provide details. If not, why not?	Horizon intends to apply to become a Port Security Authority. That application will be made in due course in accordance with the requirements of the Port Security Regulations 2009.	IACC has no comment on the answers given to Questions 18.0.6 to 18.0.12 and 18.0.19 at this stage other than to reserve the ability to comment on any overlap with its responsibilities for existing and future harbour management, including increased costs in discharging those duties arising from the WN development.
Q18.0.8	What area would be covered by the ISPS Code?	The area covered by the ISPS Code is the ship/port interface; this would include any areas such as anchorages, waiting berths and approaches from seaward, as appropriate; these areas (Bulk & Ro-Ro MOLF), are shown on Marine Works Site Layout Drawing WN0902-HZDCO-MRN-DRG-00004; page 7 of Marine Works; [APP-017] In addition the ISPS Code will apply to all important assets and infrastructure inside the port perimeter fence (exact location yet to be defined); that are critical to the port facility as well as those areas or structures that, if damaged could cause significant loss of life or damage to the port facility environment.	IACC has no comment on the answers given to Questions 18.0.6 to 18.0.12 and 18.0.19 at this stage other than to reserve the ability to comment on any overlap with its responsibilities for existing and future harbour management, including increased costs in discharging those duties arising from the WN development.
Q18.0.9	Who would the Port Security Officer be?	Horizon intends to appoint an experienced specialist contractor to manage the operations of the port. The Port Security Officer will be appointed by that contractor.	IACC has no comment on the answers given to Questions 18.0.6 to 18.0.12 and 18.0.19 at this stage other than to reserve the ability to comment on any overlap with its responsibilities for existing and future harbour management, including increased costs in discharging those duties arising from the WN development.
Q18.0.10	Where is the Port Security Plan?	Horizon intends to appoint an experienced specialist contractor to manage the operations of the port. The Port Security Plan will be developed in conjunction with the contractor following the completion of the Port Facility Security Assessment (PFSA) in accordance with the ISPS code and the issue of the PFSA report by the Department for Transport Maritime Security Division.	IACC has no comment on the answers given to Questions 18.0.6 to 18.0.12 and 18.0.19 at this stage other than to reserve the ability to comment on any overlap with its responsibilities for existing and future harbour management, including increased costs in discharging those duties arising from the WN development.

Q18.0.11	How are the other requirements of the Port Security Regulations 2009 being adhered to?	Section 4.7 in Wylfa Newydd CoCP [APP-414] states Horizon’s commitment to securing all of the construction sites including the port. Section 4.7 provides the high level security requirements and measures that Horizon will put in place. These are applicable to the port as well. More details of specific compliance with the other requirements of the Port Security Regulations 2009 are currently under development. Horizon intends to appoint an experienced specialist contractor to manage the operations of the port. Measures to meet other requirements of the Port Security Regulations 2009 will be developed in conjunction with the contractor as described in the response to FWQ 18.0.10.	IACC has no comment on the answers given to Questions 18.0.6 to 18.0.12 and 18.0.19 at this stage other than to reserve the ability to comment on any overlap with its responsibilities for existing and future harbour management, including increased costs in discharging those duties arising from the WN development.
Q18.0.12	Would the full extent of the Harbour Limits be a prohibited area? If so, when, how and by whom would this area be patrolled?	Horizon understand the term “prohibited area” is intended to refer to “restricted area” as that term is use in the Port Security Regulations 2009. [A restricted area is an area that is clearly marked and signed, and in respect of which access is limited and controlled]. Horizon does not intend that the full extent of the harbour limits as described in the draft DCO [APP- 029] will be a restricted area. The Port Security Plan that will define the extent of the restricted area and which will set out details of patrol arrangements will be developed in due course in conjunction with the contractor as described in response to FWQ18.0.11 .	IACC has no comment on the answers given to Questions 18.0.6 to 18.0.12 and 18.0.19 at this stage other than to reserve the ability to comment on any overlap with its responsibilities for existing and future harbour management, including increased costs in discharging those duties arising from the WN development.
Q18.0.13	What is the purpose of the layby berth? Why would this be necessary?	The purpose of the layby berth is described in Section 1.7.17 of ES Volume D - WNDA Development D1 - Proposed development: “In addition to the bulk and Ro-Ro quays, the marine facilities would also include a temporary layby berth that vessels could be moored against for short-term waiting until the destination bulk or Ro-Ro berth is available. The berth would be located at the southern end of the western breakwater and consist of a series of berthing and mooring dolphin structures. The berth is remote from the land and would be accessed by small boats.” The layby berth would provide an alternative to a vessel anchoring if the berth is not available on arrival. This would provide time efficiencies as suitable anchoring locations are not available in the immediate area.	
Q18.0.14	What provision has been made for Pilot Boats and where would these Pilot Boats be based?	Paragraph 1.7.18 of the Chapter D1 of the Environmental confirms that a pontoon would be required for mooring tugboats, pilot vessels, safety boats and other small workboats during the construction phase, and that it would be a floating structure located between the Ro-Ro berth and the Cooling Water intake structure. Table 2-3 of the Request for Non-Material Change (Marine Vessel Movements) [AS-013] sets out the updated expected frequency for pilotage requirements.	
Q18.0.15	What are the maximum wind and wave heights that have been modelled in the tow survey? Provide a copy of the report.	A tow survey has not been completed for the planned towage of barges associated with the Wylfa Newydd DCO Project. Once a contractor is appointed to carry out towage operations, a tow survey will be carried out by an approved authority (typically a classification society, i.e. a non-governmental organisation that establishes and maintains technical standards for the construction and operation of ships and offshore structures).	

		The tow survey will be carried out for two reasons, to provide safety limits for towage operations (i.e. maximum wind conditions and significant wave height, i.e. the mean wave height, (trough to crest), of the highest third of the waves) and as a warranty survey to limit underwriter exposure to risk. The tow survey cannot be carried out until a contractor is appointed as the specific towage equipment, setup, tug characteristics and tug certificates need to be checked as part of the process.	
Q18.0.16	Provide details of the protective layer over the shore line referred to in 11.4	The Marine Works sub-CoCP [APP-416] - paragraph 11.4 Shoreline Protection states that measures could include placing a protective layer over the shoreline prior to temporary construction. This work is a temporary construction requirement and will be the responsibility of Horizon's marine contractor to design and install as part of the causeway construction activity. Horizon will require the contractor to provide details of the final design for review prior to commencement of the works. The protective layer will be designed to facilitate the removal of the temporary section of the causeway construction with minimal resulting damage to the underlying shoreline rock strata, a key characteristic of the seascape character in this location within the AONB. While the final construction solution for the design and depth of the protective layer will be developed by Horizon's marine contractor subject to Horizon's review as described above, the fundamental objective will be to deliver a solution that enables the protective layer of materials placed directly on top of the shoreline to be removed using excavation techniques that will not result in damage to the underlying rock. It is envisaged that this could involve techniques such as vacuum excavation to remove the designed protective sand / aggregate layer. In this solution it is usual practice to install a physical barrier such as a Geotextile product before placement of the protective materials and subsequent main construction material.	
Q18.0.17	What are the security arrangements proposed for the harbour?	Horizon will implement security arrangements for the harbour that are appropriate and proportionate to the security threats identified as part of the Port Facility Security Assessment (PFSA) which will be conducted by the Department for Transport Maritime Security Division. The detailed arrangements (based on the PFSA), will be described in the Port Facility Security Plan (an Official Sensitive document once completed) that will be approved by the Department for Transport Maritime Security Division prior to the operation of the MOLF.	
Q18.0.18	What happens to the harbour after completion of the proposed works? Would it be fenced off?	During Power Station operation the harbour will remain operational for example, for service vessels to service navigational aids, or remove debris and for security and safety purposes. More specifically in respect of the MOLF, Section 15.5.46 of ES Volume D - WNDA Development D15 - Shipping and navigation [APP-134] states:	

		“During the operation of the Power Station, there is currently no identified operational requirement to use the MOLF. However, it would be subject to routine inspection to ensure it was structurally intact such that it did not present a health and safety hazard or operational hazard to the Power Station. Should it be decided to retain the MOLF during the Power Station operations, then it is currently assumed that only one vessel per year would use the MOLF during operation. As such, any potential effects would be addressed by the mitigation already in place from the Main Construction, resulting in negligible effects. In the context of the assessment such low-level use of the MOLF can be scoped out from further consideration, especially since relevant mitigation measures already in place for the construction phase would be adopted.” Section 1.7.67 of 6.4.1 ES Volume D - WNDA Development D1 - Proposed development states: “All or part of the MOLF (zone 1F-7) may be retained for use during Power Station operation. Whilst it is not expected that the bulk quay would be required, the Ro-Ro quay may be used for delivery of replacement parts, which are AIL (to avoid road transport). It is currently assumed that only one vessel per year would use the MOLF during operation.” During the operation of the Power Station the intent is to secure the harbour area from public access for safety and security purposes. This will require the installation of fences and gates.	
Q18.0.19	How do the WNDA and the Harbour interact? What are the security arrangements and lines of jurisdiction?	The Wylfa Newydd Development Area is defined in ES Volume D - WNDA Development D1 - Proposed development; Application Reference Number: 6.4.1 as: the indicative areas of land and sea (approximately 409 hectares) including the areas surrounding the Power Station Site that would be used for the construction and operation of the Power Station, the Marine Works, the Site Campus and other on-site development. The harbour is part of the WNDA and comprises of the area shown in Marine Works plans and drawings, drawing number WN0902-HZDCO-MRN-DRG-00034 MARINE WORKS STATUTORY HARBOUR AUTHORITY BOUNDARY. During construction, the day-to-day management of the harbour will be led by the construction team within the WNDA which will also manage all of the construction activity on the main site. The construction team will identify any bulk material or loads that are required and these will be scheduled via the MOLF to support the construction schedule. The Port management company will be contracted to support Horizon and the construction team. The security of the harbour will be in accordance with the requirements of the ISPS Code and described in the approved Port Security Plan; which will be developed subsequent to a Port Facility Security Assessment report being completed by the Department for Transport Maritime Security Division; as described in responses to FWQ18.0.10 and FWQ18.0.17.	IACC has no comment on the answers given to Questions 18.0.6 to 18.0.12 and 18.0.19 at this stage other than to reserve the ability to comment on any overlap with its responsibilities for existing and future harbour management, including increased costs in discharging those duties arising from the WN development.

		The security of the main construction site (which is the area within the WNDA, including the future Nuclear Licensed Site, but excluding the mounding areas and site campus) that will be completely enclosed within the construction security fence will be in accordance with the requirements of the Nuclear Industries Security Regulations 2003 (NISR). The security arrangements will be described in the Site Security Plan which will be approved by the Office for Nuclear Regulation Civil Nuclear Security, prior to the grant of a Nuclear Site Licence. Horizon will be the dutyholder under the ISPS Code and the NISR and will be accountable for all aspects of security in both the harbour and the main construction site. The boundary fencing between the two areas will delineate the areas in which the relevant security regulations will apply. The full detail of the boundaries of these two areas and any interactions between the areas will be described in the respective Port Facility Security Plan and Site Security Plan once they have been developed by Horizon and approved by the regulators.	
Q18.0.20	Provide further details of the 8 vessel movements referred to in the change request.	The change proposed in the Request for Non-Material Change (Marine Vessel Movements [AS-013] is to increase the upper daily limit on vessel movements from four movements per day (two vessels) to 16 movements per day (eight vessels) but the total number of vessel movements does not change from that assessed in the draft DCO application. These changes are proposed to maximise use of the Marine Off- Loading Facility (MOLF) at certain times and to allow for programme recovery following delays (for example after bad weather). No new or different likely significant environmental effects are predicted as a result of the proposed change.	
Q18.0.21	What is the purpose of the RoRo and why is this needed?	The Ro-Ro berth is part of the MOLF along with the two bulk berths. The purpose of the Ro-Ro berth is described in Section 1.7.16 of ES Volume D - WNDA Development D1 - Proposed development: “The Ro-Ro quay would extend eastwards from the southern end of the bulk quay (i.e., towards the shoreline) and comprise a quayside used primarily for Ro-Ro vessels and Lift-on Lift-off (Lo-Lo) vessels, incorporating a ramp for ship-to-shore transfer of AILs and Lo-Lo of equipment and materials by cranes. The purpose of the Ro-Ro is to allow access for shore side craneage and for plant to be taken off the vessels under their own power. This means that large plant and AILs will not need to be transported to site via road. As stated in paragraph 5.4.12 of the Wylfa Newydd CoCP. The MOLF is expected to receive at least 60% of the total material required for the construction of the Wylfa Newydd DCO Project, once it is operational (although Horizon would seek to increase this amount up to 80% where possible). This will limit the amount of material required to travel by road. Therefore, the use of the Ro-Ro will support this commitment in the Wylfa Newydd CoCP.	

Q18.0.22	What is the mix of vessels proposed for using the harbour and where has this been modelled?	The harbour will be used by bulk vessels, lift on-lift off (Lo-Lo) vessels and roll on-roll off (Ro-Ro) barges. The bulk vessels will be transporting concrete and aggregate via the two bulk berths. The Lo-Lo and Ro-Ro vessels will be transporting plant and abnormal indivisible loads (AILs) via the Ro-Ro berth. Section 15.4.20 of ES Volume D – WNDA Development D15 – Shipping and navigation provides the expected number of each type of vessel: “There would be approximately 1,571 bulk vessels and 330 Abnormal Indivisible Load barges, plus approximately 825 barges for both transporting dredge material to Disposal Site and importing rock material. These shipping numbers are expected to occur over approximately an 80-month period. Each vessel would have two movements associated with it.” Section 1.7.37 of ES Volume D – WNDA Development D1 – Proposed development expands planned vessel movements with: “It is expected that the MOLF would operate on a 24-hour basis, 365 days of the year, used by bulk Lo-Lo and Ro-Ro vessels. Typically, the bulk vessels would take the form of approximately 8,000 deadweight tonnage aggregate bulk carriers, plus up to approximately 5,000 deadweight tonnage cement bulk carriers and approximately 1,500 deadweight tonnage general cargo/Lo-Lo ships (for plant, equipment, rebar, AILs and cement in tanktainers). Typically, the Ro-Ro vessels would take the form of barges, sized to suit the dimensions of the individual AILs. These expected numbers form the basis of the assessment in respect to the mix of the vessels. Section 2.2.3 of Request for Non-Material Change no.2 Marine Vessel Movements [AS-013] states “In order to maximise the use of the MOLF, Horizon believes that there is a need to change the upper daily limit of vessel movements up to a peak of 16 movements per 24-hour period (eight movements per 12-hour period). A vessel movement is treated as one trip in to or out of the MOLF. This peak will be constrained by berth availability and it is assumed all three berths and the lay-by berth would be available.”	
Q18.0.23	How and from where would Pilots and the Harbour Master be recruited and when and how would they be trained? What steps would be undertaken to secure retention of these personnel?	Horizon intends to appoint an experienced specialist contractor to manage the operations of the port. Horizon will work closely with that contractor to develop appropriate recruitment, training and retention policies in relation to pilots and other harbour staff.	
Q18.0.24	When considering the proposed MOLF did the applicant consider using the existing harbour facilities at Holyhead and if they did why was this not taken forward as an option?	Horizon did consider using the existing harbour facilities at Holyhead, but Horizon decided not to take this option forward because those facilities are not suitable for Horizon's purposes. The Port of Holyhead was discounted as the facilities at that location are limited and operational constraints would restrict shipping and offloading. As a result, Abnormal Indivisible Loads (AILs) would still	We refer the ExA to the Councils Economic Development – Supply Chain LIR Chapter, specifically paragraph 1.5, where the Council confirms that the Port of Holyhead can play a significant and important role in the Wylfa Newydd Project. The location necessitates that it must become an active player in the supply chain and should Horizon demonstrate their commitment to the area the outputs could result in: a) Retaining and maximises the benefits of major investment such as the Wylfa Newydd development. b) A positive impact across the whole of North Wales, supporting future manufacturing and supply chain growth. The Port of Holyhead therefore provides jobs, develops opportunities for businesses and helps sustain services in the local economy, while providing access to markets for companies across Wales and the wider UK. By becoming part of the Wylfa Newydd supply chain it can also ensure a legacy for the area into the future. Stena Line, the owners, operators of the Port of Holyhead, Welsh Government and the IACC have already committed and invested significant sums for the various surveys and studies to ensuring the port can maximise the Wylfa Newydd development opportunities. This is an indication of partner's commitment to the scheme, and it now requires Horizon's commitment so that further investment and “future proofing” can take place. The s106 obligations should include the ability to support further work to support this objective.

	need to transit the route to the Wylfa Newydd Development Area, which would lead to a significant impact on the local community and environment due to the large number of vehicle movements required. Therefore, Horizon concluded that a MOLF would be more practical and have the least environmental impact overall. The basis for this decision is the Horizon study which reviewed the potential alternative methods of transporting construction materials including sea and rail via Holyhead, then by road to site (which is set out in the Appendix F - Integrated Traffic and Transport Strategy to Volume C of the Environmental Statement [APP-107]). Pertinent extracts from the study are below: a. The MOLF is an essential part of the freight transport infrastructure to import major reactor components, classed as AILs. <i>“Alternative routing for a large proportion of these components is not possible due to constraining factors on the road network which provides connections to port or rail terminal facilities”</i> (paragraph 10-1.1.2 in the Appendix F of ES Appendix C2-4 [APP-107]. b. It is estimated that up to 800 AILs would arrive via the MOLF (section 7.6 of the Appendix F of ES Appendix C2-4 [APP-107]. Transporting bulk materials by road would add substantial volumes of lorries to the road network; it is estimated that around 238,000 HGV deliveries would be required over the duration of the project to deliver the equivalent of the materials that could be delivered to the MOLF, once the MOLF is complete (paragraph 10-1.1.9 of Appendix C2-4 [APP-107]. Based on the proposed design/ construction, not all AILs would fit on the roads, so redesign would be necessary and more time to build up modules on site, as well as the provision of sufficient space. Using Holyhead harbour for importing bulk materials and AILs would extend the construction schedule beyond 2030 and so not deliver the Project need; the urgent need for a number of new nuclear power stations at identified sites (see Wylfa Newydd Planning Statement [APP-406]. In addition, for transporting AILs, it is Government policy to avoid road transport as far as possible by using alternative transport modes, such as water (paragraph 2.2.3 of Highways England (2016) <i>Water preferred policy guidelines for the movement of abnormal indivisible loads</i>). Responses received during Pre-Application Consultation Stage 1 revealed support for the MOLF and the use of sea transport (Horizon, 2016, Summary of Pre-Application Consultation Stage One Feedback. <i>HNP-S5-PAC-REP- 00044</i>) of the Main Consultation Report [APP-037].	

Q18.0.25	Section 4.3 of the Marine Works Sub CoCP [APP-416] deals with site lighting - are there any potential navigation issues that could arise for vessels from site lighting during construction of the MOLF? If there are how could these be mitigated?	Horizon acknowledge that there are potential navigational issues with site lighting if lights produce excessive or high level of glare. This could potentially lead to aids to navigation being indistinguishable from background light. Light spill modelling is currently being undertaken to indicate any potential issues with proposed construction lighting. If there are any potential issues indicated suitable mitigation measures will be identified.	

ExA Ref.	Question	Horizon's Response to Question	IACC Comments / Response
Q19.0.1	A number of RRs (RR-136, RR-139, RR-141 to RR143) express concerns regarding dispersion calculations for a severe accident scenario which demonstrate possible contamination of EU countries. In particular, references are made to the “project flexRISK” methodology for dispersion modelling predictions in the case of a nuclear accident scenario. Can the Applicant explain how this extreme risk has been addressed as part of the application for development consent and any other separate consents required for the operation and maintenance of the Proposed Development (as set out in Application Document 5.4 [APP-053])?	In summary, atmospheric dispersion calculations were carried out in line with UK and Euratom regulations. The EC issued a positive opinion in this respect confirming that unplanned releases of radiological effluent will not result in radioactive contamination in another Member State. The assessment carried out by Horizon is based on a different methodology to the one underpinning the "project flexRISK" referred to in the RRs, which may explain any differences in outcome. An assessment of the radiological consequences of a representative severe accident scenario for the UK ABWR is presented in sections 3 and 4 of Appendix D14-2 of Volume D of the Environmental Statement [APP-234]. Section 3 presents the details of the severe accident scenario assessed, which is based on a fault sequence with a very low predicted frequency of occurrence that leads to a core melt and requires the operation of several redundant safety systems to mitigate the potential release to the environment. A description of the assessment of the consequent radiological impacts is provided in section 4 of Appendix D14-2. This description details assumptions made, and the models and parameters used to generate the results presented in section 4.4. The assessment of transboundary effects focussed on the impacts to a reference adult, 10 year old child and 1 year old infant residing in an area close to Dublin, Ireland. This location is representative of the most affected location in any EU Member State on account of its proximity to the Wylfa Newydd site. Atmospheric dispersion calculations were performed using the long range atmospheric dispersion model described in the NRPB-R124 report (Clarke, R.H. 1979, the first report of a working group on atmospheric dispersion. The model for short and medium range dispersion of radionuclides released to the atmosphere (NRPB-R91. National Radiological Protection Board: Chilton) is an extension of the well-known Gaussian plume dispersion model, modified for short duration releases and to distances >100km. It provides a simple and transparent procedure for estimating activity concentration in air as a function of plume width and distance along the plume trajectory, in a manner that is consistent with UK and Euratom regulatory requirements. The magnitudes of the doses presented for the reference group in the nearest Member State are well below the reference levels for public exposure under emergency exposure situation set out in Annex 1 of Council Directive 2013/59/Euratom. Appendix D14-2 Sections 3 (Accident scenarios) and 4 (Assessment of the radiological impact of reference accidents) were presented at an oral hearing before an EC panel of experts in accordance with the stipulations of Article 37 of the Euratom treaty regarding the transboundary effects of nuclear developments (see item 28 Table 2-1, [APP-053]. The hearing resulted in a positive opinion from the EC, which concluded that <i>“...the implementation of the plan for the disposal of radioactive waste in whatever form, arising from the two UK-ABWR reactors of the Wylfa Newydd nuclear power station, located in Wales, United Kingdom,</i>	

		<i>both in normal operation and in the event of accidents of the type and associated magnitudes of unplanned releases of radioactive effluents as considered in the General Data, is not liable to result in a radioactive contamination, significant from the point of view of health, of the water, soil or airspace of another Member State, in respect of the provisions laid down in the Basic Safety Standards Directive".</i> Full details of the EC opinion on the proposed development can be found at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.C_.2018.193.01.0001.01.ENG&toc=OJ:C:2018:193:TOC The references to flexRISK methodology are acknowledged. The purpose, scope and methodology of flexRISK assessments differ from those of the assessment performed to support the proposed Wylfa Newydd DCO Project. FlexRISK is constrained by availability of source term data for severe accident for the nuclear facilities, so it makes conservative assumptions about the fraction of reactor core released under severe accident scenarios. The methodology used by Horizon is using well established models which are consistent with UK regulatory requirements and is aimed at demonstrating that the UK ABWR design has minimised the likelihood and consequences of severe accidents to ALARP. Therefore the outcomes of the two assessments are different and any direct comparison of the results would be misleading.	
Q19.0.4	What steps can be taken to satisfy IPs that due consideration is given to the concerns related to potential contamination resulting from a severe accident? The ExA is aware of sections 4.10 and 2.7 of NPS' EN-1 and EN-6 respectively, and that consideration of the application for development consent should not seek to duplicate such matters that are within the remit of Nuclear Regulators.	A key design objective of the proposed Wylfa Newydd development is to prevent the occurrence of a severe accident, and in the highly unlikely event that such an accident does occur, to minimise potential contamination and other consequences to ALARP. The UK ABWR design contains a number of defence-in-depth layers to prevent the onset of core damage, and additional measures to protect the integrity of the containment structure should core melt occur. As set out at Appendix D14-2, an assessment of the effects from potential accidental release scenarios for the Power Station demonstrated that all scenarios had a negligible environmental impact, even the identified severe accident scenario. The design features are described in the General Design Assessment Pre-Construction Safety Report (Hitachi-GE Nuclear Energy, Ltd. UK ABWR: http://www.hitachi-hgne-uk-abwr.co.uk/index.html) which was assessed by the UK's nuclear regulatory bodies as satisfying the UK national requirements for radiological risk. From April 2013 to December 2017, the UK ABWR was assessed under GDA by the ONR, EA and NRW. A Design Acceptance Confirmation was issued by ONR in December 2017 alongside a Statement of Design Acceptability from EA and NRW. Although extremely unlikely to occur, the design has provisions in place to manage core melt accidents and protect against containment boundary failure. The UK ABWR is fitted with a filtered containment venting system (FCVS), which allows venting of the containment (after 10's of hours) should loss of containment	

		heat removal be prolonged. The FCVS provides additional removal of aerosol species that have not been removed from the containment atmosphere by the actions of sprays and suppression pool scrubbing. Furthermore, the potential impact in terms of public dose and food contamination for reference groups resident local to the site and in the nearest EU Member State (Ireland) are given in the same appendix.	

ExA Ref.	Question	Horizon's Response to Question	IACC Comments / Response
Q20.0.1	Please respond to the concerns raised in RR-110 regarding the security of stored radioactive waste.	The management of radioactive wastes (including spent fuel) at the Power Station during operation and decommissioning is described in appendix D14-1 (radioactive waste) [APP-233]. The radioactive waste storage facilities will be designed to be safely and securely operated and maintained in accordance with legislative and regulatory requirements. Radioactive waste storage on the Power Station Site will be regulated by the Office for Nuclear Regulation ("ONR") and a safety case will be produced by Horizon as part of the nuclear site licensing process which provides the claims, arguments and evidence to demonstrate that appropriate controls are in place to ensure the safe and secure storage of radioactive waste. The safety case process is iterative, and submissions are made to ONR in increasing levels of detail prior to commencement of operations of the Power Station. Facilities for the treatment and disposal of radioactive waste currently exist in the UK and overseas. Lower activity radioactive waste generated during operation of the Power Station will be transported off-site for treatment and disposal as soon as reasonably practicable. However, in accordance with Government policy, higher activity wastes and spent fuel which cannot be transported to an existing treatment or disposal facility during the operation of the Power Station will be stored safely on site until the Geological Disposal Facility ("GDF") is available. The current assumption based on the availability of the GDF is that Higher Activity Waste disposal will commence in 2130, approximately 45 years after the end of generation. The timescales for which spent fuel storage would be required on the Power Station Site is conservatively estimated at a maximum of 140 years after the end of generation. However, work is currently on-going to optimise these timescales and to produce a more accurate estimate of the storage duration. Early work suggests that a period of 70 to 80 years after the end of generation may be a more realistic estimate. Horizon is required under section 45 of the Energy Act 2008 to have a Government approved Funded Decommissioning Programme in place before nuclear related construction of the Power Station begins. This ensures that Horizon makes prudent provision for the full cost of decommissioning and for safely and securely managing and disposing of waste, including spent fuel. In accordance with the Nuclear Industries Security Regulations 2003, Horizon has, and will continue to, implement security measures at the Wylfa Newydd Development Area to mitigate any potential threats to security. The arrangements are described in Nuclear Site Security Plans reviewed and approved by the Office for Nuclear Regulation Civil Nuclear Security. The Power Station Site will also be protected by the Civil Nuclear Constabulary, who are deployed at all civil licensed nuclear sites in the UK. The UK has robust legislative and regulatory systems in place for the management (including interim storage, disposal and transport) of all forms of radioactive waste produced by new nuclear power stations. Paragraph 2.11.4 of the NPS EN-6 states that the decision maker should assume that arrangements to manage and	No further comment from IACC

		dispose of radioactive waste will be addressed by the Government and should therefore not consider this matter further in the examination of a Draft DCO application.	
Q20.0.2	Please respond to the matters raised in RR-087 in relation to the proposed radioactive waste storage facilities and whether they fall within section 14 of the Planning Act 2008.	RR-087 raises concerns about the various waste-related facilities to be provided as part of the Wylfa Newydd DCO Project, particularly the proposed lifetimes of the different waste facilities. The management of radioactive wastes (including spent fuel) at the Power Station during operation and decommissioning is described in appendix D14-1 (radioactive waste). Radioactive Waste management arrangements The Wylfa Newydd Power Station will include the following four main waste management facilities: • Radioactive waste building (building no. 104) which forms part of the main power block; • Lower Activity Waste management facility (building no. 246); • Spent fuel storage facility (building no. 201); and • Immediate level waste storage facility (ILW storage facility) (building no. 202). Buildings 104 and 246 will be constructed during the main construction period and will be available during commissioning, operation and decommissioning. Buildings 201 and 202 will be constructed after the main construction period and will be available for use approximately 10 years into the operational phase. This is because storage of spent fuel and immediate level waste is not required at commencement. As described in Appendix D14-1 of the Environmental Statement, these waste management arrangements, including the lifetime of the various waste facilities, has been informed by a number of things including: • the decommissioning strategy that Horizon is developing; • the national strategy concerning radioactive waste; • the national arrangements for a Geological Disposal Facility (GDF); and • ensuring it is in accordance with the strict regulatory context that applies to nuclear licensed sites. These factors provide for a decommissioning strategy that aims to decommission the site as soon as practicable after generation ends. Within the first 20 years, this will involve de-fuelling of the reactor Units, treatment and disposal of radioactive waste and hazardous materials, reduction of the nuclear licenced site	No further comment from IACC

	boundary to encompass the remaining facilities including the spent fuel storage facility, ILW storage facilities for operational and decommissioning wastes and the repackaging facility. The spent fuel storage facility and the ILW storage facilities (buildings 201 and 202) are required to be maintained on site at least until the UK Government's planned GDF is available (between 75 and 140 years after the end of generation) as recognised in paragraph 6.1.4 of [APP-233]. NDA bodies responsible for the GDF and Low-Level Waste Repository have been and will continue to be consulted to ensure that the envisaged radioactive wastes would be able to be disposed of in line with current and future practices. The waste facilities are part of the Nationally Significant Infrastructure Project The spent fuel storage facility and the intermediate level waste storage facility are essential aspects of the Power Station and are therefore part of the NSIP. Neither structure requires a separate designation as a NSIP under section 14 of the Planning Act. Please refer to section 1.2 of additional information related to hazard waste facilities [APP-404]. Even if they were not part of the NSIP they would be associated development. As a result of the Wales Act 2017, "associated development" can now be consented under a DCO in Wales. The Department of Communities and Local Government's Planning Act 2008 Guidance on Associated Development Applications for Major Infrastructure Projects describes associated development as being "typical of development brought forward alongside the relevant type of principal development or of a kind that is usually necessary to support a particular type of project" and which "requires a direct relationship between associated development and the principal development". The Infrastructure Planning (Radioactive Waste Geological Disposal Facilities) Order 2015 amended the Planning Act 2008 at s14(1)(p) define radioactive waste geological disposal facilities as a project in England that is expected to be the final disposal facility of radioactive waste. The draft NPS for Geological Disposal Infrastructure (January 2018) sets out at paragraph 1.2 how the NPS would apply to development proposals for final disposal sites in England and at 1.3.3 that facilities in Wales are a matter for the Welsh Government. A concurrent Welsh Government consultation (Geological disposal of radioactive waste, 25 January 2018 WG33010) reinforces Welsh Government policy on supporting a single final GDF in the UK in line with UK Government policy, endorsing independent expert advice that the best available option for the management and disposal of (higher activity) radioactive waste is geological disposal, coupled with safe secure interim storage while final disposal facilities are developed. The consultation document (WG33010) recognises the need arising from WG support for the WNDA Development and states that modern, safe and secure interim storage can contain this waste in the short to medium term. The UK Government (alongside the devolved	

		administrations) is to seek a single GDF for the high activity waste, the programme is to be delivered by Radioactive Waste Management Ltd (RWM), a subsidiary of the NDA.	
Q20.0.3	Paragraph B.5.1 of Annex B to EN-6 states that the Government is satisfied that effective arrangements will exist to manage and disposal of the waste that would be produced from new nuclear power stations and as a result, the Examining Authority should not address this. However, are there any planning issues relating to the on-site management of radioactive waste that indicate significant effects would be likely in regard to these matters and if so, why?	The radioactive waste management facilities are part of the Power Station Site and subject to Environmental Impact Assessment as reported in Chapter D1 Proposed Development, of the Environmental Statement, [APP-120]; therefore any planning issues have been considered in line with paragraphs B.5.1 of Annex B and 2.11.5 of NPS EN6 as part of the assessment of the Wylfa Newydd Development Area. The scope and content of the assessment is set out at Chapter B14 (Introduction to the environmental assessments – radiological effects) [APP-079]. Section 14.2 of Chapter B14 outlines the legislation, policy and guidance used to inform the assessment. In accordance with NPS EN-6 the disposability of Higher Activity waste and Spent Fuel has not been assessed for the Draft DCO application. A strategy for the proposed management of radioactive waste and spent fuel arising during the operational and decommissioning stages is detailed in appendix D14-1. An assessment of radiological effects is provided at section 6.4.14 of Chapter D14 Radiological Effects, of the Environmental Statement [APP-133]. This includes the impact on the local community from the radioactivity associated with the storage facilities during normal and accident conditions. Radiological effects during construction, operation and decommissioning have been assessed as negligible and are therefore not significant Environmental Statement Non-Technical Summary [APP-401].	No further comment from IACC. Please see IACC response to this question submitted at Deadline 2
Q20.0.4	Please respond to Welsh Government's [RR- 092] concern in relation to the volume of waste that would be generated by the proposed development.	Increase in estimated volume of waste The Welsh Government in its relevant representation [RR-092] queried why the volume of waste from construction and demolition has increased by 50,000 tonnes when the number of buildings on site is reducing and more opportunities are being pursued for modular off-site construction. Chapter C6 of the Environmental Statement [APP-093] provides an estimate of waste for the construction, operation and decommissioning of the Wylfa Newydd DCO Project, based on preliminary designs and incorporating waste generated from operational facilities to support construction, for example the Site Campus. The 50,000 tonnes increase that Welsh Government reference is as a result of the decision made at Pre- Application Consultation Stage 3 (PAC3) to provide temporary workers' accommodation onsite via the Site Campus. Previously, the proposal was to provide temporary workers' accommodation away from the Wylfa Newydd Development Area. As such, these developments did not form part of the early proposals for the Wylfa Newydd DCO Project and instead were to be the subject of separate Town and Country Planning Act applications. The decision to include the Site Campus in the Wylfa Newydd Draft DCO application meant that	No further comment from IACC, Horizon's methodology appears robust.

		the waste generated as a result of the construction and operation of the Site Campus needed to be brought into the assessment. This resulted in an increase in the estimated construction waste volumes to the levels detailed within ES Volume C Chapter C6 [APP-093]. It is noted that Horizon used the Building Research Establishment (BRE) good practice key performance indicator (KPI) for mixed-use developments to estimate the waste tonnages from the construction activities associated with the Wylfa Newydd DCO Project (See Chapter C6 (APP—093). In doing so, it adopted an assessment based on a worst-case scenario using preliminary design, incorporating waste from operational facilities to support construction (See Chapter B16 [APP-081]). In addition, a contingency of 20% was added to the waste estimates to allow for the evolving designs. The assumptions and technical basis for the waste estimates were described in Chapter B16 and Chapter C6 of the Environmental Statement.	
Q20.0.5	Please respond to Natural Resources Wales' [RR-088] comment (at paragraph 3.1.1) that the Environmental Statement contains insufficient detail to demonstrate how construction waste would be managed, and if the application were to be successful, detailed Site Waste Management Plans would need to be agreed through a DCO Requirement.	Detail demonstrating how construction waste is to be managed As set out in Chapter B16 of the Environmental Statement, waste generated by the Wylfa Newydd DCO Project would be managed in accordance with the legislative and policy framework, including NPS EN-1, the overarching waste strategy document for Wales, <i>Towards Zero Waste</i> and its associated <i>Construction and Demolition Sector Plan</i>. The potential project-wide waste and materials effects are then assessed in Chapter C6 of the Environmental Statement. This sets out the embedded and good practice mitigation for the construction, operational and decommissioning phases. During construction, this includes the incorporation of efficient design solutions and modular construction of temporary buildings where possible, manufactured off-site which delivers a number of efficiency benefits. The assessment in chapter C6 has been considered at a regional level, because local facilities would rarely be capable of servicing a major infrastructure project of this scale. However, the potential impact that the Wylfa Newydd DCO Project may have on more local waste has also been considered and an assessment is included in appendix C6-1 (local and regional waste management facilities) [APP-117]. Chapter C6 confirms that all construction including waste management would be carried out in line with the requirements set out the Wylfa Newydd Code of Construction Practice (WN CoCP) [APP-414]. The WNCocP details the waste management strategy that will be applied across the Wylfa Newydd DCO Project and includes details regarding materials and waste minimisation measures in line with Horizon's waste hierarchy. Horizon's waste hierarchy requires moving waste management practices as far up the hierarchy as practicable, therefore minimising disposal and maximising reuse and recycling. This approach will look to	IACC is of the opinion that there is insufficient detailed contained within the present CoCPs with respect to the management of waste. IACC therefore welcomes Horizon's commitment to produce SWMPs. Reference to the SWMPs within updated CoCPs should include for their submission to and approval by IACC prior to commencement of the relevant development. Alternatively IACC would ask that a DCO requirement along the lines suggested

		manage waste appropriately, mitigating adverse effects on the capacity of existing waste management infrastructure and ensuring adequate steps are taken to minimise the volume of waste arisings and that which is sent to landfill. The site specific sub-CoCPs [APP-415 to APP-419] then set out more specific measures for each individual development site. The Wylfa Newydd CoCP [APP-414] WNCaCP contains a commitment by Horizon that it will implement its waste management arrangements before construction works begin on site. Throughout construction, Horizon will prepare reports for each construction site detailing the waste management processes for the site. Further, Horizon has continued to engage with key stakeholders for over 18 months at quarterly waste and materials oversight group (WaMOG) meetings, where waste management practices have been discussed including, for example, proposals for a remediation processing compound, a temporary recycling facility and appropriate use of local, regional and national waste management facilities. Horizon will continue to engage with WaMOG and report quarterly to WaMOG throughout the construction of the Wylfa Newydd Power Station to ensure that appropriate waste management processes are being followed and to ensure that lessons learned are shared between projects. Site Waste Management Plan Natural Resources Wales' in its relevant representation [RR-088] suggests that a requirement for a Site Waste Management Plan is needed in the draft Order. This issue was also raised with Horizon during stakeholder engagement including the statement of common ground process. Horizon has not proposed a requirement in the Draft DCO requiring a Site Waste Management Plan (SWMP). Horizon is confident that sufficient controls regarding the management of waste and materials relating to the Wylfa Newydd DCO Project are provided for in the WNCaCP, site-specific sub-CoCPs and the WNCaOPs at this stage of the project. However, Horizon will amend the WNCaCP at Deadline 4 (17 January 2019) to include a commitment to produce a SWMP. Furthermore, Horizon will throughout construction prepare reports for each construction site detailing the waste management processes for the site (WNCaCP).	
Q20.0.6	The 'Horizon Waste Hierarchy' is set out in section 15 of the Wylfa Newydd Code of Operational Practice ('CoOP') and the strategy within the Wylfa Newydd Code of Construction Practice ('CoCP'). How does the Horizon Waste Hierarchy reflect or address policy objectives for waste management, including that within	Section 5.14 of NPS EN-1 deals with waste management, stating that the Government policy is intended to protect human health and the environment by producing less waste and by using it as a resource where possible. It recognises that "<i>all large infrastructure projects are likely to generate hazardous and non-hazardous waste</i>". As such, it requires applications to set out the arrangements that are proposed for managing any waste produced and prepare a site waste management plan.	IACC welcomes Horizon's commitment to manage waste according to the waste hierarchy and that this will take account of local and regional management capacity. However, IACC remains concerned that there is no evidence to show that this has been transparently undertaken and consequently, is not convinced that management potentially a significant distance from the sources of arisings is justified.

section 5.14 of the 'Overarching National Policy Statement for Energy' (EN-1) and Welsh Government's 'Towards Zero Waste'?	NPS EN-1 further recognises that waste management should be implemented through the "waste hierarchy". The "waste hierarchy" stems from the EU Waste Framework Directive (2008/98/EC) implemented in Wales through amendments to the Environmental Protection Act 1990 and the Waste (England and Wales) Regulations 2011. The "waste hierarchy" sets out the priorities that must be applied when managing waste to ensure sustainable waste management, being: a) prevention; b) preparing for reuse; c) recycling; d) other recovery, including energy recovery; and e) disposal. Welsh Government's "National Waste Strategy Towards Zero Waste – One Wales: One Planet 2010" is the overarching waste strategy document for Wales and provides a framework for the management of all types of waste, with the overall aim of reducing residual waste to zero by 2050. To this end, it recognises the Welsh Governments' commitment to ensuring the established "waste hierarchy" is applied across Wales. However, it notes that the waste hierarchy is not absolute, and does not mean all waste should be reduced or recycled where it is not practical to do so, nor does it necessarily mean absolutely zero landfill or energy from waste where this is not practical. Horizon's own Waste Hierarchy – Towards Zero Waste set out in section 15 of the Wylfa Newydd Code of Operational Practice (CoCP) [APP-421] and recognised in the waste management strategies in the Wylfa Newydd Code of Construction Practice mirrors the waste hierarchy recognised in NPS EN-1 and Welsh Government's Towards Zero Waste and is consistent with these policy objectives. It was defined using Defra Guidance on applying the established waste hierarchy and has been aligned with the Welsh Government's Towards Zero Waste and its associated Construction and Demolition Sector Plan (as set out in the Environmental Statement). To this end, Horizon's Waste Hierarchy encourages the management of waste pro-actively to minimise the amount that is discarded and to recover the maximum value from the wastes that are produced, with disposal as a final option. The Horizon Waste Hierarchy forms the basis of the approach to waste management across the Wylfa Newydd DCO Project as detailed below. The potential project-wide waste and materials effects are assessed in Chapter C6 of the Environmental Statement. This sets out the embedded and good practice mitigation for the construction, operational and decommissioning phases, as required. It demonstrates that all waste arising from the Wylfa Newydd DCO Project will be managed both on-site and off-site in a responsible manner with the clear intention of applying	

		Horizon's own waste hierarchy and in line with all relevant waste legislation and regulation, taking into account the availability and capacity of local and regional waste management infrastructure. During construction, Horizon's waste management includes the incorporation of efficient design solutions and modular construction of temporary buildings where possible, manufactured off-site which delivers a number of efficiency benefits. For example, it is a key design principle in the Design and Access Statement - Volume 3 – Associated Developments and Off-site Power Station Facilities (Part 1 of 2) [APP-409] that the development of the Site Campus "will make use of simply building forms, with off-site modular construction adopted as appropriate". Similarly, it is a building design principle in the Design and Access Statement - Volume 3 (Part 2 of 2) [APP-410] that "off-site modular construction will be used where practicable" for the Dalar Hir Park and Ride. Further waste management arrangements would be in accordance with the management strategy set out in the WNCocP), which sets out materials and waste minimisation measures in line with Horizon's waste hierarchy. It provides a proportionate and precautionary assessment and a robust approach for managing and controlling construction waste. For example, the WNCocP contains a commitment by Horizon that it will implement its waste management arrangements before construction works begin on site. Throughout construction, Horizon will prepare reports for each construction site detailing the waste management processes for the site. The sub-CoCPs [APP-415 to APP-420] set out more specific measures for each individual development site. Horizon will amend the WNCocP at Deadline 4 (17 January 2019) to include a commitment to produce a Site Waste Management Plan (SWMP). During operation, the inclusion of dedicated waste handling and treatment facility at the Power Station site forms an embedded mitigation measure. All conventional wastes generated at the Power Station Site would be handled at the waste and recycling facility and would be managed in accordance with the management strategy set out in the WNCocP). Again, the waste management strategy applies Horizon's waste hierarchy and has been defined using Defra Guidance on applying the Waste Hierarchy and is aligned with Welsh Government's Towards Zero Waste and its associated Construction and Demolition Sector Plan (as set out in the Environmental Statement).	
Q20.0.7	Policy objectives for the management of waste include those within section 5.14 of the 'Overarching National Policy Statement for Energy' (EN-1), and Welsh Government's 'Towards Zero Waste'. How does the proposal address the 'Applicant's assessment' for managing waste as set out	Applicant's assessment for managing waste The NPS EN-1 at paragraph 5.14.6 recognises that the applicant should set out the arrangements that are proposed for managing any waste produced and prepare a site waste management plan. This should include information on the proposed waste recovery and disposal system for all waste generated by the development, and an assessment of the impact of the waste arising from development on the capacity of waste management facilities. It recognises that the applicant should seek to minimise the volume of waste produced and the	Horizon states in its answer that the types and volumes of waste would be managed in accordance with the Horizon Waste Hierarchy and would take account of the availability and capacity of local and regional waste management infrastructure. It refers to its assessment of the impact of waste arisings on the local and regional capacities were described in ES Volume C Chapter C6; and Appendix C6- 1. IACC would reiterate its concern over the inadequacy of the assessment which is reported within Chapter 11 of the LIR. With regard to the Horizon proposal to include reference to the preparation of SWMP within the CoCPs, IACC would refer to its response to 20.0.5 above.

paragraph 5.14.6 of EN-1? Is there a specific 'Site Waste Management Plan', and is it within/does it include section 9 of the CoCP?	volume of waste sent for disposal unless it can be demonstrated that this is the best overall environmental outcome. Chapter B6 of the Environmental Statement provides an introduction to the assumptions and technical basis for the waste and materials management assessment for the Wylfa Newydd DCO Project. The potential project-wide waste and materials effects are then assessed in Chapter C6 of the Environmental Statement. This sets out the embedded and good practice mitigation for the construction, operational and decommissioning phases. Horizon's assessment has provided an estimate of waste to be generated during construction, demolition and excavation activities, as well as construction operational facilities, for example the Site Campus. Paragraph 16.4.26 of Chapter B16 recognises that the assessment is based on a worst-case scenario using preliminary design and incorporating waste from operational facilities to support construction. In addition, a contingency of 20% was added to the waste estimates to allow for the evolving designs. Horizon has indicated how the types and volumes of waste would be managed in accordance with the Horizon Waste Hierarchy and taking account of the availability and capacity of local and regional waste management infrastructure. The proposed waste recovery and disposal routes and an assessment of the impact of waste arisings on the local and regional capacities were described in ES Volume C Chapter C6; and Appendix C6- 1. Site waste management plan In light of the waste and materials management assessment set out in the Environmental Statement, Horizon has prepared waste management practices for determining how construction and operational waste will be managed. These waste management practices are set out in the waste management strategy at section 9.3 of the Wylfa Newydd Code of Construction Practice (CoCP), the various site-specific sub-CoCPs [APP-415] to [APP-421]) and the WNCOP. Horizon is confident that sufficient controls regarding the management of waste and materials relating to the Wylfa Newydd DCO Project are provided for in the WNCOP, site-specific sub-CoCPs and the WNCOPs at this stage of the Wylfa Newydd DCO Project. However, Horizon will amend the WNCOP at Deadline 4 (17 January 2019) to include a commitment to produce a Site Waste Management Plan (SWMP). The control documents seek to apply Horizon's Waste Hierarchy and provide a robust approach to minimising the volume of waste produced and the volume of waste sent for disposal in line with policy objectives set out in the <i>Overarching National Policy Statement for Energy</i> (EN-1) and Welsh Government's <i>Towards Zero Waste</i>. The Horizon Waste Hierarchy requires moving waste management practices as far up the hierarchy	

		as practicable, therefore minimising disposal and maximising reuse and recycling. This approach will look to manage waste appropriately, will mitigating adverse effects on the capacity of existing waste management infrastructure and ensuring adequate steps are taken to minimise the volume of waste arisings and that which is sent to landfill. Horizon will throughout construction prepare reports for each construction site detailing the waste management processes for the site.	

ExA Ref.	Question	Horizon's Response to Question	IACC Comments / Response
Q21.0.1	Can the applicant confirm: (a) if they were aware of the EU (WEFO) Bathing Water Quality in Cemaes Bay Study, as is referred to in [RR-017]? (b) Did the report include an assessment of the impact of the proposal on the bay? (c) Was the findings of the report included in the applicants assessment of water quality in the ES and or the Water Framework Directive Compliance assessment? (d) Can IACC expand on its concerns in its RR [RR-020] para5 .7.5 in relation to bathing water quality at Cemaes Bay?	As set out at paragraph 13.6.53 of chapter D13 [APP-132] of the Environmental Statement, Horizon has included an assessment of the impact on bathing waters of Cemaes Bay. To assess the potential impacts of sewage discharge to Cemaes bathing water, modelling was undertaken which predicted how the effluent would disperse in the marine environment. The modelling showed that effluent would be quickly dispersed and provided levels of faecal coliform that would be predicted in Cemaes Bay. These were then compared with the background levels in Cemaes Bay (i.e. data collected by NRW as part of the bathing water compliance monitoring) and reviewed in relation for its potential to worsen the classification of the bathing water as set out in paragraph 13.6.52 and 13.6.53 of chapter D13 of the Environmental Statement, and Section 9.2 of the Water Framework Directive (WFD) Compliance Assessment [APP-444]. In respect of questions a, b and c, Horizon was not aware of the EU funded study on bathing water quality in Cemaes Bay at the time of preparation of the ES but has since discussed this study with NRW and IACC during Statement of Common Ground meetings. The study provides a predictive tool for the management of the bathing water quality but the findings from the study have not been used in the assessments of water quality. Additional baseline data provided by the Cemaes Bay study would not change the conclusions within chapter D13 of the Environmental Statement of the draft DCO application nor those within the WFD Compliance Assessment. The potential contribution of faecal coliform to the bathing water quality as a result of the Wylfa Newydd DCO Project is considered low and would not change the classification threshold band of the bathing water when existing baseline is included.	During a recent meeting with HNP, NRW and DCWW, it was confirmed that further modelling was to be undertaken by HNP(with input from DCWW). We request that HNP provides confirmation that this modelling is being pregressed and confirm when it will be submitted for review.
Q21.0.2	Chapter D1 – para 1.8.18 – states that the extension of the Cemaes water treatment plant is required for the site campus. It is not clear whether these works form part of the authorised development? If so, what part of the dDCO (is it Work 3A(c) or 'other associated development part (b))?	The extension of the Cemaes water treatment plant does not form a part of the authorised development. The works would be undertaken by Dŵr Cymru Welsh Water (DCWW) outside the draft DCO. DCWW have confirmed that Cemaes Wastewater Treatment Works (WwTW) will have sufficient capacity to treat the Site Campus foul water, following temporary remediation and expansion work to be undertaken by DCWW. Further information can be found in section 5 of Appendix 1-2 in Design and Access Statement - Volume 3 - Associated Developments and Off-Site Power Station Facilities (Part 1 of 2) [APP-409].	
Q21.0.3	Chapter G1 – mentions culverts in paras 1.3.9, 1.3.62, 1.3.147 – could you please clarify where these are located.	Horizon can confirm that the culverts mentioned are shown on plans for Section 1, 3 and 7 respectively. The full references are provided below.	

- Wylfa Newydd Project Volume 2: Plans, Sections and Drawings (Part 10/19) 2.7 A5025 Off- line Highway Improvements – Section 1 (APP-019)
 - WN0902-HZDCO-OHW-DRG-00005 A5025 OFF-LINE HIGHWAY IMPROVEMENTS SECTION 1 – VALLEY - PROPOSED DRAINAGE PLAN – SHEET 1
 - WN0902-HZDCO-OHW-DRG-00006 A5025 OFF-LINE HIGHWAY IMPROVEMENTS SECTION 1 – VALLEY - PROPOSED DRAINAGE PLAN – SHEET 2
- Wylfa Newydd Project Volume 2: Plans, Sections and Drawings (Part 11/19) 2.8 A5025 Off- line Highway Improvements – Section 3 [APP-020]
 - WN0902-HZDCO-OHW-DRG-00021 A5025 OFF-LINE HIGHWAY IMPROVEMENTS SECTION 3 – LLANFACHRAETH - PROPOSED DRAINAGE PLAN – SHEET 1
 - WN0902-HZDCO-OHW-DRG-00022 A5025 OFF-LINE HIGHWAY IMPROVEMENTS SECTION 3 – LLANFACHRAETH - PROPOSED DRAINAGE PLAN – SHEET 2
 - WN0902-HZDCO-OHW-DRG-00023 A5025 OFF-LINE HIGHWAY IMPROVEMENTS SECTION 3 – LLANFACHRAETH - PROPOSED DRAINAGE PLAN – SHEET 3
 - WN0902-HZDCO-OHW-DRG-00024 A5025 OFF-LINE HIGHWAY IMPROVEMENTS SECTION 3 – LLANFACHRAETH - PROPOSED DRAINAGE PLAN – SHEET 4
- Wylfa Newydd Project Volume 2: Plans, Sections and Drawings (Part 13/19) 2.10 A5025 Off-line Highway Improvements – Section 7 [APP-022]
 - WN0902-HZDCO-OHW-DRG-00049 A5025 OFF-LINE HIGHWAY IMPROVEMENTS SECTION 7 - CEFN COCH - PROPOSED GENERAL ARRANGEMENT SHEET 1
 - WN0902-HZDCO-OHW-DRG-00050 A5025 OFF-LINE HIGHWAY IMPROVEMENTS Section 7 - CEFN COCH - PROPOSED GENERAL ARRANGEMENT – SHEET 2

Q21.
0.4

Section 10.4 of the Main Powers Station Site Sub CoCP [APP-415] sets out a variety of monitoring and survey work that will be undertaken. Who is responsible for assessing all this monitoring and survey work? If it is the IACC or NRW do they have the expertise and/or resources to undertake the work or would a developer contribution be required to fund this aspect of the proposal?

Horizon can confirm that it will be responsible for carrying out the monitoring and surveys set out in section 10,4 of the Main Power Station Site sub-CoCP [APP-415].

It is noted that the purposes of this monitoring relate to water management during construction and Natural Resources Wales would be the relevant statutory body. It is considered that NRW would therefore have the relevant regulatory expertise in relation to these matters and will be responsible for assessing the monitoring and survey results.

As identified in rows 5 to 7 of the Wylfa Newydd DCO Project Details of Other Consents, Licenses and Agreements [APP-053], Environmental Permits would be required for the related activities e.g.in respect of construction discharges. Abstractions would be subject to licensing from NRW. It is expected that regulatory input on the monitoring would arise through future permit applications.

		Horizon would pay the fees levied with respect to the Environmental Permits and Water Abstraction Licence which would be consistent with the normal arrangements for such permits/licences.	
Q21.0.5	Paragraph 10.3.2 of the PRSCoCP [APP-418] refers to an on-site sewage treatment plant – is such a facility necessary?	Horizon can confirm that the on-site sewage treatment plant is necessary. It is noted that on-site package treatment plant is proposed to treat foul flows as there are no sewer mains in the area. For further information, please refer to drawing WN0902-HZDCO-ADV-DRG-00038 PARK AND RIDE - DALAR HIR PROPOSED SURFACE WATER AND FOUL WATER DRAINAGE PLAN [APP-023] including note 7.	
Q21.0.6	Explain the implications of removing Works No12 (Site Clearance and Preparation Works) from the DCO and delivering these works only within the provisions of the current planning application, should it be granted. If Works No12 proceed under the DCO, what are the implications for the s106 relating to the Site Preparation Works and the s106 under discussion for the DCO application?	A status update on the SPC planning permission was provided at Deadline 1 (REP1-008). It detailed how IACC resolved to grant planning permission for the SPC works on 5 September 2018 subject to entry into a Draft DCO s.106 [REP1-010] agreement and finalising conditions. Horizon has applied for a separate planning permission for site preparation and clearance works ("SPC works") under the Town and Country Planning Act 1990. This planning permission was applied for to enable a more rapid delivery of the overall construction programme, by enabling Horizon to undertake the SPC works under the planning permission prior to the draft DCO being granted. However Horizon has always recognised the risk that either the SPC planning permission would not be granted or that it would be granted (and challenge free) so late in the programme (if for example the SPC application is called in, or judicially reviewed), so as to negate the benefit of carrying out the SPC works under the planning permission rather than the draft DCO itself. Assuming the SPC permission is granted in the form currently anticipated, and is challenge free such that it can be implemented without risk of being quashed, the key implications of removing Works No12 (Site Clearance and Preparation Works) from the draft DCO and delivering these works only within the provisions of the current planning application are: • Removing the ability to undertake these works under the draft DCO would also prevent Horizon from, in due course, exercising its ability to switch from the planning permission to the draft DCO. Horizon considers that it is preferable to maintain that ability so that in the event both the permission and the draft DCO are able to be exercised, the works can be rationalised under a single process. There is precedent for this approach, as noted in paragraph 4.8 of the Explanatory Memorandum (Revision 4.0, submitted at Deadline 2). • Further there is no detriment in allowing this to occur – the controls in the draft DCO are designed to adequately take over from the TCPA conditions if this switch is made and Horizon has provided for some documents, works or licences approved or undertaken pursuant to a condition of the planning permission to be deemed as approved or complied with for the purposes of the corresponding DCO requirement (see Schedule 4 of the draft	

		DCO (Revision 3.0, submitted at Deadline 2) and paragraphs 4.9 to 4.15 and Appendix 1 of the Explanatory Memorandum (Revision 4.0) which sets out what condition or requirement would occur in the event of notice being served to switch under article 5). As detailed in both the SPC status note [REP1-008] and the Draft DCO s.106 status note ([REP1-010] provided at Deadline 1, both s.106 agreements currently anticipate that the SPC s.106 agreement would continue to operate alongside the Draft DCO s.106 [REP1-010] agreement rather than be superseded by it. This means that the SPC s.106 agreement – and its associated restoration provisions - would continue to cover the SPC works whether they were being undertaken pursuant to the SPC permission or as Work No.12 under the draft DCO. Negotiations on the Draft DCO s.106 [REP1-010] agreement for the DCO are ongoing and drafting to ensure appropriate protection of the clauses within the Draft DCO s.106 [REP1-010] agreement, if the SPC works switch from being undertaken under the planning permission to the draft DCO, is a matter flagged by the Welsh Government as an area for consideration. Horizon is confident this can and will be appropriately addressed.	