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**Cc:** [POCOCK Michael](#); [HEGGIE Francesca](#)  
**Subject:** Wylfa Newydd DCO - Land and Lakes (Anglesey) Limited - Deadline 3 submissions [PM-AC.FID1867548]  
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[18.12.2018 - Land and Lakes Deadline 3 Submissions final.PDF](#)

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Dear Sirs

Please see attached letter containing a link to Land and Lakes (Anglesey) Limited's Deadline 3 submissions in respect of the above matter. A copy of the submissions is also attached to this email.

If you have any difficulties accessing the documents, please don't hesitate to contact me.

Kind regards

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# LAND AND LAKES (ANGLESEY) LIMITED

## DEADLINE 3 SUBMISSIONS

relating to

**Wylfa Newydd Nuclear Power Station  
Development Consent Order Application**



Pinsent Masons

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## 1. INTRODUCTION

- 1.1 Land and Lakes (Anglesey) Limited ("L&L") is registered as an interested party to the Wylfa Newydd Nuclear Power Station Development Consent Order ("DCO") Application submitted by Horizon Nuclear Power Limited ("HNP").
- 1.2 On 4 December 2018 ("Deadline 2") L&L submitted written representations outlining its serious concerns regarding HNP's proposals for on-site worker accommodation put forward as part of its DCO application. In light of its concerns and those cited by others L&L maintains its position that its consented development at Cae Glas and Kingsland provides a deliverable and sustainable solution for temporary worker accommodation during the construction period and notably provides genuine legacy benefits to Holyhead and the wider region. The L&L consented off-site campus is therefore a preferable alternative to the on-site campus promoted by HNP through the DCO.
- 1.3 Following its review of the documentation submitted by HNP and others at Deadline 2, L&L sets out its comments in this submission with specific reference to the following:
  - 1.3.1 HNP's Written Representations ("WR") [REP2-003];
  - 1.3.2 Holyhead Town Council's written submission [REP2 – 304];
  - 1.3.3 Isle of Anglesey County Council's local impact report in relation to Temporary Worker Accommodation ("TWA") [REP2 – 090];
  - 1.3.4 Gwynedd Council's local impact report [REP2-297]; and
  - 1.3.5 North Wales Wildlife Trust's written representation of biodiversity [REP2-349].
- 1.4 In addition, L&L has reviewed HNP's responses to the written questions of the Examining Authority and sets out its response in the table at Appendix 1.



## 2. HNP'S WRITTEN REPRESENTATIONS

2.1 L&L sets out below, its comments in relation to HNP's WR. This is separated into topic headings which align with the evidence base presented by L&L as part of its DL2 submissions.

### 2.2 TRAFFIC AND TRANSPORT

2.2.1 It is clear from the WR that HNP's main justification for locating 4000 workers on the WNDA is now a reduction in the need to travel for workers. For example, para 3.3.19 of the WR states that *"the location of the site campus for example, on the WNDA, significantly reduces the needs of the workforce to travel."*

2.2.2 As set out within the evidence of Mr York [REP2-248], workers' need to travel for leisure, retail and their return to their permanent place of residence will be affected by the location of the TWA. The Campus TWA does not bring about a reduced need for workers to travel. In particular, workers at the proposed Campus TWA may be more inclined to travel by less sustainable modes than if they were located at the L&L Sites. Both in terms of their journey from their permanent residence and for non-work related trips.

2.2.3 A shorter travel time to work would undoubtedly have some benefits to workers, however, this cannot be seen in isolation. Instead, the experience of the TWA for workers (and the host communities) needs to be seen as a whole. The ExA is referred to L&L's evidence on the noise impacts on residents of the Campus [REP2-261] and the experiences of Mr Seaton [REP2-254] which show that the proximity of the Campus to the workers' place of work also has down-sides. These effects will be felt in terms of the lack of ability to 'decompress' and knock on effects on productivity. The remote location of the WNDA, isolated from existing facilities and communities, coupled with the corresponding desire to travel to Holyhead and other main towns in order to access a wider range of services will mean that the Campus does not necessarily have lower transport impacts than the L&L scheme.

2.2.4 The principle of off-site TWA has been accepted as part of the Hinkley Point C DCO. Workers at the Hinkley Campus travel some 10 miles by bus/coach in order to reach the worksite at Hinkley. This is a broadly comparable journey.

### 2.3 PLANNING

2.3.1 L&L remains of the view that HNP has failed to properly assess the Site Campus against the policy criteria within PS10. Notably, HNP provides insufficient justification that criterion 1 of PS10 has been met, i.e. to demonstrate that the need for temporary construction workers accommodation 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.

2.3.2 HNP argues that proposing permanent homes to facilitate temporary use by workers results in larger homes which do not necessarily meet local need. However, as demonstrated at Chapter 4 of Land and Lakes' Planning Report [REP2-229], this is incorrect. The proposed development at Kingsland would offer the flexibility to divide the accommodation for workers' needs and then subsequently convert the units to housing for a mix and type of housing comprising 2, 3, 4 and 5 bedroom properties in the form of mews, semi-detached and detached housing, including an affordable housing provision of 50%, a significant benefit towards meeting local needs.

2.3.3 At 3.3.77 of WR, HNP states that a housing fund represents the best solution to delivering homes for the purposes of PS10. However, the housing fund alone fails to

constitute an appropriate 'package of community benefits' particularly when compared to the significant community and legacy benefits that would be realised through provision of workers accommodation at the Kingsland and Cae Glas sites. See, in this regard, [REP2-229 at Chapter 6].

- 2.3.4 Further, L&L notes that IOACC currently does not consider that the Housing Fund represents a sufficient mitigation measure. Paragraph 1.1.3 of the IOACC LIR – Housing [REP2-068] states that IOACC currently objects to the WAS due to the lack of clarity and detail provided by HNP. Paragraph 2.7 also describes the fund as “too little too late”.
- 2.3.5 Horizon has provided no robust evidence to justify that the accommodation could not be provided at Kingsland and Cae Glas. Such evidence is required in order to demonstrate compliance with PS10(1). As demonstrated at chapter 4 of L&L’s planning evidence [REP2-229] the site selection report is fundamentally flawed in its assessment of both the Site Campus and the Kingsland and Cae Glas sites, making a number of false and unjustified statements and failing to apply the policy test of PS10 (1).
- 2.3.6 IOACC shares this view and consider that the proposals do not comply with JLDP policy PS10. At paragraph 2.1.10 of its local impact report (LIR) [REP2-062 Chapter 2- policy framework] IOACC confirms that the proposals do not comply with the need to secure legacy benefits. IOACC states that “*Simply proposing temporary housing in modular units to be removed 12 offers no legacy at all*”. L&L agrees with IOACC and respectfully requests the ExA to reject the assertion by HNP that the ill-defined housing fund would provide sufficient legacy to represent compliance with PS10. As such, there is significant conflict with local policy which should be afforded material weight in the decision.
- 2.3.7 HNP continues to place reliance upon the NPS in order to justify conflict with the local development plan. However, the NPS only takes priority where there is a conflict between the NPS policy and the local policy. Here, the JLDP does not conflict with the NPS, it merely provides a local set of requirements for how nationally significant development may be satisfactorily accommodated at the local level. Merely because the JLDP provides a more detailed set of policy requirements does not mean that the two policies conflict. Indeed, that is precisely how national strategic policies should sit together with local policies. It is noted that HNP references the potential for conflict but stops short of identifying any specific instances of conflict in their WR. Further, HNP argues that local policy is “*unlikely to be fundamental to the consideration of the principles of an NSIP*” [3.1.1 of the WR] and in doing so ignores the fact that local policy will instead be fundamental to the determination of whether the *specifics* of the project proposed are acceptable. Neither IOACC nor L&L attack the principle of development or assert lack of compliance with the NPS. However, that does not render local policy irrelevant: Indeed it is the only set of policies which provides guidance as to what details will be acceptable. HNP ignores this entirely and seeks to gloss over the importance of the carefully drafted and considered JLDP.
- 2.3.8 HNP seeks to rely on the reference within national policy to the urgency of providing for energy generation [WR 2.2.3-2.2.8 and 2.2.19]. L&L does not take issue with this statement however it cannot be used as a means of consenting any scheme, regardless of its impacts. Again, this addresses the principle of a power station, but does not mean that the specifics of *this* proposal are acceptable.
- 2.3.9 Nor is urgency a sound basis to reject the L&L sites. An amendment to the scheme which would see the substitution of the Site Campus for the L&L TWA scheme would not cause any delay to the Wylfa Newydd project as a whole. As set out within paragraphs 4.2.3 to 4.2.5 below, the L&L scheme can deliver the required

levels of TWA in advance of HNP's proposed Site Campus and even earlier than required by IOACC. It would therefore assist HNP with early delivery of the scheme rather than be a hindrance to the urgency of the project.

### 3. LOCAL IMPACT REPORTS AND OTHER REPRESENTATIONS

#### 3.1 HOLYHEAD TOWN COUNCIL

- 3.1.1 L&L notes that its proposals have received the unequivocal support of Holyhead Town Council ("Town Council") [REP2-304]. The Town Council states that they have supported the L&L scheme since 2012 as part of the legacy project arising out of the AAM/Rio Tinto works. The Town Council is particularly supportive of workers forming part of the Holyhead community and they express the view that this would be preferable to workers being isolated elsewhere on the island. This provides first hand evidence that the people of Holyhead would welcome the TWA within their town and should be preferred to HNP's assertion that workers ought not to be located close to existing communities for fear of adversely affecting current residents. These fears are unfounded and the residents of Holyhead would instead welcome the local jobs created and additional business that would be created for the shops and other facilities in Holyhead.
- 3.1.2 The position of the Town Council is reflective of L&L's evidence from Regeneris [REP2-263] that HNP's Site Selection evidence does not appraise sites on their ability to maximise construction worker spend. There are many positive spillovers from a project that integrates the construction workforce into a community such as knowledge exchange, greater chance of long term attraction to the area of skilled workers, as well as the benefits to existing facilities. In other words, the L&L scheme would deliver numerous positive externalities to the wider Anglesey community that HNP does not take consider in its site selection process and does not accrue to the Site Campus proposal.

#### 3.2 ISLE OF ANGLESEY COUNTY COUNCIL

- 3.2.1 As set out at paragraph 2.3 above, L&L notes the agreement between Mr Suckley's evidence and that provided on behalf of IOACC in relation to the lack of compliance with PS10 of the JLDP. Both parties agree that HNP's proposals fail to accord with this policy in substantial part due to the inadequate reasons given for rejecting the L&L sites.
- 3.2.2 In addition, IOACC raises a number of other objections to the Site Campus in relation to the layout of the Campus and potential for adverse effects on the Tre Gof SSSI and the Wylfa Head Wildlife Site.
- 3.2.3 In common with other respondents, IOACC raises a concern in relation to the phasing of the Site Campus. These concerns are raised by IOACC [REP2-090] and Gwynedd Council [REP2-297]. L&L's scheme does not give rise to the same delivery concerns; L&L has programmed to provide the full 3500 bed spaces within 2 years of the Final Investment Decision [see REP2-249 Section 10]. This is well in advance of IOACC's requirement that HNP delivers 1000 bed spaces by the end of Q2 year 3 [REP2-090 para 3.3.1]. L&L has also subdivided both sites into separate phases that can be delivered in separate packages to suit both HNP's master delivery plan and IOACC and Gwynedd's requirements for early delivery of the TWA.
- 3.2.4 L&L notes that HNP will be providing an update to the phasing strategy for Deadline 4 (17 January 2019). L&L's delivery programme has been developed to provide flexibility whilst ensuring deliverability and we are therefore confident that we would be able to coordinate with HNP and any adjustments to their strategy.
- 3.2.5 Additionally, all of the amenity buildings and sports pitches on the L&L site would be complete and available for when the workers accommodation opens.

Furthermore at the Kingsland site there is existing sports facilities adjacent to the site (Holyhead Hotspurs outdoor football pitches and the Holyhead leisure centre) which the workers could access and which would facilitate wider social community interaction.

- 3.2.6 IOACC also raise concerns about the sufficiency of provision of amenity facilities for workers and the Council confirms that it objects to the DCO on this basis [REP2-090 para 3.6.1]. No such concerns were raised in relation to the L&L scheme.
- 3.2.7 IOACC and the NWWT both raise concerns about the ecological impacts of the Site Campus [REP2-090 para 3.1 and 3.8.1 and REP2-349 respectively]. Whilst L&L does not provide separate ecology evidence, it is notable that the Council and Wildlife Trust consider the impacts to be insufficiently assessed.
- 3.2.8 Overall, the IOACC LIR is supportive of L&L's case that the Site Campus is contrary to local policy and has a range of unacceptable adverse impacts that would not be caused by the L&L scheme. These effects should be avoided completely and the L&L scheme pursued rather than ineffectively mitigated through the Housing Fund, which IOACC also objects to, and other less effective means of mitigation.

### 3.3 GWYNEDD COUNCIL

- 3.3.1 L&L notes that Gwynedd Council's LIR [REP2-297] at 6.4.14 refers to the Site Campus as a negative local impact. Gwynedd questions the ability to deliver 4000 beds on the WNDA and queries whether the TWA will be delivered sufficiently early in the programme in order to fully mitigate effects on the private sector. The Council also, in line with L&L and IOACC records that *"the type of accommodation also reduces the potential legacy to the region"*.
- 3.3.2 Paragraphs 6.4.24 -6.4.26 also expresses doubt about the Site Campus's compliance with PS9 and PS10 based on the failure to fully explore TWA options that provide for a legacy use, such as the L&L Site.

### 3.4 NORTH WALES WILDLIFE TRUST

- 3.4.1 The NWWT states that the Site Campus is likely to have a range of adverse ecological effects [REP2-349]. In line with IOACC, the NWWT considers that HNP overly relies upon the post-development mitigation of effects rather than the avoidance of effects in the first place [REP2-329 at 1.10]. Both bodies consider that this is a significant flaw in HNP's approach and ES. This has a particular bearing on the proposed Site Campus which represents a portion of the scheme where a viable alternative exists which would avoid many of the harmful effects caused by the Site Campus.
- 3.4.2 The NWWT submission provides yet another reason to consider that the Site Campus, as currently proposed, has unacceptable adverse effects.

## APPENDIX 1

Response to Schedule of Written Questions issued by Examining Authority on 6 November 2018

Ref	Question	LL Deadline 2 Comments	Horizon Deadline 2 Comments	LL Response to Horizon Deadline 2 Comments
<b>Development Consent Order</b>				
Q4.0.107	[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?	<p>L&amp;L has considerable concerns in this regard (a) in relation to the reduced likelihood of there being high levels of campus occupancy due to it being an undesirable place to live and (b) the likely effects on tourism etc in the event that there are not high levels of campus occupancy.</p> <p>The ExA is referred to L&amp;L's Appendices 2, 4, 5, 6 and 7 in this regard.</p>	<p>The Workforce Accommodation Strategy states within paragraph 9.1.6 that "Horizon will also commit to maintaining high levels of occupancy in the Site Campus."</p> <p>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.</p> <p>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.</p> <p>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].</p> <p>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 Model Procedures for the Management of Land Contamination (April 2016). 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.</p>	<p>HNP's response provides no meaningful response to this query. It is essential that the TWA is in fact used in order to avoid unacceptable impacts on local accommodation and HNP recognise this. Moreover, the ES is based upon no more than 3000 workers residing in the community. However, HNP offer no safeguards to ensure that this level is not exceeded, nor is there any requirement offered to require particular workers to be accommodated in TWA, or proper incentive to do so. HNP rely entirely on an assertion (rather than any properly modelled scenario) that the Site Campus would be used because it will meet workers' needs. However, L&amp;L and IOACC's evidence does not support this view.</p> <p>The Site Campus residents will likely be exposed to unacceptable noise impacts [REP2-261] and be an unattractive place to live given its isolation [REP2-254]. Moreover, IOACC do not consider that the amenity provision would be adequate [REP2-090]. This substantially undermines HNP's case on this point which in any event is not evidence based.</p>
<b>9. Noise and Vibration</b>				
Q9.0.6	Table D6-18 (on Page D6-41) of ES document D6 Noise and vibration [APP-125] presents the predicted	L&L have identified further discrepancies in the Noise Assessment [APP-125] as set out within the evidence of Mr Maclagan [L&L Appendix 7].	The following response responds to each of the apparent discrepancies identified by the Examining Authority.	HNP's response does not address the deficiencies in the assessment of noise and vibration impacts at the site campus, as identified in Mr Maclagan's evidence [REP –

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	<p>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:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• 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</li> <li>• in paragraph 6.5.15, 44 dwellings in total are anticipated to experience a minor effect (not</li> </ul>	<p>Including, the failure to properly assess the baseline conditions for the Site Campus residents. There is likely to be an under-assessment of these effects and it is unclear whether the adverse effects can practically be mitigated to acceptable levels in line with WHO Guidelines.</p>	<p>Receptor Group C</p> <p>Table D6-18 of chapter D6 of the Environmental Statement details the predicted significance of effect at residential receptor groups A to H.</p> <p>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.</p> <p>In respect of receptor group C, table D6-18 demonstrates that:</p> <ul style="list-style-type: none"> <li>• a large magnitude of change will be experienced at 8 residential properties; and</li> <li>• 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.</li> </ul> <p>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.</p> <p>Receptor Group H</p> <p>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 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.</p> <p>Receptor groups B and F, while not the greatest number of residential properties affected, is considered likely to suffer the</p>	<p>261]. Therefore, HNP has still not demonstrated how the temporary worker accommodation can be justified in such a noisy environment or how the wellbeing of workers would be affected by living in these conditions. The additional information only underlines that many receptors much further from the noise sources at the WNDA than the site campus will experience major adverse noise impacts. The severity of the impacts at the site campus must therefore be properly considered by HNP.</p>



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	<p>significant) due to a negligible magnitude of change, although 43 are identified in the table.</p> <p>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?</p>		<p>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.</p> <p>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:</p> <p>"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."</p> <p>Errors identified in table D6-18</p> <p>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.</p> <p>Summary</p> <p>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</p>	

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			<p>benefits to the other receptor groups. These mitigation measures are detailed in chapter D6 and include the following:</p> <ul style="list-style-type: none"> <li>· 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].</li> <li>· 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 Nonmaterial 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).</li> <li>· 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.</li> </ul>	
<b>10. Socio-Economic</b>				
<b>10.1 Accommodation</b>				
Q10.1.2	Do you consider that the proposed site campus would comply with policy PS 10 of the JLDP? If not, why not?	As set out within the evidence of Mr Suckley MRTPI [L&L Appendix 3], the Site Campus is contrary to key policies including PS10. In short, PS10(1) requires HMP to demonstrate that the need for TWA "cannot be met" through the use of new permanent buildings such as those proposed by L&L, before the policy permits any consideration of purely temporary structures. This is a very high test, however, it is the clear wording of PS10 and has not been addressed by HNP within the Planning Statement [APP- 406] or other application documents. The Site Campus is therefore contrary to this policy as Horizon have	<p>Although this question is directed to the IACC, Horizon would like to provide the following comments.</p> <p>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</p>	<p>L&amp;L remain of the view that HNP has failed to properly assess the Site Campus against the policy criteria. Notably, HNP provide insufficient justification that criterion 1 of PS10 has been met.</p> <p>HNP assert that proposing permanent homes to facilitate temporary use by workers results in larger homes which do not necessarily meet local need. However, as demonstrated at Chapter 4 of Land and Lakes' Planning Report [REP2- 229] this is incorrect. The proposed development at Kingsland would offer the flexibility to divide the accommodation for workers needs and then subsequently convert the units to housing for a mix and</p>

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		<p>not, and are unable to, demonstrate that the need for TWA "cannot be met" by the use of permanent buildings.</p> <p>Mr Suckley's evidence should be read in full for a full explanation of why the Site Campus is contrary to key policies in the JLDP including PS10.</p>	<p>in the preparation of a Local Impact Report.</p> <p>The criteria are addressed in turn below. 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;</p> <p>The need for purpose built temporary workers accommodation is addressed in section 4.2 of the Appendix C of the Planning Statement.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>type of housing that would demonstrably meet local needs and is acceptable to the local planning authority.</p> <p>HNP's response provides no robust evidence to justify that the accommodation could not be provided at Kingsland and Cae Glas. In its response to Q10.1.2, HNP fail to offer any consideration of alternative sites and how and why they have been discounted. ). As demonstrated at Chapter 4 of Land and Lakes' Planning Report , [REP2- 229] the Site Selection Report [APP-439] is fundamentally flawed in its assessment of both the Site Campus and the Kingsland and Cae Glas sites, making a number of inaccurate statements and failing to apply the policy test of PS10 (1).</p> <p>IACC share this view and consider that the proposals do not comply with JDLP Policy PS10. At paragraph 2.1.10 of its Local Impact Report (LIR) Chapter 2 Policy Framework [REP2 – 062] the Council confirm that the proposals do not comply with the need to secure legacy benefits.</p>

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			<p>which do not necessarily meet local need. Therefore, Horizon consider that the requirement for permanent homes is best met through the Housing Fund.</p> <p>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.</p> <p>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, Llangejni, 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;</p> <p>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.</p> <p>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;</p> <p>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].</p> <p>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.</p> <p>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</p>	

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			<p>to mitigate negative impacts which may include onsite provision of ancillary facilities for the use of the occupiers;</p> <p>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.</p> <p>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].</p> <p>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.</p> <p>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.</p> <p>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.</p>	
Q10.1.3	<p>Respond, with evidence, to IACC's [RR-020] concerns that:</p> <p>(a) There is insufficient justification of the need to accommodate up to 4000 workers on site;</p>	<p>L&amp;L's submissions provide a suite of evidence to address issues (a) and (b) and should be read in full; the impacts of accommodating 4000 workers on the WNDA are unacceptable and contrary to policy. The rationale given by HNP to rejecting alternatives such as the L&amp;L scheme are entirely</p>	<p>(a)</p> <p>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.</p>	<p>L&amp;L's evidence demonstrates that HNP's assertion that the effects are best managed by the use of a remote Site Campus is incorrect. In addition to the documents provided by L&amp;L at REP2, L&amp;L ask the ExA to note the clear support of Holyhead Town Council and the benefits they assert in locating temporary workers within the exiting community, contrary to HNP's claims [REP2-304].</p>



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	<p>(b) Why alternative locations for the temporary accommodation, including other potential sites within the NWDA and those elsewhere have been rejected;</p> <p>(c) The on and off-site leisure and other facilities are insufficient for a workforce of 9000?</p>	<p>unconvincing and at times simply factually wrong. As such, there is no proper reason for pursuing the Site Campus as a more harmful option and this part of the scheme should be rejected.</p>	<p>The need for TWA for 4,000 workers 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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>Further, as explained within L&amp;L's comments on HNP's WR at DL3, HNP place undue reliance upon the reduced need to travel to and from the WNDA. This ignores the other reasons for travel that would be increased by the remote location of the Site Campus such as a desire to seek out a wider range of facilities in Holyhead and other surrounding settlements, fails to address the potential large number of vehicles taking rural roads at the end of the shift pattern and ignores the other benefits of integrating the workers with local communities.</p>

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			<p>TWA.</p> <p>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.</p> <p>The benefits of a single on-site campus 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).</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	

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			<p>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.</p> <p>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.</p> <p>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.</p> <p>Horizon therefore believes that the Site Campus is appropriately located on-site and sized at 4,000 bedspaces.</p> <p>(b)</p> <p>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.</p> <p>As stated in the Site Selection report, the report only considers the</p>	



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			<p>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.</p> <p>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 Section Methodology and the 4 key stages to site selection.</p> <p>The methodology is split into four stages, as follows:</p> <ul style="list-style-type: none"> <li>· 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.</li> <li>· 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);</li> <li>· Stage 3: Operational pre-requisites, location and compatibility-</li> </ul> <p>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).</p> <p>Stage 3b of the assessment applies location and compatibility criteria to the remaining site; and</p> <ul style="list-style-type: none"> <li>· 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.</li> </ul> <p>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.</p> <p>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</p>	

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			<p>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.</p> <p>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.</p> <p>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.</p> <p>(c) Please see chapter C1 of the Environmental Statement [APP-088], which assesses the project-wide socioeconomic effects of the Wylfa Newydd DCO Project, including effects on public services. This assessment covers the potential effects on leisure and community facilities.</p> <p>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.</p> <p>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</p>	

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			<p>Anglesey from a Community and Welsh Language effects perspective.</p> <p>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.</p> <p>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.</p> <p>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.</p>	
Q10.1.4	Paragraph 4.3.14 of the Planning Statement [APP-406] refers to the site campus being provided in a	There are undoubtedly adverse effects that would ensue from the failure to deliver or delays in the delivery of the Temporary Worker	<p>(a)</p> <p>For ES purposes the assessment is based on delivery of the Site</p>	(e) The current build programme for the LL scheme demonstrates that all of the amenity buildings and sports pitches under that scheme would be complete and

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	<p>'phased manner' and the ES [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 DCO requirement.</p> <p>Can the applicant</p> <p>(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?</p> <p>(b) Indicate which is the relevant requirement and where are the thresholds referred to?</p> <p>(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?</p> <p>(d) Why there is a 5 year build programme for the site campus.</p> <p>(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.</p>	<p>Accommodation.</p> <p>L&amp;L's Appendix 5 sets out the work undertaken to date to ensure the L&amp;L scheme is deliverable. Detailed surveys including for grid connection and other infrastructure have already taken place and have confirmed capacity should the development be implemented. Appendix 5 demonstrates that the scheme could also be delivered to the appropriate timescale.</p>	<p>Campus in a phased manner. The first phase would provide accommodation for up to 1,000 workers (phase one), then increase incrementally to 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.</p> <p>(b) The relevant requirement is PW2, which states that "The delivery of Key Mitigation must be in accordance with the sequencing set out in the Phasing Strategy, unless otherwise approved by IACC."</p> <p>(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.</p> <p>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).</p> <p>The total workforce in the last quarter before the Site Campus becomes available is just under 3,200, of which just over 50%</p>	<p>available prior to occupation of the temporary worker's accommodation. Furthermore, at the Kingsland site there are existing sports facilities adjacent to the site (Holyhead Hotspurs outdoor football pitches and the Holyhead Leisure Centre) which the workers could access and which would facilitate wider social community interaction.</p> <p>In terms of phasing, the LL scheme is programmed to provide 3,500 bed spaces within 2 years of FID. Both the Cae Glas and Kingsland sites have been subdivided into separate phases that can be delivered in separate packages to suit Horizon's master delivery plan.</p> <p>We note that Horizon will be providing an update to this phasing strategy for deadline 4 (17 January 2019). The LL's delivery programme has been developed to provide flexibility whilst ensuring deliverability and LL is therefore confident that it would be able to coordinate with Horizon and any adjustments to its strategy</p>

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			<p>(1,620) are expected to be non-home based, i.e. well below the 3,000 assessed in the ES.</p> <p>The numerical breakdown is:</p> <p>Sector Workers</p> <table><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> <p>(d) 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.</p> <p>(e) 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.</p> <p>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.</p>	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	<p>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.</p> <p>(a) Can the IACC provide a copy of</p>	<p>A copy of the relevant documentation appears at [REP1-042].</p> <p>For the reasons set out within L&amp;L's Submissions document and supporting evidence, the reasons given for rejecting the L&amp;L Site are unconvincing and inaccurate and present a flawed basis for pursuing the Site Campus as a solution.</p>	<p>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,</p>	<p>Land and Lakes has provided its own RAG assessment [REP2- 244] which sets out why Horizon's comparative assessment is flawed. This is also considered in detail within Chapter 4 of L&amp;L's planning evidence [REP2-229].</p> <p>HNP assert that they were not consulted during the development or consenting of the L&amp;L scheme. This is factually incorrect. Indeed, L&amp;L's discussions with HNP during the early stages of the process prior to the planning permission being granted in 2016 resulted in HNP</p>												



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	<p>the decision notice and committee report for this planning permission and any comments they may wish to make on this scheme; and</p> <p>(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?</p>		<p>temporary purpose-built campus as close as possible to the Power Station.</p> <p>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.</p> <p>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).</p> <p>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 red ratings 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).</p> <p>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.</p> <p>As explained above, Horizon has thoroughly considered the use of</p>	<p>submitting two letters of support for the L&amp;L scheme [REP2-233] and [REP2-234].</p> <p>Further, HNP were invited to engage in the s.106 negotiations. Notably, L&amp;L provided HNP with the draft heads of terms and two impact assessments in May 2015. A draft s106 was provided to HNP during early 2016. HNP and L&amp;L met on more than one occasion in 2016 to discuss the draft 106 and a number of amendments were requested by HNP. The assertion that HNP were not engaged in this process is simply not correct and L&amp;L assumes the statement to be an error or oversight on the part of HNP. Extensive correspondence can be produced to evidence the point if required but it is hoped that upon a closer consideration, HNP may wish to correct this point.</p> <p>The consented scheme was formulated for the purpose of comprising TWA to be used by HNP. L&amp;L are therefore surprised that Horizon consider amendments would be required in order for the consents to be utilised. It was also demonstrated to be in a highly sustainable, accessible location that was an appropriate distance from the WNDA. Indeed, in its letter of support dated June 2012 [REP2-233] Horizon stated: <i>"...I can confirm that the scheme would seem to meet the criteria that Horizon was initially set for minimum worker travel time to site, and the accommodation, along with the associated leisure facilities, would appear to satisfy the modern standards expected for a construction workforce..."</i></p> <p>HNP have not identified what amendments would be required, or why any such amendments would be incompatible with the outline nature of the permission obtained.</p> <p>HNP now also rely on the exclusion of permanent dwellings from the scope of the Planning Act 2008. However, this does not preclude the use of the Town and Country Planning Act 1990 to obtain such consents, or the utilisation of existing consents outside 2008 Act. HNP already seek additional consents over and above the DCO including marine licenses. Obtaining separate TCPA consent for an element of the scheme that cannot be included within a DCO is no different.</p>

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			<p>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.</p> <p>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.</p>	
Q10.1.16	<p>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:</p> <p>(a) What facilities would be provided on site.</p> <p>(b) Whether these facilities would be free and if not whether they would be subsidised.</p> <p>(c) Whether home-based workers would be eligible to use the facilities</p> <p>(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</p>	<p>The L&amp;L section 106 secures leisure facilities which will be available for use by construction workers and local residents. They will remain and be available as a legacy benefit to local residents of Holyhead and surrounding areas.</p> <p>A summary of the key obligations appears at L&amp;L's Appendix 3.</p>	<p>(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.</p> <p>(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&amp;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.</p> <p>(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:</p>	<p>(b) It is a requirement of the s.106 agreement that the leisure facilities be provided at no charge throughout the construction period [REP2-247 Sch 3 para 3.2 and 4.3].</p> <p>(d) In assessing LL's development work, Arcadis has reviewed the amenity building requirement information provided by Sodexo, which breaks the hub building down into uses and floor areas, this has been coordinated with the Arcadis model to site the appropriate sized Hub building and incorporate the costs in the overall project cost estimate.</p> <p>(e) it is intended that the leisure facilities would form part of the legacy arising from the L&amp;L scheme. Indeed, community access to the key facilities proposed at Penhros are secured through the s.106 agreement [REP2-247 schedule 9 para 4].</p>

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	<p>based workers).</p> <p>(e) Indicate whether or not they would be available for use by the wider community (paragraph 2.3.1 BP18).</p> <p>(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?</p>		<p>· Reactor 1 - Jan – March 2014 &amp; Aug – Jan 2011;</p> <p>· Reactor 2 - April – July 2008 &amp; April – Sep 2012</p> <p>(d)</p> <p>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.</p>	
Q10.1.19	<p>Whilst the availability of accommodation has been looked at with regard to affordability has any assessment of the suitability of accommodation for workers been undertaken? If so what criteria were used?</p>	<p>L&amp;L's evidence demonstrates that the overriding concern for HNP has been the costs of providing off-site TWA. L&amp;L consider that the costs are overestimated and come with considerable benefits whilst not jeopardising the viability of the project as a whole.</p> <p>Specifically, Mr Seaton [Appendix 6] explains, from experience, that work camps have been proven to be hugely problematic and not fit for purpose. And Watermans demonstrate that the noise impacts for residents of the Site Campus would be likely to make it an undesirable location to live [Appendix 7].</p> <p>In contrast, the permitted scheme has been designed in concert with Sodexo who assisted in ensuring, again based upon their extensive experience, that the accommodation is sufficient for workers' needs [Appendix 10]</p>	<p>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 to tool used to ensure that properties are suitable and safe for workers to use. 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.</p> <p>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.</p>	<p>L&amp;L note that IOACC does not consider that the Site Campus would provide an adequate standard of accommodation.</p> <p>Further, the potential for adverse noise impacts on residents of the Campus remains unassessed.</p>
Q10.1.26	<p>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</p>	<p>The temporary Site Campus is a missed opportunity to provide meaningful (or any) legacy benefits to Anglesey as required by local policy.</p>	<p>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).</p> <p>As part of the WAS, Horizon will look for ways to create long-term</p>	<p>IOACC, Gwynedd Council and L&amp;L all point to the lack of legacy provided by the Site Campus. Even leaving to one side IOACC's criticisms of the Housing Fund, this would be provided even if the L&amp;L scheme was pursued and the existence of the fund is therefore not sufficient justification for the Site Campus and its lack of legacy.</p>



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	through the site campus which is a temporary facility?		<p>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, s Community Impact Fund (secured through the Draft DCO 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.</p> <p>Although the Site Campus will not provide any legacy, through the Housing Fund and the Community Fund,</p> <p>Horizon considers that the aims of the WAS can be achieved alongside the provision of TWA.</p>	