

From: [Jones Gareth \(AMG\)](#)
To: [Wylfa Newydd](#)
Subject: DCO Wylfa Newydd: Sylwadau Terfyn Amser 3 gan Gyngor Gwynedd / Deadline 2 Submissions by Gwynedd Council
Date: 18 December 2018 11:50:06
Attachments: [Sylwadau Gwynedd ar atebion HNP i PINS Rhagfyr 2018.pdf](#)

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Eich cyfeirnod: EN010007

Yr Arolygiaeth Gynllunio / The Planning Inspectorate

Cynllunio Seilwaith Cenedlaethol / National Infrastructure Planning

Terfyn amser 3 / Deadline 3

18 Rhagfyr 2018 / 18 December 2018

Annwyl Syr / Fadam,

Parthed: Cais DCO ar gyfer gorsaf niwclear Wylfa Newydd

Sylwadau Cyngor Gwynedd ar atebion Horizon i gwestiynnau gan yr Awdurdod Archwilio (ExQ1)

Atodir sylwadau ar ran Cyngor Gwynedd i rai o'r cwestiynnau uchod yn unol ac amserlen yr archwiliad.

Yn gywir,

Gareth Jones

Uwch Reolwr Gwasanaeth Cynllunio a Gwarchod y Cyhoedd

Dear Sir / Madam,

Reference: DCO application for Wylfa Newydd Power Station

Gwynedd Council comments on Horizon's reponse to questions by the Examining Authority (ExQ1)

Please find attached comments on behalf of Gwynedd Council to some of the above questions in accordance with the timetable for the examination.

Yours faithfully,

Gareth Jones

Senior Manager, Planning and Public Protection Service

Gareth Jones

Uwch Reolwr Gwasanaeth Cynllunio a Gwarchod y Cyhoedd /

Senior Manager, Planning and Public Protection Service

Adran Amgylchedd / Environment Department

Cyngor Gwynedd / Gwynedd Council

Gwasanaeth Cynllunio a Gwarchod y Cyhoedd / Planning and Public Protection Service

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	Question	Horizon	Gwynedd
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.	*Mae CG wedi adolygu Nodyn Statws y Gorchymyn Caniatâd Cynllunio (DCO) Drafft a.106 a gyflwynwyd ar Derfyn Amser 1 ac yn nodi fod cyfeiriad dan dwristiaeth at ‘Gronfa dwristiaeth wrth gefn – sydd ar agor i Wynedd a Chonwy’. Cyfeirir yn y Nodyn Statws at WNMPOP fyddai’n cynnwys nifer o fudd-ddeiliaid ac is-grwpiau. Byddai CG yn dymuno gweld cyfeiriad penodol ato yng nghyd-destun yr is-grŵp twristiaeth perthnasol. Byddai hefyd yn dymuno derbyn mwy o wybodaeth ar sgôp a natur y gronfa wrth gefn arfaethedig a byddant yn dymuno cael mynediad i’r gronfa er mwyn atal effiethiau allai gael eu hachosi, yn hytrach nac ymateb iddynt. *GC has reviewed the Staus Note on the Draft DCO s.106 submitted at Deadline 1 and notes that under tourism, there is a reference to ‘A <i>tourism contingency fund – open to Gwynedd and Conwy</i>’. Reference is made within the Status Note to the WNMPOP which would include a number of stakeholders and sub-groups. GC would wish to see specific reference to it in the context of the relevant tourism sub-group. It also wishes to receive more information on the scope and nature of the proposed contingency fund and in particular would wish to have access to the fund to prevent, rather than to react to impacts which may occur. *Nodir nad yw CG wedi cael unrhyw fewnbwn i’r cytundeb 106 drafft nac ychwaith wedi derbyn copi o gytundeb 106 drafft yn uniongyrchol gan Horizon. Er hyn, yn hwyr yn y dydd derbyniwyd fersiwn drafft o gytundeb 106 drwy law partneriaid sydd yn cydweithio ar faterion yn ymwneud a’r iaith Gymraeg, a rhoddir ymateb dechreuol yn unig ar hyn o bryd, ar gwestiynnau yn ymwneud a’r iaith Gymraeg. Bydd CG yn rhoi ymateb llawn i’r 106 drafft fydd yn cael ei gyflwyno gan Horizon ar derfyn amser 3 ar yr holl faterion sydd yn berthnasol i CG. *It is noted that GC has not had any input into the draft 106 agreement and GC has not received a copy of the draft 106 agreement directly from Horizon. However, late in the day, a draft 106 was received by partners that GC is working jointly with, in respect of Welsh language issues, and therefore, at present, an initial response is provided on questions relating to the Welsh language. GC will be providing a full response on the draft 106 that Horizon will be submitting on deadline 3 on all matters that are relevant to GC.
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).	Mae CG wedi adolygu’r Nodyn Statws ar y DCO Drafft a.106 a gyflwynwyd ar Derfyn Amser 1 ac mae’n bryderus bod cyfeiriad yn cael ei wneud ato yng nghyd-destun twristiaeth ac addysg yn unig. Nid yw CG wedi bod yn barti i unrhyw drafodaethau sylweddol ar yr a106 er bod ei ardal yn cynrychioli rhan sylweddol o gyfanswm yr ardal economaidd-gymdeithasol allweddol (KSA). Er bod CG yn derbyn bod lefel yr effaith ar Wynedd yn debygol o fod yn llai na’r hyn a brofir yn Ynys Môn, mae’n ei ystyried yn briodol bod ei fuddion wedi’u cydnabod a’u cyfarch yn yr a.106 yn foddhaol. GC has reviewed the Status Note on the Draft DCO s.106 submitted at Deadline 1 and is concerned that it is only referenced in the context of tourism and education. GC has not been party to any substantive discussions on the s106 despite its area representing a substantial part of the total KSA area. Whilst GC accepts that the level of impact upon Gwynedd is likely to be less than experienced on Anglesey it does consider it appropriate that its interests are recognized and addressed within the s.106 satisfactorily.

	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	
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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.

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.	

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
			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.
			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.

				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.	Mae ateb Horizon yn cyfeirio at drafodaethau ynglŷn â'r rhwymedigaethau cynllunio arfaethedig fel rhai parhaus gyda CSYM, Llywodraeth Cymru, CNC a 'budd-ddeiliaid perthnasol' eraill. Gall CG gadarnhau nad yw wedi bod yn barti i unrhyw drafodaethau sylweddol ynglŷn â sgôp na maint y rhwymedigaeth a.106. Horizon's answer refers to discussions regarding the proposed planning obligations as ongoing with IACC, Welsh Government, NRW and other 'relevant stakeholders'. GC can confirm that it has not been party to any substantive discussion regarding the scope or size of the s.106 obligation.
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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.				
	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	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> <tr> <td></td><td></td><td></td><td></td></tr> </table> 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.		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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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.	Dim Sylw No Comment								

	· 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),	
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		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	
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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.	Mae Horizon yn cyfeirio at DCO Drafft a.106 wedi'i adolygu. Nid yw CG yn ymwybodol os yw hyn wedi cael ei roi i'r archwiliad ac nid yw'n glir p'un a ddylai ateb Horizon gyfeirio yn hytrach at y Nodyn Statws Cytundeb. Noda CG fod cyfeiriad yn cael ei wneud yn Natganiad Tir Cyffredin (SOCG) Horizon a CG at yr isod: <i>A redacted draft s.106 Agreement was issued to Isle of Anglesey County Council and Welsh Government on 25th October 2018 and provides for a specific Housing Fund, which includes an upfront payment to Gwynedd Council on commencement, phased payments following commencement and a contingency element. At the time of writing this draft SoCG, Gwynedd have not received the draft s.106.</i> Felly, mae'n glir o'r SOCG bod Horizon, yn ogystal â thaliadau wrth gefn, hefyd yn cynnig taliadau ymlaen llaw i'r Cyngor ond, er ei fod yn gefnogol mewn egwyddor, nid yw CG wedi bod yn barti i unrhyw drafodaeth sylweddol ar y mater hwn. Byddai CG yn dymuno trafod a chytuno ar gyfleoedd penodol gyda Horizon ar gyfer taliadau ymlaen llaw, cynnar neu flynyddol dan y gronfa Dai a than gronfeydd eraill o bosib fyddai'n ychwanegol at y rhai fyddai'n cael eu talu drwy gronfeydd wrth gefn. Byddai CG yn dymuno deall ei rôl ddiffiniedig yn yr a.106. Horizon refers to a redacted Draft DCO s.106. GC is unaware as to whether this has been provided to the examination and is not clear as to whether Horizon's answer should instead refer to the Agreement Status Note. GC notes that reference is made within the Horizon and GC SOCG to the following: <i>A redacted draft s.106 Agreement was issued to Isle of Anglesey County Council and Welsh Government on 25th October 2018 and provides for a specific Housing Fund, which includes an upfront payment to Gwynedd Council on commencement, phased payments following commencement and a contingency element. At the time of writing this draft SoCG, Gwynedd have not received the draft s.106.</i> It is therefore clear from the SOCG that in addition to contingency payments, Horizon also propose upfront payments to the Council yet, whilst supportive in principle, GC has not been party to any substantive discussion on this matter. GC would wish to discuss and agree with Horizon specific opportunities for upfront, early or annualized payments under the Housing fund and potentially under other funds which would be in addition to those paid through contingency. GC would wish to understand its defined role within the s.106.
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	Mae'r niferoedd dan sylw a hyd arhosiad yn ystod diffoddiad wedi'i gynllunio yn wahanol, ac felly, mae'n haws ymdrin â'r effaith. Er nad yw'n gymharydd uniongyrchol, byddai o ddiddordeb nodi lle ac ym mha fath o lety oedd y gweithwyr hyn yn aros ynddo pan gynhaliwyd diffoddiadau wedi'u cynllunio yn Wylfa A. The numbers involved and length of stay during a planned outage are different and therefore the impact easier to absorb. Whilst not a direct comparator it would be of interest to identify where and in what type of accommodation these workers were accommodated when planned outages of Wylfa A were undertaken.

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.	Byddai CG yn gofyn i Horizon gadarnhau beth a ystyrir yn lefel gynaliadwy o ddeiliadaeth. Beth yw uchafswm deiliadaeth a pha lefel o drosiant a ganiatawyd o fewn cyfrifiadau? GC would ask Horizon to confirm what is considered to be a sustainable level of occupancy. What is maximum occupancy and what level of turnover has been allowed within calculations
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	(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.	d) Mae CG yn deall nad yw'r gwaith monitro a wnaed ar gyfer Hinkley Pwynt C yn darparu manylion llawn rhwng cyfran y carafanau sefydlog a theithiol ac nad oes unrhyw orfodaeth o ran y gweithwyr i gymryd rhan neu ymateb i'r arolygon monitro. Mae CG yn gofyn am gadarnhad gan Horizon y bydd mecanweithiau yn eu lle i sicrhau bod darlun cynhwysfawr o alw a chyflenwad yn cael ei ddarparu i CSYM, LIC, Conwy a Gwynedd d) GC understands that monitoring undertaken for Hinkley Point C does not provide full detail between the proportion of static and touring caravans and that there is no compulsion on the part of workers to partake or respond to the monitoring surveys. GC seeks confirmation from Horizon that mechanisms will be in place to ensure that a comprehensive picture of demand and supply is provided to IACC, WG, Conwy and Gwynedd.
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.	Gweler ymateb CG i'r cwestiwn a gyflwynwyd ar Derfyn Amser 2. Please see GC's response to this question submitted at Deadline 2.

		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):	
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- 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.	a) Mae Astudiaeth ARC 4 wedi cwestiynu lefel ac ehangder y capasiti yn y PRS. Mae'r ffigyrau % yn is na rhannau eraill o'r DU ac mae lefel y trosiant yn is gyda llai o landlordiaid proffesiynol. Ceir pryderon y gallai lleihad yn nifer y stoc effeithio ar grwpiau bregus. Ceir ychydig o dystiolaeth anecdotaidd bod <i>Air BnB</i> yn effeithio ar argaeledd mewn rhai ardaloedd twristaidd ac y gall galw Wylfa gywasgu'r farchnad i grwpiau bregus. Y rheswm dros hyn yw fod posib y gallent fod y cyntaf i gael eu gorfodi i symud allan gan fod llai o bŵer economaidd ganddynt i wrthsefyll unrhyw gynnydd posib mewn lefelau rhent. c). Mae gwybodaeth o Hinkley yn awgrymu fod pobl yn gwneud eu trefniadau eu hunain ac y bydd hyn yn anodd i'w reoli. Mae CG yn gofyn am ymrwymiad gan Horizon y bydd pob gweithiwr heb gartref lleol, sydd â chysylltiad uniongyrchol ac anuniongyrchol gyda'r prosiect, yn chwilio am lety drwy'r WAMS. a) The ARC 4 Study has questioned the level and extent of capacity within the PRS. The % figures are lower than other parts of the UK and the level of turnover is lower with fewer professional landlords. There are concerns that reduction in stock numbers could impact on vulnerable groups. There is some anecdotal evidence that Air BnB is impacting on availability in some tourist areas and that Wylfa demand could contract the market for vulnerable groups as they could potentially be the first to be forced out having less economic power to withstand any potential increase in rent levels. c). Information from Hinkley suggest that people are making own arrangements and that this will be difficult to control. GC requires a commitment from Horizon that all non-home based workers directly or indirectly associated with the project will source accommodation through the WAMS.
Q10.1.13	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.	Nodir sefyllfa Horizon. Tybia CG y bydd hyd cyfnod lleoli gweithwyr yn ystyriaeth allweddol o ran faint o weithwyr sydd yn debygol o ystyried prynu tŷ. Horizon's position is noted. GC assumes that the duration of deployment will be a key consideration as to how many workers are likely to consider owner-occupation.
Q10.1.15	(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.	Nodir sefyllfa Horizon. Horizon's position is noted.

	(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 7	The accommodation strategy assumes that housing developers would anticipate and respond to the demand created by the Wylfa 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 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. 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).	Gweler yr ateb a roddodd CG i'r cwestiwn hwn ar Derfyn Amser 2. Noda CG fod ateb Horizon yn ymwneud yn benodol ag Ynys Môn yn hytrach nag ystyried y KSA ehangach. Bydd angen amser paratoi i gyflawni a gwneud y gorau o'r deilliannau. Nid yw CG wedi derbyn unrhyw fanylion ynglŷn â'r dyraniad arfaethedig na'r meini prawf mynediad i bennu p'un a yw 'ymestyn capasiti' yn ddigonol neu'n ddichonadwy. Please see GC's answer to this question given at Deadline 2. GC notes that Horizon's answer is Anglesey specific rather than considering the wider KSA. There will be a need for a lead time to deliver and maximise outcomes. GC has not received any detail regarding the proposed allocation or access criteria to determine whether 'capacity enhancement' is adequate or feasible.

		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.	
Q10.1.18	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.	Byddai CG yn gofyn am gytundeb rhwng Horizon, CSYM, LIC a CG ar strategaeth raddol ar gyfer adeiladu a meddiannu campws y safle. Nid yw'r DCO drafft f3 yn cynnwys Strategaeth Llety Gweithwyr fel cynllun ardystiedig dan Atodlen 18, ac felly, mae CG yn cwestiynu sut all unrhyw gamau graddol y cyfeiriwyd atynt yn y ddogfen honno yn unig gael eu gorfodi. Mae CG yn gofyn i strategaeth raddol fanwl, ddiwygiedig gael ei chynhyrchu er mwyn cynnwys elfennau ar gyfer cyflawni campws y safle'n raddol, sy'n gysylltiedig â lefel gweithlu penodol. Bydd hyfforddiant sgiliau er mwyn uchafu nifer y trigolion lleol sy'n derbyn swyddi yn hanfodol; byddai anallu i recriwtio gweithwyr lleol yn cynyddu heriau llety. GC would ask that a phasing strategy for the construction and occupation of the site campus is agreed between Horizon, IACC, WG and GC. The dDCO v3 does not include the Worker Accommodation Strategy as a certified plan under Schedule 18 and as such GC questions how any phasing referenced solely within that document can be enforced. GC requests that a revised and detailed phasing strategy is produced to include for the phased delivery of the site campus linked to a certain workforce level. Skills training to maximise job take-up by local residents will be critical, an inability to recruit local workers would increase accommodation challenges.
Q10.1.19	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.	Byddai CG yn gofyn am gyllid er mwyn ei alluogi i ymdrin â materion trwyddedu a gorfodaeth. O ystyried cynigion Horizon fod pob eiddo sydd wedi'i gofrestru ar WAMS yn diwallu safonau penodol, mae CG yn llai pryderus ynglŷn â phroblem tai is-safonol yng nghyd-destun gweithwyr ac yn fwy pryderus ynglŷn â'r posibilrwydd ar gyfer trigolion presennol sydd o bosib yn fregus. Efallai y bydd trigolion presennol yn cael eu dadleoli i'r llety o ansawdd gwaelach ac o bosib yn methu â chofrestru. GC would request funding to allow it to address issues licensing and enforcement issues. Given Horizon's proposals that all properties registered on the WAMS meet certain standards, GC is less concerned about the issue of substandard housing in the context of workers and more

			concerned over the potential for existing, potentially vulnerable residents. Existing residents might be displaced to the poorer quality accommodation potentially incapable of registration.
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	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.	
Q10.1.20	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.	Nodir sefyllfa Horizon. Horizon’s position is noted.
Q10.1.21	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.	A) Er mwyn osgoi amheuaeth, nid oes angen caniatâd cynllunio fel arfer i ddefnyddio tŷ fel llety gwyliau (tai gwyliau ar osod neu ail gartrefi) oherwydd bod y tŷ yn dal o fewn Defnydd Dosbarth C3. Felly, nid oes unrhyw newid defnydd wedi digwydd. Pan roddir caniatâd cynllunio i newid defnydd adeilad di-breswyl yn lety gwyliau (tŷ gwyliau ar osod/defnydd busnes) defnyddir amod ‘meddiannaeth gwyliau’ i reoli meddiannaeth eiddo er mwyn sicrhau ei fod yn cael ei ddefnyddio gan aelwydydd ar wyliau, ac felly, atal ei ddefnydd fel unig neu brif breswylfan. B) Ni ellir defnyddio llety/bythynnod gwyliau, sydd wedi derbyn caniatâd cynllunio ar gyfer y defnydd penodol hwnnw, fel llety parhaol, h.y. fel unig neu brif breswylfan ar gyfer gweithiwr adeiladu. Byddai’n rhaid i geisiadau ar gyfer defnyddio bythynnod gwyliau cymeradwy ar gyfer defnydd preswyl fod yn destun cais cynllunio er mwyn dileu’r amod. Byddai’n rhaid ystyried pob cais ar ei rinweddau ei hun. Felly, mae’n anodd rhoi ateb absoliwt ynglŷn ag argaeledd posib. Byddai lleoliad yr eiddo yn ystyriaeth allweddol oherwydd byddem angen bod yn ystyriol o beidio â chreu cynsail, yn enwedig gan fod yr eiddo hyn yn dueddol o fod wedi’u lleoli yng nghefn gwlad agored yn bennaf. C) Fel y cyfeiriwyd ato yn yr ymateb i (b), byddai angen ystyried pob cais ar ei rinweddau ei hun. Ffactorau i’w hystyried – effaith ar y cyflenwad o lety gwyliau, a oes prawf o or-gyflenwad oherwydd gallai’r defnydd ‘dros dro’ hwn fodoli am nifer o flynyddoedd, a yw wedi’i leoli mewn lleoliad cynaliadwy i hwyluso’r defnydd o gludiant cyhoeddus i brif safle neu safle parcio a theithio. Byddai cyfyngiad amser yn cael ei roi ar ganiatâd drwy gyfrwng amod wedi’i eirio’n addas. A) For the avoidance of doubt, planning consent is not normally required to use a house as holiday accommodation (holiday lets or second homes) as the house is still within Use Class C3. Therefore, no change of use has occurred. When planning consent is given to change the use of a non- residential building to holiday accommodation (holiday let/ business use) a ‘holiday occupation’ condition is used to manage a property’s occupation in order to ensure that it is used for households on holiday and therefore prevent its use as a sole or main residence. B) Holiday accommodation/ cottages that have received planning permission for that specific use cannot be used as permanent accommodation, i.e. as a sole or main residence for a construction worker. Applications for the use of approved holiday cottages for residential use would have to be subject to a planning application for the removal of the condition. Each application would have to be considered on its own merit. Therefore difficult to provide an absolute answer about the potential availability. The property’s location would be a key consideration as we would need to be mindful of not creating a precedent particularly as these

			properties tend to be located mainly in open countryside.

	(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.	C) As referred to in response to (b) each application would need to be considered on its own merit. Factors to be considered – impact on supply of holiday accommodation, is there a proven over- supply as this ‘temporary’ residential use could be for a number of years, is it located in a sustainable location to facilitate use of public transport to main site or a park and ride site. Consent would be time limited via suitably worded condition.
Q10.1.22	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	(a) - (c) Nid yw CG wedi derbyn copi o'r cytundeb drafft A.106 ac o ymatebion cynharach mae'n deall fod hwn wedi cael ei rannu gyda CSYM a LIC. Mae CG yn croesawu'r egwyddor o 'ymestyn capasiti' ond nid yw wedi bod yn barti i unrhyw fanylion, ac felly, ni all bennu beth a ellir ei gyflawni. Byddai CG hefyd yn pwysleisio'r angen i gael cyfnod o arweiniad er mwyn hwyluso'r gwaith cyflawni. Byddai CG yn dymuno derbyn cyllid gan Horizon i'w alluogi i gyflawni ei swyddogaeth fonitro fel y cyfeirir ati yn ymateb Horizon. Byddai CG hefyd yn dymuno derbyn cyllid i gefnogi'r dasg o gyflogi un swyddog llety a byddai'n dymuno bod yn aelod o WNMPOP a'r Is-grŵp Llety, Twristiaeth a Hamdden. Credwn y bydd hyd yr arhosiad a'r cyfnod adeiladu yn effeithio ar y digartref; gallai fod yn fwy aciwt oherwydd bydd mwy o ysbeidiau terfynu mewn tenantiaethau. - (c) GC has not been provided with a copy of the Draft S.106 agreement which it understands from earlier responses has been shared with IACC and WG. GC welcomes the principle of 'capacity enhancement' but has not been party to any detail and cannot determine what can therefore be achieved. GC would also emphasise the need to have a lead in period to facilitate delivery. GC would wish to receive funding from Horizon to enable it to fulfil its monitoring function as referred to in Horizon's response. GC would also wish to receive funding to support the employment of one accommodation officer and would wish to be a member of the WNMPOP and Accommodation, Tourism and Leisure Sub-Group It is our belief that the duration of stay and build period will impact on homeless could be more acute as there will be more termination intervals within tenancies. d) Nid yw CG yn gallu gwneud sylw heb weld y manylion sydd wedi'u cynnwys yn yr A106d. GC is unable to comment without sight of the detail contained within the dS106.

	(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.	
Q10.1.23	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	Mae CG yn tybio bod gwiriad Safon Ddiogelwch Safonol ar gyfer Personél (BPSS) yn cynnwys gwiriad ar unrhyw ymddygiad troseddol blaenorol, ac felly, mae'n gyson â gwiriad DBS ond byddai angen cadarnhad bod hyn yn gywir. Dylid cynnal gwiriadau ar bob contractwr ac isgontractwr. Mae CG yn cefnogi'r gwasanaethau brys a'r gwasanaethau trydydd parti yn eu ceisiadau am adnoddau ychwanegol i ymateb i'r galw posib am eu gwasanaethau o ganlyniad i'r prosiect a byddai'n gofyn iddynt gael eu cynrychioli ar yr is-grŵp lechyd a Llesiant. GC presumes that a BPSS check includes for a check on any previous criminal behavior and is therefore consistent with a DBS check but would seek confirmation that this is the case. Checks should extend to all constructors and sub-constructors. GC supports the emergency and third services in their requests for additional resources to respond to the potential demand for their services as a result of the project and would request that it is represented on the Health and Well-being sub-group.

	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	
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	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).	
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Q10.1.26	Paragraph 2.1.1 of the WAMS [APP-412] sets out three overarching aims for the WAMS and this includes ‘providing a positivelegacy’. 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, s Community Impact Fund (secured though the Draft DCO	Mae CG o’r farn na fyddai’r safle campws arfaethedig yn darparu etifeddiaeth gadarnhaol o gofio mai cyfleuster dros dro ydyw nad yw Horizon yn bwriadu’i gadw. Mae CG wedi holi Horizon ynglŷn â fyddai’n bosib ail-ddefnyddio ychydig o’r modiwlau rhagsaernïol i ddarparu llety dros dro i oedolion bregus yng Ngwynedd (ac Ynys Môn o bosib). Mae CG yn ymwybodol o’r Gronfa Dai y cyfeiriwyd ati yn ateb Horizon er nad yw wedi cael trafodaethau sylweddol ynglŷn â beth allai’r gronfa ei chynnwys a fyddai’n berthnasol i Wynedd. Ac eithrio’r ddogfennaeth a gyflwynwyd i’r archwiliad, nid yw wedi gweld yr A.106 drafft. GC is of the opinion that the proposed site campus would not provide a positive legacy given that it is a temporary facility which Horizon does not intend to retain. GC has enquired of Horizon as to whether it would be possible to re-use some of the prefabricated modules to provide temporary accommodation for vulnerable adults in Gwynedd (and potentially Anglesey). GC is aware of the Housing Fund referred to in Horizon’s answer although it has not had substantive discussions over what the fund might contain relative to Gwynedd. Other than the documentation submitted to the examination, it has not had sight of the draft S.106.
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		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.																																		
Q10.1.300	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>	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	Gweler yr ateb a roddodd CG i'r cwestiwn hwn ar Derfyn Amser 2 sydd yn cynnwys yr wybodaeth gywir a geir yn atodiad 2 o'r Datganiad Monitro Tir ar gyfer tai sydd yn y linc isod: https://www.gwynedd.llyw.cymru/cy/Cyngor/Dogfennau-Cyngor/Strategaethau-a-pholisiau/Cynllunio-ac-amgylchedd/Polisi-cynllunio/Datganiad-Monitro-Tir-ar-gyfer-Tai-Gwynedd-2017.pdf Please see GC's answer to this question given at Deadline 2 which provides the correct information as included in appendix 2 of the Housing land availability statement in the link below: https://www.gwynedd.llyw.cymru/en/Council/Documents---Council/Strategies-and-policies/Environment-and-planning/Planning-policy/Gwynedd-Housing-Land-Monitoring-Statement-2017.pdf
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		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).																																		
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. if 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).	Mae barn Cyngor Gwynedd ar effeithiau cadarnhaol a negyddol posibl datblygiad Wylfa Newydd ar y farchnad leol wedi eu datgan yn glir yn yr ‘Adroddiad Datganiad Effaith Lleol’ (Wylfa Newydd Pŵer Station Llyfrgell yr Archwiliad – REP2-297) gyflwynwyd gan y Cyngor i'r Arolygaeth Cynllunio ar 04 Rhagfyr 2018. Yng ngoleuni ymateb Pŵer Niwclear Horizon dymunai'r Cyngor ddweud y canlynol unwaith eto: 1. Yng nghyswllt adeiladu Wylfa Newydd, mae Cyngor Gwynedd yn croesawu rhagolwg Pŵer Niwclear Horizon y bydd 2,000 o swyddi uniongyrchol yn cael eu meddu gan drigolion lleol, gyda 1,800 i'w credu yn anuniongyrchol (yn amodol i'r sylwadau isod parthed y risgiau posibl). Mae'r Cyngor yn nodi fod rhain yn rhagolygon achos gwaethaf (h.y. isafswm); er efallai fod hyn yn ddull gweithredu addas ar gyfer rhagweld y galw am lety a.y.b., ond nid yw'n fuddiol ar gyfer rhagweld a chynllunio'r pwysau ar y farchnad lafur lleol. Dymunai Cyngor Gwynedd weithio gyda Phŵer Niwclear Horizon a phartneriaid megis Llywodraeth Cymru, Cyngor Sir Ynys Môn a Bwrdd Uchelgais Economaidd Gogledd Cymru i adnabod targed delfrydol ar gyfer cyflogaeth leol - gyda ffocws ar swyddi gwerth uwch - sydd yn uchafu'r budd lleol ac yn minimeiddio unrhyw risgiau posibl. 2. 6.2.19 Fe allai cyflenwad annigonol o lafur arwain at ddadleoli swyddi o fusnesau lleol i Bŵer Niwclear Horizon a'i gytundebwyr ac / neu arwain at bwysau i gynyddu cyflogau allai danseilio hyfywdra rhai mentrau lleol. Byddai'r effeithiau hyn gyda chanlyniad negyddol i'r economi lleol. 3. 6.2.20 mae'r ‘Asesiad o'r Risg o Ddadleoli’ a chomisiynwyd gan Lywodraeth Cymru o Hardisty Jones Associates (wele Atodiad 2) yn awgrymu fod diffyg sylweddol yn y nifer o weithwyr sydd ar gael i gwrdd ag anghenion Wylfa Newydd, yn arbennig yng nghyswllt swyddi gyda sgiliau uwch. Allai hyn arwain at weithwyr yn y meysydd hyn yn gadael cwmnïau lleol i weithio yn Wylfa Newydd. Mae Gwynedd yn arbennig o agored i'r effeithiau hyn gan ei fod yn agos at Wylfa Newydd. 4. 6.2.33 Mae Cyngor Gwynedd yn gofyn fod yr elfennau canlynol yn cael eu gosod allan a'u hymrwymo iddynt yn y dogfennau rheolaeth megis y CoCP Fod Cyngor Gwynedd yn cael ei gynnwys yn llawn yn yr holl Is-grwpiau Monitro ac																																	

			Ymgysylltiad. • Fod monitro yn digwydd yn gynnar a'i fod yn barhaus yn ystod y cyfnod adeiladu • Fod mesurau lliniaru yn cael eu gweithredu yn rhagweithiol pan yn briodol • Fod lliniaru yn dilyn effaith ac yn ystyried yr effeithiau uniongyrchol, anuniongyrchol a'r effeithiau ysgogwyd • Monitro parhaus o'r effeithiau cronno1 o Wylfa Newydd yng ngoleuni'r nifer fawr o brosiectau sylweddol allai gael eu gweithredu yng Ngogledd Cymru o ganlyniad i Gais Twf Gogledd Cymru. Gwynedd Council's view on the potential positive and negative impacts of the Wylfa Newydd development upon the local labour market are clearly articulated in the 'Statement of Local Impact Report' submitted by the Council to the Planning Inspectorate on 04 December 2018 (Wylfa Newydd Power Station Examination Library REP2-297). In the context of Horizon Nuclear Power's response the Council would reiterate the following: 1. 6.2.11 <i>In relation to the construction of Wylfa Newydd, Gwynedd Council welcomes Horizon Nuclear Power's forecast that 2,000 direct posts should be taken up by home based workers with a further 1,800 generated indirectly (subject to the comments below on the potential risks). The Council notes that this is a worst case (i.e. minimum) forecast; this may be an appropriate approach for the purpose of anticipating demand for accommodation etc., but is not helpful in anticipating and planning the demands of the construction phase on the local labour market. Gwynedd Council would like to work with Horizon Nuclear Power and partners such as the Welsh Government, the Isle of Anglesey County Council and the North Wales Economic Ambition Board to determine an optimal target for local employment – with a focus on higher value posts - which maximises local benefit and minimises any potential risks</i> 2. 6.2.19 <i>An insufficient labour supply will lead to the displacement of posts from local businesses to Horizon Nuclear Power and its contractors and / or a degree of upward pressure on wages which may undermine the sustainability of local enterprises. Both these impacts would have a negative consequence on the local economy. Gwynedd Council also believes the fluidity of labour movement between Anglesey and the mainland has been underappreciated, the high levels of commuting between Anglesey and Gwynedd adds to the complexity of the issue and has the potential to increase the negative impacts on Gwynedd.</i> 3. 6.2.20 <i>.... the 'The Potential Displacement Impact of the Construction of Wylfa Newydd on Gwynedd' report commissioned by Gwynedd Council from Hardisty Jones Associates (see Annex 2) suggest that there is a significant shortfall in the number of available workers to meet Wylfa Newydd's requirements for more highly skilled posts. The report notes the anticipated demand for Civils Operatives and M&E Operatives from Gwynedd far outstrips the available labour (i.e. job seekers in these fields) and represent a not insignificant proportion of the total number of existing workers in these fields. The report also highlights that there is insufficient labour to meet the anticipated demand in Anglesey. Both these factors could lead to workers in these fields leaving local companies to work at Wylfa Newydd. Given its proximity to Wylfa Newydd, the Gwynedd is particularly vulnerable to these impacts.</i> 4. 6.2.33 <i>Gwynedd Council requests that the following elements are set out and committed to in the DCO control documents e.g. the CoCP, as follows:</i> • <i>That Gwynedd Council be fully involved in the Programme Board and all relevant Monitoring and Engagement Sub Groups</i> • <i>That monitoring is undertaken early and is ongoing throughout the construction period</i> • <i>That mitigation should be undertaken proactively where appropriate</i> • <i>That mitigation should follow impact and consider direct, indirect and induced impacts.</i> • <i>Ongoing monitoring of the cumulative effects of Wylfa Newydd in view of the large volume of major projects potentially being implemented in North Wales as a result of the North Wales Growth Bid.</i>
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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).	No comment Dim sylw
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	Hoffai Cyngor Gwynedd nodi nad yw'r Cyngor wedi ei wahodd i gymryd rhan yn natblygiad / monitro'r WNESS hyd yn hynny tu hwnt i'n presenoldeb yng ngweithdy ar gasgliadau'r Strategaeth Swyddi a Sgiliau. Yng Nghyswllt ymateb Pŵer Niwclear Horizon, eto dymunai'r Cyngor dynnu sylw i'r farn a fynegir yn yr 'Adroddiad Datganiad Effaith Lleol' Wylfa Newydd Pŵer Station Llyfrgell yr Archwiliad – REP2-297) gyflwynwyd gan y Cyngor i'r Arolygaeth Cynllunio ar 04 Rhagfyr 2018 (wele adrannau 6.2.9 i 6.2.11 a 6.2.17 i 6.2.23). Nodwn fod bron i 20% o gyfranogwyr y WNESS hyd yn hyn o Wynedd er bod y peilot wedi ei dargedu'n benodol i Fôn; mae hyn yn adlewyrchu barn y Cyngor fod symudedd llafur rhwng y ddwy sir yn sylweddol (6.2.19) Nodwn fod yr ymateb yn datgan fod cytundeb s.106 drafft y DCO yn ymrwymo Horizon a Chyngor Môn i gefnogi'r WNESS ac yn cynnig gweithredu'r Cynllun Gweithredu Swyddi a Sgiliau. Nodwn nad yw'r Cyngor wedi gweld y cytundeb s.106 drafft y DCO a'r Cynllun Gweithredu Swyddi a Sgiliau. Hoffai Cyngor Gwynedd ailadrodd ei gais fod y Cyngor yn chwarae rhan lawn yn datblygu a gweithredu'r WNESS. Gwynedd Council would note that the Council has not been invited to participate in the development / monitoring of the WNESS to date beyond our presence in a briefing on the findings of the Jobs and Skills Strategy. In the context of Horizon Nuclear Power's response, again the Council would draw attention to the views articulated in the 'Statement of Local Impact Report' (Wylfa Newydd Power Station Examination Library REP2-297) submitted by the Council to the Planning Inspectorate on 04 December 2018 (sections 6.2.9 to 6.2.11 and 6.2.17 to 6.2.23). In particular, the Council would note that nearly 20% of the participants in the WNESS to date are from Gwynedd despite the pilot being specifically targeted to Anglesey; this reflects the Council's assertion that the fluidity of labour movement between both Counties is significant (6.2.19). The Council also notes that the response states that the draft DCO s.106 agreement obliges Horizon and IACC to support the WNESS and proposed the delivery of the Jobs and Skills Implementation Plan. The Council has not seen either the Draft DCO s.106 agreement or the Jobs and Skills Implementation Plan. Gwynedd Council would reiterate its request (6.2.23) that the Council is fully involved in the development and delivery of WNESS.

		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.	No comment Dim sylw
Q10.2.10	The Workforce Management Strategy [APP- 413] sets outs 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	No comment Dim sylw

	(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.	
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		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) 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?	(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	Gweler ateb blaenorol CG. Yn ogystal, byddai CG yn ychwanegu ei fod yn gofyn am gadarnhad y bydd y cod yn cael ei ymestyn i gontractwyr ar yr ail, trydydd haen ac ati yn hytrach na'r prif gontractwr yn unig o bosib. O ran cyfeiriad Horizon at y CoCP a'r rheolaethau o ran rheoli traffig, byddai CG yn cadw at ei sylwadau blaenorol o ran annigonolrwydd y ddogfen (ac mae'r adran ar reoli traffig yn un enghraifft). Please refer to GC's previous answer. In addition GC would add that it seeks confirmation that the code will extend to second, third etc tier contractors rather than potentially the main contractor only. With regard to Horizon's reference to the CoCP and controls on the management of traffic GC would maintain its previous comments with regard to the inadequacy of the document (and the traffic management section is one example).

		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.	
Q10.2.11	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.	Gweler ateb CG i’r cwestiwn hwn, a gyflwynwyd ar Derfyn Amser 2.
			Please see GC answer to this question, submitted at Deadline 2.
		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	

	(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.	
Q10.2.12	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.	No comment Dim sylw
Q10.2.13	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).	Nid yw Cyngor Gwynedd yn aelod o’r ‘Grŵp Gwaith Sgiliau Adeiladu’. Nodwn o’r ymateb fod y Grŵp yma am gael ei ail-gyfansoddi i fod yn ‘Grŵp Sgiliau a Swyddi’ y WNMPOP. Mae Horizon yn nodi eu bod wedi parhau i ddatblygu’r Strategaeth Sgiliau a Swyddi drwy law’r Grŵp ac wedi datblygu Cynllun Gweithredu drafft mewn ymgynghoriad gyda’r Grŵp. Gan nad yw’r Cyngor yn aelod o’r Grŵp, nid ydym wedi cael unrhyw fewnbwn i ddatblygiad pellach y Strategaeth nac datblygiad y Cynllun Gweithredu drafft. Hoffwn ailadrodd nad yw’r Cyngor wedi gweld y cytundeb s.106 drafft y DCO , fydd, fel a nodie yn ymateb Horizon, yn llywio penderfyniadau gwariant ynglŷn â mesurau lliniaru yn gysylltiedig â’r farchnad llafur lleol. Mae Cyngor Gwynedd y croesawu'r cyfeiriad yn ymateb Horizon at hyfforddi a chynyddu sgiliau Gweithwyr sy’n Byw Gartref i ymgymryd â swyddi gwerth uwch (fel a nodir yn yr ‘Adroddiad Datganiad Effaith Leol’ gyflwynwyd gan y Cyngor - adran 6.2.11 - Wylfa Newydd Pauer Station Llyfrgell yr Archwiliad – REP2-297). Mae’r Cyngor angen cadarnhad pellach fod sgôp ac ardal ddaearyddol y gweithgareddau a gynigir yn ddigonol i uchafu’r cyfleoedd a lleihau’r risgiau sydd wedi eu hadnabod yn yr Adroddiad Datganiad Effaith Lleol. Mae’r Cyngor hefyd yn dymuno eglurder ynglŷn â’r berthynas rhwng y Grŵp Gwaith Sgiliau Adeiladu (‘Grŵp Sgiliau a Swyddi’ y WNMPOP) a’r grŵp yn rheoli’r WNESS. Gwynedd Council is not involved in the Construction Skills Working Group. We note from the response that this Group will be re-constituted as the Jobs and Skills Group to the WNMPOP. Horizon states that it has continued to refine the Jobs and Skills Strategy via this Group and has developed a draft Implementation Plan in consultation with the Group. As the Council is not a member of the Group, the Council has not had any input into the further development of the Strategy or the development of the draft Implementation Plan. We would also reiterate that the Council has not had sight of the draft DCO s.106 agreement, which, as stated in Horizon’s response, will guide spending decisions on mitigation measures relating to the local labour market. Gwynedd Council welcomes the reference in Horizon’s response to the training and upskilling of

			Home Based Workers to undertake higher value posts (as noted in the ‘Statement of Local Impact Report’ submitted by the Council - section 6.2.11 - Wylfa Newydd Power Station Examination Library REP2-297). The Council requires further assurance that the scope and geographical coverage of the activities proposed are sufficient to maximise the opportunities and minimise the risks identified by the Statement of Local Impact Report. The Council would also request further clarity regarding the relationship between the Construction Skills Working Group (Jobs and Skills Group to the WNMPOP) and the group managing the WNESS.
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		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.	
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Q10.2.14	(a) How much money would be available to the Skills fund? (b) Given the advocated need for flexibility and the wide range of projects and activities it could fund would the proposed amount be sufficient to mitigate the effect of the application?	(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.	Nid yw'r ymateb darparwyd i (a) yn ateb y cwestiwn a ofynnwyd. Eto, hoffwn nodi nad yw'r Cyngor wedi gweld y cytundeb s.106 drafft y DCO a'r Cynllun Gweithredu Swyddi a Sgiliau. Dymunai'r Cyngor ailadrodd ei ddymuniad i chwarae rhan lawn yn datblygu a gweithredu ymyraethau marchnad llafur ac y dylai lliniaru ddilyn effaith ac yn ystyried yr effeithiau uniongyrchol, anuniongyrchol a'r effeithiau ysgogwyd (adran 6.2.33 o'r 'Adroddiad Datganiad Effaith Leol' gyflwynwyd gan y Cyngor - Wylfa Newydd Power Station Llyfrgell yr Archwiliad - REP2-297). Hoffai'r Cyngor nodi fod y 'Welsh Government Deadline 2 Submission - written submission' (Wylfa Newydd Power Station Llyfrgell yr Archwiliad REP2-367) Appendix B 'Assessment of the Risk of Displacement prepared gan Hardisty Jones Associates i Lywodraeth Cymru ac Atodiad 2 yr 'Adroddiad Datganiad Effaith Leol' ('The Potential Displacement Impact of the Construction of Wylfa Newydd on Gwynedd' gan Hardisty Jones Associates) yn awgrymu fod cyflawni targed Horizon am Weithwyr sy'n Byw Gartref, gan gynnwys symud 1,000 o drigolion o ddiweithdra, am fod yn fwy heriol nac sydd wedi ei awgrymu yn yr ymateb a ddarparwyd. The response provided to (a) does not answer the question asked. Again, the Council would reiterate that it has not seen the draft DCO s.106 agreement or the Jobs and Skills Implementation Plan. The Council would, once again restate its desire to be fully involved in the development and delivery of labour market interventions and that mitigation should follow impact and consider direct, indirect and induced impacts (section 6.2.33 of the 'Statement of Local Impact Report' submitted by the Council - Wylfa Newydd Power Station Examination Library REP2-297). The Council would note that the 'Welsh Government Deadline 2 Submission – written submission' (Wylfa Newydd Power Station Examination Library REP2-367) Appendix B 'Assessment of the Risk of Displacement prepared by Hardisty Jones Associates for the Welsh Government along with Appendix 2 of Statement of Local Impact Report ('The Potential Displacement Impact of the Construction of Wylfa Newydd on Gwynedd' by Hardisty Jones Associates) suggest that fulfilling Horizon's target for Home Based Workers, including moving 1,000 residents from worklessness, will be more challenging than is implied in the response provided.
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		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.	
Q10.2.15	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.	Eto, hoffwn nodi nad yw'r Cyngor wedi gweld y cytundeb s.106 drafft y DCO a'r Cynllun Gweithredu Swyddi a Sgiliau. Again, the Council would reiterate that it has not seen the draft DCO s.106 agreement or the Jobs and Skills Implementation Plan.

		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.																						
Q10.2.16	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?	The majority of opportunities for home-based (HB) workers will not be in site services. Most site services jobs (34%) will go to home-based workers, but most home-based workers (66%) will not be working in site services. Table 3-1 Occupation Groups Workforce Breakdown on p.33 of 6.3.9 ES Volume C - Project-wide effects App C1-2 - Socio-economic technical appendix summarises the estimated number of HB workersin each broad occupation at the peak of construction: <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>		% 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	Dim sylw y tu hwnt i’r hyn sydd eisoes wedi ei nodi No comment beyond points previously noted
	% 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																						
		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																						

		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.	Dim sylw y tu hwnt i'r hyn sydd eisoes wedi ei nodi No comment beyond points previously noted
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	Byddai Cyngor Gwynedd yn dymuno gweithio gyda Horizon i ehangu ac ymestyn y ddarpariaeth mor fuan â phosib. Gwynedd Council would seek to work with Horizon to expand and extend the programme at the earliest opportunity

		who can provide the necessary practical experiences to achieve the associated National Vocational Qualification.	
Q10.2.19	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	Nod yw'n ymddangos fod yr ymateb yn ateb y cwestiwn yn llawn gan nad yw'n cadarnhau'r mesurau cytundebol a gynigir. Derbyniwyd drafft cychwynnol o'r Cynllun Gweithredu Cadwyn Cyflenwi gan Gyngor Gwynedd ar 14 Rhagfyr; mae'r ddogfen eto i'w adolygu. Response does not appear to fully answer the question, as it does not state what contractual measures are proposed. An initial draft of the Supply Chain Action Plan was received by Gwynedd Council on Friday 14 December and is yet to be reviewed.

	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 through Section Draft DCO s.106) • Skills Fund (Secured through 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 through Draft DCO s.106) • Supply Chain Charter, Action Plan and Service (Secured through Draft DCO s.106) • Community Involvement Officer/ Economic Development Officer (Secured through 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	
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	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	
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		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.	
Q10.2.20	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;	Byddai Cyngor Gwynedd yn dymuno gweithio gyda Horizon i ehangu ac ymestyn y ddarpariaeth mor fuan â phosib. Gwynedd Council would seek to work with Horizon to expand and extend the programme at the earliest opportunity.

		• 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.	
Q10.2.21	(a) Is the school engagement work undertaken in both Welsh and English?	(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.106Agreement, commits that: 'Horizon will continue to develop and provide bilingual educational support for primary and secondary pupils as well as Further Education students'	Dim sylw No comment

	(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.	
Q10.2.22.	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.	Fel a nodwyd, derbyniwyd drafft cychwynnol o'r Cynllun Gweithredu Cadwyn Cyflenwi gan Gyngor Gwynedd ar 14 Rhagfyr; mae'r ddogfen eto i'w adolygu. Dymunai Cyngor Gwynedd ofyn eto â'n y ei fod yn cael chware ran lawn yn y strwythurau sydd i'w datblygu i fonitro a lliniaru unrhyw effeithiau ac uchafu unrhyw gyfleoedd (adran 6.2.12 a 6.2.31 o'r 'Adroddiad Datganiad Effaith Leol' gyflwynwyd gan y Cyngor - Wylfa Newydd Pauer Station Llyfrgell yr Archwiliad - REP2-297). Byddai Cyngor Gwynedd yn croesawu gwybodaeth bellach am y gofynion cytundebol sydd ar y Cytundebwr Rheoli Prosiect yng nghyswllt datblygu'r gadwyn cyflenwi leol a llafur lleol. As noted previously, an initial draft of the Supply Chain Action Plan was received by Gwynedd Council on Friday 14 December and is yet to be reviewed. Gwynedd Council would again request its involvement in any structures developed to monitor and mitigate any impacts and maximise the opportunities (sections 6.2.12 and 6.2.31 of the 'Statement of Local Impact Report' submitted by the Council - Wylfa Newydd Power Station Examination Library REP2-297). Gwynedd Council would welcome further information on the contractual requirements placed upon the Project Management Contractor in relation to local supply chain development and local labour.

		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.	
Q10.2.23	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.	Fel a nodir yn ‘Adroddiad Datganiad Effaith Leol’ (Wylfa Newydd Power Station Llyfrgell yr Archwiliad - REP2-297) gyflwynwyd gan y Cyngor (adrannau 6.2.17 i 6.2.23), mae Gwynedd yn credu fod effeithiau sylweddol <i>posib</i> i’r farchnad llafur lleol yn deillion o ddatblygiad Wylfa Newydd. Yn fwyaf arbennig, nid ydym yn cytuno gyda’r dull a nodir yn yr ymateb sydd yn ystyried Môn yn unig, hoffwn ailadrodd rydym ‘yn credu fod y symudiad llafur rhwng Môn a Gwynedd heb ei werthfawrogi’n llawn, mae’r lefel uchel o gymudo rhwng yr Ynys a Gwynedd yn ychwanegu i gymhlethdod y mater hwn a gyda’r potensial i gynyddu effeithiau negyddol ar Wynedd’ (adran 6.2.19 o’r Adroddiad Datganiad Effaith Leol’). Mae Cyngor Gwynedd yn credu fod y risg o ddadleoli llawer iawn yn uwch nac sydd wedi ei gydnabod gan Horizon; manylir ar ein rhesymeg am hyn yn Atodiad 2 yr ‘Adroddiad Datganiad Effaith Leol’ (‘The Potential Displacement Impact of the Construction of Wylfa Newydd on Gwynedd’ gan Hardisty Jones Associates) sydd yn unol â’r ‘Welsh Government Deadline 2 Submission - written submission’ (Wylfa Newydd Power Station Llyfrgell yr Archwiliad REP2-367) Appendix B ‘Assessment of the Risk of Displacement gan Hardisty Jones Associates i Lywodraeth Cymru. As noted in the ‘Statement of Local Impact Report’ (Wylfa Newydd Power Station Examination Library REP2-297).submitted by the Council (sections 6.2.17 to 6.2.23), Gwynedd believes that there are significant <i>potential</i> risks to the local labour market from the development of Wylfa Newydd. In particular, we do not agree to the approach noted in the response which considers Anglesey in isolation, we would reiterate <i>‘the fluidity of labour movement between Anglesey and the mainland has been underappreciated, the high levels of commuting between Anglesey and Gwynedd adds to the complexity of the issue and has the potential to increase the negative impacts on Gwynedd’</i> (section 6.2.19 of the ‘Statement of Local Impact Report’). Gwynedd Council believes the risk of displacement is greater than is recognised by Horizon.; our reasoning for this is detailed in Appendix 2 of the Statement of Local Impact Report (‘The Potential Displacement Impact of the Construction of Wylfa Newydd on Gwynedd’ by Hardisty Jones Associates) and is in line with the ‘Welsh Government Deadline 2 Submission – written submission’ (Wylfa Newydd Power Station Examination Library REP2-367) Appendix B ‘Assessment of the Risk of Displacement prepared by Hardisty Jones Associates for the Welsh Government.

		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.	
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		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>	
Q10.2.26	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	Fel a nodwyd yn flaenorol, mae Cyngor Gwynedd yn credu fod y risg o ddadleoli yn sylweddol uwch na’r hyn sydd wedi ei awgrymu gan Horizon (weler ein sylwadau i Q10.2.2 3). Fel a nodir yn adran 6.2.21 o’r ‘Adroddiad Datganiad Effaith Leol’ (Wylfa Newydd Power Station Llyfrgell yr Archwiliad - REP2-297) gyflwynwyd gan y Cyngor mae ‘.....diffyg gweithwyr eisoes yn bryder gan nifer o sectorau megis twristiaeth, yn arbennig yn y cyfnod ar ôl Brexit; bydd y galw am weithwyr gan Wylfa Newydd yn cynyddu’r her mae cyflogwyr yn eu hwynebu i recriwtio staff cymwys’ Unwaith eto, hoffai’r Cyngor alw iddo gael ei gynnwys yn dylunio, gweithredu a rheoli unrhyw mesurau lliniaru ar gyfer y farchnad llafur lleol. As previously stated Gwynedd Council believes the risk of displacement is significantly greater than suggested by Horizon (see comments on response to Q10.2.2 3). As noted in section 6.2.21 of ‘the Statement of Local Impact Report’ (Wylfa Newydd Power Station Examination Library REP2-297).submitted by the Council ‘....a lack of workers has already been cited by sectors such as tourism as a concern, particularly post-Brexit; the demand for workers generated by Wylfa Newydd will increase the challenge employers face in recruiting suitably qualified staff’. Once more, the Council would call for it to be fully involved in the design, delivery and management of any mitigation measures relating to the local labour market.

	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	
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		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>”	
Q10.3.4	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.	Mae CG wedi adolygu’r ymatebion a gyflwynwyd gan Heddlu Gogledd Cymru, Gwasanaeth Tân ac Achub Gogledd Cymru ac Ymddiriedolaeth Ambiwllans Cymru. Noda eu bod i gyd wedi nodi’r gofyn am adnoddau ychwanegol sylweddol o ganlyniad i’r prosiect. Mae CG yn awyddus i sicrhau nad yw lefel bresennol y gwasanaethau a ddarperir gan bob sefydliad i gymunedau Gwynedd dan fygythiad o ganlyniad i’r prosiect, ac felly, mae’n eu cefnogi gyda’u ceisiadau. Gc has reviewed the responses submitted by North Wales Police, North Wales Fire and rescue and the Wales Ambulance Trust. It notes that they have each identified a requirement for significant additional resources as a result of the project. GC is keen to ensure that the existing level of services each organization provides to the communities of Gwynedd is not compromised as a result fo the project and therefore supports them in their requests.
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 curtesy.	Nid yw CG wedi bod yn barti i gynnwys y cytundeb a.106 yn y DCO Drafft. Byddai CG yn dymuno trafod y posibilrwydd o fod yn bresennol ar yr Is-grŵp Iechyd a Llesiant oherwydd byddai effeithiau posib ar wasanaethau iechyd lleol yn cael effaith ar ei breswylwyr a chymunedau lleol. GC has not been party to the contents of the Draft DCO s.106 agreement. GC would wish discuss the potential for its attendance on the Health and Well-being Sub-group as potential impacts upon local health services would affect its residents and local communities.
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.	Yr Iaith Gymraeg Welsh Language

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	Fel a nodwyd yn flaenorol, derbyniwyd drafft cychwynnol o’r Cynllun Gweithredu Cadwyn Cyflenwi gan Gyngor Gwynedd ar 14 Rhagfyr; mae’r ddogfen eto i’w adolygu. Fel a nodwyd yn ymateb Cyngor Gwynedd ‘Deadline 2 Submission - Response to Examining Authority’s Written Questions’ (Wylfa Newydd Power Station Llyfrgell yr Archwiliad REP2-294) mewn ymateb i gwestiwn 10.4.1 ‘Nid yw Cyngor Gwynedd wedi bod yn rhan o unrhyw ymchwil hyd yma i adolygu p’un a yw’r busnesau sydd eu hangen i gyflenwi’r ymgeisydd ar gael yn lleol neu’n rhanbarthol ac mae ymgysylltiad ar hyn wedi bod yn ysbeidiol. Dymunai Cyngor Gwynedd ofyn eto ei fod yn cael chware ran lawn yn y strwythurau sydd i’w datblygu i fonitro a lliniaru unrhyw effeithiau ac uchafu unrhyw gyfleoedd (adran 6.2.12 a 6.2.31 o’r ‘Adroddiad Datganiad Effaith Leol’ gyflwynwyd gan y Cyngor - Wylfa Newydd Power Station Llyfrgell yr Archwiliad - REP2-297). As noted previously, an initial draft of the Supply Chain Action Plan was received by Gwynedd Council on Friday 14 December and is yet to be reviewed. As noted in Gwynedd Council’s ‘Deadline 2 Submission - Response to Examining Authority’s Written Questions’ (Wylfa Newydd Power Station Examination Library REP2-294) in response to question 10.4.1 ‘Gwynedd Council has not been involved in any research to date to review whether the businesses needed to supply the applicant are available either locally or regionally and engagement on this matter has been intermittent’. Gwynedd Council would again request its involvement in any structures developed to monitor and mitigate any impacts and maximise the opportunities (sections 6.2.12 and 6.2.31 of the ‘Statement of Local Impact Report’ submitted by the Council - Wylfa Newydd Power Station Examination Library REP2-297).
	(b) If it has what were the findings? In particular what percentage of the applicants supply needs could currently be met either locally or regionally?	(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.	Wele sylwadau blaenorol See previous comments

	(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?	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. (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.	Fel a nodwyd yn adran 6.2.27 o'r 'Adroddiad Datganiad Effaith Leol' gyflwynwyd gan y Cyngor (Wylfa Newydd Power Station Llyfrgell yr Archwiliad - REP2-297) 'mae'r Cyngor yn ystyried fod defnydd o lety gan weithwyr dros-dro yn anghydnaws â chynnal eu defnydd ar gyfer ymwelwyr gan fod anghenion y ddwy garfan yn wahanol. Dymunai Cyngor Gwynedd i Horizon sicrhau argaeledd llety amgen ac annog gweithwyr i beidio defnyddio llety ymwelwyr'. As noted in section 6.2.27 of the 'Statement of Local Impact Report' submitted by the Council (Wylfa Newydd Power Station Examination Library REP2-297) '<i>...the Council considers that the utilisation of this accommodation by temporary workers is incompatible with maintaining their use for tourists due to the differing needs of both groups. Gwynedd Council would ask that Horizon Nuclear Power ensure the availability of alternative accommodation and discourage the use of visitor accommodation.</i>'

	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.	Wele sylwadau blaenorol See previous comments
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	Dim sylw No comment

	(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.	
Q10.4.6	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.	Fel a nodwyd yn adran 6.2.28 o’r ‘Adroddiad Datganiad Effaith Leol’ gyflwynwyd gan y Cyngor (Wylfa Newydd Power Station Llyfrgell yr Archwiliad - REP2-297) o ystyried arwyddocâd twristiaeth i economi Gwynedd, mae’r Cyngor yn gofyn i’r awdurdod cael chware ran lawn yn datblygu a gweithredu mesurau monitro a lliniaru yn gysylltiedig â thwristiaeth, yn unol â’r egwyddorion a nodir yn 6.2.33 o’r adroddiad. As noted in section 6.2.28 of the ‘Statement of Local Impact Report’ submitted by the Council (Wylfa Newydd Power Station Examination Library REP2-297) given the significance of tourism to the Gwynedd economy, the Council requests that the authority is fully involved in the development and delivery if monitoring and mitigation measures relating to tourism, in line with the principles noted in section 6.2.33 of the Report.

		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.	
Q10.5.1	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.	Nodir ymateb Horizon. Horizon’s response is noted.
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.	Nodir ymateb Horizon. Horizon’s response is noted.
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.	Byddai Gwynedd yn cefnogi strategaeth fyddai’n edrych yn benodol ar yr effaith ar addysg ac ysgolion, gan nad ydym yn credu bod sylw digonol wedi ei roi i’r effaith ieithyddol ar ysgolion yn y AEIG. Ar sawl achlysur, mae CG wedi tynnu sylw at y gwendid yn yr asesiad effaith wrth edrych ar yr effaith ar ysgolion. Fel y nodwyd yn ein AELI/ LIR mae’r sylw hyd yma wedi bod ar nifer y llefydd gwag yn yr ysgolion a gallu yr ysgolion ar draws y brif ardal astudiaeth (KSA) i ymdopi gyda’r niferoedd mwy o ddisgyblion, heb ddigon o ystyriaeth i’r effeithiau ieithyddol ehangach. Mae’r sylw gan Horizon ynghylch yr ymrwymiad i liniaru effeithiau ar lefydd mewn ysgolion yn dangos bod yr agwedd simplistig yma yn parhau. Mae Horizon yn cyfeirio at Adran 7 y Strategaeth Swyddi a Sgiliau fel crynodeb o’u strategaeth addysg, ond nid yw’r ddogfen honno yn gwneud yr un cyfeiriad at yr iaith Gymraeg (namyn un) nac at wasanaethau peripatetig, felly mae’r ddogfen honno yn amherthnasol yng nghyd-destun y cwestiwn a godir ynghylch effaith ieithyddol. Credwn bod y pwyntiau hyn ynddynt eu hunain yn ddigon o reswm dros ofyn am strategaeth addysg ar wahân, fydd yn rhoi sylw manylach ar yr effaith ar y system addysg ar draws y

		ddwy sir gyfagos. Nid ydym yn credu bod digon o sicrwydd yn cael ei gynnig yn y cytundeb 106 gan fod hwn yn gytundeb cyfreithiol gyda Chyngor Mon, ac nid yw’n cynnwys ymrwymiad cadarn i weithredu yn rhagweithiol yng Ngwynedd, ond yn hytrach (fel yr ydym wedi ei nodi sawl tro cyn hyn) i weithredu yn ymatebol “os bydd angen”. Nid yw ymateb Horizon i’r cwestiynau yma yn dangos unrhyw newid yn yr agwedd mewn unrhyw ffordd, ac nid yw nodi y bydd “specific interventions may change ovver time” yn rhoi ymrwymiad digonol gan Horizon y bydd gweithredu effeithiol. Mae’n aneglur ar hyn o bryd pwy fydd yn gwneud y penderfyniad am newid neu gynnydd i’r “angen” o’r hyn a ragwelwyd, a sut y bydd arian yn cael ei ddyrannu. Ni ellir ar hyn o bryd roi ffydd llawn yn yr ymyraethau hyn o ganlyniad. Gellir dadlau bod cyfle i CG fanteisio ar gymorth ariannol drwy’r Gronfa Addysg wrth Gefn, dan anodau cymal 3.3., Atodlen 6 y cytundeb 106 Drafft, ond nid oes unrhyw drafodaethau wedi bod rhwng Horizon a CG ynghylch manteisio ar gronfeydd ariannol o’r fath, nac am yr effeithiau penodol posib ar Wynedd, sut y bydd data yn cael ei rannu a sut y bydd yr angen yn cael ei fesur. Mae hefyd yn bryderus nad yw arian wrth gefn hwnnw ond ar gael ar gyfer y cyfnod adeiladu, ac felly yn cyfyngu unrhyw allu i sicrhau cymorth tymor hir ar gyfer problem tymor hir. Mewn ymateb i’r cyfeiriad at gasglu data, rydym unwaith eto yn tynnu sylw at broblem gyda’r asesiad wnaed o’r effaith posib yn y cyd-destun yma a’r mesur lliniaru a gynigir. Nid yw’r AEIG ond yn cyfeirio at ddibynyddion sydd yn symud efo gweithwyr, ac nid yw’r cyfeirio at sut y bydd yn delio gyda effaith tymor hir posib y gweithwyr hyn wrth iddynt setlo yn yr ardal wedi’r cyfnod adeiladu ac effaith unrhyw blant a dibynyddion allai gael eu geni yn ystod y cyfnod adeiladu a gweithredu, ac a fydd yn cael effaith uniongyrchol ar wasanaethau. Felly er bod ymrwymiad yn cael ei wneud i fonitro, nid oes ymrwymiad clir hyd y gwelwn i sicrhau arian fyddai ar gael yn y dyfodol i liniaru unrhyw effeithiau uniongyrchol o’r natur hwn.
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		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.	Gwynedd would support a strategy that would focus specifically on educational impact as we do not believe it has been given sufficient attention and focus within the WLIA. CG has on several occasions drawn attention to the weakness of the WLIA in regards to it’s approach to assessing the effect on schools and the language. As noted in our LIR, the focus has been on school capacity, and the ability of the schools across both counties to cope with the additional number of pupils, without much consideration to the additional linguistic impact. The comment by Horizon about the commitment to mitigate effects on school place demand again displays this simplistic view of the problem. Horizon refers to Section 7 of the Jobs and Skills strategy as a summarization of their education strategy – but this document makes no mention of the Welsh language (apart from one) or to peripatetic services, so is irrelevant in the context of the questions raised here. We believe that these point in themselves are enough justification to ask for a separate Education Strategy that will amongst other things bring a closer focus on the impact on the school system across both neighboring counties. We do not believe that sufficient security is given by the Draft DCO 106 Agreement, as this is a contract agreement with IOACC, and does not include a firm commitment to operate proactively in Gwynedd, but rather as we have previously noted, to react “if needed”. Horizon’s response to these question does not show a change in their position in any way and noting that “specific interventions <u>may</u> change over time” does not in our opinion give a satisfactory commitment by Horizon. It is unclear at this time who will make the decision about a change or increased “need” to that which was predicted, and how funding will be allocated, and so no firm trust can be instilled in these mitigations. It could be argued that there would be a chance to secure mitigating funding through the Education Contingency Fund, as noted in clause 3.3. Schedule 6.of the Draft DCO 106 agreement, if CG could prove a significant impact, bu no discussions have been held between Horizon and GC about possible access to such funds, and specific possible impacts on Gwynedd, how data would be shared, and how the impact and need would be measured, It is also concerning that this fund is only available until the end of construction stage, and so restricts any possibility of securing long term funding for a long term problem. In response to the reference to collecting data, we once again highlight a problem with the assessment made of the possible impact and as a result the mitigation measure offered. The WLIA only refers to dependents that will move to the area with workers, but does not mention the possible long term impact of workers moving into the area, settling in the area after construction and any children and dependent that will be born during construction and operational stages, and that will also have a direct impact on services. So, even though a commitment has been made to monitor, there is no clear commitment to ensuring funding would be available in the future to mitigate any direct effects of this nature.
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		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.	
Q10.5.5	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	Mae’r ymrwymiad a welir yn y cytundeb 106 drafft gyda Chyngor Môn yn nodi cyfraniad o £80,000 tuag at ddau athro peripatetic. Nid yw hwn, mi gredwn, yn fesur digonol ar gyfer sicrhau bod y gwasanaeth ar draws y ddwy sir yn y sefyllfa orau ddelio gydag unrhyw gynnydd yn y gal war y gwasanaethau trochi. Mae hwn wedi bod yn destun trafod ers cryn amser, ac nid ydym eto yn teimlo bod Horizon wedi rhoi sylw dyledus i’r pryderon sydd yn cael eu mynegi (gan CG na Cyngor Môn) yn y cyd-destun yma. Dylid nodi bod fersiwn flaenorol o’r AEIG yn cyfeirio at gyfraniad ariannol o £240-270k yn erbyn y mesur lliniaru hwn yn unig, ac felly mae’r swm a nodir yn y cytundeb 106 yn ymddangos yn bitw iawn ac yn dangos newid sylweddol yn y lliniaru a gynigir ar gyfer y gwasanaethau trochi yn benodol.. nid yw’n teimlo bod Horizon wedi ystyried pa ychwanegiad fyddai’n gweddu orau i’r model cyfredol sydd yn cael ei gynnal gan y ddwy sir. Rydym yn ymwybodol nad yw Cyngor Mon yn fodlon gyda’r lefel yma o ymrwymiad ychwaith,a’u bod yn gofyn am lefel uwch o gyfraniad ariannol tuag at athrawon peripatetic. Os gellir sicrhau cyfraniad uwch drwy’r cytundeb 106 yna credwn y dylid ystyried pennu a sicrhau cyfraniad penodol i Wynedd hefyd. Roedd ein adroddiad ardrawiad lleol (LIR) yn nodi bod gennym dystiolaeth sydd yn dangos bod disgyblion yn teithio o bob rhan o’r ynys i ysgolion dalgylch Bangor, a chredwn yn gryf y dylid nodi ymrwymiad penodol o liniaru’r effaith posob ar yr ardal yma o Wynedd yng nghyd-destun addysg ac ysgolion. Fel y noda Cyngor Mon yn eu hymatebion, byddai CG yn ffafrio unrhyw fodel lliniaru sydd yn dilyn eu model cyfredol o weithredu’r gwasanaeth, gan ddefnyddio gwasanaeth trochi sefydlog yn hytrach nag adnodd symudol.

		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.	The commitment made in the Draft DCO 106 agreement with IACC notes a contribution of £80,000. This does not, in our opinion, constitute an adequate measure that will ensure the services across both counties are equipped and ready to deal with any increase on demand on the immersion services. This is a matter that has been a bone of contention for some time and we still do not feel that Horizon are giving due attention to the concerns raised. It should be noted that a previous version of the WLIA referred to a financial contribution of £240-270k in this mitigation measure alone, and so the sum noted in the 106 agreement shows a considerable change in the mitigation offered for immersion services in particular. It also does not feel that Horizon have considered what addition would best suit the current model being run by both Anglesey and Gwynedd education departments. We are aware that IACC is not happy with this level of undertaking, and is asking for a higher contribution towards peripatetic teachers. If a higher contribution can be secured, then a contribution to Gwynedd should also be specified and secured. Our LIR noted evidence that shows pupils are currently travelling from various areas of Anglesey to primary schools in Gwynedd, and in particular the Bangor area, and we believe strongly that a firm commitment should be made to mitigate possible effects in Gwynedd. As noted by IOACC in their responses, CG would favour any mitigation that follows their current mode of operation, with static immersion service rather than movable peripatetic resource.
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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	Wele sylwadau blaenorol See previous comments
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	(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?	<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) 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	
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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.	Nodir ymateb Horizon. Horizon's response is noted.

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;	Nodir ymateb Horizon. Horizon's response is noted.
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	(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.	
Q10.5.10	(a) Can you provide details of when the evaluation of the impact of the project on the Welsh language in the KSA will be completed	(a)	Nodir ymateb Horizon. Horizon's response is noted.

	(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.	
Q10.5.11	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.	Creda CG y dylid nod ymrwymiad clir i ddiweddarau neu greu strategaeth lliniaru ddilynol ar gyfer y cyfnod gweithredu a dad-gomisiynu. Mae effeithiau ieithyddol yn rhai tymor hir, ac ni ellir eu cyfyngu i derfyn amser penodol. Er ein bod yn cydnabod bod ceisio rhagweld unrhyw effeithiau posib y tu hwnt i'r cyfnod adeiladu bron yn amhosib ar y pwynt hwn heb i ni fod efo gwaelodlina sylfaen tystiolaeth gadarn ynghylch nifer y gweithwyr ac ati, ond byddai yn gam i'r cyfeiriad cywir i weld cyfeiriad penodol at sut y bydd yr effeithiau ieithyddol ar gymunedau a gwasanaethau yn cael eu hasesu ar ôl y cyfnod adeiladu. CG believes that a clear commitment should be made to update, amend or create an additional strategy for the operational and decommissioning stages. Linguistic effects are long term ones, and cannot be limited to a certain timeframe. Although we accept that trying to ascertain any possible impacts beyond the construction phase, at this stage in time, is near impossible without a solid baseline and evidence of actual numbers, but it would be a step in the right direction to see a specific reference to how the linguistic impact on the communities and services will be assessed after the construction stage

		• 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).	
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Q10.5.17	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.	Nodir ymateb Horizon. Horizon's response is noted.
Q10.5.18	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)	Nodir ymateb Horizon. Horizon's response is noted.

		- Community Involvement Officer/ Economic Development Officer (Secured though 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).	
Q10.5.19	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 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.	Fel y nodwyd yn flaenorol, mae CG yn bryderus am Fesur Iliniaru 13 yr AEIG, sydd yn nodi y bydd Horizon yn casglu data ar blant a phartneriaid y gweithwyr fydd yn symud i mewn i brif ardal astudiaeth o ganlyniad i’r datblygiad. Nid yw hyn yn ystyried unrhyw blant fydd yn cael eu geni ar ôl i’r gweithwyr setlo yn y brif ardal astudiaeth, ac ni wneir ymrwymiad clir i gasglu data fyddai’n dangos yr effaith ddilynol yma. Er bod y ddogfennaeth yn nodi “monitro parhaus” deallir bod hynny yn cyfeirio at weithwyr fydd yn cyrraedd ar wahanol adegau o’r cyfnod adeiladu, ac nid oes cyfeiriad penodol at gasglu gwybodaeth gan yr un bobl er mwyn diweddarau cofnodiona a nodi newid mewn amgylchiadau a gallu monitro unrhyw ardrawiadau cynyddol. Hoffir cael mwy o eglurder ar y mater hwn. As previously noted, CG is concerned about mitigation Measure 13 of the WLCMES, which notes Horizon will collect data on children and partners/spouses moving into the KSA. This does not take into account any children that will be born after the workers settle in the KSA, and no clear commitment has been seen to collect data that would assess this secondary impact. Although they state “monitoring on an ongoing basis” this is understood to refer to incoming workers at different stages and does not specify if they will ask the same people to update information regularly in order to monitor any ongoing and increasing impacts. Further clarity on this mater would be needed.

		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.	
Q10.5.20	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.	Economaidd-gymdeithasol / Yr Iaith Gymraeg Socio-ec/ Welsh language

Q10.5.22	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.	Nodir ymateb Horizon. Horizon's response is noted.
Q10.5.23	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.	Nodir ymateb Horizon. Horizon's response is noted.
Q10.5.24	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	Nodir ymateb Horizon. Horizon's response is noted.

	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;	
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		- 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.	
Q10.5.25	(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?	(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:	Nodir ymateb Horizon. Horizon's response is noted.
	(b) Who would these groups be accountable too?	- 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.	
	(c) Given many of the Welsh language and cultural groups are voluntary organisations what resources would be made available to them to enable	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.	

Q10.5.26	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.	Nodir ymateb Horizon. Horizon's response is noted.
Q10.5.27	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.	Cyflwynwyd awgrymiadau gan CG ar y pwynt hwn, ond gan fod nifer o'r cyrff a gynigiwyd hefyd yn aelodau ar Fforwm Iaith Mon, rydym yn fodlon gyda'r awgrym bod y Fforwm yn cael ei defnyddio fel ffordd o weithredu a sicrhau'r Datganiadau o Dir Cyffredin. Hoffem serch hynny dynnu sylw at y canlynol: Hoffem sicrwydd y bydd y partneriaid hynny sydd wedi eu hadnabod yn cael eu hannog i gynrychioli eu sefydliadau yn ehangach, ac i edrych ar yr effeithiau ar yr ardal astudiaeth gyfan,ac nid ar yr ynys yn unig. Hoffem wybod a fydd y Datganiad o dir Cyffredin yn cael ei wneud gyda'r aelodau hynny o'r Fforwm sydd wedi cyflwyno cynrychiolaeth ysgrifenedig, neu a fydd aelodau eraill y Fforwm hefyd yn cael cyfle i gyfrannu at y drafodaeth? Yn y cyd-destun hwn, ac fel partner i waith Hunaniaith yng Ngwynedd, a rhan o deulu ehangach y Mentrau Iaith, rydym o'r farn y dylid ystyried cynnwys datganiad o dir cyffredin gyda Menter Iaith Bangor hefyd. Suggestions were submitted by GC on this point, but as many of the main bodies suggested are also members of Fforwm Iaith Mon, we are happy with the suggestion that the Fforwm is used as a means to ensure this. We would however like to raise the following points: We would like an assurance that those parties identified will be encouraged to represent their organizations as a whole, and consider the effect on the KSA, and not only the isle of Anglesey. We would like to know if the Statement of Common Ground be specifically with those members of the Fforwm that have submitted Relevant Representations, or will all members of the Fforwm be included in discussion and get a chance to contribute? As a partner in Hunaniaith's work in Gwynedd, and part of the wider Mentrau Iaith family, we are also of the opinion that consideration should be given to preparing a SoCG with Menter Iaith Bangor.
Q10.6.12	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	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	Gweler ateb CG i'r cwestiwn hwn, a gyflwynwyd ar Derfyn Amser 2. Noder bod Horizon yn cyfeirio at rannu'r cylch gorchwyl drafft ar gyfer y bwrdd rhaglen gyda LIC a CSYM. Mae CG yn parhau i gael ei gau allan o drafodaethau ynglŷn â'r bwrdd rhaglen, ei gyfansoddiad, ei sgôp a'i aelodaeth. Mae CG wedi adolygu'r cylch gorchwyl drafft a gynhwysir yn Nodyn Statws Cytundeb A.106 y DCO Drafft. Noda nad yw'r cylch gorchwyl yn ei ddynodi'n rhan o'r aelodaeth graidd (paragraffau 1.4.7 ac 1.4.8). Nodir CG gan Horizon yn y SOCG a gyflwynwyd fel derbynnydd taliadau ymlaen llaw. Fe'i nodir hefyd fel derbynnydd cronfeydd wrth gefn. Am y rhesymau hyn, ystyria'r Cyngor y dylai ffurfio rhan o'r aelodaeth graidd.

	available to attend these boards?	CoCP but its functions would be secured by the Draft DCO s.106 Agreement, including circumstances under which it	O’r cronfeydd wrth gefn a nodir yn Nhabl 1-1, cyfeirir at CG yng nghyd-destun Tai a Thwristiaeth yn unig. Cred y Cyngor y dylai hefyd gael mynediad i gyllid dan bob atodlen ac eithrio rhifau 9,10,11 ac 13. Please see GC’s answer to this question, submitted at Deadline 2. Please note that Horizon is referring to the sharing of the draft terms of reference for the programme board with WG and IACC. GC continues to be excluded from discussions around the programme board, its constitution, scope and membership. GC has reviewed the draft terms of reference contained within the Draft DCO S.106 Agreement Status Note. It notes that the terms do not indicate it as being part of the core membership (paragraphs 1.4.7 and 1.4.8). GC is identified by Horizon within the submitted SOCG as being the recipient of upfront payments. It is also noted as being the recipient of contingency funds. For these reasons the Council considers it should form part of the core membership. Of the contingency funds identified within Table 1-1 GC is only referred to in the context of Housing and Tourism. The Council is of the opinion that it should also have access to funding under all schedules with the exceptions of nos. 9,10,11 and 13.
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		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	
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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	Mae CG wedi gofyn yn flaenorol am asesiad traffig blynyddoedd cynnar pan fydd mesurau megis y Ganolfan Logisteg a Pharcio a Theithio (P&R) yn cael ei hadeiladu, oherwydd bod pryderon y gallai'r llifau traffig hyn, ar lefel lleol, achosi problemau gyda thagfeydd, oedi, toriad ac effeithiau cyffredinol os na fyddant yn cael eu rheoli. Mae CG hefyd wedi gwneud sylw blaenorol y dylai'r cyfleusterau hyn fod ar gael o ddiwrnod cyntaf y gwaith adeiladu er mwyn annog defnydd ohonynt ar ddechrau unrhyw weithgarwch adeiladu. Er bod Horizon yn nodi y rhagwelir y bydd rheolaeth ar lifau traffig, nid oes unrhyw fanylion amdanynt ar gael i allu gwneud sylwadau. Mae angen i'r holl fanylion ynglŷn â rheoli fod yn y CoCP, y ddogfen reolaeth ar gyfer gweithgarwch yn ymwneud â thraffig. Fodd bynnag, p'un a yw'r ganolfan logisteg a pharcio a theithio ar agor ai peidio, nid yw hynny'n newid y llifau traffig cyffredinol yn ardal CG, gan fod y cyfleusterau hyn wedi'u lleoli yn y fath fodd fel bod traffig eisoes wedi mynd trwy ardal CG. Mae CG wedi gofyn o'r blaen pam fod y lleoliadau hyn wedi cael eu dewis ac nad yw cyfleusterau eraill wedi'u cynnig ar y tir mawr. Nid oes manylion o hyd ynglŷn â sut fydd cerbydau adeiladu yn cael eu rheoli a'u rhyddhau yn ôl ar y briffordd ar ôl dadlwytho yn safle Wylfa. Mae CG yn croesawu'r manylion ychwanegol a ddarparwyd. GC have asked previously for early years assessment of traffic when measures such as the Logistics Centre and Park and Ride (P&R) are being built, as there are concerns that at a local level these traffic flows, if uncontrolled could cause issues with congestion, delays, severance and general impacts. GC have also previously commented that these facilities should be available from day one of construction to encourage use at the very start of any construction activity. Whilst it is stated by Horizon that it is envisaged there will be controls on traffic flows, there have been no details available of these to comment on. All details around control needs to be in the CoCP, the control document for traffic related activity. However, whether the logistics centre and P&R are open or not does not change the overall traffic flows within the GC area, as these facilities are located in such a way that traffic has already passed through the GC area. GC have asked previously why these locations were chosen and other facilities are not proposed on the mainland. There are still no details of how construction vehicles will be controlled and released back onto the highway after off-loading at the Wylfa site. GC welcome the additional details given.
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		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	Mae gan CG beth amheuaeth o hyd ynglŷn â sut fydd tybiaethau cymhareb rhannu car yn cael eu cyflawni a'u gorfodi, o ystyried lleoliad y cyfleuster, diffyg bysiau lleol (darpariaeth gwasanaeth gwledig) ac nid yw'r patrymau sifft yn gwneud rhannu car yn hawdd. Felly, er mwyn cyflawni'r symudiadau cerbydau a ragwelir, ceir dibyniaeth gref ar rannu ceir. GC reservations remain with respect to how the car sharing ratio assumptions are going to be achieved and enforced, given the location of the facility, the lack of local buses (rural service provision) and the shift patterns do not make car share easy. Therefore to achieve the vehicle movements forecast there is heavy reliance on car share.
		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	Nid oes gan CG unrhyw sylw o ran gwelliannau all-lein ar yr A5025 oherwydd nad ydynt yn effeithio ar rwydwaith priffyrdd CG na llifau traffig ar hyn. GC have no comments with respect to the off-line improvements on the A5025 as they do not affect the GC highway network or traffic flows on this.
		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 Llanrhuuddlad to north of Cefn Coch – comprising a proposed bypass to provide a straighter section of road and bypass two existing substandard bends in Llanrhwyrus. 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	Nid oes gan CG sylwadau pellach i'w hychwanegu at hyn, gweler yr Adroddiad Effaith Lleol (LIR). Mae CG yn ystyried y dylai gwasanaethau bysiau parcio a theithio hefyd gael eu lleoli ar y tir mawr er mwyn lleddfu'r pwysau ar briffyrdd CG a Phont Britannia. GC do not have further comments to add to his, please see the LIR. GC consider that P&R shuttle bus services and Park and Share should also be located on the mainland to alleviate pressure on GC highways and the Britannia Bridge.
	(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.	Mae CG wedi gofyn i gael bod yn rhan o'r is-grŵp trafnidiaeth. GC have requested that they are part of the transport sub-group.

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.	Mae CG wedi codi pryderon yn flaenorol ynglŷn â’r goblygiadau i draffig pan fydd Pont Mentai a/neu Phont Britannia yn cau oherwydd digwyddiadau megis tywydd garw. Mae CG wedi gofyn am brofion sensitifrwydd yn y gwaith modelu trafndiaeth ar gyfer digwyddiadau posib megis cau pontydd. Mae CG yn croesawu’r sylwadau ychwanegol a wnaed, ond maent yn cadw at eu sylwadau ac mae angen amlinellu’r mesurau i ymdrin â chau pontydd yn y CoCP, dogfen reoli. GC have raised concerns previously with the implications for traffic when the Menai Bridge and/or Britannia Bridge closes for events such as bad weather. GC have asked for sensitivity testing in the transport modelling for eventualities such as bridge closures. GC welcome the additional comments made, but their comments still stand and the measures to deal with closures need to be set out in the CoCP, a control document.
		• 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.	Mae CG wedi codi pryderon yn flaenorol ynglŷn â’r goblygiadau i draffig pan fydd y Cyfleuster Dadlwytho Morol (MOLF) yn cau oherwydd digwyddiadau megis tywydd garw. Mae CG wedi gofyn am brofion sensitifrwydd yn y gwaith modelu trafndiaeth ar gyfer digwyddiadau posib megis cau MOLF. Mae CG yn croesawu’r sylwadau ychwanegol a wnaed, ond maent yn cadw at eu sylwadau ac mae angen amlinellu’r mesurau i ymdrin ag achosion o gau yn y CoCP, dogfen reoli. GC have raised concerns previously with the implications for traffic when the MOLF closes for events such as bad weather. GC have asked for sensitivity testing in the transport modelling for eventualities such as MOLF closures. GC welcome the additional comments made, but their comments still stand and the measures to deal with closures need to be set out in the CoCP, a control document.
		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.	Mae CG yn croesawu hyn, ond mae pryder o hyd gydag opsiynau wrth gefn tymor hirach, y dylid eu nodi yn y CoCP, dogfen reoli. GC welcome this, but concerns still remain with longer term contingency options, which should be set out in the CoCP, a control document.
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.	CG, dim sylw pellach. GC, no further comment.

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 where in the documentation this information can be found.	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. 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.	CG, dim sylw pellach. GC, no further comment.
Q11.1.10	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).	Nid oes gan CG unrhyw sylw pellach at y rhai blaenorol a wnaed ynglŷn ag ymestyniad y cyfnod adeiladu, nac ymestyniad yr amseroedd pan fydd cerbydau ar y rhwydwaith priffyrdd. Mae CG wedi gofyn am brofion sensitifrwydd ar adeg prysuraf y cyfnod adeiladu a fodelwyd oherwydd bod ganddynt bryderon ynglŷn â llifau prysuraf cerbydau yn lledaenu a chyfnodau symudiadau cerbydau yn ymestyn. GC, have no further comment to those made previously with respect to the prolongation of the construction period, or the extension of the times when vehicles are on the highway network. GC have requested sensitivity tests around the modelled peak of construction as they have concerns around the peak spreading of vehicle flows and lengthening of vehicle movement periods.

Figure 1 – DCO Transport Assessment

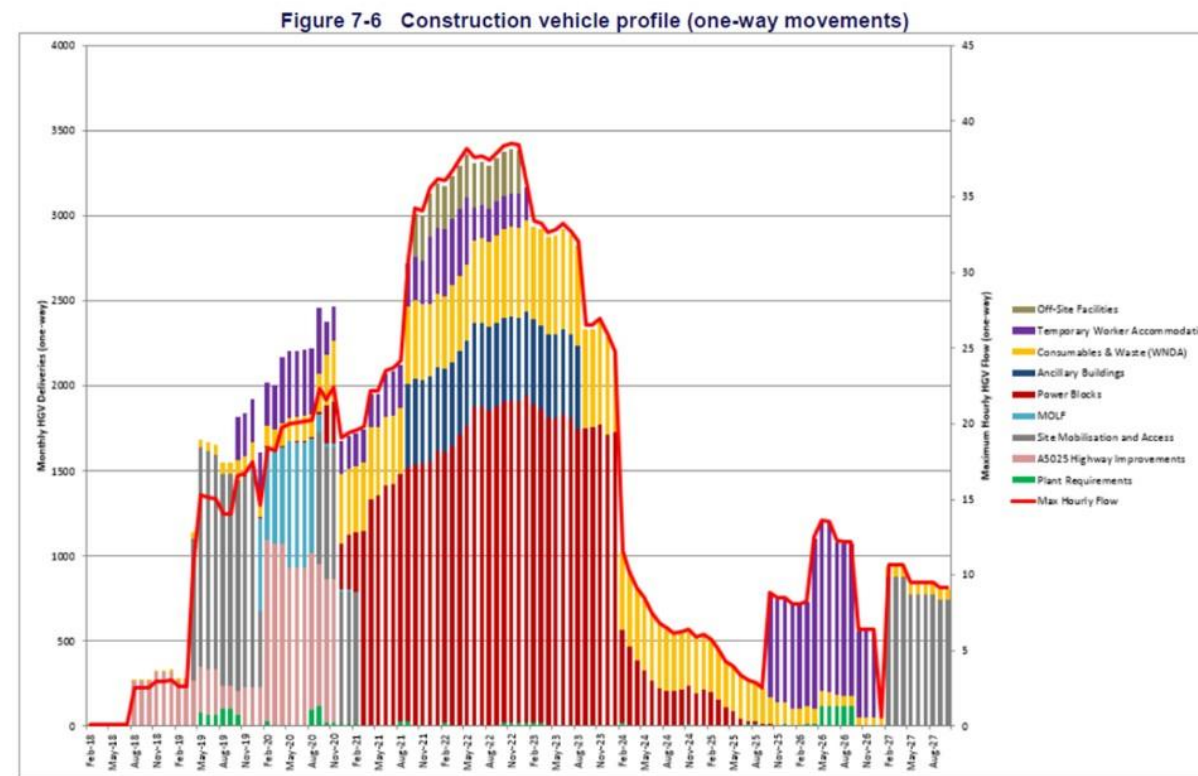


Figure 2 – Effect of six-month delay in delivery of MOLF on HGV deliveries related to MOLF

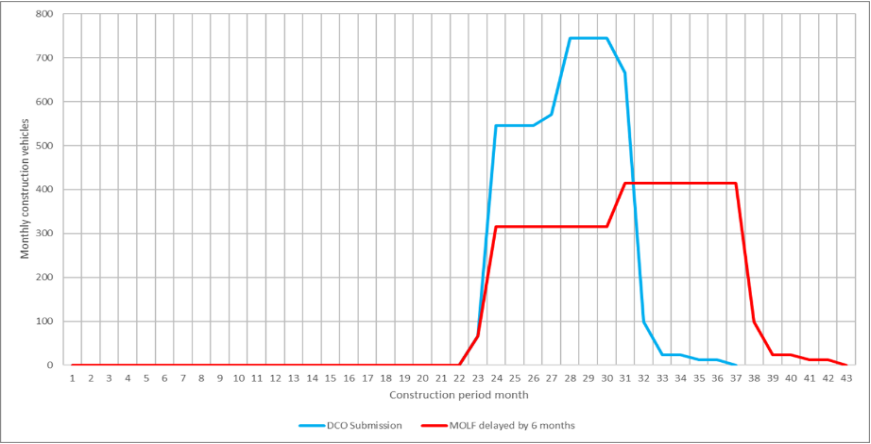
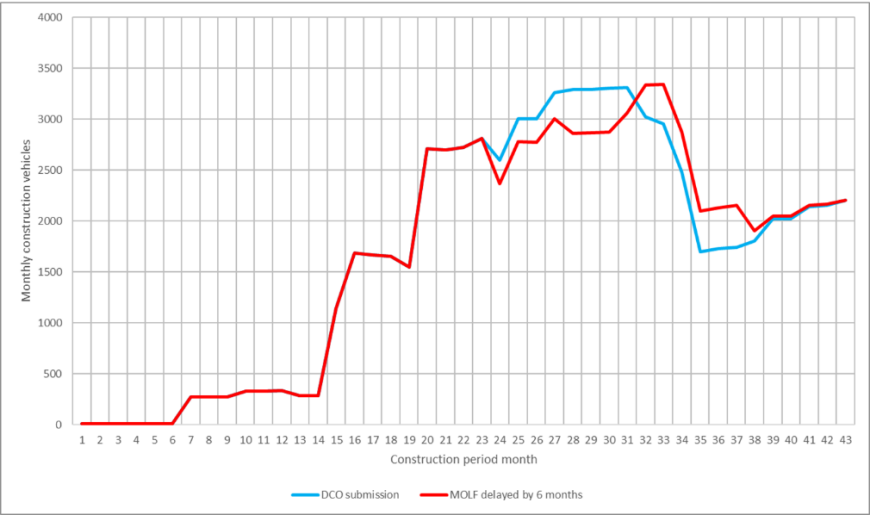


Figure 3 – Effect of six-month delay in delivery of MOLF on all HGV deliveries



Q11.1.11	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.	Mae CG wedi gofyn yn flaenorol i brofion sensitifrwydd gael eu cynnal ar gyfer y gwaith modelu trafnidiaeth, petai digwyddiadau posib yn codi na ellir eu hystyried yn fanwl yn awr. Mae CG wedi gofyn i fesurau gael eu hamlinellu yn y CoCP yn y dyfodol er mwyn sicrhau y gellir rhoi mesurau lliniaru yn eu lle petai effeithiau anrhagweledig ac annerbyniol yn codi. GC have previously requested sensitivity testing to be undertaken for the transport modelling, should eventualities occur that cannot be considered in detail now. GC have requested future measures to be set out in the CoCP to ensure that mitigation could be put in place should there be unforeseen, unacceptable impacts.
Q11.1.12	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	Mae CG wedi gofyn yn flaenorol i brofion sensitifrwydd gael eu cynnal ar gyfer y gwaith modelu trafnidiaeth, petai digwyddiadau posib yn codi na ellir eu hystyried yn fanwl yn awr. Mae CG wedi gofyn i fesurau gael eu hamlinellu yn y CoCP yn y dyfodol er mwyn sicrhau y gellir rhoi mesurau lliniaru yn eu lle petai effeithiau anrhagweledig ac annerbyniol yn codi. GC have previously requested sensitivity testing to be undertaken for the transport modelling, should eventualities occur that cannot be considered in detail now. GC have requested future measures to be set out in the CoCP to ensure that mitigation could be put in place should there be unforeseen, unacceptable impacts.
		its impact on the Wylfa Newydd Project can be found in Chapter 2 of Appendix L – Supplementary Information.	

Q11.1.14	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 (WNTA) 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.	CG, dim sylw pellach. (Ond noder bod cyfyngiadau ar gyfer rhai cerbydau dros y pontydd ar Afon Menai.) GC, no further comment. (But note there are restrictions for some vehicles over the bridges at the Menai Straits.)
Q11.1.15	(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:	CG, dim sylw pellach. GC, no further comment.

	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.	
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Q11.1.16	Do the local authorities agree with the 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?	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).	Ni ofynnwyd i CG fewnbynnu i unrhyw sgôp o arolygon a ddefnyddiwyd yn yr Asesiad Trafnidiaeth a gwaith modelu perthnasol; Mae CG yn tybio bod pob cyfrif traffig ac ati wedi cael eu sgopio gyda Llywodraeth Cymru a CSYM, fel y Cyngorau a'r awdurdodau trafndiaeth sy'n ymdrin â'r DCO hwn; Mae CG wedi gwneud sylwadau gyda'r SofCG y byddent yn dymuno gweld llifau traffig ar naill ochr y cyfnodau prysuraf yn cael eu hasesu yn yr Asesiad Trafnidiaeth, oherwydd ceir pryderon y bydd posib i lifau traffig, sy'n ymwneud â'r gwaith adeiladu, ledaenu ar yr adegau prysuraf os na fydd amseroedd/patrymau sifft yn cael eu rheoli'n dynn iawn. GC were not asked to input to any scope of surveys utilised in the Transport Assessment and related modelling work; GC assume that all traffic counts etc were scoped with Welsh Government and IACC, as the councils and transport authorities dealing with this DCO; GC have made commentary with the SofCG that they would wish to see the traffic flows either side of the peak periods assessed in the Transport Assessment, as there are concerns that if shift times/patterns are not very tightly controlled, there could be significant potential for peak spreading of construction related traffic flows.
Q11.1.17	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	Mae CG wedi gofyn yn flaenorol i brofion sensitifrwydd gael eu cynnal ar gyfer y gwaith modelu trafndiaeth, petai digwyddiadau posib yn codi na ellir eu hystyried yn fanwl yn awr, neu os nad yw'r tybiaethau a wnaed yn yr asesiadau yn digwydd yn ôl y disgwyl. GC have previously requested sensitivity testing to be undertaken for the transport modelling, should eventualities occur that cannot be considered in detail now, or the assumptions made in the assessments do not happen as anticipated.

	(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.	
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Q11.1.19	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.”	Mae CG wedi gwneud sylwadau tebyg o’r blaen, ac er eu bod yn croesawu’r wybodaeth ychwanegol, mae angen amlinellu oriau penodol, amseroedd danfon, oriau gweithredu ac ati yn nogfennau rheoli’r DCO, megis y CoCP. Mae gan CG bryderon ynglŷn â’r oriau a fodelwyd, y prysurdeb allai ledaenu, ymestyniad oriau adeiladu a newidiadau i amseroedd sifft ac maent wedi gofyn am brofion sensitifrwydd yn flaenorol ac wedi nodi eu pryderon yn y LIR a’r ymateb i’r mân ddiwygiadau. GC have raised similar comments previously, and whilst welcoming the additional information, there needs to be set hours, delivery times, hours of operation etc set out in the DCO control documents, such as the CoCP. GC have concerns about the hours modelled, peak spreading that may occur, extensions of construction hours and changes to shift times and have requested sensitivity tests previously and have noted their concerns in the LIR and response to the non-material amendments.
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	(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.	
Q11.1.20	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.	Mae CG yn croesawu'r mesur lliniaru o fysiau Parcio a Theithio a bysiau gwennol. Fodd bynnag, fel y nodwyd yn flaenorol yn y LIR, mae CG yn ystyried y dylid lleoli gwasanaethau bysiau gwennol PaTh a Pharcio a Rhannu ar y tir mawr hefyd er mwyn lleddfu pwysau ar briffyrdd CG a Phont Britannia. Mae CG yn gwneud sylw pellach y dylai'r gwasanaeth fod am ddim er mwyn annog defnydd ohono a lleihau symudiadau cerbydau, dylid darparu safleoedd bws ychwanegol (yn ychwanegol at safleoedd bysiau gwasanaeth presennol) er mwyn annog defnydd ohonynt a sicrhau bod staff yn cerdded at y safleoedd a ddim yn gyrru atynt. Mae CG wedi gofyn am fwy o fanylion ynglŷn â gweithrediad a rheolaeth y gwasanaethau ac am leoliadau stopio a llwybrau, ac yn gofyn i hyn gael ei amlinellu yn nogfennau rheoli'r DCO. Mae gan CG bryderon hefyd ynglŷn â'r ddarpariaeth bysiau a'r straen ar weithredwyr lleol, a sut allai hyn effeithio ar wasanaethau eraill megis bysiau ysgol. Mae CG yn gofyn i gael bod yn rhan o'r is-grŵp trafnidiaeth. GC welcome the mitigation of P&R and shuttle buses. However, as noted previously in the LIR, GC consider that P&R shuttle bus services and Park and Share should also be located on the mainland to alleviate pressure on GC highways and the Britannia Bridge. GC further comment that the service should be free to encourage use and minimise vehicle movements, there should be additional stops provided (in addition to the existing service bus stops) to encourage use and ensure staff walk to the stops and do not drive to them. GC have requested further details of the services operation and management and of stop locations and routes, and request that this is set out in the DCO control documents. GC also have concerns about the provision of the buses and the strain to local operatives, and how this may affect existing other services such as school buses. GC request to be part of the transport sub-group.

	(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.	
Q11.1.21	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.	Mae CG yn croesawu'r mesur lliniaru o fysiau PaTh a bysiau gwennol. Fodd bynnag, fel y nodwyd yn flaenorol yn y LIR, mae CG yn ystyried y dylid lleoli gwasanaethau bysiau gwennol PaTh a Pharcio a Rhannu ar y tir mawr hefyd er mwyn lleddfu pwysau ar briffyrdd CG a Phont Britannia. Mae CG yn gwneud sylw pellach y dylai'r gwasanaeth fod am ddim er mwyn annog defnydd ohono a lleihau symudiadau cerbydau, dylid darparu safleoedd bws ychwanegol (yn ychwanegol at safleoedd bysiau gwasanaeth presennol) er mwyn annog defnydd ohonynt a sicrhau bod staff yn cerdded at y safleoedd a ddim yn gyrru atynt. Mae CG wedi gofyn am fwy o fanylion ynglŷn â gweithrediad a rheolaeth y gwasanaethau ac am leoliadau stopio a llwybrau, ac yn gofyn i hyn gael ei amlinellu yn nogfennau rheoli'r DCO. Mae gan CG bryderon hefyd ynglŷn â'r ddarpariaeth bysiau a'r straen ar weithredwyr lleol, a sut allai hyn effeithio ar wasanaethau eraill megis bysiau ysgol. Mae CG yn gofyn i gael bod yn rhan o'r is-grŵp trafndiaeth. GC welcome the mitigation of the provision of P&R and shuttle buses. However, as noted previously in the LIR, GC consider that P&R shuttle bus services and Park and Share should also be located on the mainland to alleviate pressure on GC highways and the Britannia Bridge. GC further comment that the service should be free to encourage use and minimise vehicle movements, there should be additional stops provided (in addition to the existing service bus stops) to encourage use and ensure staff walk to the stops and do not drive to them. GC have requested further details of the services operation and management and of stop locations and routes, and request that this is set out in the DCO control documents. GC also have concerns about the provision of the buses and the strain to local operatives, and how this may affect existing other services such as school buses. GC request to be part of the transport sub-group.

	(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.	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) 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	
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	(g) Confirm whether users would be required to pay for parking? (h) Confirm whether the shuttle bus would be free or subsidised? (i) Confirm that the shuttle buses would be capable of accessing the routes shown on Figure 5-5 of the TA [APP-101] (j) Explain why no shuttle buses are currently proposed for the east and south of the island? 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	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) Users of the Park & Ride facility at Dalar Hir would not be required to pay for parking. (h) The shuttle bus services are likely to be free at the point of use for construction workers only. (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. (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.	
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	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.	
Q11.1.22	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.	Mae CG wedi gofyn i bob llif traffig gael ei reoli a'i fonitro ac i ddarpariaeth gael ei gwneud er mwyn lliniaru effeithiau, hyd yn oed y rhai na ragwelir ar hyn o bryd, oherwydd y tybiaethau a wnaed. Mae angen rhoi rheolaethau yn eu lle i sicrhau bod tybiaethau a wnaed yn y gwaith modelu yn cael eu rheoli, oni fyddent yn cael eu gwireddu. Mae CG wedi codi pryderon tebyg o ran adnabod staff sy'n parcio'n anghyfreithlon. GC have requested management and monitoring of all traffic flows and provision to be made to mitigate impacts, even those that are unforeseen at this time, due to the assumptions made. Controls need to be in place to ensure that assumptions made in the modelling work are managed should they not be realised. GC have raised similar concerns with respect to identifying staff who fly park.

Q11.1.23	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.	CG dim sylw pellach. GC no further comment.
Q11.1.24	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	

	Tracking System (DMATS) has been successfully used?	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) 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?	(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) 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?	(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.	Roedd CG yn deall mai pwrpas y ganolfan logisteg oedd rheoli llifau traffig ac mae wedi codi pryderon ynglŷn â sensitifeddau Pont Britannia a'r tagfeydd sy'n gysylltiedig â hyn. Mae CG hefyd wedi codi pryderon ynglŷn â cherbydau sy'n disgwyl ar ffyrdd lleol. GC understood that the logistics centre was to control traffic flows and have raised concerns with the sensitivities of the Britannia Bridge and congestion associated with this. GC have also raised concerns of vehicles waiting on local roads.
Q11.1.25	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.	Mae CG wedi codi pryderon o'r blaen ynglŷn â'r lefelau canfyddiadol rhannu car tybiedig sydd angen eu cyflawni. Mae gan CG beth amheuaeth o hyd ynglŷn â sut fydd tybiaethau cymhareb rhannu car yn cael eu cyflawni a'u gorfodi, o ystyried lleoliad y cyfleuster, diffyg bysiau lleol (darpariaeth gwasanaeth gwledig) ac nid yw'r patrymau sifft yn gwneud rhannu car yn hawdd. Felly, er mwyn cyflawni'r symudiadau cerbydau a ragwelir, ceir dibyniaeth gref ar rannu ceir. Mae prinder manylion yn y strategaeth deithio, y CoCP a'r CoOP ar hyn o bryd. GC have previously raised concerns around the perceived levels of car share that have been assumed to be achieved. GC reservations remain with respect to how the car sharing ratio assumptions are going to be achieved and enforced, given the location of the facility, the lack of local buses (rural service provision) and the shift patterns do not make car share easy. Therefore, to achieve the vehicle movements forecast there is heavy reliance on car share. The travel strategy and CoCP and CoOP are currently lacking in details.

Q11.1.26	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.	Nid oes gan CG unrhyw sylw pellach. GC have no further comments.
Q11.1.27	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.	Nid oes gan CG unrhyw sylw pellach. GC have no further comments.
Q11.1.28	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.	Nid oes gan CG unrhyw sylw pellach. GC have no further comments.
		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.	
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Q11.1.32	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.	Nid oes gan CG unrhyw sylw pellach. GC have no further comments.
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	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.		
Q11.1.33	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.	Nid oes gan CG unrhyw sylw pellach. GC have no further comments.

Q11.1.35	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	Nid oes gan CG unrhyw sylw pellach. GC have no further comments.
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		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.	
Q11.1.37	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.	Nid oes gan CG unrhyw sylw pellach. GC have no further comments.
Q11.1.39	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	Mae CG yn croesawu'r mesur lliniaru o fysiau Parcio a Theithio a bysiau gwennol. Fodd bynnag, fel y nodwyd yn flaenorol yn y LIR, mae CG yn ystyried y dylid lleoli gwasanaethau bysiau gwennol PaTh a Pharcio a Rhannu ar y tir mawr hefyd er mwyn lleddfu pwysau ar briffyrdd CG a Phont Britannia. Mae CG yn gwneud sylw pellach y dylai'r gwasanaeth fod am ddim er mwyn annog defnydd ohono a lleihau symudiadau cerbydau, dylid darparu safleoedd bws ychwanegol (yn ychwanegol at safleoedd bysiau gwasanaeth presennol) er mwyn annog defnydd ohonynt a sicrhau bod staff yn cerdded at y safleoedd a ddim yn gyrru atynt. Mae CG wedi gofyn am fwy o fanylion ynglŷn â gweithrediad a rheolaeth y gwasanaethau ac am leoliadau stopio a llwybrau, ac yn gofyn i hyn gael ei amlinellu yn nogfennau rheoli'r DCO. GC welcome the mitigation of the provision of P&R and shuttle buses. However, as noted previously in the LIR, GC consider that P&R shuttle bus services and Park and Share should also be located on the mainland to alleviate pressure on GC highways and the Britannia Bridge. GC further comment that there should be additional stops provided (in addition to the existing service bus stops) to encourage use and ensure staff walk to the stops and do not drive to them. GC have requested further details of the services operation and management and of stop locations and routes, and request that this is set out in the DCO control documents.

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	(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.	
Q11.1.41	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 7.3.15and 7.3.16 of the DCO Transport Assessment.	Mae gan CG beth amheuaeth o hyd ynglŷn â sut fydd tybiaethau cymhareb rhannu car yn cael eu cyflawni a'u gorfodi, o ystyried lleoliad y cyfleuster, diffyg bysiau lleol (darpariaeth gwasanaeth gwledig) ac nid yw'r patrymau sifft yn gwneud rhannu car yn hawdd. Felly, er mwyn cyflawni'r symudiadau cerbydau a ragwelir, ceir dibyniaeth gref ar rannu ceir. GC reservations remain with respect to how the car sharing ratio assumptions are going to be achieved and enforced, given the location of the facility, the lack of local buses (rural service provision) and the shift patterns do not make car share easy. Therefore to achieve the vehicle movements forecast there is heavy reliance on car share.
Q11.1.42	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.	Nid oes gan CG unrhyw sylw pellach. GC have no further comment.
		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.	
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Q11.1.43	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.	Mae CG wedi gofyn yn flaenorol i brofion sensitifrwydd gael eu cynnal ar gyfer y gwaith modelu trafnidiaeth, petai digwyddiadau posib yn codi na ellir eu hystyried yn fanwl yn awr, neu os nad yw'r tybiaethau a wnaed yn yr asesiadau yn digwydd yn ôl y disgwyl. GC have previously requested sensitivity testing to be undertaken for the transport modelling, should eventualities occur that cannot be considered in detail now, or the assumptions made in the assessments do not happen as anticipated.
Q11.1.44	(a) Would Abnormal Indivisible Loads (AILs) particularly those requiring an escort be scheduled to occur outside of the morning and evening peaks? 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	Mae a wnelo pryderon CG ynglŷn â'r AILs ag addasrwydd a thagfeydd presennol ar Bont Britannia. GC concerns regarding the AILs are focused around the suitability and existing congestion on the Britannia Bridge.

	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.	
Q11.1.45	With regards to the park and ride facility, Chapter F1 para 1.1.7 states that the facility works include a new roundabout. [1] 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.	Nid oes gan CG unrhyw sylw pellach. GC have no further comment.
Q11.1.46	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.	Nid oes gan CG unrhyw sylw pellach. GC have no further comment.

Q11.1.48	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].	
Q11.1.49	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	Nid oes gan CG unrhyw sylwadau pellach. Mae CG wedi gofyn i safleoedd ar y tir mawr gael eu hystyried yn ogystal â'r rhai a gynigir yn Ynys Môn. GC have no further comment. GC have requested sites be considered on the mainland in addition to those proposed on the Isle of Anglesey.

		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.	
Q11.1.50	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.	Mae CG wedi gofyn yn flaenorol i brofion sensitifrwydd gael eu cynnal ar gyfer y gwaith modelu trafnidiaeth, petai digwyddiadau posib yn codi na ellir eu hystyried yn fanwl yn awr, neu os nad yw'r tybiaethau a wnaed yn digwydd yn ôl y disgwyl. Mae gan CG bryderon ynglŷn â'r gwaith modelu a wnaed ac unrhyw wyriad oddi wrth y tybiaethau a wnaed yn hyn, ac mae ganddynt hefyd bryderon ynglŷn â phrosiectau <i>North West Connections</i> a phrosiectau eraill allai gael effeithiau cronol. GC have previously requested sensitivity testing to be undertaken for the transport modelling, should eventualities occur that cannot be considered in detail now, or the assumptions made in the assessments do not happen as anticipated. GC have concerns around the modelling done and any departures from assumptions made within this, and also have concerns around the North West Connections projects and other projects that could have cumulative impacts.

	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.	
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