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**Subject:** Welsh Government Deadline 3 Submission - Wylfa Newydd Nuclear Power Station EN010007  
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[18.12.17 Welsh Government Deadline 3 Submission FINAL.PDF](#)

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Dear Ms Sully

On behalf of Welsh Government, please find attached response for Deadline 3 of the Wylfa Newydd Examination. This includes Welsh Government's comments on responses to the Examining Authority's written questions.

I would be grateful if you could confirm receipt of this email and attachment

Kind regards

Ruth

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Eich cyf/Your ref **EN010007**

FAO: Kay Sully  
National Infrastructure Planning  
The Planning Inspectorate  
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Temple Quay  
Bristol  
BS1 6PN

18 December 2018

Dear Ms Sully,

**EN010007 Wylfa Newydd Nuclear Power Station**

**Welsh Government (IP Number: 20011597) Deadline 3 Submission – 18 December 2018**

- 1.1.1 The Welsh Ministers (hereafter referred to as Welsh Government) formally registered on 10 August 2018 as an Interested Party to the Wylfa Newydd Nuclear Power Station Development Consent Order (DCO) Application, submitted by Horizon Nuclear Power (hereafter referred to as Horizon).
- 1.1.2 Welsh Government submitted their Written Representation to the Examining Authority at Deadline 2 (4 December 2018) of the Examination. In that report, Welsh Government identified those parts of the DCO application or specified matters with which it agrees and those parts with which it does not agree. Further detail has been provided for those areas of disagreement, and, in some cases, the minimum acceptable further information required from Horizon.
- 1.1.3 Welsh Government also provided a response to the Examining Authority's Written Questions which were outlined in the Rule 8 letter of 6 November 2018.
- 1.1.4 Welsh Government has reviewed the documents submitted for Deadline 2 of the Examination. Following review, Welsh Government has additional comments on the responses to the Examining Authority's questions. A schedule has been provided at Appendix A of this submission setting out the initial question, the Deadline 2 response and the comments from Welsh Government.
- 1.1.5 Appendix B contains the questions submitted to Horizon in preparation for the Statement of Common Ground Workshop relating to Economy and Supply Chain, held on 31 August 2018. This document has been referred to in Appendix A, in the comment relating to Q10.2.22.

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and responding in Welsh will not lead to a delay in responding.

- 1.1.6 In light of the short timescale allowed between the publication of all the Deadline 2 documents on the PINS website, and this Deadline 3 date, Welsh Government anticipates that it will be necessary to provide further comments in relation to documents submitted for Deadline 2, either within the Issue Specific Hearings or as part of Deadline 4.
- 1.1.7 To confirm to the Examining Authority, Welsh Ministers determined on the 13 December 2018 to call in the Site Preparation and Clearance planning application.

Yours sincerely,

**James Hooker (MRTPI)**

Wylda Newydd Spatial Planning Manager, Welsh Government

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**Appendices**

Appendix A: Welsh Government Comments on Responses to Examining Authority's First Written Questions

Appendix B: Welsh Government Questions submitted to Horizon prior to Economy/Supply Chain SoCG Workshop (31 August 2018)

## **Appendix A**

### **Welsh Government Comments on Responses to Examining Authority's Written Questions**

## APPENDIX A

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### Comments on Responses to Examining Authority's Written Questions

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q1.0.3	In relation to paragraphs 1.9.57 and 1.9.58 of APP-120, and paragraphs 5.4.18 to 5.4.26 of APP-124, should the sewage treatment plant be a separate numbered 'work' item within the development?	<p><b>Horizon - Deadline 2 response</b></p> <p>The package sewage treatment plant referred to in Q1.0.3 is to be constructed in connection with Work No. 1, 2, 3 and 4 and will be temporary in nature as will only be in place and operational during the construction phase of the Wylfa Newydd DCO Project. As this plant relates to, and will support a number of Work No. it has been included within paragraph (b) of "Other Associated Development" under Schedule 1 of the Draft DCO. For this reason, Horizon does not consider that a separate numbered Work No. is required for this sewerage treatment plant</p>	<p><b>Welsh Government – Deadline 3 response</b></p> <p>As set out in its Deadline 2 response, Welsh Government raised concerns in its Written Representation (see Section 13.3) regarding the potential siting, odour and visual impact from the proposed temporary sewage treatment plant on Cestyll Registered Park and Garden. Previously raised concerns are maintained, and it remains the position of Welsh Government that, to ensure appropriate controls can be secured at the appropriate time, in relation to the package treatment plant Welsh Government would support it being a separate numbered work item within the Order. It would appear from Horizon's response that this package treatment plant relates to several different work numbers and therefore it is not clear how control or enforcement could be secured.</p>
Q1.0.9	Please respond to the concerns expressed by representors (including RR-051, RR-52, RR-97, RR-104, RR-002, RR-018, RR-050, RR-054, RR-060 and RR-063) regarding the potential for there to be effects from noise, dust/on air quality, lighting and general 'pollution'.	<p><b>Horizon - Deadline 2 response</b></p> <p>[...]</p> <p>Horizon takes its responsibility to the people and communities that neighbour the Wylfa Newydd Development Area and the Associated Development sites very seriously. The various mitigation strategies that form part of this application have been considered and designed with the interests of local people in mind. Where possible Horizon has sought to reduce the impacts on the surrounding properties and residents through measures such as:</p> <ul style="list-style-type: none"> <li>• [...]</li> <li>• the preparation of Community Safety Management Strategy which will set out how Horizon will work with existing public bodies, including IACC and the emergency services, and will include a framework of communication routes and ways of working to mitigate impact of the construction workforce within the community;</li> <li>• [...]</li> </ul>	<p><b>Welsh Government – Deadline 3 response</b></p> <p>At the time of writing, Welsh Government have not had sight of the Community Safety Management Strategy. Welsh Government expect the CSMS to address the following areas in relation to safeguarding:</p> <ul style="list-style-type: none"> <li>• Addresses potential safeguarding impact especially with regard to the vulnerable within communities including children and adults, for example: <ul style="list-style-type: none"> <li>➢ workforce forming relationships with community members or lodging with children and vulnerable adults;</li> <li>➢ human trafficking and modern slavery, especially in light of the proximity to Holyhead port;</li> <li>➢ domestic abuse;</li> <li>➢ community mental health and wellbeing; and</li> <li>➢ drinking and drug offences.</li> </ul> </li> <li>• The HIA notes 'in assessment terms, the potential for a significant effect is considered to be likely'. Mitigation is heavily focused on the Workforce Management Strategy (WMS), the Workers Code of Conduct, role of community involvement officers and the Well-being Monitoring Group. Welsh Government expect further detail to be set out the CSMS.</li> <li>• Welsh Government will require assurance on the effective monitoring of the requirements of the principles set out in the WMS across the supply chain and contractors to include screening and ongoing monitoring of potential impact on care, support and emergency services for both children and adults. Welsh Government expect when a risk is identified from Horizon screening, further checks are carried out and protocols in place to share information with relevant partners.</li> <li>• An agreed formula for resourcing additional activity if there was impact on services.</li> <li>• Welsh Government would expect the CSMS to set out how the links and communication between Horizon, the Community Involvement Officers, support services and emergency services and with the wider community. Protocols should take account of both routine arrangements for sharing information/communication and the need to share information more urgently. Welsh Government also seek assurances that the duty of care to the local population and the individual will extend to Horizon ensuring repatriation of workers to their home address if there is a perceived issue. There is a concern that vulnerable workers could themselves fall into the trappings of modern slavery etc. if not fully supported.</li> </ul>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q2.0.11	Chapter D9 para 9.4.18 refers to appendix D8- 8 Summary of preliminary design for construction surface water drainage [APP-167]. Should this document be referenced in the MPSSS CoCP?	<p><b>Horizon – Deadline 2 Response</b></p> <p>The summary of preliminary design for construction surface water design in Appendix D8-8 was used as a basis to form the assessment within the Environmental Statement. Horizon does not consider that it would be appropriate to reference this document within the Main Power Station Site sub-CoCP as that document describes the proposed measures and criteria required to protect the water environment from pollution and to avoid an increase in flood risk; rather than design matters.</p> <p>Principles in respect of the final design are set in the Landscape and Habitat Management Strategy [APP-424] and the Design and Access Statements [APP-408 and APP-409], and would need to meet the proposed measures and criteria set out in the Main Power Station Site sub-CoCP. However, Horizon is committed to revising the preliminary drainage design at the detailed design stage and therefore will propose a requirement as part of an updated draft DCO to be submitted at Deadline 4 (17 January 2019) which will require Horizon to submit a surface water drainage design for construction works.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>Welsh Government welcome a requirement to submit a Surface Water Drainage Design.</p> <p>As set out in Planning Policy Wales 10 (paragraph 6.6.19), <i>“Development proposals should incorporate design for surface water management, based on principles which work with nature to facilitate the natural functioning of the water cycle, providing issues such as land contamination would not result in the mobilisation of contaminants which may have an impact over a wider area. Design for multiple benefits and green infrastructure should be secured wherever possible and as part of Green Infrastructure Assessments suitable approaches towards the provision of SuDS should be identified. It may, in some circumstances, be necessary for ‘hard’ infrastructure solutions to be preferred because of practical or archaeological considerations, but taking into account the role of water services in contributing to the quality of place, nature based solutions should be the preference”</i>.</p> <p>In addition, paragraph 6.6.27 states <i>“Planning authorities should be aware of the risk of surface water flooding, usually caused by heavy rainfall, and ensure developments are designed and planned to minimise potential impacts. Development should not cause additional run-off, which can be achieved by controlling surface water as near to the source as possible by the use of SuDS. Care should be taken in places of shallow groundwater or where flooding is caused by combined surface and groundwater processes. In such situations direct infiltration SuDS may not be appropriate. Consultation with drainage bodies and NRW should be undertaken and relevant evidence and information drawn from Area Statements taken into account”</i>.</p>
Q4.0.21	Respond to the matters raised by Welsh Government [RR-092] in regard to the identification of Crown Land and the land referred to within the representation.	<p><b>Horizon – Deadline 2 Response</b></p> <p>In its relevant representation, the Welsh Government stated that land belonging to the Welsh Ministers or the National Assembly of Wales had not been identified as Crown land in the Land Plans or Book of Reference [APP-034/035/036]. It then referred to section 85(2) of the Government of Wales Act 2006 and noted that under s135 of the Planning Act 2008 Horizon has not made a formal approach seeking Welsh Ministers consent for these rights. Horizon has identified in the Book of Reference that there are three entities (National Assembly for Wales, Welsh Ministers and Secretary of State for Wales) which own, occupy or have rights in plots located at Parc Cybi, Dalar Hir and the A5025 Off-Line Highway Improvements Section 1 (Valley).</p> <p>Horizon wrote to the Welsh Government on 2 November 2018 seeking confirmation as to the Welsh Government entities affected and status of this land; these discussions are ongoing. In the interim, and in accordance with the Examining Authority's direction in its Rule 8 letter [PD-010], Horizon has also prepared and submitted at Deadline 2 (4 December 2018) a schedule of all Crown land and interests and how Horizon intends to comply with section 135 of the Planning Act 2008 [WN0902-HZDCO-PAC-REP00049]. For completeness, this schedule provisionally includes all land and interests held by the three entities identified (National Assembly for Wales, Welsh Ministers and Secretary of State for Wales) while this issue is outstanding. This schedule shall be further refined as Horizon and Welsh Government resolve this issue. Horizon is committed to ensuring that its DCO application documents reflect the nature of the Welsh Government's interests and obtaining Welsh Government consent where necessary.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>This matter is subject to ongoing discussions with the Applicant.</p> <p>The position of Welsh Government remains as set out in its Written Representation (section 2.2). All land identified in the Book of Reference in respect of which the three identified entities (National Assembly for Wales, Welsh Ministers and Secretary of State for Wales) own, occupy or have rights in those plots are Crown Land (for the reasons set out at section 2.2 of the Written Representation), and consent must be obtained from the Welsh Government pursuant to S135 of the Planning Act 2008 in respect of each identified plot.</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q4.0.51	Article 75: is the local planning authority content with the disapplication of the Hedgerow Regulations 1997 as proposed?	<p><b>Isle of Anglesey County Council – Deadline 2 Response</b></p> <p>The Hedgerow Regulations require land managers, developers, etc to notify the Local Planning Authority (LPA) if they wish to remove a hedgerow (with reasons) and the LPA has 42 calendar days from receipt of the notification to give or refuse consent. It is a criminal offence for land managers, developers, etc to remove a hedgerow in contravention of the Regulations.</p> <p>In this case, Important Hedgerows to be removed are listed in Schedule 17 and shown on the plans identified in Schedule 17 (although see answer to Question 100 below), so the final DCO and plans will be the notification and, if granted, the DCO will provide the consent for the removal of these Important Hedgerows.</p> <p>However, as shown on the plans, in some locations it is only parts of these Important Hedgerows that need to be removed. The removal of any Important Hedgerow beyond what is shown as necessary on the plans should be avoided and under the regulations would be considered a criminal offence.</p> <p>Therefore, Article 75 (3) should be more specific. IACC suggest this is reworded with the additional words (<b>in red</b>) as follows:</p> <p>75 (3) The undertaker may, for the purposes of the authorised development:</p> <ul style="list-style-type: none"> <li>a) subject to paragraph (2), remove any hedgerows <b>that are not important hedgerows</b> within the Order Limits that may be required for the purposes of carrying out the authorised development; and</li> <li>b) <b>remove only those sections of the important hedgerows identified in Schedule 17 (Removal of important hedgerows) and shown on the plans identified in Schedule 17.</b></li> </ul> <p>75 (4) The power conferred by paragraph (3) removes any obligation upon the undertaker to secure [any] consent under the Hedgerow Regulations 1997 <b>for those sections of the Important Hedgerows in Schedule 17 and on the plans identified in Schedule 17, but does not remove the obligation upon the undertaker to secure consent under the Hedgerow Regulations 1997 for the removal of any other sections of Important Hedgerows.</b></p> <p><b>Horizon – Deadline 2 Response</b></p> <p>Whilst the question is not directed to Horizon as the applicant, the following response has been provided by Horizon at this stage:</p> <p>Horizon considers that the disapplication of the Hedgerow Regulations is appropriate as consent to remove hedgerows is already provided for under article 75 of the draft DCO. Regulation 6(1)(e) of the Hedgerow Regulations provides that hedgerows can be removed for the purposes of carrying out development for which a planning permission is granted; however, a development consent does not fall within the definition of "planning permission" under the Regulations and so Horizon would need to seek consent. Conversely, article 75 of the draft DCO enables the removal of any hedgerow within the Order Limits, and the specified 'important hedgerows' identified in Schedule 17, without the need to seek additional consents. Horizon considers that the disapplication is entirely appropriate as it would otherwise be duplicative of the powers already provided under the draft DCO.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>Welsh Government supports the suggested amendments proposed by Isle of Anglesey County Council (IACC) to Article 75(3) in its Deadline 2 response.</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q4.0.55	<p>Explain how each requirement satisfies the tests for planning conditions (namely that they should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects).</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p>This question appears to contemplate that Horizon gives an explanation in relation to each requirement in Schedule 3 as to how it complies with the tests for 'planning condition'. In view of the large number of requirements in Schedule 3 and the volume of questions that has been asked by the Examining Authority for Deadline 2 (4 December 2018), Horizon does not have the resources to comply with this request by Deadline 2 (4 December 2018). Horizon has, therefore, set out below an overall explanation as to how its requirements comply with the tests for planning conditions. Horizon would be willing, however, to respond to questions about individual requirements if the Examining Authority had specific concerns.</p> <p>As noted in the Planning Inspectorate's Advice Note 15: Drafting Development Consent Orders (July 2018), DCO requirements must be precise, enforceable, necessary, relevant to the development, relevant to planning and reasonable in all other respects. Each of these criteria are set out below:</p> <ul style="list-style-type: none"> <li>• <b>Necessary:</b> All of the requirements have been included to ensure that the mitigation referred to in the ES is secured. Horizon has sought to keep the requirements to a minimum and rely on control documents to provide the necessary detail on mitigation measures (e.g. Requirement PW7 (Wylfa Newydd CoCP)). The benefit of this approach is that it enables Horizon to provide more detail in relation to the mitigation than would ordinarily be able to be included in a Statutory Instrument. In addition, it avoids the need for numerous requirements which could create ambiguity and potentially conflict with each other, thereby undermining Horizon's ability to comply with the requirements.</li> </ul> <p>Where requirements duplicate detail within control documents (for example, Requirement PW6 and the CoCP) Horizon has proposed to remove the requirement and rely on the control documents to secure this mitigation. This ensures that only necessary requirements are contained in the draft DCO. Bespoke requirements have been inserted to deal with specific issues that are not dealt with within control documents (e.g. Requirements SPC6 (demolition of alternative emergency control centre/district survey laboratory); PW10 (Wylfa Newydd Decommissioning Strategy); WN13 (Reptile Receptor Site)).</p> <ul style="list-style-type: none"> <li>• <b>Relevant to planning and the development:</b> All requirements have been identified because they fairly and reasonably relate to the construction, operation and maintenance of the authorised development – both the NSIP and associated development. (e.g. Requirements WN3 and WN9 which relate to the design of the Power Station Site or PW2 (Phasing of the authorised development). All requirements are justified by the nature of the development and due to the effects of the development on surrounding receptors (e.g. Requirements OH9 (Water vole enhancement areas: Valley); PW7: Wylfa Newydd CoCP); WN18 (Site Campus health facility))</li> <li>• <b>Enforceable:</b> All requirements are clear as to what is required to comply with the requirement, for example: <ul style="list-style-type: none"> <li>➢ by specifying what control documents must be complied with;</li> <li>➢ stating that certain activities (i.e. site clearance or occupation) cannot occur prior to a certain event; or</li> <li>➢ identifying clear triggers when the requirement must be discharged.</li> </ul> </li> </ul> <p>For these reasons, the requirements are considered enforceable in respect of section 161 of the Planning Act 2008 (breach of terms of order granting development consent) and Horizon will be able to comply with them.</p> <p>For requirements which could be difficult to detect a breach (e.g. Requirement WN27 (Operation and use of the Marine Off-Loading Facility), the requirement requires Horizon to submit monitoring details to IACC to enable IACC to detect a breach of this requirement.</p> <ul style="list-style-type: none"> <li>• <b>Precise:</b> The Requirements include clear triggers when certain activities should be undertaken, who consent is required from, the process for preparing and submitting revised designs and control documents, and what control documents must be complied with. The interpretation section in paragraph 1 of Schedule 3 of the draft DCO also provides clarity around the implementation of amended plans, discharging authority approval, interpretation of the parameters and the scope of any amendments permitted under the tailpieces (see <b>FWQ4.05.56</b> below)</li> <li>• <b>Reasonable:</b> The Requirements are all considered reasonable as they can be discharged by Horizon in accordance with the development consent and are not reliant on approvals or activities of third parties who are not identified as the discharging authority.</li> </ul>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p><b>Relationship between control documents and requirements</b></p> <p>In addition to its previous submissions in respect of the relationship between the proposed control documents and the DCO requirements, by which it still stands [AS-016], the Welsh Government notes that the Applicant have provided the following in their Deadline 2 response; "<i>Where requirements duplicate detail within control documents (for example, Requirement PW7 and the CoCP) Horizon has proposed to remove the requirement and rely on the control documents to secure this mitigation</i>". The Welsh Government maintains its position that where mitigation is proposed to be secured through a control document, the DCO must include an appropriately drafted requirement which commits the Applicant to provide a draft of the relevant control document for submission and approval to the appropriate approving body.</p> <p>Consequently, the requirement must list the detail that is required to be included in that control document (e.g. Requirement PW7 should be amended to require the submission of a draft Code of Construction Practice (CoCP) for approval by IACC, in consultation with Gwynedd Council, Conwy County Borough Council and Welsh Government and be further amended to list the detail that will be required in the COCP e.g. triggers, appropriate assessments to be carried out and plans to be submitted).</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q4.0.56	<p>3 (4) Attempts to limit the extent to which a tailpiece (or other drafting) might permit changes to the approved scheme to only those minor or immaterial changes which have been subject to EIA. The applicant's attention is drawn to: Section 17 of Advice Note 15 <a href="https://infrastructureplanninginspectorate.gov.uk/wp-content/uploads/2014/10/advice_note_15_version_1.pdf">https://infrastructureplanninginspectorate.gov.uk/wp-content/uploads/2014/10/advice_note_15_version_1.pdf</a></p> <p>R. (on the application of Hubert) v Carmarthenshire CC Queen's Bench Division (Administrative Court), 05 August 2015 R. (on the application of Midcounties Cooperative Ltd) v Wyre Forest DC Queen's Bench Division (Administrative Court) 27 March 2009</p> <p>Having regard to the above, provide commentary for each requirement which provides flexibility in relation to approving and varying final details whether or not by use of a tailpiece (for example PR3 which would appear to have the same effect as a tailpiece in that it would allow the applicant to amend/alter the design and layout of the proposed park and ride facility at a later stage). This commentary should justify why the flexibility is necessary and confirm that it would not have the effect of allowing the LPA to permit materially different development from that assessed in the ES and fixed by the parameters of the DCO in the detailed design drawings (thereby bypassing the need to seek authorisation for a change through section 153 of the Planning Act 2008) or to dispense altogether with the need for any scheme. The applicant is also asked to have regard to Regulations 18 to 19 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 and the definition of "subsequent application" and to consider whether any drafting in the DCO (e.g. Article 79 and Schedule 18) and requirements needs to be changed as a consequence.</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p><b>Validity of Tailpieces</b></p> <p>A number of the requirements in the draft DCO include tailpiece wording "unless otherwise approved by the relevant planning authority". The purpose of this wording is to enable a level of flexibility in the discharge of certain requirements within the DCO. Such flexibility is helpful to enable the most effective design solution/methods to be applied at the stage the Requirement is discharged, which at present may be unknown and/or the detail of which will be established much later in the Wylfa Newydd DCO Project.</p> <p>Although the cases cited were in the context of the Town and Country Planning Act 1990, and not a statutory instrument like the draft DCO, they illustrate that the Courts have accepted that tailpieces are acceptable provided they include sufficient limitations. As noted in the Hubert and Midcounties Co-operative cases referred to (as well as R (Butler) v East Dorset District Council [2016] EWHC 1527 (Admin)), the Courts have been willing to accept tailpieces that are limited so that material changes to the scope of a development or environmental effects beyond that which has been assessed by the Local Planning Authority cannot be allowed.</p> <p>The Planning Inspectorate, in its Advice Note 15, has also confirmed that provided that the tailpiece is limited in such a way that ensures the scope of the consented Authorised Development remains the same and cannot be dispensed with, tailpieces may be appropriate within DCO requirements.</p> <p>The general approach that has been taken in a number of other DCOs (such as the Hinkley Point C, North London Heat and Power and Thames Tideway Tunnel DCOs) has been to limit the application of tailpiece by providing a separate interpretation clause that clarifies that the tailpiece provision can only be used to approve variations which are non-material and are unlikely to give rise to any materially new or materially different effects from those assessed in the environmental statement.</p> <p>The draft DCO adopts this approach by including an interpretation clause (Schedule 3, paragraph 1(4)) which is identical to the provision to Hinkley (and subsequent DCOs) and confirms that approvals can only be given for minor, non-material changes that are unlikely to give rise to new or materially different environmental effects from those assessed in the ES:</p> <p>[...]</p> <p><i>"(4) Where an approval of details or other document is required under the terms of any Requirement or where compliance with a document contains the wording "unless otherwise agreed" by the discharging authority, such approval of details or of any other document (including any subsequent amendments or revisions) or agreement by the discharging authority is not to be given except in relation to minor or immaterial changes or deviations where it has been demonstrated to the satisfaction of the discharging authority that the subject matter of the approval or agreement sought does not give rise to any materially new or materially different environmental effects to those assessed in the Environmental Statement."</i></p> <p>In this respect, the tailpieces within the draft DCO Requirements are sufficiently limited in that any potential variations to the requirement must still fall within the effects assessed in the ES. For these reasons, the use of tailpieces within the draft DCO Requirements is considered to be appropriate and lawful.</p> <p><b>Infrastructure Planning (Environmental Impact Assessment) Regulations</b></p> <p>Horizon does not consider Regulations 18 and 19 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 are relevant as these regulations would only apply in instances where it has become clear that the original ES is not adequate to assess the environmental effects of the development sought in the subsequent application.</p> <p>The use of the tailpiece does not enable Horizon to amend approved plans or seek change to approved controls that would enable it to undertake development which has not already been assessed as part of the ES submitted with the DCO application. The interpretation clause in Schedule 3, paragraph (4) of the draft DCO ensures that the use of tailpieces is restricted.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>The Welsh Government remains concerned by the number of tailpieces included within the draft DCO requirements which have the potential to take the project beyond the parameters assessed within the Environmental Statement. For example, DCO Requirement WM15 limits the number of parking spaces during construction to 1,900. This is consistent with the maximum parameter assessed in the Environmental Statement and is fundamental to the assessment of impacts and mitigation required. It is not appropriate for a DCO requirement to allow for the possibility of this to be increased informally through tailpiece "unless otherwise agreed" wording.</p> <p>There is a statutory process should future amends be required to the DCO.</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q4.0.60	PW8 - the Wylfa Newydd Code of Conduct would appear not to need to be submitted to or approved by IACC. Has this been discussed and agreement reached between the Applicant and IACC? If not, why not?	<p><b>Isle of Anglesey County Council – Deadline 2 Response</b></p> <p>No there has been no discussion on or agreement of this approach. The IACC considers it to be fundamentally unacceptable that a mitigation strategy cannot be reviewed, challenged or tested, does not require to be approved and can be changed by the developer acting alone. Furthermore, it undermines the principle of securing delivery of mitigation that the developer can amend the strategy to rectify non-compliance by changing the standard and thereby circumvent enforcement.</p> <p><b>Horizon – Deadline 2 Response</b></p> <p>Agreement has not been reached with IACC on this approach. The justification for providing that Horizon only has to provide a copy of the Wylfa Newydd Code of Conduct to IACC for information only is that the Code of Conduct would need to be prepared in accordance with the principles set out in the Workforce Management Strategy [APP-413]. These principles are subject to scrutiny during the examination and would be approved in any granted DCO as a certified document.</p> <p>Horizon is considering what amendments can be made to the Workforce Management Strategy so that the principles provide more certainty to IACC on the behaviour that will be required of the workforce and Horizon's construction partners. Horizon will submit an updated version of the Workforce Management Strategy at Deadline 4 (17 January 2019).</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>The Welsh Government agrees with Isle of Anglesey County Council (IACC) in respect of this matter. It is of fundamental importance that the DCO requires all mitigation strategies and control documents to be submitted for approval by the relevant body, in consultation with any other relevant body specified to ensure that each document will include all the required information to ensure that it contains sufficient detail to secure required mitigation, to be implemented and enforced.</p> <p>Therefore, it is the view of Welsh Government that the Code of Conduct submitted to IACC for approval should be approved by IACC in consultation with Gwynedd Council and Conwy County Borough Council on the basis that implementation of some of the proposed mitigation that will be included will fall within the responsibility of those authorities in addition to IACC.</p>
Q4.0.74	Table WN20 – no point from which height is to be measured is given – should this be AOD?	<p><b>Horizon – Deadline 2 Response</b></p> <p>The maximum and minimum heights for the Site Campus stated in Table WN20 are from above finished ground level.</p> <p>As noted above at <b>FWQ4.0.66</b>, the updated draft DCO (Revision 2.0) submitted at Deadline 1 (13 November 2018) [REP1-004] now includes an interpretation clause that clarifies that, unless stated otherwise, all references to "m" in relation to parameter heights should be taken to mean above finished ground level. (Refer to Schedule 3, paragraph 1(8) of the updated draft DCO (Revision 2.0).)</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>Welsh Government raised a response to Horizon on 24 October 2018 [EV-013] regarding this matter:</p> <p><i>"Table WN20 – query the 32m height parameter of accommodation block. Understand from ES that maximum would be 7 storeys. Therefore, 7x3 metres would equal a height of 21m"</i></p> <p>Horizon have not considered this point as part of their response to Q4.0.74.</p>
Q4.0.92	LC6 – can the applicant provide details of what search and screening facilities, waiting and inspection mean? How many vehicles at any one time are likely to be undertaking these activities? Emergencies does not appear to be defined in order to meet the enforceability test for requirements should it be? The parking is stated as a maximum rather than a specific number, is this acceptable to IACC, as Local Highway Authority?	<p><b>Horizon – Deadline 2 Response</b></p> <p>[...appropriate section below which relates to Welsh Government comment]</p> <p><b>LC6 Operational HGV parking</b></p> <p>[...]</p> <p>(2) For the purposes of this requirement, an emergency would be an event that prevents or seriously impacts on HGV movements on the A5025 to or from the Wylfa Newydd Development Area and results in HGVs remaining at the Logistics Centre until deliveries or movements can be resumed. This definition is considered necessary to deal with situations where Horizon cannot make deliveries to the site or HGVs cannot return from the WNDA or other sites due to weather, traffic or infrastructure issues.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>Welsh Government, in its capacity as the strategic highway authority for the A55 request the following wording is added (in red) to requirement LC6:</p> <p><i>"(2) For the purposes of this requirement, an emergency would be an event that prevents or seriously impacts on HGV movements on the A5025 or A55 (junction 2 to Junction 3) to or from the Wylfa Newydd Development Area and results in HGVs remaining at the Logistics Centre until deliveries or movements can be resumed..."</i></p> <p>As the Strategic Highway Authority, Welsh Government would expect that if 40 heavy goods vehicles are travelling to the site along the A55 and 40 heavy goods vehicles are travelling from the site along the A55 then the logistics centre capacity should be a minimum of 100 heavy good vehicles spaces.</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q4.0.101	Schedule 18 (Article 79): Provide a full explanation and justification for the departure from the standard drafting in relation to Procedure in relation to certain approvals set out in Appendix 1 of PINS Advice Note Number 15 (rev. 2) Drafting Development Consent Orders published in July 2018.	<p><b>Horizon – Deadline 2 Response</b></p> <p>[...]</p> <p>Paragraph 3 has been drafted to recognize the different costs involved in discharging the different types of requirements. The fee schedule in Paragraph 3 is based on Town and Country Planning Act (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2017 (which apply in Wales). These Regulations have been used to set fee charges in other development consent orders such as Thames Tideway, Hinkley and North London and Horizon considers them appropriate.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>Welsh Government has requested that the DCO is amended in line with the Swansea Bay Tidal Lagoon DCO in respect of the Procedure relating to Certain Approvals to ensure that the DCO respects the devolution settlement.</p> <p>The Welsh Government has requested that a specific Article is inserted into the DCO to reflect the approach taken in the Swansea Bay DCO (Article 48 in that DCO):</p> <p><i>"(1) Where an application is made to the relevant planning authorities or either of them for any consent, agreement or approval required by a Requirement, the following provisions apply, so far as they relate to a consent, agreement or approval of a local planning authority required by a condition imposed on a grant of planning permission, as if the Requirement were a condition imposed on the grant of planning permission—</i></p> <p class="list-item-l1"><i>(a) sections 78 and 79 of the 1990 Act (right of appeal in relation to planning decisions);</i></p> <p class="list-item-l1"><i>(b) the provisions of any orders, rules or regulations that provide in relation to a consent, agreement or approval of a local planning authority required by a condition imposed on the grant of planning permission insofar as those provisions are not inconsistent with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 and any other orders, rules or regulations made under the 2008 Act.</i></p> <p><i>(2) For the purposes of paragraph (1), a provision relates to a consent, agreement or approval of a local planning authority required by a condition imposed on a grant of planning permission in so far as it provides in relation to an application for such a consent, agreement or approval, or the grant or refusal of such an application, or a failure to give notice of a decision on such an application.</i></p> <p><i>(3) For the purposes of the application of section 262 of the 1990 Act (meaning of "statutory undertaker") to appeals pursuant to this article, the undertaker is deemed to be a holder of a licence under section 6 of the Electricity Act 1989."</i></p> <p>In addition, in respect of the currently proposed Schedule 18 para 3, the applicable Regulations which should be referred to for a Welsh development are the Town and Country Planning (Fees for Applications, Deemed Applications and Site Visits) (Wales) Regulations 2015 (SI 2015/1522) (as amended or superseded).</p>
Q4.0.106	Why are Work 1I (Simulator and Training Building) and Work 1K (Vehicle Inspection Bay) not included in the list of works covered by the Power Station Works Requirement (4) despite being referenced in WN4A of the Draft DCO [APP-029] [RR-021] questions the ability of DCO Requirements to ensure high levels of site campus occupancy and thus, reduce pressures on other areas. Would the draft DCO ensure high levels of campus occupancy and why?	<p><b>Horizon – Deadline 2 Response</b></p> <p>In the updated draft DCO submitted at Deadline 1 (13th November 2018) (Revision 2.0), Horizon amended the title to the Power Station Works Requirements (WN1 to WN16) to insert reference to Work No. 1I and 1K. This aligns to the definition of "Power Station Works" in Schedule 3(1) includes "Work No. 1A-D, 1I-O, 2 and 4 described in Schedule 1".</p> <p>The Workforce Accommodation Strategy [APP-412] states within paragraph 9.1.6 that <i>"Horizon will also commit to maintaining high levels of occupancy in the Site Campus."</i></p> <p>The key driver for seeking to ensure a high occupancy of the Site Campus is to ensure that Horizon remains within its ES, which is based on no more than 3,000 workers residing in the community. Therefore, high occupancy of Site Campus will ensure that it is utilised effectively and the impact on the local community is minimised.</p> <p>Horizon will secure high levels of occupancy by ensuring that the Site Campus fully meets the needs and expectations of a modern construction workforce. These needs will be met through provision of purpose-built high-quality accommodation and a range of on-site facilities and amenities. Alongside the proximity of the Site Campus to the rest of the WNDA, thereby reducing the need and time to travel, the Site Campus will be an attractive location for construction workers to live.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>It is the view of the Welsh Government that Horizon's commitment to <i>"maintaining high levels of occupancy in the site campus"</i> can only be effectively secured through the proposed s106.</p> <p>The Welsh Government is currently in discussions with IACC and Horizon in respect of the s106 agreement to ensure that it contains an obligation on the Applicant to ensure early delivery and high occupancy of the site campus which links the provision of the Site Campus with a phasing strategy.</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q4.0.109	<p>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:</p> <p>(a) Confirm if this is operation of the first or second reactor?</p> <p>(b) Why two years is considered an appropriate time period</p> <p>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?</p> <p>Provide a copy of the draft Heads of Terms for the s106 under discussion for the DCO application?</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p>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.</p> <p>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).</p> <p>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.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>Paragraph 8.3.27 and 8.3.38 of Welsh Government's Written Representation sets out the positioning and reasoning on why a five-year period would be more appropriate than two years. However, Welsh Government would also draw attention to Horizon's Deadline 2 response, 2-years post-commission of Unit 1 would only equate to approximately 6-12 months of full operation as Unit 2 is due to be commissioned some 12-18 months after Unit 1. If impacts on tourism are still occurring as a result of final build activity and the decommissioning of associated development sites, then the ability to access sufficient mitigation funds would be available.</p>
Q4.0.110	<p>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 [APP406] 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.</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p>Section 11 of the table set out in Horizon response:</p> <p>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.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>Paragraph 13.3.17 of Welsh Government's Written Representation sets out that the proposed mitigation measures for Cestyll Garden Registered Park and Garden are not adequate. Welsh Government have requested that a commitment to delivering a Conservation Management Plan is secured through the DCO, see paragraph 13.3.18-13.3.20.</p> <p>In addition, Horizon have referred to 'best endeavours to deliver to a Conservation Management Plan within the draft S106 agreement. Welsh Government is concerned about enforceability and deliverability of the proposed mitigation.</p>
Q6.0.2	<p>With reference to 6.2.11 ES Volume B - Introduction to the environmental assessments B11 - Cultural heritage [APP-076] are you content with the Applicant's methodologies; assessment criteria; measures of magnitude of change and impact and conclusions for Cultural Heritage across the project in relation to:</p> <p>(a) Planning Inspectorate Scoping Opinion particularly in relation to the 'action taken';</p> <p>(b) Statutory and non-statutory consultations carried out by the Applicant;</p> <p>(c) Topic specific methodologies and assessment criteria; particularly:</p> <ul style="list-style-type: none"> <li>i. Assessment of parameters</li> <li>ii. Identification of study areas</li> <li>iii. Identification of receptors</li> <li>iv. Identification of baseline conditions</li> <li>v. Assessment of effects</li> <li>vi. Limitations</li> </ul> <p>If not outline your concerns and explain how the issues might be resolved.</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p>Horizon comments to provide a summary of the locations of their assessment information. In addition, it makes the following statement:</p> <p><i>The approach summarised above ensured that the extent of the impact of the proposed development on the significance of any heritage assets affected could be adequately understood, in line with the requirement of paragraph 5.8.10 of EN-1.</i></p> <p><i>With regards to the limitations of ongoing investigations on site, Horizon continues to engage with IACC/GAPS/Cadw providing on site access to investigation areas (Weekly/Monthly). On completion of the investigation areas, Horizon will be submitting Archaeological Summary Reports for review to confirm there has been no change to the baseline assessed within the ES.</i></p> <p><i>Other limitations, relating to the identification of study areas, trial trench reports which Horizon relied on have not been fully reviewed and signed off by GAPS. However, GAPS were fully integrated into the decision making of the methodologies which lead to the planning / phasing / and implementation of the archaeological investigations.</i></p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>In our written representation, Cadw acknowledges and welcomes the engagement with Horizon to date and the early involvement in discussions around the strategy and approach for managing the impact on terrestrial archaeology. This approach is reliant on a programme of field excavation and sampling to both record and characterise the historic environment baseline and to manage impact to the resource by its controlled removal through this process.</p> <p>Recent discussions have indicated a potential change in strategy. Cadw are awaiting sight of the archaeological summary reports, trial trench reports and further information around Horizons proposed approach. Cadw remains concerned that there is potential for substantial harm (which to assets of national significance must only be permitted in wholly exceptional circumstances).</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q6.0.6	<p>Referring to Effects on Heritage Assets on all sites – D11-6 [APP-213], E11-2 [APP-263], F11-5 [APP-301], G11-5 [APP-351] and H11-2 [APP-381] is the Applicant's assessment of:</p> <ul style="list-style-type: none"> <li>(a) the likely effects;</li> <li>(b) the proposals for additional mitigation; and</li> <li>(c) the significance of residual effects</li> </ul> <p>Satisfactory for archaeological remains; historic buildings; and historic landscapes and gardens during construction, operation and decommissioning?</p> <p>If not explain why and outline what needs to be done to address any issues.</p>	<p><b>Welsh Government deadline 2 response</b></p> <p>Cadw are in agreement with a) the likely effects on Cestyll Registered Park and Gardens and its setting. Cadw not consider the current mitigation proposals (b) to be adequate (see above comment to Q6.0.5).</p> <p>Overall Cadw are content with the approach taken for dealing with the terrestrial archaeology and historic landscape. However, Cadw are still awaiting assurances relating to the post-excavation analysis, publication and archiving.</p> <p>With regards to historic buildings, as with the response to Q6.0.5 above, Cadw are unclear about why certain effects have not been considered, and do not consider that the current mitigation proposals are adequate.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>To expand on our response at Deadline 2:</p> <p><b>Terrestrial archaeology</b></p> <p>Further information is required on the latest status of the archaeological investigation programme. As stated at sections 13.3.31 of Welsh Governments Written Representation, to avoid substantial harm to archaeological assets within the WNDA Horizon must provide:</p> <ul style="list-style-type: none"> <li>• Detailed Summary Reports for all excavation works completed on-site in a timely manner. Horizon must also commit to undertake a programme of analysis, reporting, archiving and dissemination commensurate with the results of the investigations. This will be developed based on the results of post-excavation analysis, reporting, archiving and dissemination.</li> <li>• A Written Scheme of Investigation for the 18-remaining archaeological 'hot-spots'. At the time of writing, Horizon has not confirmed the feasibility and/or methodology for preserving the remaining archaeological 'hot-spots' in-situ or a programme for completing the remaining excavation works.</li> </ul> <p>Cadw is concerned that there is potential for substantial harm (which to assets of national significance must only be permitted in wholly exceptional circumstances).</p>
Q6.0.7	<p>List those Scheduled Monuments, Listed Buildings, Conservation Areas and Registered Historic Landscapes and Parks and Gardens assessed as subject to substantial harm or total loss of significance as a consequence of the project in all of its phases and across all sites and in each case outline the reasons why the substantial harm or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm; and the steps taken to mitigate the harm and/or loss of significance.</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p><b>Steps taken to mitigate the harm and/or loss of significance</b></p> <p>Chapter D11 of the Environmental Statement details the embedded and good practice mitigation identified in respect of Cestyll Garden. The following additional mitigation measures have also been identified to mitigate the construction effects on Cestyll Garden. These will be secured by the Wylfa Newydd Code of Construction Practice [APP-414] and Wylfa Newydd Main Site sub-CoCP [APP-415]:</p> <ul style="list-style-type: none"> <li>• A level 2 topographic and historic landscape survey.</li> <li>• Archaeological earthwork survey of any surviving remains of Cestyll House, Former Site of (Asset 132).</li> <li>• Historic England Level 2 historic building recording of surviving structures.</li> <li>• A photographic survey to provide a permanent visual record of the garden in its current form and condition and Significant Views and provide a detailed visual record of the garden, providing a comprehensive record of its existing form, appearance, setting and key views. This would include the former site of Cestyll House.</li> <li>• Translocation of 'Lady's Finger of Lancaster' apple trees from Cestyll Garden kitchen garden.</li> <li>• Consult with the landowner to implement appropriate monitoring of soil pH and a visual inspection of the condition of plants during the bulk earthworks of the construction period.</li> </ul>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>Discussions between Welsh Government and Horizon are ongoing, however, there hasn't been any substantive dialogue on these matters since issues were raised in August 2018. No progress has been made since this point, in particular, in regard to potential for restoration/reinstatement once the temporary laydown area is no longer required.</p>

Q6.0.9	<p>Referring to Effects on Heritage Assets on all sites – D11-6 [APP-213], E11- 2 [APP-263], F11-5 [APP-301], G11-5 [APP-351] and H11-2 [APP-381]:</p> <p>(a) Explain the processes and timetables through which each of the additional mitigation measures proposed in respect of archaeological remains; historic buildings; and historic landscape types during construction, operation and decommissioning will be designed, approved by the competent authorities and undertaken on site;</p> <p>(b) How will they be secured through the dDCO [APP-029] and relevant Code and Sub-codes of Construction Practice;</p> <p>(c) What measures will be taken to create the necessary partnerships and provide adequate resources to agree and implement these works and how can these be secured through the dDCO?</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p>(a) Horizon's approach to cultural heritage management is based on the controls set out in Section 12 of the Wylfa Newydd Code of Construction Practice (CoCP) whilst cultural heritage asset specific additional mitigation is presented within Section 12 of the relevant sub-CoCPs [APP-415 to APP-420]. Section 12 of Wylfa Newydd CoCP also identifies the procedure in the event of the discovery of unknown archaeological remains. As identified in the sub-CoCPs [APP-415 to APP-420] the mitigation will be undertaken in accordance with the relevant standards and good practice guidance from the Chartered Institute for Archaeologists, and Written Schemes of Investigation (WSI) which will be developed in consultation and agreed with the appropriate authority i.e. Gwynedd Archaeological Planning Service. In addition to identifying the approach to fieldwork, the WSI will also identify the approach to post-fieldwork assessment, reporting, analysis, publication, other forms of dissemination and archiving. Timescales for the completion of the fieldwork, and programmes for subsequent post-fieldwork assessment, reporting, analysis, publication, other forms of dissemination and archiving, will be identified in the WSIs. The development of the WSIs, in consultation with relevant stakeholders, will determine subsequent timing of activities. As detailed in chapter D11 of the Environmental Statement, no additional mitigation was identified for archaeological remains or historic buildings during operation. Additional mitigation is however proposed to offset operational effects on Cestyll Garden. This additional mitigation includes restoration works, installation of interpretation boards, a programme of maintenance during the operational period and enhanced public access to the Cestyll Gardens. The Wylfa Newydd Code of Operational Practice (WN CoOP) [APP-421] further provides that should any earthworks be required during operation, works will proceed in accordance with the measures set out in section 12 of the WN CoCP and relevant sections of any relevant sub-CoCP. No additional mitigation is proposed for archaeological remains, historic buildings or historic landscape types during decommissioning.</p> <p>(b) The controls provided for in the Wylfa Newydd CoCP the various site-specific sub-CoCPs and the WN CoOP will be secured by the Development Consent Order. The requirements in Schedule 3 of the Draft Development Consent Order [APP-029] state that the construction of the Wylfa Newydd Project, as described in Schedule 1 of the Draft Development Consent Order, must be carried out in accordance with this CoCP and the relevant sub-CoCP applying to a specific site. They also provide that the operation and maintenance of the Power Station Works must be carried out in accordance with the WN CoOP.</p> <p>(c) The additional mitigation proposed in respect of Cestyll Garden during operation will be secured through the Draft DCO s.106 which includes an obligation on Horizon to, prior to the operational period, use reasonable endeavours to enter into a Deed of Covenant with the Nuclear Decommissioning Authority as landowner of Cestyll Garden (or its successor in title) to develop and deliver a management plan for Cestyll Garden which will comprise restoration works, installation of interpretation boards, a programme of maintenance during the operational period and enhanced public access to the Cestyll Gardens. Horizon has a number of existing partnerships with archaeological contractors who are currently engaged and delivering investigation works on site as part of the early preparatory works for the Wylfa Newydd Project. The suppliers for the current archaeology investigation works were selected after a competitive tender process in June 2018 with two suppliers selected based on capability and the ability to secure the resources necessary to undertake the works safely and respectful of the archaeology required to be excavated. During this tender process Horizon selected a consultant which could support and oversee main site development activities allowing for a smooth transition and retention of resources from the initial investigation phase. Horizon will therefore utilise these existing relationships throughout the construction period. Any additional partnerships and/or resourcing needs required for archaeological works throughout construction will be sought via the Supply Chain Portal, in accordance with the Supply Chain Action Plan which seeks to maximise supply chain opportunities throughout Wales. These services i.e. the Supply Chain Action Plan and the Supply Chain Portal will be secured through obligations in the Draft DCO s.106. Horizon will follow the principles that are to be described in the Supply Chain Action Plan for securing future work packages, each package will be reviewed against the scope of works required to be undertaken and consideration as to whom (Employer / Contractors) is best placed to manage and mitigate the associated risks attributed to the specific packages of works. Horizon will ensure Works Information, specifications, and associated WSI/Method Statements have been developed in agreement with GAPS in advance of contract awards.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p><b>(a &amp; b) – Archaeological Remains</b></p> <p>Section 12.2 of the CoCP states that 'if significant archaeological remains are discovered and it is determined by Horizon's archaeologist consultant (in liaison with GAPS) that the planned construction works may affect those remains, Horizon will cease works in those areas'. Welsh Government wish to raise a concern that no definition of significance has been provided and therefore it is unclear how and who will determine what are deemed to be significant archaeological remains.</p> <p>The control currently set out in the CoCP is imprecise and therefore will be difficult to enforce (using terms such as 'significant' when no definition of significant has been provided). Consequently, Welsh Government proposes that it is necessary for an additional DCO requirement to be drafted as follows to be secured for this development:</p> <p><b>“WNXX - Archaeology</b></p> <p>(1) <i>No part of the authorised development within the WNDA may commence until a written scheme of investigation for [that part] has been submitted to and, after consultation with CADW in its capacity as the relevant archaeological body, approved by IACC.</i></p> <p>(2) <i>The scheme submitted and approved must be in accordance with Chapter D11 (App. Ref. 6.4.11) of the environmental statement and contain a detailed programme of remaining excavation work of [that part].</i></p> <p>(3) <i>The scheme must identify any areas where further archaeological investigations are required and the nature and extent of the investigation required in order to preserve by knowledge or in-situ any archaeological features that are identified.</i></p> <p>(4) <i>The scheme must provide details of the measures to be taken to protect record or preserve any significant archaeological features that may be found.</i></p> <p>(5) <i>Any archaeological investigations implemented and measures taken to protect record or preserve any identified significant archaeological features that may be found must be carried out—</i></p> <p><i>(a) in accordance with the approved scheme; and</i></p> <p><i>(b) in consultation with CADW.</i></p> <p>As presented in paragraph 13.3.2 of Welsh Government's Written Representation, the Applicant will be aware that where unexpected archaeological discoveries are of national importance, which is the case at Wylfa Newydd, the Welsh Ministers have the power to schedule the site. In the event of scheduling, Horizon will be required to seek separate scheduled monument consent before any further construction work can continue.</p> <p><b>(a &amp; b) – Historic Buildings</b></p> <p>Welsh Government wish to draw the Examining Authority's attention to paragraph 13.3.38 of Welsh Government's Written Representation regarding mitigation needing to be agreed with Cadw.</p> <p><b>(a, b &amp; c) – Historic Landscapes (Cestyll Registered Park and Gardens)</b></p> <p>Paragraph 13.3.17 of Welsh Government's Written Representation sets out that the proposed mitigation measures for Cestyll Garden Registered Park and Garden are not adequate. Welsh Government have requested that a commitment to delivering a Conservation Management Plan is secured through the DCO, see paragraph 13.3.18-13.3.20.</p> <p>In addition, Horizon have referred to 'best endeavours to deliver to a Conservation Management Plan within the draft S106 agreement. Welsh Government is concerned about enforceability and deliverability of the proposed mitigation.</p> <p><b>(c) – Supply Chain Action Plan</b></p> <p>Welsh Government expect that all contractors will be contractually obliged to adhere to any requirements in regard to WSI/method statements, including the necessary requirement outlined above.</p>
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Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q6.0.10	<p>Outline in tabular form the programme for implementing the various measures of mitigation set out in section 12 of the relevant Code of Construction Practice and sub-Codes of Construction Practice [APP-414 to APP-420] to enable the ExA to understand the sequence of activity in relation to heritage assets for each development site; the order of events; their broad timing and the length of period allowed for their implementation.</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p>Horizon's approach to cultural heritage management during construction is based on the controls set out in section 12 of the Wylfa Newydd Code of Construction Practice (CoCP) whilst cultural heritage asset specific additional mitigation is presented within Section 12 of the relevant sub-CoCPs [APP-415 to APP-420]. This additional mitigation was identified as part of the environmental impact assessment undertaken in respect of cultural heritage to mitigate or offset effects on heritage assets where an effect was predicted. This assessment is detailed in chapter D11 of the Environmental Statement (Cultural heritage).</p> <p>The programme for implementing these mitigation measures is yet to be determined but will be heavily influenced by the construction programme. This detail will continue to be developed in consultation with relevant stakeholders, including IACC / Gwynedd Archaeological Planning Service (GAPS) / Welsh Government and Cadw. The Written Schemes of Investigation which are required to be undertaken pursuant to the WN CoCP are to be developed in agreement with GAPS and will detail the timescales for the completion of the fieldwork, and programmes for subsequent post-fieldwork assessment, reporting, analysis, publication, other forms of dissemination and archiving.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>Given the uncertainty in relation to the Written Scheme of Investigations (WSI), Welsh Government would expect there to be a DCO requirement which would prevent works commencing within a specific phase/area until that detail is submitted.</p>
Q6.0.12	<p>Respond to the Welsh Government's comments in its relevant representation [RR-092] in relation to Cestyll registered historic park and garden and its setting that:</p> <p>(a) Greater detail should be provided on how the design of the proposed landscaping (mounding, tree planting, restoration of field boundaries) within the current essential setting has been informed by the impact on the registered park and garden.</p> <p>(b) Visualisations are requested to show how the power station will appear in views adjacent to the southern extent of the Cestyll and would inform a landscaping scheme for this area.</p> <p>(c) Further clarification is required on how the valley garden will be accessed if the historic access is removed through the proposed landscaping mound/bank.</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p>(a) The detail of the proposed landscape design will be submitted and approved following any grant of DCO. The draft DCO includes two DCO Requirements WN9: Final Landscape and Habitat Scheme and WN11: Landscape and Habitat Management Scheme which require the details to be submitted and approved by IACC. Under both DCO Requirements the details submitted would need to accord with the principles contained in the Landscape and Habitat Management Strategy [APP-424/425]. These principles are contained in section 4 of the strategy and secure measures such as ensuring that the detailed landscaping design takes into account cultural heritage considerations and a specific principle securing new woodland planting between the Power Station and Cestyll Valley Gardens. On the basis of the safeguards provided by the DCO Requirements in the draft DCO and principles in the Landscape and Habitat Management Strategy, it is not considered necessary to provide any further detail on landscape design at this stage.</p> <p>(b) Horizon continue to engage with the Welsh Government through the SoCG process. Matters related to potential impacts on Cestyll garden have and continue to be discussed through the SoCG. Any agreed requests for further information such as visualisations will be reported through the SoCG process and formally submitted into examination for consideration by the Examining Authority at an appropriate deadline.</p> <p>(c) During the construction phase, Horizon will relocate the current sole private means of access for the landowner to enable them to maintain private access to the garden. This is shown on for approval DRG WN0902-HZDCO-ROW-DRG-00020 [APP-012]. In respect of the operational phase Horizon intends to retain the private means of access as shown on illustrative DRG WN0902-HZDCO-ROW-DRG-000205. There is no existing or proposed means of public access.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>Given the residual substantial harm to Cestyll Gardens Registered Parks and Gardens, it is Cadw's position that the mitigation measures outlined in the Environmental Statement are not adequate. Further detail about the requirement for further commitments around mitigation are provided in paragraphs 13.3.17-13.3.22 of Welsh Government's written representation.</p> <p>Horizon's commitment to working with Cadw and other stakeholders to 'restore and/or enhance' the former location of the Kitchen Garden is welcomed. As stated in paragraph 13.3.17 – 13.3.22 of Welsh Government's written representation, Cadw are still awaiting detail from Horizon on these proposals, and are also awaiting confirmation of Horizon securing an agreement with the current landowner.</p> <p>Both the DCO requirements WN9 and WN11 should be drafted to include 'approved by IACC in consultation with Cadw'.</p> <p>In addition, Welsh Government considers that Requirement WN11 should be amended to include "(k) Site of Former Cestyll Kitchen Garden". This will ensure that a suitable management scheme will have to be prepared and submitted as part of securing the necessary mitigation.</p> <p><i>"Matters related to potential impacts on Cestyll garden have and continue to be discussed through the SoCG". Welsh Government wish to raise No progress since August 2018.</i></p> <p><i>"There is no existing or proposed means of public access". Paragraph 13.3.20 of Welsh Government's Written Representation identifies provision of public access to the Valley Garden as part of the potential mitigation measures that should be secured by Horizon.</i></p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q6.0.16	<p>Is there merit in drawing up a comprehensive Conservation Management Plan for the group of heritage assets comprising:</p> <ul style="list-style-type: none"> <li>• Cestyll Garden (Historic Landscape Type 2)</li> <li>• The sites of Cestyll House and kitchen garden</li> <li>• Felin Gafnan Corn Mill (Grade II* Listed Building); Mill House at Felin Gafnan (Grade II* Listed Building); and</li> <li>• The Corn-drying House at Felin Gafnan (Grade II Listed Building);</li> <li>• Cafnan House (Grade II Listed Building)</li> <li>• If so, how might this be done and how might it be secured through the dDCO?</li> </ul>	<p><b>Horizon – Deadline 2 Response</b></p> <p>[...]</p> <p><b>Summary</b></p> <p>The mitigation identified in chapter D11 (Cultural heritage) and summarised above is considered by Horizon to be proportionate to the nature and level of the significance of these assets (as required by paragraph 5.8.20 of EN-1). and the potential effects on them. The development of an additional Conservation Management Plan (CMP), or a comprehensive CMP to cover Cestyll Garden, the former site of the Cestyll House and the kitchen garden Felin Gafnan Corn Mill, the Mill House at Felin Gafnan, the Corn-drying House at Felin Gafnan and Cafnan House is therefore considered unnecessary.</p>	<p><b>Welsh Government – Deadline 2 Response</b></p> <p>As presented in paragraph 13.4.5 of Welsh Government's Written Representation, Cadw agree that a Conservation Management Plan (CMP) with clear binding commitments should be produced. The appropriate mechanism for securing the Conservation Management Plan would be the s106 agreement. The CMP should capture the long-term management and enhancement of the historic assets, and this would be delivered through the provision of the Historic Environment Fund.</p> <p><b>Welsh Government – Deadline 3 Response</b></p> <p>Welsh Government maintains the view expressed in its Written Representation (REP2-367) and Deadline 2 response (REP2-366). As highlighted by Horizon's reference to paragraph 5.8.20 of NPS EN-1, the value of these assets is 'high' and therefore Cadw would expect the mitigation proposed to be directly related in scale and kind to the major adverse permanent impact on Cestyll Gardens. To date, the mitigation proposed is subject to best endeavour clauses and does not include detail on what will be secured through a Conservation Management Plan.</p>
Q6.0.17	<p>Produce a plan at scale 1:1250 of the area from Porth-y-Pistyll extending south to Cemlyn Road showing the location of:</p> <ul style="list-style-type: none"> <li>• Cestyll Garden (Historic Landscape Type 2);</li> <li>• The site of Cestyll House and kitchen garden;</li> <li>• Felin Gafnan Corn Mill (Grade II* Listed Building);</li> <li>• Mill House at Felin Gafnan (Grade II* Listed Building); and</li> <li>• The Corn-drying House at Felin Gafnan (Grade II Listed Building);</li> <li>• Cafnan House (Grade II Listed Building) in relation to the boundaries of the WNDA area, the Wylfa NPS site and the Wylfa Power Station site.</li> </ul> <p>Show (a) the works planned for this location during site preparation and clearance and construction; and (b) the situation during the operation period, accurately plotting the proposed boundary fences, the proposed line of the Welsh Coastal Path and the proposed landform and landscape.</p> <p>How would the public access these heritage assets during construction, operation and decommissioning?</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p>Three plans have been produced to illustrate the information requested and submitted alongside this written response. These are attached with this submission.</p> <p>[...]</p> <p>Figure 1b, Appendix 6b (60PO80AS_Q6.0.17_01b) illustrates the subsequent main construction works.</p> <p>[...]</p> <p><b>The site of Cestyll House and kitchen garden</b></p> <p>As shown on Figure 1b, this area is required as a temporary laydown area during the construction of the marine works. This would involve the physical removal of the kitchen garden and the plot of land where Cestyll House formerly stood.</p> <p>An assessment of these effects against policy was set out in the Planning Statement.</p> <p>The assessment of effects is provided in chapter D11 of the Environmental Statement with identification of additional mitigation measures for the operational phase. This includes agreeing the design of appropriate landscape measures to restore and/or enhance the former location of the kitchen garden with National Trust, Cadw and Gwynedd Archaeological Planning Service (GAPS).</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>Horizon's commitment to working with Cadw and other stakeholders to 'restore and/or enhance' the former location of the Kitchen Garden is welcomed. As stated in paragraph 13.3.17 – 13.3.22 of Welsh Government's written representation, Cadw are still awaiting detail from Horizon on these proposals, and are also awaiting confirmation of Horizon securing an agreement with the current landowner.</p> <p>Figure 1b, Appendix 6b (60PO80AS_Q6.0.17_01b) does not include the temporary sewerage treatment works shown on Drawing WN0907-HZCON-LAP-DRG-00023 and referred to in Q1.0.3.</p> <p>The Wylfa Newydd Environmental Statement accounted for the potential impacts of the construction, operation, and decommissioning of the temporary causeway, proposed breakwaters, and the Marine Off-Loading Facility (MOLF), all of which would introduce a source of noise and visual intrusion into the valley garden and Essential Setting of Cestyll Gardens. The Environment Statement concluded that these works would significantly detract from its tranquil character, and the temporary causeway and the breakwater would be dominant and incongruous in the Significant View from the valley garden. It is not clear whether the potential impacts of the temporary waste water outfall were accounted for in the Environmental Statement.</p> <p>Cadw request that further clarification of the impacts on Cestyll Gardens from the temporary treatment plant is provided as an addendum to the Environmental Statement and further consideration given to adequate mitigation of protecting a national heritage asset.</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q6.0.21	<p>(a) How would an agreed archaeological excavation and recording programme be agreed, adhered to and completed prior to the Examination; and</p> <p>(b) Explain how archaeological mitigation is to be achieved across all the sites?</p> <p>Welsh Government [RR-092] IACC [RR-020] NT [RR-053]</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p>Horizon has no plans to carry out any further archaeology investigation works within the Examination timetable other than those areas identified in a letter to the Isle of Anglesey County Council (and copied to Welsh Government) dated 7 August 2018.</p> <p>However, if planning permission for site preparation and clearance (SPC) works is granted by IACC, Horizon may commence early works on the site (in advance of the Development Consent Order being granted) which have the potential to trigger additional archaeological works. The SPC planning permission will, however, be subject to various conditions relating to archaeological matters. The current draft conditions include a condition that no works (including demolition, clearance, trial pitting, topsoil strip or other groundworks) shall take place until a detailed Written Scheme of Investigation (WSI) of archaeological work has been submitted to and approved in writing by IACC. The development must be carried out and all archaeological work completed in strict accordance with the approved WSI details. A Scheme of Archaeology Investigation Reporting on the archaeological work must be submitted to and approved in writing by IACC within six months of the completion of the archaeological fieldwork.</p> <p>Further mitigation will be secured through the Draft DCO s.106 to the SPC planning permission. The Draft DCO s.106 includes an obligation on Horizon to pay to IACC a Heritage and Archaeology Contribution. The contribution will be applied to various measures including:</p> <ul style="list-style-type: none"> <li>• a Heritage and Archaeology Officer to facilitate and deliver the following mitigation measures;</li> <li>• the provision of bilingual interpretation boards and signage which deal with the cultural, archaeological and heritage significance of the Site;</li> <li>• the provision of a web presence which shall include online interpretation material including (if the Council considers it appropriate the use of augmented reality / digital experiences and Social Media); and/or</li> <li>• the provision of a public exhibition explaining the historical significance of the Site; and</li> <li>• other such matters as agreed between Horizon and IACC.</li> </ul> <p>If the Development Consent Order is granted, Horizon's approach to cultural heritage management during construction will be based on the controls set out in Section 12 of the Wylfa Newydd Code of Construction Practice (CoCP) whilst cultural heritage asset specific additional mitigation is presented within Section 12 of the relevant sub-CoCPs [APP-415 to APP-420]. Where changes to the mitigation identified in the sub-CoCPs are proposed the sub-CoCPs will be updated. Section 12 of Wylfa Newydd Code of Construction Practice (CoCP) also identifies the procedure in the event of the discovery of unknown archaeological remains. As identified in the sub-CoCPs [APP-414 to APP-420] the mitigation will be undertaken in accordance with the relevant standards and good practice guidance from the Chartered Institute for Archaeologists, and Written Schemes of Investigation (WSI) which will be developed in consultation and agreed with the appropriate authority i.e. Gwynedd Archaeological Planning Service. In addition to identifying the approach to fieldwork, the WSI will also identify the approach to post-fieldwork assessment, reporting, analysis, publication, other forms of dissemination and archiving.</p> <p>Timescales for the completion of the fieldwork, and programmes for subsequent post-fieldwork assessment, reporting, analysis, publication, other forms of dissemination and archiving will be identified in the WSIs. The development of the WSIs, in consultation with relevant stakeholders, will determine subsequent timing of activities.</p> <p>The controls provided for in the WN CoCP the various site-specific sub-CoCPs will be secured by the Development Consent Order. The requirements in Schedule 3 of the Draft Development Consent Order state that the construction of the Wylfa Newydd Project, as described in Schedule 1 of the Draft Development Consent Order, must be carried out in accordance with this CoCP and the relevant sub-CoCP applying to a specific site.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>EN-1 outlines that there should be a presumption in favour of the conservation of designated heritage assets, including archaeological assets. The more significant the designated heritage asset, the greater the presumption in favour of its conservation. NPS EN-1 goes on to state that the absence of a designation for such heritage assets does not indicate a lower significance and that the impact on the asset is subject to the same policy considerations as those that apply to designated assets.</p> <p>Horizon have confirmed that there are no plans to carry out any further archaeology investigation works within the Examination timetable.</p> <p>It is evident that a robust and agreed mitigation strategy must be available for implementation and the appropriate time, which is also enforceable to ensure archaeological assets within the Wylfa Newydd Development Area are protected to avoid any impacts of substantial harm (as described in EN-1). The developer will be aware that where unexpected archaeological discoveries are of national importance, which is the case at Wylfa Newydd, the Welsh Ministers have the power to schedule the site. In the event of scheduling, Horizon will be required to seek separate scheduled monument consent before any further construction work can continue.</p> <p>Welsh Government are concerned that there is no parity between the provisions being suggested for the SPC conditions and S106, and the approach to the DCO. As a minimum, Welsh Government would expect suitable DCO requirements around the submission and agreement of the Written Scheme of Investigation (WSI) rather than being controlled through the CoCP.</p> <p>Welsh Government request a DCO Requirement committing Horizon to carrying out assessment and analysis of any artefacts discovered (including appropriate archiving/recording) or provide appropriate funding for a third party to manage these works.</p> <p>The control currently set out in the CoCP is imprecise and therefore will be difficult to enforce (using terms such as 'significant' when no definition of significant has been provided). Consequently, Welsh Government proposes that it is necessary for an additional DCO requirement to be drafted as follows to be secured for this development:</p> <p><b>“WNXX - Archaeology</b></p> <p>(1) <i>No part of the authorised development within the WNDA may commence until a written scheme of investigation for [that part] has been submitted to and, after consultation with CADW in its capacity as the relevant archaeological body, approved by IACC.</i></p> <p>(2) <i>The scheme submitted and approved must be in accordance with Chapter D11 (App. Ref. 6.4.11) of the environmental statement and contain a detailed programme of remaining excavation work of [that part].</i></p> <p>(3) <i>The scheme must identify any areas where further archaeological investigations are required and the nature and extent of the investigation required in order to preserve by knowledge or in-situ any archaeological features that are identified.</i></p> <p>(4) <i>The scheme must provide details of the measures to be taken to protect record or preserve any significant archaeological features that may be found.</i></p> <p>(5) <i>Any archaeological investigations implemented and measures taken to protect record or preserve any identified significant archaeological features that may be found must be carried out—</i></p> <p>(a) <i>in accordance with the approved scheme; and</i></p> <p>(b) <i>in consultation with CADW".</i></p>

<p><b>Q10.1.4</b></p> <p>Paragraph 4.3.14 of the Planning Statement [APP-406] refers to the site campus being provided in a 'phased manner' and the ES [APP-088 – paragraph 1.4.9 and APP-122 – paragraph 3.4.6] refers to the bed spaces becoming available once workforce thresholds have been met as set out in the dDCO requirement.</p> <p>Can the applicant:</p> <ol style="list-style-type: none"> <li>Indicate where in the submitted documentation further information on this can be found or provide further details as to how this phasing will work and whether it would be linked to the WAMS?</li> <li>Indicate which is the relevant requirement and where are the thresholds referred to?</li> <li>What the workforce numbers would be prior to the need for the site campus being triggered and what the accommodation arrangements for these workers would be?</li> <li>Why there is a 5-year build programme for the site campus.</li> <li>When in the build programme/phasing the health and social facilities element (including the MUGAs) of the site campus would be delivered and if this is not in the first phases what alternative arrangements would be made for workers health and social needs during this period.</li> </ol>	<p><b>Horizon – Deadline 2 Response</b></p> <p>(a) For ES purposes the assessment is based on delivery of the Site Campus in a phased manner. The first phase would provide accommodation for up to 1,000 workers (phase one), then increase incrementally to out in paragraph 1.8.12 of Chapter D1 Proposed Development. Horizon's commitment to delivering the Site Campus is in the Phasing Strategy [APP-447], which states within Table 2-1 that the Site Campus needs to be delivered by Peak Construction. The Phasing Strategy will be updated at Deadline 4 (17 January 2019) to expressly include the delivery of the Site Campus in a phased manner, in accordance with the ES. The delivery of the Site Campus and how it contributes to meeting worker demand is set out in Figure C1-6 in document ES Volume C - Project-wide effects C1 - Socio-economics, Page C1-13. As illustrated in Figure C1-6, the phasing of the Site Campus is linked to the growth of the workforce. The WAMS is linked to occupation of the Site Campus in that the WAMS will be used to both book the Site Campus (to the extent bed spaces are available) and to monitor the take-up of all forms of accommodation by workers. Please refer to the answer to (c) below for more information.</p> <p>(b) (b) The relevant requirement is PW2, which states that "<i>The delivery of Key Mitigation must be in accordance with the sequencing set out in the Phasing Strategy, unless otherwise approved by IACC.</i>"</p> <p>(c) The ES has assessed the impact on accommodation at the point of peak demand from workers, which is the overall construction peak. This is based on 3,000 workers looking for space in existing accommodation markets (owner occupied, private rented, tourist, caravans and latent). The delivery of the Site Campus has been phased so that the 3,000 figure in existing accommodation markets is not exceeded at any point. Horizon's assessment of capacity does not assume any growth in supply and the estimates of capacity are historical (e.g. the 2011 Census in the case of the PRS), so the existing accommodation market capacity is assumed to be the same at the peak as it is in the early years. This is a conservative assessment because in reality, growth in accommodation capacity has already happened and further growth is likely – particularly given the Housing Fund proposed under the Draft DCO s.106 agreement (namely the Worker Accommodation (Capacity Enhancement) Contribution proposed to deliver new capacity). The total workforce in the last quarter before the Site Campus becomes available is just under 3,200, of which just over 50% (1,620) are expected to be non-home based, i.e. well below the 3,000 assessed in the ES. The numerical breakdown is:</p> <table border="1"> <thead> <tr> <th>Sector</th><th>Workers</th></tr> </thead> <tbody> <tr> <td>Caravans</td><td>350</td></tr> <tr> <td>Owner occupied</td><td>325</td></tr> <tr> <td>Latent</td><td>215</td></tr> <tr> <td>Tourism</td><td>245</td></tr> <tr> <td>PRS</td><td>485</td></tr> <tr> <td><b>TOTAL</b></td><td><b>1,620</b></td></tr> </tbody> </table> <p>(d) The five-year build period is linked to when workers are required for the Wylfa Newydd DCO Project. It links to the worker profile and is currently completed in manner that represents 'Just in Time' practices.</p> <p>(e) Work is in progress, with BCUHB, to define the specification for health services to the construction workforce and on the approach to providing financial contributions associated with use of NHS services. The Draft DCO s.106 agreement proposes increased health related payments until the onsite medical facility is delivered. The specification will cover the phases of the construction e.g. the period prior to the opening of the Site Campus Medical Centre and the period when the Site Campus Medical Centre is up and running. In respect of the MUGA, the current intention is to deliver in the build programme (i.e. it will be available for 1st 1,000 workers). No alternative current arrangements are provided, it is not the intention of the project to require alternative measures, due to the nature of construction and Horizon's commitment to deliver facilities on-site.</p>	Sector	Workers	Caravans	350	Owner occupied	325	Latent	215	Tourism	245	PRS	485	<b>TOTAL</b>	<b>1,620</b>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>Welsh Government may wish to comment further on the phasing of the Site Campus after deadline 4 when the Phasing Strategy is updated. Its response at this stage is based on the current version of the Phasing Strategy (App ref 8.29, June 2018). Welsh Government has substantial concerns around the currently presented phasing strategy.</p> <p>Horizon's commitments currently reflect that there will 1,000 bed spaces at the site campus (TWA) available by Q4 year 4, building gradually up to a peak of 4,000 by Q2 Year 7 (Figure C1-6, ES Volume C, Document APP-088). Welsh Government continues to have concerns that this approach will place stress on the local housing market and tourism sectors as a result of accommodation supply lagging behind demand.</p> <p>Horizon relies on the Figure C1-4 and C1-6 to explain the phasing strategy, however by using bar charts it is difficult to read the figures and analyse the potential impacts. The profile reflects the build-up of workers against demand for the different types of accommodation. In general terms in the first few years of construction, the work force builds with a reliance on home based workers. Once peak is reached and the workforce drops, again there is a reliance on home based workers. There are some anomalies within the data set such as owner occupied dwellings peaking at around 600, dropping to around 50 the following year, before rising up to 200 and then dropping again to 50. Welsh Government would welcome clarification around the assumptions behind these numbers.</p> <p>Based on professional experience, ground workers and other civil engineers are likely to seek temporary forms of accommodation at the lowest cost. Horizon (in Figure C1-4, ES Volume C, Document APP-088) shows this workforce at approximately 100 workers in year 1 and 2 rising to 1,250 workers in year 3 and 3,050 workers in year 4. However, without the TWA being available until the end of Year 4, it means that Horizon are relying on all these workers being drawn from home base workers in year 1 and 2 and around 60% earlier in year 3. In the first two years of construction at Hinkley C home workers have accounted for 45-54% of workers (Accommodation Reports Hinkley, Document REP2-136). Should the numbers of home based workers employed in the early years be lower than projected, even if workers are seeking other forms of temporary accommodation (tourism/caravans, latent and private rental stock), this would reflect a much greater demand these accommodation types at an earlier stage in the construction period than Horizon has allowed for within their own accommodation strategy.</p> <p>In line with the above, evidence from Hinkley C (Accommodation Reports Hinkley, Document REP2-136) has shown that take up of accommodation in the early years of construction shows that the demand for caravans/tourism, private rental stock and latent accommodation has been far greater than anticipated and at Q1 2018 accounted for 51% of known supply. Interviews with planning and housing officers working on the Hinkley C project have indicated that this has led to delayed provision of the TWA and enforcement issues in terms of illegally sited caravans, pressures on the local private rent market. Furthermore, there has been slow take up of the TWA as result of accommodation patterns already being established within the workforce.</p> <p>Welsh Government has previously stated our concerns with the level of supply in the private rental sector and tourism accommodation where there is likely to be insufficient supply to meet demand at peak periods (Welsh Government Written representation, Document REP2-367.). If the Hinkley C experience is repeated using Horizons figures it is clear that there will be an undue impact on the local housing and tourism accommodation market. Welsh Government considers that bringing forward the site campus/TWA, with the first 1,000 units being available by Q1 construction year 3 would help to mitigate the potential accommodation sector impacts. The TWA should then be built up at a rate of 1,000 units a year until year 6 when 4,000 units should be available and occupied. This will ensure supply is maintained and is ready for workers,</p>
Sector	Workers															
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Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
			<p>rather than being reactive and too late to influence the pattern of accommodation demand.</p> <p>Horizon's phasing suggests that the TWA is closed by the end of year 9 of construction. While the workforce numbers are shown to have reduced by this stage, the closure of the TWA means that there would be an increase in demand for other forms of accommodation. If the TWA is phased out then pressure from demand on other forms of accommodation can be reduced.</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q10.1.8	<p>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.</p> <p>(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?</p> <p>(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?</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p>Policy TAI14 sets out five criteria for proposals for the use of existing caravan sites “outside of the usual occupancy season”.</p> <p>The assessment of headroom in the caravan sector was undertaken in the summer peak as this is when capacity is at its lowest. As a result, Policy TAI 14 would not apply. IACC’s latest bedstock survey shows peak occupancy in August of 82%. The lowest occupancy is in February 34% and occupancy remains below 50% from October through to March. In the winter there is therefore still significant occupation of sites, but significantly greater capacity (nearly four times as much). Data provided by IACC identified 1,423 caravan pitches that are licensed for year-round occupancy and a further 474 touring pitches that are licensed for occupancy for over 10 months of the year (no data were provided for static caravans). Using the same ratio of pitches to bedspaces as the bedstock survey (4.4) this would translate to capacity of 8,346 bedspaces available for at least ten months of the year. At winter occupancy levels (37%), that means over 5,250 bedspaces would be unoccupied. The five criteria in TAI14 are:</p> <ol style="list-style-type: none"> <li>1. There is a proven need for temporary residential accommodation in association with an approved building project; and</li> <li>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</li> <li>3. It can be demonstrated that the construction worker accommodation facilitates the delivery of the building project's construction workers' accommodation strategy; and</li> <li>4. It can be demonstrated that the proposal would not have a significant detrimental impact on the tourism industry;</li> <li>5. The proposal is appropriate when considered against Policy TWR 3.</li> </ol> <p>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:</p> <ul style="list-style-type: none"> <li>• It is common ground with IACC that temporary residential accommodation is needed to support the delivery of Wylfa.</li> <li>• 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 Llanbedr goch 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):</li> <li>• Use of caravans is part of Horizon's WAS and extensions to occupancy periods would facilitate the delivery of the strategy</li> </ul> <p>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.</p> <p>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 without 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).</p> <p>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.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>ES document 6.3.9 Socio-economic technical appendix section 3.3 Accommodation Supply contains the information about use of caravans and other accommodation types that may be used for workers. Table 3-15 in this document provides more detailed location information. This discussion does not contain reference to the JLDP criteria although other adjustments are undertaken.</p> <p>Welsh Government also notes that the ES document 6.3.1 Socio-economics discusses the availability of visitor accommodation for workers and at 1.5.25 the JLDP is discussed in terms of amendments to year-round licensing restrictions, but not in terms of adjustments to the potentially available caravan stock.</p> <p>Document 8.5 Workforce Management Strategy refers to the JLDP and in section 4 refers to various policies including TAI 14 as well as TWR 3 in relation to new/expanded holiday accommodation. Here, the interpretation is that there is policy support for additional caravan accommodation (e.g. 6.3.2) rather than restrictions on what proportion of the existing stock may meet the JLDP criteria.</p> <p>Overall, Welsh Government cannot identify where JLDP TAI 14 criteria have been used in the estimates of caravan bedstock available for Wylfa Newydd workers. These criteria will reduce the available accommodation and as noted in the Welsh Government Deadline 2 Written Representation (REP2-367), there are further adjustments for other reasons that significantly reduce the availability of caravan accommodation for example ownership, business interest, peak availability, price and bed occupancy below Horizon's estimates (refer table 12-2 in the Welsh Written Representation). Workers obliged to seek non-caravan accommodation will increase pressure on other parts of the sensitive housing market with people displaced from lower value private rented accommodation. This has the potential for homelessness on Anglesey and in neighbouring authorities.</p> <p>Responses to this issue may include specific proposals for new caravan accommodation for workers compliant with TAI 14 and TWR 3. In addition, as referenced above, the main site campus TWA needs to be delivered in advance of pressures on the housing market becoming apparent and occupancy needs to be formally guaranteed. There also needs to be provision of additional affordable housing to mitigate pressure on lower cost private rented accommodation. For the latter, delivery would need to be through third parties using HNP's Housing Fund, which needs to be agreed at an adequate scale within the s106.</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q10.1.9	<p>(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?</p> <p>(b) Explain how you have differentiated between private rented and holiday cottages/flats?</p> <p>(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?</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p>(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.</p> <p>(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.</p> <p>(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.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>(a) Welsh Government concurs with Horizon's approach and has undertaken its analysis on the same basis i.e. Census definition of Private Rent. Welsh Government also notes Horizon's confirmation that landlords will only be permitted to let to Wylfa construction workers if they are registered with Rent Smart Wales.</p> <p>(c) Welsh Government welcome the commitment that there will only be landlords who rent their properties safely and legally, however please refer to paragraphs 12.5.10 and 12.5.11 of the WG written representation (the limitations of the WAMS)</p>
Q10.1.10	<p>Do you have any concerns regarding the effect of the demand for temporary worker accommodation may have on the private rented stock in Bangor that is currently used by/available to University students?</p> <p>(a) What is the current number of students at Bangor University?</p> <p>(b) Of these how many need accommodations?</p> <p>(c) Of those who need accommodation how many can be accommodated in halls of residence or university accommodation and how many need to use the private rented sector?</p> <p>(d) Does the University have a student accommodation strategy and if so does it factor in the potential impact of the application and are there any proposals in the future for the University either on its own or in partnership to provide additional student accommodation?</p> <p>(e) Do you have any comments you wish to make on this matter to the ExA?</p>	<p><b>Gwynedd Council – Response to Deadline 2</b></p> <p>(a) According to the University, there are approximately 8,900 students enrolled at present (November 2018) (b) of the approximately 7,500 8,900 need accommodation. (c) of the 7,500: about 300 nursing course students are taught on campus in Wrexham; approximately 150 students off-campus (outgoing exchange year abroad); and 2,960 rooms of the University. This leaves the underlying demand for approximately 4,090 of private accommodation. (d) the University will be in the best position to provide information on its properties/accommodation strategy. (e) GC Can confirm that the private sector has provided a number of properties (new buildings and converting existing buildings), only for students in Bangor. Before the intervention of the private sector, students have been relying on the University's halls of residence itself and on a substantial number of domestic properties (where students were living together as single households) and HMO, all owned by private landlords and rented to students. The LDP jointly supported the provision of accommodation for additional students. There is concern about the capacity of social housing in the city and we struggle to get supply for vulnerable groups.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>While Welsh Government has not undertaken detailed analysis of the potential impact of the construction workforce on the private rental market in Bangor, high level analysis suggests that there is significantly less private rented accommodation in the Menai Mainland than Horizon assumes (refer Welsh Government Written Representation (REP2-367) paragraphs 12.4.26 to 12.4.29, including Table 12-4). This analysis indicates there will be pressure on the private rented market in Gwynedd including in Bangor.</p>
Q10.1.15	<p>(a) How would the Workforce Accommodation Management Strategy(WAMS) be funded?</p> <p>(b) Would workers be charged to use the service?</p> <p>Would accommodation providers be charged to register/use the service?</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p>(a)</p> <p>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.</p> <p>(b)</p> <p>There would be no charge to workers to use the service.</p> <p>(c)</p> <p>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.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>While Welsh Government welcomes Horizon's commitment to pay for WAMS and that workers will not be charged for using the service we await details of how WAMS is to be set up and operated.</p> <p>Welsh Government seeks commitment from Horizon that landlords will landlords only be listed on the WAMS subject to compliance with required policy and legislation e.g. registration with Rent Smart Wales, holding HMO licences and being compliant with relevant building and safety standards</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q10.1.18	<p>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.</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p>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.</p> <p>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.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>Welsh Government considers that the response from Horizon does not clarify which stock types would be affected if fewer than anticipated workers are home based.</p> <p>While Horizon refers to the site campus and how it will be delivered as the workforce grows to an as-yet unspecified level they do not state what actions it will take to ensure that non-home based workers outside the site campus will not exceed 3,000. WAMS is a passive information and monitoring system (rather than a control mechanism) and may be bypassed by workers using social media etc. to source accommodation. While number of units in the site campus is set out (i.e. 4,000 at peak), there is no clear strategy to reflect how this level of occupancy will be achieved.</p> <p>Welsh Government remains concerned that no effective control over accommodation choices has been put forward, that the TWA delivery may not be early enough to address pressures on the housing market at the outset, and that there is currently no occupancy guarantee for the TWA that can be relied on. Combined with the inherent uncertainty about the estimates of workers that will be home based, there is a strong probability that there will be additional pressure put on a sensitive housing market. The effect of this would be vulnerable people displaced from low cost private rented accommodation by workers and potential homelessness will increase on Anglesey and people displaced into neighbouring authorities.</p> <p>To address this, the TWA needs to be delivered in advance of pressures on the housing market becoming apparent, occupancy needs to be formally guaranteed (HNP to determine how, but price to the worker seems to be an obvious approach) and there needs to be early provision of additional affordable housing to mitigate pressure on lower cost private rented accommodation. For the latter, delivery would need to be through the Housing Fund, which needs to be agreed at an adequate scale within the s106.</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q10.1.22	<p>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:</p> <p>(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?          (d) What would happen in the event of a dispute?</p> <p>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?</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p>(a) – (c)</p> <p>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:</p> <ul style="list-style-type: none"> <li>• 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:                     <ul style="list-style-type: none"> <li>➢ undertaking interventions to stimulate supply of latent accommodation;</li> <li>➢ providing new build permanent housing, including Affordable Housing;</li> <li>➢ supporting the social-rented sector through the provision of assistance to existing tenants (including rehousing support); and</li> <li>➢ bringing empty homes back into use in the period in the lead up to year three in the Construction Period;</li> </ul> </li> <li>• 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:                     <ul style="list-style-type: none"> <li>➢ monitoring homelessness and housing displacement, and working with Gwynedd Council and Conwy Council on the same</li> <li>➢ establishing and operating community programmes that assist with managing housing and accommodation demands and prevention of homelessness including help with downsizing</li> <li>➢ monitoring accommodation enforcement issues, and working with Gwynedd Council and Conwy Council on the same</li> </ul> </li> <li>• 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</li> <li>• 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:                     <ul style="list-style-type: none"> <li>➢ An increase in homelessness within the KSA caused by the Wylfa Newydd DCO Project.</li> <li>➢ A lack of access to the private rented sector within the KSA caused by the Wylfa Newydd DCO Project.</li> <li>➢ 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.</li> </ul> </li> </ul> <p>(d) Disputes under the Draft DCO s.106 agreement generally is 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.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>Horizon does not provide any information on the scale of funding available or on the amount of money which would be spent on each intervention and without this information it is not possible to comment on the robustness of the proposed S106 package. No justification is provided for the figure of 600 bedspaces. There is no obvious rationale for it in the Workforce Accommodation Strategy.</p> <p>Where detail is given (as in the proposed Accommodation Officers contribution towards two to three IACC officers, Welsh Government considers that a much wider range of local authority officers including planning, housing and environmental officers will be required and that it is important that there is a presence in all three local authorities. Among other items officer support will be required to bring in latent accommodation, raise PRS standards and police unlicensed caravans</p> <p>The split of S106 monies on the basis of the anticipated percentage of non-home based workers living in each area does not allow for any difference in out-turn. There should be greater flexibility to allow for funding to be allocated according to actual need.</p> <p>The proposed Contingency Fund is linked to homelessness and access to private rent. These are among the most serious manifestations of housing stress but there is also a risk of displacement of potential home owners, who in turn put pressure on the private rented sector and pressure on the sale housing market should also be taken into account.</p> <p>The housing market on Anglesey and in north west Wales is sensitive. As set out in our Written Representation Welsh Government will be seeking a substantial housing fund to mitigate the impact of the construction workforce at Wylfa Newydd on the local housing market.</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q10.1.25	<p>The WAMS [APP-412] states (paragraph 1.1.5) states that as there will be a number of other large-scale infrastructure projects under construction in the UK at the same time as the proposal. As a result, workers would have a choice about where they work and consequently the accommodation offer for this project would need to be attractive.</p> <p>Can the applicant explain how this is reflected in the design, layout and facilities of the site campus (with reference to the size of the rooms)?</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p><b>Horizon's design intention</b></p> <p>The Wylfa Newydd DCO Project needs to be able to attract and retain a highly skilled workforce. A key component of that is ensuring that there is enough accommodation that is attractive to workers and that it is affordable, has a good range of facilities and provides good access to their place of work. Horizon's proposals for purpose-built accommodation for up to 4,000 workers within the WNDA and close to the site is a key part of that offer. It will also help to avoid a range of adverse impacts on existing communities, such as overdemand on existing tourist and residential accommodation, social and community facilities, and traffic impacts, as well as helping to manage worker behaviour and avoiding impacts on the Welsh language and culture (see the Welsh Language Impact Assessment for further details).</p> <p>As set out in the Draft DCO application the Site Campus will consist of:</p> <ul style="list-style-type: none"> <li>• Accommodation for up to 4,000 workers in campus-style modular form (providing an independent living space for each worker) in close proximity to the Main Construction Site;</li> <li>• A purpose-built amenity building (zone 3A-19) including cafeteria, café, reception area, gym, bar, shop, and other social space to provide for social and convenience facilities;</li> <li>• An on-site medical centre which will provide primary care services (GP services, specialised clinics, out-of-hours care and pharmaceutical services), occupational health services and occupational hygiene facilities.</li> <li>• Outdoor recreation areas, including two multi-use games areas (zone 3A-29), outdoor seating and informal public spaces for socialising;</li> <li>• Bus set-down and parking area;</li> <li>• Disabled parking spaces and parking for light vans/minibuses;</li> <li>• Temporary parking for workers during the initial phases of construction, consisting of 400 spaces;</li> <li>• Soft landscaping works; and</li> <li>• Secondary substation, compactor and bin stores and cycle stores</li> </ul> <p>Paragraph 3.1.4 of the Appendix 1-2 of DAS Volume 3 states that <i>"The proposed layout of the Site Campus has been developed to:</i></p> <ul style="list-style-type: none"> <li>• <i>Provide suitable amenity space to attract and retain a high standard construction workforce;</i></li> <li>• <i>Provide an environment to meet the needs of the workers during their stay on the Site Campus."</i></li> </ul> <p>Another key consideration in the development of the Site Campus proposal has been the health and well-being of the construction workforce – the vast majority of the construction roles would involve long shifts of physical labour. On-site accommodation will reduce workers' commuting time, and enable longer rest periods for workers. reduce the need to travel. For these reasons, worker needs have driven the development proposal for the Site Campus through seeking to ensure that workers are effectively catered for and an attractive site campus has been provided for them to work successfully and have an attractive place to live.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>Welsh Government supports the development of the Site Campus for 4,000 construction workers, that is well designed and managed and includes a range of facilities that workers in a campus-style environment will require. Affordability and price competitiveness will be a very important element in the offer to ensure maximum occupancy. It is important that this initiative comes onstream early in the life of the project so as to minimise impacts on local housing markets.</p> <p>Horizon states that <i>The workers will have to register with the WAMS and this will be used to allocate accommodation to allow effective control</i> and Welsh Government continues to await confirmation on how this will be enforced and how Horizon will allocate available bed spaces across the different types of accommodation that will be available.</p>
Q10.2.4	<p>Paragraph 1.3.7 of the ES Volume C [APP-088] states that data shows Ynys Môn's resident workforce contains a relatively high proportion of high-level skills (standard occupational classification groups 1-3).</p> <p>(a) Of the roles set out in figure C1-5 of ES volume C [APP-088] how many of these would be classified as high-level skills?</p> <p>(b) If the majority of these roles are low-level skills how is the applicant proposing to fulfil these positions from the local workforce?</p> <p>(c) How does the Jobs and Skills Strategy [APP-411] reflect the training required given the current skill levels of the home-based workers?</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p>(a) Figure C1-5 shows the construction trades. It does not include the managerial and supervisory roles so very few of these roles would be in Standard Occupational Classification groups 1-3. As shown in Figure 2.1 of the Jobs &amp; Skills Strategy, just under 2,000 of the jobs at the construction peak will be managerial and supervisory roles.</p> <p>(b) This is answered under (c) below.</p> <p>(c) As is set out in the Jobs and Skills Strategy, there are a number of entry level, semi-skilled and skilled trades where many workers will be required, where there are existing skills shortages and where there is a reasonable prospect of local residents being trained and therefore subsequently enjoying a sustainable long-term career in the construction industry. Further detail on Horizon's proposals and what has been agreed with the Construction Skills Working Group is set out in answers to several other questions:</p> <ul style="list-style-type: none"> <li>• The response to Q10.2.13 sets out how the draft Jobs and Skills Implementation Plan includes activity to upskill potential Home-Based workers into civils roles – based on the training lead time for general labouring roles, scaffolding, steel fixing – and back office professional roles, as well as into site service roles such as cleaning, catering.</li> <li>• The response to Q10.2.14 sets out how the Skills Fund will support both people moving from unemployment into employment (mainly in entry level jobs) and training and upskilling for apprenticeships and people already in work.</li> <li>• The response to Q10.2.15 sets out how the timing of training aligns to the project's forecast demand for skills.</li> </ul>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>a) Horizon has provided only limited information on the detailed skills required by the construction workforce (see Jobs and Skills Strategy Tables 3.3, 3.4, 3.5, 3.6). More detail is needed on the skills required to fulfil these requirements.</p> <p>Horizon has not provided the data behind Figure 2.1 of the Jobs &amp; Skills Strategy. Welsh Government have requested to see the data that has been used to draw Figure 2.1 (and all other workforce figures in the DCO application). However, this information has not been made available.</p> <p>c) In the Jobs and Skills Strategy, Horizon does not provide a comparison of the skills required by the construction project and the skills available in the local labour force, so it is not clear exactly what training is required.</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q10.2.10	<p>The Workforce Management Strategy [APP-413] sets out parameters for codes of conduct relating to workforce behaviour (paragraph 2.2.1) and employer behaviour (paragraph 2.3.1). Can the applicant:</p> <ul style="list-style-type: none"> <li>(a) Confirm if home based workers would have to sign the codes of conduct?</li> <li>(b) Explain what is meant by workers being off-site?</li> <li>(c) Confirm that the codes would not breach workers (in particular home-based workers) Human Rights or employment rights.</li> <li>(d) Explain what the ramifications for breaching the codes would be.</li> <li>(e) Explain how the codes would be enforced?</li> </ul> <p>Are the IACC, GCC, NWP, PHW and BCUHB satisfied with the measures proposed by the WMS given the concerns they have expressed with reference to safeguarding and anti-social behaviour? If not, why not?</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p>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.</p> <p>[...]</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>Welsh Government welcomes the confirmation that the Code of Conduct will apply to all personnel. However, Welsh Government mirror the concerns raised by IACC regarding the drafting of requirement PW8, which only requires that a code is prepared (but not agreed) and that Horizon can unilaterally amend the code at any point in time provided they submit an amendment to IACC (no requirement to obtain approval) two months prior to it taking effect.</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q10.2.13	Can you provide an update on the progress with the Jobs and Skills Strategy?	<p><b>Horizon – Deadline 2 Response</b></p> <p>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.</p> <p>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).</p> <p>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.</p> <p>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.</p> <p>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 Implementation Plan.</p> <p>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 stage in order to align it with the supply chain action plan and to better define KPIs against it to monitor delivery.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>The Draft Implementation Plan does not set out the triggers for how and when funding will be released or the extent of funds that will be available for each mitigation measure proposed.</p> <p>There is no link or synergy to the Supply Chain Action Plan in regard to identifying relevant and necessary competencies for the relevant local construction sector that could benefit from the proposed Wylfa Newydd roles.</p> <p>Welsh Government have been present in meetings with Horizon on the development of the Implementation Plan. However, at the time of writing, Welsh Government considers that further development of the draft is required to progress the objectives identified into deliverable actions and performance indicators.</p> <p>Horizon have stated that "<i>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</i>". To date, Welsh Government have yet to received minutes from the September 2018 meeting, however, Welsh Government attendees who dialled in were of the understanding that the Implementation Plan will initially focus on the first three years of skills/training needs but will be reviewed and developed throughout the construction period. Therefore, Welsh Government's understanding is that provision of skills/training measures will continue throughout the construction period. This appears to be indicated in Horizon's response to Deadline 2 and Welsh Government would welcome a firm commitment that this is the case and the Skills Fund will be available throughout this period.</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q10.2.15	<p>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?</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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 months 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.</p> <p>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.</p> <p>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.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>As part of the Deadline 2 response, Horizon have stated "<i>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</i>".</p> <p>Welsh Government welcome early provision of the Skills Fund, however, are concerned that the current drafting and triggers in the draft S106 agreement are not clear and will deliver funding when needed. Welsh Government also seek clarity on the statement above that the Skills Fund will operate for the duration of the construction period, as Horizon have stated a commitment to provide opportunities for re-training/re-skilling.</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response																					
Q10.2.16	<p>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.</p> <p>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?</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p>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 workers in each broad occupation at the peak of construction:</p> <table border="1" data-bbox="733 480 1432 727"> <thead> <tr> <th></th> <th>% of HB</th> <th>HB No.</th> </tr> </thead> <tbody> <tr> <td>Site services, security &amp; clerical</td> <td>34%</td> <td>689</td> </tr> <tr> <td>Civils labour</td> <td>34%</td> <td>675</td> </tr> <tr> <td>Mechanical &amp; 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> </tbody> </table> <p>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:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• Q10.2.8 sets out the number of people already in work who have used the pilot version of the WNESS.</li> </ul>		% 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	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>Welsh Government would like to see more engagement of home-based workers in higher-skilled and higher-paid opportunities on the project, which will lead to sustainable careers after the construction has been completed. Horizon needs to invest in training local people to both work on the construction of Wylfa Newydd, and also back-fill any vacancies created in local business if and when local people are employed on the Wylfa Newydd project.</p> <p>The Jobs &amp; Skills Strategy does not set out sufficient detail on implementation i.e. the training that needs to be and will be provided to local people to enable them to access opportunities on the construction project, or back-fill vacancies created in local businesses.</p> <p>In addition, paragraph 6.5.4 of Welsh Government's Written Representation sets out further matters that need to be secured in order to ensure that the Wylfa Newydd Employment and Skills Service (WNESS) will operate effectively.</p>
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Q10.2.19	<p>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?</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p><b>Overview and Assessment- Local Jobs for Local People</b></p> <p>[...]</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>[...]</p> <p><b>Construction- Local Recruitment Measures.</b></p> <p>In order to facilitate the recruitment of local people, Horizon has several measures during construction, these are described in more detail below:</p> <ul style="list-style-type: none"> <li>• Wylfa Newydd Employment and Skills Service (Secured through Section Draft DCO s.106)</li> <li>• Skills Fund (Secured through Draft DCO s.106)</li> <li>• Employment and Skills Portal (Secured through the Draft DCO s.106)</li> <li>• Welsh Language and Culture Mitigation and Enhancement Strategy (WLCMES) (Secured through Draft DCO s.106)</li> <li>• Supply Chain Charter, Action Plan and Service (Secured through Draft DCO s.106)</li> <li>• Community Involvement Officer/ Economic Development Officer (Secured through Draft DCO s.106)</li> <li>• Principles about recruiting local workforce (Secured in the Workforce Management Strategy and Requirement PW8).</li> </ul> <p>[...]</p> <p>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.</p> <p>The Supply Chain Action Plan, as, which is secured through the Draft DCO s.106, will set out strategic objectives and desired outcomes into the detailed actions and processes required to deliver Horizon's goals. This aims to maximise opportunities in the local area, support implementation of the Employment and Skills Service and a number of other objectives. A Supply Chain Service, which is secured in the Draft DCO s.106, which will oversee the delivery of the Action Plan.to clarify what Horizon expect from its suppliers, Horizon has developed a Supplier Code of Conduct which is secured through the Draft DCO s.106 and the Workforce Management Strategy, to supplement the Supply Chain Charter and clearly specify what behaviours, practices and regulations it expects to see demonstrated and complied with, this includes the promotion of local recruitment during construction. This code of conduct will require compliance by all contractors, where practical and possible, this will be contractually enforced.</p> <p>[...]</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>Welsh Government understands that most of the 2,000 home-based workers on the construction phase of the project will not be employed directly by Horizon, but will be employed by its subcontractors in Tiers 1, 2, 3 etc. Therefore, the Supply Chain Action Plan needs to show how Horizon will develop and promote opportunities for local contractors from within the DCCZ to secure work packages throughout all phases of the project. This will help to ensure that local home-based residents are maximised on the project, or local companies are able to recruit additional local residents as required.</p> <p>Welsh Government want to/and have been working collaboratively with Horizon and other stakeholders in developing the Supply Chain Action Plan. In initial draft of the SCAP was shard with Welsh Government on the 11 December 2018 for comment and review.</p> <p>Welsh Government remain concerned about the time available in order to make serious progress on securing an agreed Supply Chain Action Plan that can be appended to the s106 to meet the Examining Authority's Examination timeline.</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q10.2.22	<p>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?</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p>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.</p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> <li>• 08/02/2018 – Economic Development and Supply chain with IACC</li> <li>• 05/03/2018 – Economic Development and Supply Chain with Welsh Government;</li> <li>• 31/08/2018 – SoCG Workshop with Welsh Government – Economy &amp; Supply Chain;</li> <li>• 11/10/2018 – IACC workshop – Local employment, skills and supply chain;</li> <li>• 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.</li> </ul> <p>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 Government, NWEAB, Horizon supported by selected partners) and were circulated for discussion in 2018.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>With reference to the SoCG workshop between Horizon and Welsh Government on the 31 August 2018, please refer to <a href="#">Appendix B</a> which sets out a list of questions that were provided to Horizon on the 24 August 2018 to inform the workshop.</p> <p>Horizon have since provided a draft outline structure of the Supply Chain Action Plan on the 11 December 2018 and have arranged a further meeting on the 29 January 2019.</p> <p>Welsh Government want to/and have been working collaboratively with Horizon and other stakeholders in developing the Supply Chain Action Plan. In initial draft of the SCAP was shared with Welsh Government on the 11 December 2018 for comment and review.</p> <p>Welsh Government remain concerned about the time available in order to make serious progress on securing an agreed Supply Chain Action Plan that can be appended to the s106 to meet the Examining Authority's Examination timeline.</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q10.2.23	<p>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?</p>	<p>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></p> <p>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:</p> <ol style="list-style-type: none"> <li>1. Those already employed by businesses that win contracts on the project</li> <li>2. Those that are entering (or re-entering) the labour market</li> <li>3. Those that change job to work for a contractor on the project</li> </ol> <p>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.</p> <p>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.</p> <p>The corollary of this is that up to 60% of new vacancies will be filled by people who change job.</p> <p>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.</p> <p>All of these are likely to happen in Anglesey.</p> <p>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.</p> <p>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.</p> <p>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”.</p> <p>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.</p> <p>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.</p> <p>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>”</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>Welsh Government is not aware of any information on the level of displacement of local workers at Hinkley Point C. However, the local economic impact of the construction of Sizewell B in Suffolk was reviewed in-depth by Professor John Glasson (Reference WG36-29 of Welsh Government's Written). Glasson considered the local labour market experience from Sizewell B. The monitoring reports show that local people were employed on the project, including people who were previously unemployed. Efforts were made to retrain workers who had undertaken a role on the project which subsequently became redundant. Glasson found that there is potential for the displacement of workers because of the higher salaries paid in the project, and difficulty in back-filling vacant posts because of generally high employment and skills shortages in the local economy (p.220). He estimated that 600 employees were drawn from other local businesses in the early years; and a survey of local businesses reported that 10% found that the project made it more difficult to retain or recruit staff.</p> <p>Horizon has correctly defined displacement as the off-setting of economic activity elsewhere in the economy. Welsh Government agrees that displacement occurs when there is a negative impact because of a worker moving to Wylfa Newydd which incurs a cost or who is not replaced, or a negative impact on the local economy as a consequence of a local business being engaged in the supply chain (e.g. the ‘normal’ level of construction in the local economy declines because local construction businesses are engaged at Wylfa Newydd).</p> <p>Horizon claims that 40%-52% of new jobs filled by people who are not previously working. There is no source given for this claim, and this needs to be properly evidenced so that it can be tested. Work undertaken for Welsh Government by Hardisty Jones Associates shows that there are insufficient suitably skilled and experienced JSA claimants in the local economy to fill the demand for home-based workers created by Wylfa Newydd, and so the demand for home-based workers can only be met by employing people who are already in work. This will likely cause a displacement effect of civils operatives and M&amp;E operatives, particularly in Anglesey, but also in Menai Mainland.</p> <p>Churn becomes displacement when vacant roles incur a significant cost to fill or cannot be filled. Displacement can lead to boom and bust.</p> <p>Horizon is treating Anglesey as a self-contained economy whereas it clearly is not. Many of the higher order functions, including higher-quality employment, for Anglesey residents are in Gwynedd - particularly in an area that Horizon defines as Menai Mainland. The Holyhead &amp; Bangor Travel to Work Area (TTWA) is an ONS defined area which comprises Anglesey and Menai Mainland, and is a far better definition of a functional economic market area (FEMA) than Anglesey alone is. The Jobs Density (ONS figure for jobs per working age resident) for this TTWA is 0.81, so it has 810 jobs per 1,000 working-age residents, which is higher than the Wales figure of 0.76 (or 760 jobs per working-age resident). This TTWA has the sixth highest level of Jobs Density of the 20 TTWAs that make up Wales, so does not stand out as a problem on this measure. It would be inappropriate to consider the local authority area of Anglesey as a self-contained unit for matching jobs and residents as it is not a self-contained economic market area.</p> <p>The Enterprise Zone will want to create permanent jobs which contribute to sustainable economic activity. Temporary during construction jobs are helpful, but these will need to lead to sustainable careers for local people.</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q10.3.2	Prescriptions are free in Wales for all those registered with a Welsh GP. How would the cost of prescriptions for workers registered with the on-site campus GP be covered?	<p><b>Horizon – Deadline 2 Response</b></p> <p>A contract will be agreed with a local pharmacy to provide prescription and pharmacy services to the Site Campus Medical Centre. The prescriptions that will be written by the Site Campus Medical Centre clinicians will be private prescriptions which Horizon will subsidise. In this way all workers will be able to use prescriptions without paying a fee.</p> <p>This will remove the incentive of free prescriptions that might otherwise persuade some non-home-based workers to register with a Welsh GP. An estimated demand, and a means of monitoring, will be set up through the Health and Well-being Engagement Sub-group (Item 0097 Mitigation Route Map secured through the Draft DCO s.106, Draft Heads of Terms for Planning Obligations).</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>Welsh Government welcome the statement by Horizon to ensure that free prescriptions will be provided to workers using the Site Campus Medical Centre. However, it is still not clear how this provision would be secured through the DCO.</p> <p>It is the view of Welsh Government that the DCO S106 include a continuing obligation on the Applicant to provide all workers (construction and operation) with free prescriptions for the duration of their employment on the Site.</p>
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 this stock and to ensure that when it is vacated by workers it would be of a standard that is suitable for tourism lets?	<p><b>Horizon – Deadline 2 Response</b></p> <p>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.</p> <p>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).</p> <p>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.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>The Welsh Government has provided evidence in Table 12-2 of the Written Representation that indicates that the potential available supply of tourism accommodation stock (for the KSA, which covers Anglesey and parts of Gwynedd and Conwy) is significantly less than that stated by Horizon.</p> <p>Consequently, it will be more likely that the same accommodation stock would be used continuously which is contrary to the view provided by Horizon. In addition, the consequence of restricted supply will mean that around 600 additional bedspaces will be required in other accommodation sectors within the KSA.</p>
Q10.4.3	<p>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:</p> <p>(a) What measures are proposed to ensure that these contracts are awarded to local companies rather than large contract catering companies?</p> <p>(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?</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p>(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.</p> <p>(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.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p><i>"...will enable opportunities to be maximised for local SME and local people"</i></p> <p>Paragraph 7.3.15 of Welsh Government's Written Representation sets out that the SCAP should include the provision of an SME strategy.</p> <p>Welsh Government has been engaging with Mon Larder to develop the potential opportunities that could be secured at Wylfa Newydd, in particular, catering for both on-site and temporary worker accommodation. Welsh Government will continue to engage with both Mon Larder and Horizon through the development of the Supply Chain Action Plan.</p> <p>Paragraph 4.3.5 of Appendix C (Welsh Government Written Representation) outlines the potential opportunities for businesses within the food and drink sector through the development of a comprehensive and timely Supply Chain Action Plan.</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q10.4.6	<p>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?</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p>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:</p> <ol style="list-style-type: none"> <li>1) A <b>Tourism (Annual) Contribution</b> payable by the Applicant to IACC annually for the construction period. The council would be required to allocate this money to: <ul style="list-style-type: none"> <li>• safeguarding and enhancing the image and perception of North Anglesey as a visitor destination;</li> <li>• a programme of measures or works to attract greater visitor numbers to North Anglesey;</li> <li>• 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</li> <li>• other such matters agreed as between the Council and the Developer which promote or support Anglesey as a tourism destination.</li> </ul> </li> <li>2) A <b>Tourism Officer Contribution</b>, payable by the Applicant to IACC for the construction period manage the council's obligations under the agreement.</li> <li>3) <b>Tourism (WG Monitoring) Contribution</b> to be paid by the Applicant to the Welsh Government for the purposes of contributing to the Welsh <b>Government</b> costs of part-sponsoring the existing Welsh Government: Tourism Barometer Survey, Wales Visitor Survey, and the Wales Tourism Accommodation Occupancy Survey.</li> <li>4) A <b>Tourism Contingency Fund</b> 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: <ul style="list-style-type: none"> <li>• changes (material reductions) in visitor numbers to or visitor spend;</li> <li>• changes in the quality and availability of tourism accommodation;</li> <li>• a decrease in attendance numbers at tourist attractions and events; and</li> <li>• negative impacts on tourism businesses.</li> </ul> </li> </ol> <p>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.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>Paragraphs 8.1.4, 8.3.27, 8.4.6, 8.4.7, 8.4.8, and 8.5.4 within Welsh Government's Written Representation raised concerns about the proposed Tourism Fund, including the spatial coverage, triggers, and mechanisms for release of the funds.</p> <p>In addition, discussions with Horizon are still ongoing about the role of the Tourism and Leisure Sub-Group, Tourism Contingency Fund, and Tourism (WG Monitoring) Contribution.</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q10.5.6	<p>Paragraph 6.2.41 of the Planning Statement [APP-406] states that 85% of the operational workforce would be local people.</p> <p>(a) Please define what is meant by a local person or where in the documentation this definition can be found.</p> <p>(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?</p> <p>(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?</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p>(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. 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.</p> <p>(b) Horizon believe that this is achievable without disrupting the workforce of other businesses on Anglesey (Ynys Mon) due to the current characteristics of the Anglesey labour market.</p> <p>(c) 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 <i>"Grow the local economy and provision of new jobs"</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. 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:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• 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</li> <li>• 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.</li> </ul> <p>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.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>Welsh Government disagrees with the evidence base set out in answer to Part C (see answer to Q.10.2.23), but does not disagree with the sentiment of ensuring that local residents are employed in the operation of Wylfa Newydd. Welsh Government notes that Horizon seeks to employ 2,000 home-based workers in the construction of Wylfa Newydd, and that these workers will come from within a 90-minute drive-time DCCZ, which extends across a significant area of North Wales beyond Anglesey. Three-quarters of these home-based workers will come from Anglesey and Menai Mainland. To ensure sustainable employment for these home-based workers after the construction of Wylfa Newydd has been completed (and to help avoid boom-and-bust), Welsh Government would like to see these workers re-trained to enable them to work in the operation of Wylfa Newydd.</p> <p>With sufficient training in place during the construction period, it will be possible to employ 850 people from across the DCCZ area in permanent jobs in the operation of Wylfa Newydd. Therefore, Welsh Government's aspiration for 90% from the DCCZ (as indicated by Horizon) would be achievable.</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q10.5.9	<p>Paragraph 6.4.476 of the Planning Statement [APP-406] sets out a number of proposed mitigation measures:</p> <p>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.</p> <p>(a) How many jobs does Horizon envisage will be 'required' to have Welsh language skills?</p> <p>(b) what provisions are proposed for interviewing candidates whose first language is Welsh for roles that are not 'required' to have Welsh language skills?</p> <p>Bullet point 4 refers to providing language 'awareness' training – can you provide further information as to:</p> <p>(a) what will constitute 'language awareness' training;</p> <p>(b) how this differs from learning the Welsh language training; and</p> <p>(c) how 'awareness training' will protect and/or grow the use of the Welsh language?</p> <p>Bullet point 6 - why is it that the collection of data 'may be' rather than 'will be' linked to the Worker Accommodation Management Service?</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p>Response to Bullet Point 3</p> <p>[...]</p> <p>(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</p> <p>[...]</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>In respect of Horizons response to Part B (interviewing candidates) the Welsh Government would draw attention to paragraph 5.3.15 of its Written Representation, which states under the Welsh Language Act 1993 Welsh is an official language, and that Welsh Government has provided Human Resource guidance that provides advice on assessing what language to use during interviews.</p>
Q11.1.4	<p>(a) Who currently provides bus services on Ynys Môn?</p> <p>(b) When were they awarded the contract and when will it be up for renewal?</p> <p>(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?</p> <p>(d) Has the possibility of opening up the workforce buses to the wider community been considered?</p> <p>(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?</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p>[...]</p> <p>(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.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>(e) Welsh Government wish to draw attention to paragraph 9.4.44 of its Written Representation. The ITTS states that the bus routes are to be determined by the bus operator. However, in response to this question, Horizon indicate that the Transport Sub-Group will be able to make changes to the bus route network. Clarification on the position is required. In addition, paragraph 9.4.46 of the WR sets out that the bus route should be identified early on and bus routes operated along the major road and accommodation corridors to coincide with first worker arrivals in order to allow workers to make informed accommodation choices through the Workforce Accommodation Management Service (WAMS).</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q11.1.5	<p>Concerns have been raised in a number of the RR regarding the fact that the Menai and Britannia bridges occasionally have to shut.</p> <p>Can the IACC/GCC provide details of:</p> <ul style="list-style-type: none"> <li>(a) How frequently the Menai and Britannia Bridges have shut over the last five years?</li> <li>(b) How often both bridges were shut at the same time?</li> <li>(c) What measures are currently in place when a bridge shuts e.g. how and where is traffic diverted or held and how does this effect travel times/congestion?</li> </ul>	<p><b>Horizon – Deadline 2 Response</b></p> <p>This answer refers to the latter part of the question above - "can the applicant confirm" sections (a) and (b) - only.</p> <ul style="list-style-type: none"> <li>(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.</li> <li>(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.</li> <li>(c) 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:</li> </ul> <p><i>"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:</i></p> <ul style="list-style-type: none"> <li>• <i>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.</i></li> <li>• <i>Controlling the number and frequency of Heavy Goods Vehicles (HGVs) on the designated HGV routes.</i></li> <li>• <i>Establishing an appropriate communications protocol for workers, bus drivers transporting construction workers and HGV drivers.</i></li> <li>• <i>Communicating incident management information to all workers, contractors making a delivery and bus operators transporting workers.</i></li> <li>• <i>Holding HGVs and buses at appropriate locations, including the Logistics Centre, during an incident."</i></li> </ul>	<p><b>Welsh Government – Deadline 3 Response</b></p> <ul style="list-style-type: none"> <li>(a) Whilst full closure of Britannia Bridge is a rare occurrence (as stated in Welsh Government's Deadline 2 Response), the number of occasions that restrictions to high sided vehicles are imposed due to high winds is far more frequent. For example, based on the Traffic Wales information feed (<a href="http://www.traffic-wales.com">www.traffic-wales.com</a>), restrictions were imposed on high sided vehicles six times in the last three weeks (28-29 November, 2 December, 6 December, 15 December, and 18 December).</li> <li>(b) Welsh Government have requested further information about the holding locations on the Menai Mainland and the means of communication to vehicles both en-route to and departing from Wylfa.</li> <li>(c) Welsh Government accept that Horizon will not have a statutory authority should an incident occur. However, under the Wylfa Newydd CoCP Welsh Government would expect Horizon to provide and agree appropriate locations to hold HGVs prior to deliveries commencing.</li> </ul>
Q11.1.6	<p>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.</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p>Whilst the question is not directed to Horizon as the applicant, the following response is provided by Horizon at this stage:</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>Welsh Government welcomes the commitment from Horizon to ensure that HGV movements will not exceed the thresholds and would welcome clarity on how this will be secured through the DCO requirements or S106 agreement. Paragraph 9.3.5 of Welsh Government's Written Representation clearly sets out the expectations for freight movements during the construction phase of the project.</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
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?	<p><b>Horizon – Deadline 2 Response</b></p> <p>The standard vehicle for delivery of freight via Logistics Centre to Wylfa Newydd Development Area (WNDA) will be 44 Tonne Gross Vehicle Weight Curtain Sided Artic or Container &amp; 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:</p> <p>Weight:</p> <ul style="list-style-type: none"> <li>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.</li> <li>Each part of the combination must have 3 axles and the trailer must have road friendly suspension.</li> <li>40 tonnes for lorries with 5 axles with maximum axle weight limit of 11.5 tonnes length</li> </ul> <p>Length:</p> <ul style="list-style-type: none"> <li>12 metres for a rigid vehicle</li> <li>16.5 metres for an articulated vehicle if the articulated combination can turn within a concentric radii of 12.5 metres.</li> <li>18.75 metres for a road train (a combination of a lorry and a trailer)</li> </ul> <p>Width:</p> <ul style="list-style-type: none"> <li>Standard 2.55 metres wide, excluding driving mirrors</li> <li>refrigerated vehicles are permitted to be 2.6 metres wide to allow for the extra thickness of the insulation</li> </ul> <p>Height:</p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p>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.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>Welsh Government note that Horizon's response is based on a standard vehicle.</p> <p><i>"The standard vehicle for delivery of freight via Logistics Centre to Wylfa Newydd Development Area (WNDA) will be 44 Tonne Gross Vehicle Weight Curtain Sided Artic or Container &amp; Trailer"</i></p> <p>Welsh Government is aware that Horizon will need to move approximately 500 escorted Abnormal Indivisible Loads (AIL) and have requested a requirement for a AIL Management Plan, please refer to paragraph 9.5.3 of Welsh Government's Written Representation. Therefore, Welsh Government is unclear as to what the largest vehicle will be that the Applicant intends to use. However, based on the answer provided by Horizon, this would be acceptable to Welsh Government and could be suitably secured through an appropriate requirement.</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q11.1.20	<p>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:</p> <ul style="list-style-type: none"> <li>(a) Whether a dedicated bus service is proposed for workers based in Bangor and Caernarfon?</li> <li>(b) Would this service be free or subsidised?</li> <li>(c) Would this require the instillation of new or improvements to existing bus stops and if so how would this be funded?</li> <li>(d) Has the potential of opening this service up to the wider community been considered?</li> <li>(e) Would the service continue once the plant is operational to enable workers to travel sustainably and minimise road traffic?</li> </ul>	<p><b>Horizon – Deadline 2 Response</b></p> <ul style="list-style-type: none"> <li>(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).</li> <li>(b) The shuttle bus services are likely to be free to use for construction workers associated with the Wylfa Newydd Project.</li> <li>(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 &amp; 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.</li> <li>(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.</li> <li>(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.</li> </ul>	<p><b>Welsh Government – Deadline 3 Response</b></p> <ul style="list-style-type: none"> <li>(a) Welsh Government supports this provision that workers from Bangor and Caernarfon will be served as this will provide opportunities for home-based-workers to travel sustainably.</li> <li>(b) As part of securing the travel plan behaviour, Welsh Government would expect the shuttle bus service to be attractive to the workforce and therefore would expect the buses to be free to the users.</li> <li>(c) It is unclear whether all bus stops are within 600 metres of the worker accommodation. The definition of whether a worker will be compelled to use a bus relies on being within 600 metres of a route. There is an inconsistency between route and stop. Paragraph 9.4.52 of Welsh Government's Written Representation also outlines the strategic interface opportunities between the additional proposed Park and Share sites and shuttle bus services to the Wylfa Newydd Development Area.</li> <li>(d) Welsh Government have no comment to make on this response.</li> <li>(e) It is currently not clear as to what measures and monitoring arrangements will be implemented during the operational phase of the project to ensure that the uptake of car share and other modal transport choices are maximised. Welsh Government would expect an appropriate DCO requirement that will require Horizon to provide an operational travel plan including measures to promote public transport prior to the operation of the site.</li> </ul>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q11.1.21	<p>Reference is made to the use of shuttle buses between the Park and Ride and the construction sites. Can the applicant:</p> <ul style="list-style-type: none"> <li>(a) Confirm what they mean by 'shuttle bus' as it would appear from other references within the documentation that minibuses are proposed.</li> <li>(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?</li> <li>(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?</li> <li>(d) Provide details of how many passengers a shuttle bus could accommodate.</li> <li>(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?</li> <li>(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.</li> <li>(g) Confirm whether users would be required to pay for parking?</li> <li>(h) Confirm whether the shuttle bus would be free or subsidised?</li> <li>(i) Confirm that the shuttle buses would be capable of accessing the routes shown on Figure 5-5 of the TA [APP-101]</li> <li>(j) Explain why no shuttle buses are currently proposed for the east and south of the island?</li> </ul> <p>Paragraph 4.2.4 of the Park and Ride sub CoCP (PRSCoCP) [APP-418] appears to be contradictory stating that the Park and Ride would operate from 06:00 to 20:00 but that it would also operate 24 hours, seven days a week. Can you:</p> <ul style="list-style-type: none"> <li>(a) Confirm the hours of operation and</li> <li>(b) Explain how users would access this facility if the service is not 24/7.</li> </ul>	<p><b>Horizon – Deadline 2 Response</b></p> <p>(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 &amp; 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. 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.</p> <p>(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</p> <p>(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.</p> <p>[...]</p> <p>(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).</p> <p>(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 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 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.</p> <p>(g) Users of the Park &amp; Ride facility at Dalar Hir would not be required to pay for parking.</p> <p>(h) The shuttle bus services are likely to be free at the point of use for construction workers only.</p> <p>[...]</p> <p>(j) Figure 6-8 of Appendix F – Integrated Traffic &amp; 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.</p> <p>[...]</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>(a) Welsh Government have no comment to make on this response.</p> <p>(b) Welsh Government have no comment to make on this response.</p> <p>(c) Welsh Government have no comment to make on this response.</p> <p>(d) Welsh Government have no comment to make on this response.</p> <p>(e) Welsh Government would expect a commitment to (at least) fulfil the current emissions standard (EURO-VI). Horizon have not provided justification as to why EURO-IV is appropriate. Please see paragraph 9.4.47 of Welsh Government's Written Representation.</p> <p>(f) Please refer to paragraph 9.4.49 of Welsh Government's Written Representation.</p> <p>(g) It is not clear how this proposal will reinforce travel behaviour for those that are using the shuttle bus services.</p> <p>(h) Welsh Government would expect a commitment for free to use bus services, and this should be secured through the s106 in order to ensure that workers will be incentivised to use the bus to minimise additional commuter traffic on the network.</p> <p>(i) Welsh Government have no comment to make on this response.</p> <p>(j) Welsh Government have no comment to make on this response.</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q11.1.44	<p>(a) Would Abnormal Indivisible Loads (AILs) particularly those requiring an escort be scheduled to occur outside of the morning and evening peaks?</p> <p>(b) Can you confirm whether AILs would be required to go via the Logistics Centre or would they go direct to the WNDA?</p> <p>(c) If they are to go direct to the WNDA how would they be managed to ensure that they would not cause congestion on the A5025 for other construction traffic?</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p>(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.</p> <p>(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.</p> <p>(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 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.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>(a) Welsh Government note Horizon's response on this matter. Welsh Government is aware that Horizon will need to move approximately 500 escorted Abnormal Indivisible Loads (AIL) and have requested a requirement for a AIL Management Plan, please refer to paragraph 9.5.3 of Welsh Government's Written Representation.</p> <p>(b) Welsh Government have no comment to make on this response.</p> <p>(c) Welsh Government may wish to cover this matter through the Issue Specific Hearing on Transport.</p>
Q17.0.5	<p>Is the Well-being of Future Generations (Wales) Act (2015) applicable to this application? And if it is, would the Application achieve the well-being goals set out in the Act and if it would not why would it not?</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p>Although this question is directed to the Welsh Government, Horizon would like to make following comments at this stage:</p> <p>The duty introduced by the Well-being of Future Generations (Wales) Act 2015, to take steps to contribute to the achievement of the well-being goals, does not apply directly to Horizon (as it is not a specified public body). The 'specified public bodies' are defined in Section 6 of the Act. The Welsh Ministers, NRW, and IACC are specified public bodies, but the Planning Inspectorate and the Secretary of State are not. Horizon nonetheless wishes to support public bodies in discharging their duties in respect to the Act.</p> <p>Various documents in the DCO application contain information that will assist relevant public bodies in meeting their obligations under the Act in respect of the Wylfa Newydd Project. In particular, the Equality Impact Assessment (EqIA) [APP-434], the HIA Report [APP-429], the Welsh Language Impact Assessment [APP-432 and APP-433], the Carbon and Energy Report [APP-423], and the Sustainability Statement [APP-426] demonstrate how the Wylfa Newydd DCO Project contributes towards these and other goals in the Act. By undertaking the EqIA, Horizon is seeking to identify how the Wylfa Newydd DCO Project would contribute towards the objectives of 'a more equal Wales' and 'a Wales of cohesive communities'.</p> <p>Table A-6 of the HIA Report sets out links between the HIA to the Well-being Goals of the Well-being of Future Generations (Wales) Act 2015 in order to support public bodies in discharging their duties in accordance with the Act when considering the HIA.</p> <p>The Welsh Language Impact Assessment [APP-432 and APP-433] addresses the goal of the Well-being of Future Generations (Wales) Act 2015 of achieving "a Wales of vibrant culture and thriving Welsh language". The Carbon and Energy Report (at paragraph 3.3.6) and the Sustainability Statement (at paragraph 7-1.1.15) note that the Wylfa Newydd DCO Project, has the potential to make a substantial contribution to several of the objectives that support the well-being goals.</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>The Welsh Government has set out clearly in its written representations the duties under which it operates (including pursuant to the Well-being of Future Generations Act (Wales) 2015 (the Act)).</p> <p>In addition to those submissions, which also set out the areas of interest in this application which are devolved to Welsh Ministers, the Welsh Government also wishes to highlight and reinstate that importance of the role of the Act in respect of the assessment and determination of the DCO application in Wales.</p> <p>Welsh Government consider that Planning Policy Wales (Edition 10) (now in force) is an important and relevant consideration under Section 105 of the Planning Act 2008. PPW10 sets out in planning terms the requirements of the Act.</p> <p>Therefore, it is the Welsh Government's view that the SOS, through its Examining Authority, must take account of the Act in its consideration and determination of this application, and significant weight must be attached to the duties in respect of which the Welsh Government is bound, and the extent that the DCO application meets the objectives of the Act.</p> <p>Consequently, the Act itself is an important and relevant consideration for the SOS pursuant to S105 Planning Act 2008.</p>

Question Number	Examining Authority's Question	Deadline 2 Response	Welsh Government Response
Q20.0.5	<p>Please respond to Natural Resources Wales' [RR-088] comment (at paragraph 3.1.1) that the Environmental Statement contains insufficient detail to demonstrate how construction waste would be managed, and if the application were to be successful, detailed Site Waste Management Plans would need to be agreed through a DCO Requirement.</p>	<p><b>Horizon – Deadline 2 Response</b></p> <p><b>Detail demonstrating how construction waste is to be managed</b></p> <p>As set out in Chapter B16 of the Environmental Statement, waste generated by the Wylfa Newydd DCO Project would be managed in accordance with the legislative and policy framework, including NPS EN-1, the overarching waste strategy document for Wales, Towards Zero Waste and its associated <i>Construction and Demolition Sector Plan</i>.</p> <p>The potential project-wide waste and materials effects are then assessed in Chapter C6 of the Environmental Statement. This sets out the embedded and good practice mitigation for the construction, operational and decommissioning phases.</p> <p>During construction, this includes the incorporation of efficient design solutions and modular construction of temporary buildings where possible, manufactured off-site which delivers a number of efficiency benefits.</p> <p>The assessment in chapter C6 has been considered at a regional level, because local facilities would rarely be capable of servicing a major infrastructure project of this scale. However, the potential impact that the Wylfa Newydd DCO Project may have on more local waste has also been considered and an assessment is included in appendix C6-1 (local and regional waste management facilities) [APP-117].</p> <p>Chapter C6 confirms that all construction including waste management would be carried out in line with the requirements set out the Wylfa Newydd Code of Construction Practice (WN CoCP) [APP-414].</p> <p>The WNCoCP details the waste management strategy that will be applied across the Wylfa Newydd DCO Project and includes details regarding materials and waste minimisation measures in line with Horizon's waste hierarchy. Horizon's waste hierarchy requires moving waste management practices as far up the hierarchy as practicable, therefore minimising disposal and maximising reuse and recycling. This approach will look to manage waste appropriately, mitigating adverse effects on the capacity of existing waste management infrastructure and ensuring adequate steps are taken to minimise the volume of waste arisings and that which is sent to landfill. The site specific sub-CoCPs [APP-415 to APP-419] then set out more specific measures for each individual development site.</p> <p>The Wylfa Newydd CoCP [APP-414] WNCoCP contains a commitment by Horizon that it will implement its waste management arrangements before construction works begin on site. Throughout construction, Horizon will prepare reports for each construction site detailing the waste management processes for the site.</p> <p>Further, Horizon has continued to engage with key stakeholders for over 18 months at quarterly waste and materials oversight group (WaMOG) meetings, where waste management practices have been discussed including, for example, proposals for a remediation processing compound, a temporary recycling facility and appropriate use of local, regional and national waste management facilities. Horizon will continue to engage with WaMOG and report quarterly to WaMOG throughout the construction of the Wylfa Newydd Power Station to ensure that appropriate waste management processes are being followed and to ensure that lessons learned are shared between projects.</p> <p><b>Site Waste Management Plan</b></p> <p>Natural Resources Wales' in its relevant representation [RR-088] suggests that a requirement for a Site Waste Management Plan is needed in the draft Order. This issue was also raised with Horizon during stakeholder engagement including the statement of common ground process.</p> <p>Horizon has not proposed a requirement in the Draft DCO requiring a Site Waste Management Plan (SWMP). Horizon is confident that sufficient controls regarding the management of waste and materials relating to the Wylfa Newydd DCO Project are provided for in the WNCoCP, site-specific sub-CoCPs and the WNCoOPs at this stage of the project. However, Horizon will amend the WNCoCP at Deadline 4 (17 January 2019) to include a commitment to produce a SWMP. Furthermore, Horizon will throughout construction prepare reports for each construction site detailing the waste management processes for the site (WNCoCP).</p>	<p><b>Welsh Government – Deadline 3 Response</b></p> <p>Welsh Government request a DCO requirement to provide site waste management plans which should apply and comply with the Waste Hierarchy. The site waste management plans would need to be approved by IACC in consultation with NRW and relevant steering group. Welsh Government also wishes to see a commitment within the CoCP to design the facility to ensure keeping waste separate at source is easily carried out in both the construction and operational phases. This will help ensure minimum contamination of waste streams and production of high economic value recyclate. This is in line with the Welsh Government policy requirements of Towards Zero Waste, the Construction and Demolition Plan and the Industrial and Commercial Sector Plan.</p>

## **Appendix B**

Welsh Government Questions submitted to Horizon in preparation for Statement of Common Ground Workshop relating to Economy / Supply Chain Matters (held on 31 August 2018)



## Economy and Supply Chain

Statement of Common Ground (SoCG) Ref.	Sub-topic	Outstanding issue	Question for Horizon Nuclear Power (HNP) / SoCG Action
TBC	Baseline	<b>Economic baseline data</b>  WG have concerns around the date of some of the economic baseline data, such as using census data, which is from 2011. Monitoring is required to test the current situation and to identify what the ongoing situation is.  WG have also noted that the DCO documents rely on the North Wales Economic Board Survey (2015) which had a poor response rate.  Although possibly unavoidable due to timescales, it is noted that the economic data was collected during the recession, where there was a greater availability of labour. There needs to be a contingency which recognises the uncertainty and limitations of the baseline.	1) WG do not have a direct question. However, a discussion around the baseline data provided in support of the DCO would be beneficial for both parties.
TBC	Method	<b>Supply Chain Value</b>  There is no clear statement of the project value and the apportionment of potential value to the host area (i.e. Anglesey). Greater information is required on supply chain spend and local supply chain spend.	2) Please could HNP clarify the value of the project, the supply chain spend, and the local supply chain spend values?

Statement of Common Ground (SoCG) Ref.	Sub-topic	Outstanding issue	Question for Horizon Nuclear Power (HNP) / SoCG Action
TBC	Method	<p><b>Worker numbers</b></p> <p>Further clarity is required on the breakdown of worker numbers across the whole programme. There is also clarification required on the definition of a 'worker' (i.e. minimum employment time) – there has been discussion and comparison with the definitions which have been used for the Hinkley Point C power station. Also, there is reference to 1,800 'multiplier' jobs; further clarification is required on what these roles would be.</p> <p>There has been discussion in relation to the number of home-based workers and which sectors these workers would be within. There is a presumption that most of these roles would be lower skilled and lower paid, and that this would have the potential to concentrate the impacts on the local supply chain.</p>	<p>3) Please could HNP provide the definition and detail of how a 'worker' would be defined on the Wylfa Newydd project? (i.e. timescales, minimum employment, roles).</p> <p>4) What are the provisions for monitoring and calculating the numbers of workers (based on the definition)?</p> <p>5) Please could HNP provide further detail on what the 1,800 'multiplier' jobs are?</p> <p>6) Please could HNP provide detail on how the Supply Chain Action Plan would demonstrate how the minimum 2,000 home-based workers will be achieved and without any displacement impacts in the receiving area?</p>
WG26	Overarching Strategy	<p><b>Supply Chain Strategy and Action Plan</b></p> <p>The current level of information on the Supply Chain Action Plan is insufficient. The plan needs to set out clear targets for local, regional and Wales-wide spend and engagement.</p>	<p>7) Please could HNP provide the Supply Chain Action Plan for comment by WG?</p>
WG27	Mitigation	<p><b>Supply Chain Service</b></p> <p>Further detail is required on Horizons vision/key principles for this service and how this will be managed proactively to achieve a benefit to the Welsh economy. There should be a clear aim to seek out and engage Welsh businesses.</p>	<p>8) Please could HNP provide an update on the current proposals for the Supply Chain Service? Further detail is required.</p>
WG28	Mitigation	<p><b>Setting of targets for local jobs or local investment values</b></p> <p>The Welsh Government target is for £1billion to be generated in Wales. Maximising supply from Wales, where possible, needs to be a priority.</p> <p>HNP need to engage proactively in North Wales at a senior level to support procurement.</p>	<p>9) Please could HNP clarify how the Supply Chain Action Plan will identify the proportion of Wylfa Newydd supply chain which can be supported by Welsh businesses?</p> <p>10) Please can HNP confirm how they will identify what proportion of the build must be sourced outside Wales and the UK (i.e. how much is available for investment in UK and Welsh Supply Chain)?</p>