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Good Evening

This is the first in a series of 8 e-mails for the Wylfa Newydd DCO Examination Deadline 3 deliverables.

The list below provides a complete list of all documents attached to this e-mail and we will also be delivering 2x USB pen drives containing all of our Deadline 3 submission to your offices at 10:00 tomorrow (Tuesday 18th December).

Our covering letter in support of the submissions is also attached.

0 Deadline 3 Cover Letter.pdf
01 1.3 Guide to the Application.pdf
02 1.3 Guide to the Application (Rev 4.0) Welsh Language.pdf
03 Horizon's Response to IACC's Local Impact Report.pdf
04 Horizons response to Interested Parties responses to the ExA First Round Written Questions.pdf
05 Horizon's Response to Written Representation - Arthur Wyn Owen .pdf
06 Horizon's Response to Written Representation - Betsi Cadwaladr University Health Board .pdf
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Kind Regards

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Wylfa Newydd Project

Horizon's response to Interested Parties
responses to the ExA First Round Written
Questions

PINS Reference Number: EN010007

18 December 2018

Revision 1.0

Examination Deadline 3

Planning Act 2008

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

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2 Introduction

Purpose of Statement

This statement provides a summary of the applicant's response to responses provided by interested parties to the Examining Authority's First Round Questions published at Deadline 2. Horizon's responses to the question responses are answered in the sequence set out by the Examining Authority and by interested party. Please note that Horizon have conducted a targeted approach, only providing responses where it is considered relevant and necessary. On this basis Horizon have not provided a response to every response provided by the interested parties.

Wylfa Newydd DCO Project

The Wylfa Newydd DCO Project comprises those parts of the Wylfa Newydd Project which are to be consented by a DCO, namely:

The Nationally Significant Infrastructure Project (NSIP)

- Power Station: the proposed new nuclear power station at Wylfa, including two UK Advanced Boiling Water Reactors, the Cooling Water System, supporting facilities, buildings, plant and structures, radioactive waste and spent fuel storage buildings and the Grid Connection;
- other on-site development: including landscape works and planting, drainage, surface water management systems, public access works including temporary and permanent closures and diversions of public rights of way, new Power Station Access Road and internal site roads, car parking, construction works and activities including construction compounds and temporary parking areas, laydown areas, working areas and temporary works and structures, temporary construction viewing area, diversion of utilities, perimeter and construction fencing, and electricity connections;
 - Permanent Marine Works: the Cooling Water System, the Marine Offloading Facility, breakwater structures, shore protection works, surface water drainage outfalls, waste water effluent outfall (and associated drainage of surface water and waste water effluent to the sea), fish recovery and return system, fish deterrent system, navigation aids and Dredging;
 - Temporary Marine Works: temporary cofferdams, a temporary access ramp, temporary navigation aids, temporary outfalls and a temporary barge berth;

- Off-site Power Station Facilities: comprising the Alternative Emergency Control Centre (AECC), Environmental Survey Laboratory (ESL) and a Mobile Emergency Equipment Garage (MEEG);

Associated Development

- the Site Campus within the Wylfa Newydd Development Area;
- temporary Park and Ride facility at Dalar Hir for construction workers (Park and Ride);
- temporary Logistics Centre at Parc Cybi (Logistics Centre);
- the A5025 Off-line Highway Improvements;
Wetland habitat creation and enhancement works as compensation for any potential impacts on the Tre'r Gof Site of Special Scientific
- Interest (SSSI) at the following sites:
 - Tŷ Du;
 - Cors Gwawr;
 - Cae Canol-dydd

The following terms are used when describing the geographical areas related to the Wylfa Newydd DCO Project and the Licensable Marine Activities:

- Power Station Site – the indicative areas of land and sea within which the majority of the permanent Power Station, Marine Works and other on-site development would be situated; and
- Wylfa Newydd Development Area – the indicative areas of land and sea including the Power Station Site and the surrounding areas that would be used for the construction and operation of the Power Station, the Marine Works, the Site Campus and other on-site development (WNDA Development).

Licensable Marine Activities

The Licensable Marine Activities comprise the Marine Works and the disposal of material from Dredging at the Disposal Site.

Enabling Works

The Enabling Works comprise the Site Preparation and Clearance Proposals (SPC Proposals) and the A5025 On-line Highway Improvements.

Horizon has submitted applications for planning permission for the Enabling Works under the Town and Country Planning Act 1990 to the Isle of Anglesey County Council (IACC).

In order to maintain flexibility in the consenting process for the Wylfa Newydd DCO Project, the SPC Proposals have also been included in the DCO application. The A5025 On-line Highway Improvements are not part of the DCO application.

FWQ1.0.5: ES D13 paras 13.5.14-15 state that construction derived sewage and site campus sewage would both have a maximum daily rate of discharge as 1,598m ³ . It seems unlikely that the discharges would be exactly the same. [13] Is this correct, are they both the same and is there a need for any limits to be set and controlled through a suitable mechanism? Is NRW content this could be controlled through the EP?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	As of June 2018, NRW's Permitting Service is determining an Environmental Permit application (reference PAN-002428) that includes - amongst a number of other discharges - a discharge of up to 990m ³ /d of sewage effluent. NRW has not received an application from the Applicant or Dŵr Cymru Welsh Water for sewage discharges derived from the site campus.	Please refer to Horizon's response to FWQ1.0.5 [REP2-002]. The maximum predicted discharge of treated sewage effluent is 18.5l/s which corresponds to a daily discharge of 1598m ³ . It is expected that the actual discharge will probably be for approximately 12-15 hours per day which equates to approximately 990m ³ . This is the basis upon which Horizon has applied for a water discharge permit to NRW. DCWW will apply for the variation for sewage discharges from the combined site campus and Cemaes village sewage.

FWQ1.0.6: With reference to Table D5-46 of Chapter D5 Air Quality [APP-124], and section 7.5 of the MPSSSCoCP [APP-415], the ExA notes that many of these measures are yet to be fully defined/specified, including the monitoring locations and plant emission standards (see paragraph 7.5.2 of [APP-415]). IACC and NRW would also be involved in the specification of these works post-consent, and in determining any "additional modelling and assessment [that] would be undertaken to support the development of the scheme as it matures". IACC and NRW are invited to comment on: whether they consider that it would be appropriate these matters to be deferred until later; and, whether or not sufficient certainty is provided for their delivery through the provisions of the dDCO.

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	IACC considers that the draft DCO s.106 agreement (and the CoCPs) as currently drafted do not provide sufficient certainty and that more detail on these issues is required. There is no mechanism proposed which would allow the Council or NRW to challenge any inadequacy in the plans brought forward for these matters later. The IACC therefore objects to these plans being secured without at least outline detail during examination. The IACC would request that the standards to be applied and the processes for monitoring should be included within the certified CoCPs. As confirmed in the Air Quality LIR Chapter, during SoCG meetings the Council have received a draft Air Quality and Dust Monitoring proposal from HNP. The IACC has requested that this proposal is provided in updated versions of the Wylfa Newydd CoCP and sub CoCPS and submitted into the examination process. The detailed CoCP and sub CoCPs should include the following information; • Further detail of the real-time web-based environmental system including data management and access • The proposed locations of monitoring equipment for PM10, PM2.5, NOx, NO2 and dust deposition	Horizon has now updated section 7.6 of the Main Power Station Site sub-CoCP at Deadline 2 (4 December 2018) [REP2-032] to provide further information on: • Further detail of the real-time web-based environmental system including data management and access • The proposed locations of monitoring equipment for PM10, PM2.5, NOx, NO2 and dust deposition • Confirmation of the thresholds and exceedance trigger levels for dust, NO2, NOx, PM2.5 and PM10, and frequency of reporting (including amber and red trigger levels) • The process of investigating trigger exceedances In addition to the above, Horizon has updated section 7.5 of the Main Power Station Site sub-CoCP, as submitted at Deadline 2 (4 December 2018) [REP2-032] to confirm that a minimum of 90% of Horizon's Non-Road Mobile Machinery (NRMM) fleet mix will meet the EU Stage IV emissions standard. The modelling utilised for the DCO application utilised EU Stage IIIB emission standard plant. To demonstrate the effectiveness of this level of Stage IV plant, Horizon has undertaken re-modelling. The results of this re-modelling have been submitted at Deadline 3 (18 December 2018) and demonstrate large decreases in the NOx levels reported at receptors in Chapter D5 of the Environmental Statement [APP-124].

- Confirmation of the thresholds and exceedance trigger levels for dust, NO₂, NO_x, PM_{2.5} and PM₁₀, and frequency
 - of reporting (including amber and red trigger levels)
 - The process of investigating trigger exceedance in consultation with the IACC
 - Further detail of the process of receiving, investigating and responding to complaints
 - Further detail of the proposed Community Liaison Groups including frequency of meetings. The IACC considers
 - that these meetings should be monthly until First Nuclear Concrete
- In addition during SoCG meetings the IACC have commented on Horizon's additional mitigation proposals that include a commitment to use a higher percentage of newer construction plant that conform to stricter emissions requirements. The IACC has also requested that this additional mitigation to be detailed in updated versions of the CoCPs and sub CoCPS and submitted into the examination process.

FWQ1.0.6: With reference to Table D5-46 of Chapter D5 Air Quality [APP-124], and section 7.5 of the MPSSSCoCP [APP-415], the ExA notes that many of these measures are yet to be fully defined/specified, including the monitoring locations and plant emission standards (see paragraph 7.5.2 of [APP-415]). IACC and NRW would also be involved in the specification of these works post-consent, and in determining any "additional modelling and assessment [that] would be undertaken to support the development of the scheme as it matures". IACC and NRW are invited to comment on: whether they consider that it would be appropriate these matters to be deferred until later; and, whether or not sufficient certainty is provided for their delivery through the provisions of the dDCO.

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	NRW do not consider there is sufficient certainty for the delivery through the dDCO of the measures outlined in Table D5-46 of D5 [APP-124] or section 7.5 of the MPSSSCoCP [APP-415]. Paragraph 7.5.2 of the MPSSSCoCP states that "<i>a comprehensive air quality monitoring and reporting scheme will be developed in consultation with IACC and NRW</i>". However there is no DCO Requirement to secure the approval of the detailed measures. NRW consider an additional DCO Requirement, for approval of a detailed MPSSSCoCP by the discharging authority is needed. NRW is satisfied that it would be appropriate to provide the required detail prior to the commencement of the relevant activity (i.e. after the DCO is made). NRW has set out its overarching views on the dDCO, and the need that detailed CoCPs be subject to approval by the discharging authority in its Written Representations (section 4).	Horizon updated section 7.6 of the Main Power Station Site sub-CoCP at Deadline 2 (4 December 2018) [REP2-032] to provide further information on: • Further detail of the real-time web-based environmental system including data management and access. • The proposed locations of monitoring equipment for PM10, PM2.5, NOx, NO2 and dust deposition. • Confirmation of the thresholds and exceedance trigger levels for dust, NO2, NOx, PM2.5 and PM10, and frequency of reporting (including amber and red trigger levels). • The process of investigating trigger exceedances. In addition to the above, Horizon has updated section 7.5 of the Main Power Station Site sub-CoCP [REP2-032] to confirm that a minimum of 90% of Horizon's Non-Road Mobile Machinery (NRMM) fleet mix will meet the EU Stage IV emissions standard. The modelling utilised for the DCO application utilised EU Stage IIIB emission standard plant. To demonstrate the effectiveness of this level of Stage IV plant, Horizon has undertaken re-modelling. The results of this re-modelling have been submitted at Deadline 3 (18 December 2018) and demonstrate large decreases in the NOx levels reported at receptors in Chapter D5 of the Environmental Statement [APP-124].

FWQ2.0.1: Are IACC and NRW content that the baseline assessments for Soils and Geology in Chapter B7 [APP-072] and Terrestrial and Freshwater Ecology in Chapter B9 [APP-074] are sufficient?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	IACC has reviewed the information relating to Terrestrial and Freshwater Ecology contained in Chapter B9 [APP-074], and within Chapter D9 [APP-128] and the associated appendices. The evidence base for the Ecological Impact Assessment is primarily set out the in 'Technical Summary Reports' (TSRs), generally one for each receptor or group of similar receptors, which summarise a number of survey reports from several years relating to each receptor. IACC's review suggests that these documents largely provide a sufficient baseline for the assessment of effects for most receptors (notwithstanding issues of data age, see Question 2.0.49). However, there are several areas where the TSRs are not clear, or where deviations from established survey guidance are not explained or justified. This in turn does not allow aspects of the baseline as described in Chapter D9 to be substantiated, which introduces uncertainties into the assessment; this means that IACC cannot have confidence that the effects of the scheme on some receptors are sufficiently characterised to ensure that the proposed mitigation is robust and commensurate with the impacts. The original survey reports have not been submitted with the application and so cannot be used to verify the statements provided within the TSRs or	Please see Horizon's response to IACC's Local Impact Report: WNDA chapter, submitted at Deadline 3 (18 December 2018), which responds to the more detailed comments made by IACC on these matters in that chapter.

	the ES and IACC requests that these are provided. The main data gaps and uncertainties, and their implications for the ES, are identified within the ecology section of the WNDL LIR Chapter. IACC has reviewed the information relating to Soils and Geology contained in Chapter B7, [APP-072] and within Chapter D7 [APP-126] and the associated appendices. The factual reports supporting the baseline assessment are not included within App D7-2 – Land Contamination Risk Assessment and Remediation Strategy and information on potential contamination arising from Tregele petrol station is not available.	

FWQ2.0.1: Are IACC and NRW content that the baseline assessments for Soils and Geology in Chapter B7 [APP-072] and Terrestrial and Freshwater Ecology in Chapter B9 [APP-074] are sufficient?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	NRW consider that there are sufficient baseline assessments in Chapter B7 [APP-072]. NRW consider there are sufficient baseline assessments in Chapter B9 [APP074] for the relevant receptors with the exception of Tre'r Gôf and Cae Gwyn Sites of Special Scientific Interest. We refer you to sections 7.13 and 7.15 respectively in NRW's Written Representations.	Please see Horizon's response to NRW's Written Representation, submitted at Deadline 3 (18 December 2018), which responds to the more detailed comments made by NRW in sections 7.13 and 7.15 of their Written Representation.

FWQ2.0.6: Are NRW/IACC content with the 15 year lease arrangements described in Chapter B9 para 9.3.8 for the ecological mitigation areas?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	No. The 15-year lease arrangements are only acceptable provided that there is provision for this to be extended depending on the results of site monitoring and the success of the restoration; Horizon have not explained how the ability to require such an extension is secured. Colonisation of the restored habitats by target species must be confirmed before the lease is ended; it will not be acceptable to translocate or displace species and then remove the habitat support without evidence that the restored habitats are suitable and accessible.	Please refer to Horizon's response to this question (FWQ2.0.6), submitted at Deadline 2 [REP2-002].

FWQ2.0.6: NRW: Are NRW/IACC content with the 15 year lease arrangements described in Chapter B9 para 9.3.8 for the ecological mitigation areas?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	Paragraph 9.3.8 refers to the 'ecological mitigation areas'. NRW understands this to be the mitigation areas for notable wildlife species and reptiles. NRW defer to IACC on locally important species and species partially protected under the Wildlife and Countryside Act 1981. The Applicant should explain whether it has secured the rights required once the lease mentioned at Paragraph 9.3.8 of Chapter B9 is terminated. NRW notes that reliance on third party agreements outside of the powers of the DCO is not usually considered sufficient for securing essential mitigation. Please note, for the avoidance of doubt, that NRW would expect long-term management on the ecological compensation proposals (fen creation and restoration).	Please refer to Horizon's response to this question (FWQ2.0.6), submitted at Deadline 2 (4 December 2018) [REP2-002].

FWQ2.0.16: What would be the effects on Tre'r Gof SSSI if the drainage system cannot be improved compared to the baseline, and can further refinements be included within the authorised development? monitoring is presented?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	The land drainage system installed as part of the Wylfa Newydd DCO Project may result in changes in water quantity and water quality at the SSSI. Changes in water quantity may result in fen vegetation becoming inundated which, though normal at times in winter, could be damaging if occurring for long periods in the summer growing season. Alternatively, periods of drought leading to peat shrinkage and oxidation may occur with consequential changes to the properties of the peat and to the flora and fauna that it supports. Changes in water quality (e.g. as a result of increased nutrients or suspended solids during construction) may result in fen vegetation becoming over-enriched (and the vegetation dominated by aggressive nitrophilous species), while changes in the pH or in the mineral content of the irrigating waters may result in subtle long-term shifts in the nature of the fen vegetation. As noted above, consideration may need to be given to strengthening the system of leats around Mound A in particular with regard to attenuation of energy.	The information presented in Appendix D8-7 to ES Chapter D8 Surface water and groundwater modelling results [APP-166] indicates that flow duration curves are expected to change across Tre'r Gof as a result of the proposed development. The changes noted by NRW might be the outcome of the changes simulated even with the implementation of the proposed drainage system, hence the residual uncertainty of success with respect to impacts on water availability and water quality and hence the pre-emptive pursuit of SSSI compensation sites. It is pointed out that the description of the drainage channels, described as leats by NRW, does include stoplogs and energy dissipation features to capture sediment and to promote the flow of water into and through the soil layers in efforts to mimic the runoff from the existing site.

FWQ2.0.19: NRW: In its RR para 4.4.1 [RR-088] NRW considers that there is inadequate consideration of direct mitigation at Tre'r Gof SSSI. Are there any further direct measures that NRW suggest to protect the SSSI?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	NRW considers that further direct mitigation measures should be considered by the Applicant in relation to Tre'r Gof SSSI. Possible measures that the Applicant may consider include controlling water loss from the site via the underground culvert at VN5 during critical periods, in order to avoid the drying and oxidation of the peat body. Consideration should also be given to recharging groundwater, particularly in areas potentially affected by dewatering during the construction period. These mitigation measures should be clearly secured and identified in the draft DCO. We refer you to section 7.13 of NRW's Written Representations.	Please refer to Horizon's response to NRW's Written Representation, submitted at Deadline 3 (18 December 2018).

FWQ2.0.21: NRW: Do NRW, NWWT and RSPB agree that the creation and management of species - rich grassland with a close sward and coastal heath/grassland mosaic as described in Chapter 8.16 [APP-424] paras 6.5.7 and 6.5.12 and the management of Mound A as described in 5.4.12 would be sufficient for providing optimal foraging for Chough?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	NRW consider that the proposed management of habitat for chough is feasible long-term, during the operational phase of the development. NRW do not consider that creating optimal foraging habitat for chough would be feasible during the construction phase.	Please refer to Horizon's response to this question (FWQ2.0.21), submitted at Deadline 2 [REP2-002].

FWQ2.0.21: NWWT: Do NRW, NWWT and RSPB agree that the creation and management of species - rich grassland with a close sward and coastal heath/grassland mosaic as described in Chapter 8.16 [APP-424] paras 6.5.7 and 6.5.12 and the management of Mound A as described in 5.4.12 would be sufficient for providing optimal foraging for Chough?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NWWT	NWWT agree with the joint response provided by the RSPB on this matter. NWWT provide additional commentary in the NWWT's WR 'Biodiversity – Tre'r Gof SSSI and the Temporary Site Campus'.	Please refer to Horizon's response to this question (FWQ2.0.21) submitted at Deadline 2 (REP2-002] and Horizon's response to NWWT's Written Representation submitted at Deadline 3 (18 December 2018).

FWQ2.0.21: RSPB: Do NRW, NWWT and RSPB agree that the creation and management of species - rich grassland with a close sward and coastal heath/grassland mosaic as described in Chapter 8.16 [APP-424] paras 6.5.7 and 6.5.12 and the management of Mound A as described in 5.4.12 would be sufficient for providing optimal foraging for Cough?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
RSPB	The RSPB do not agree that the habitat management referenced above will be sufficient for providing optimal foraging for choughs. To be considered "sufficient", chough habitat provision needs to: • be of sufficient quality • be of sufficient extent and • have continuity through the construction phase. We would agree that on areas already known to be utilised by choughs in the past, the management as described would be optimal in terms of quality. However, the RSPB knows of no examples of newly created chough-feeding habitat being utilised by choughs, therefore success with "created" habitats cannot be guaranteed. This is particularly relevant to the site campus and Mound A. The long-term impact of the site campus is unclear, but it is likely that the habitats lost beneath it would require re-creation (e.g. reseeded) rather than re-instatement (e.g. mowing/grazing) after the construction phase, consequently there is less confidence in the degree of success. Similarly, the proposals for the creation of new chough foraging habitat on Mound A cannot be relied upon to replace the loss of chough feeding habitat from the site campus and/or elsewhere within Wylfa Newydd Development Area (WNDA).	Please refer to Horizon's response to this question (FWQ2.0.21), submitted at Deadline 2 [REP2 - 002].

Our key concern is whether, under the current plans, there would be sufficient foraging area available during the construction and operation phases to support even the single remaining pair of choughs (of the 2-3 pairs that were present in the past when grazing regimes were more sympathetic). We are particularly concerned about the potential lack of sufficient chough foraging habitat during the construction phase, when the site campus will cover much of the existing foraging resource away from the Wylfa headland itself. In which case there may no longer be any resident choughs to respond to any favourable habitats provided in the future.

The RSPB has recommended to Horizon that proposed habitat management for chough, in conjunction with other measures on the headland, are implemented as soon as possible, before existing foraging habitats are lost. We can confirm that some positive habitat management measures for chough have been carried out on the headland during the winter of 2017/18, but we remain concerned over the detail of the draft management plan for Wylfa Head as some of prescriptions will be unsuitable for chough, including proposals to exclude grazing on parts the headland, and the planting of scrub.

Chough foraging strategy has both a temporal (over years) and a spatial component relating to invertebrate population cycles and accessibility provided by management. Therefore, in

order to provide greater certainty that sufficient foraging resource is maintained, we consider that alternative foraging areas must be provided in addition to those areas currently proposed.

We would suggest that the proposed 100ha of "coarse sward" should be more ambitiously managed as species-rich grassland with a mosaic of sward heights, and, with the 40ha of farmland, all managed through appropriate grazing regimes with chough foraging habitat as a primary focus. Some key features (e.g. cloddiau, ant-hills, soil/rock interface of rock-outcrops) are not specifically mentioned and where such features already exist and are utilised by chough, these should be retained.

FWQ2.0.22: NRW: Do NRW, NWWT and RSPB agree that the mitigation described in the MPSSSCoCP 8.3.3 would be sufficient to protect Chough nesting sites from construction noise?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	Chough is a Schedule 1 bird. In order to avoid disturbing a Schedule 1 bird while nesting, we advise that detailed mitigation measures will need to be set out in the Sub-CoCP and approved by the discharging authority in consultation with NRW.	Please refer to Horizon's response to this question (Q2.0.22), submitted at Deadline 2 [REP2-002].

FWQ2.0.22: NWWT: Do NRW, NWWT and RSPB agree that the mitigation described in the MPSSSCoCP 8.3.3 would be sufficient to protect Chough nesting sites from construction noise?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NWWT	NWWT agree with the joint response provided by the RSPB on this matter and the cross referencing to the eNGO WR.	Please refer to Horizon's response to this question (Q2.0.22), submitted at Deadline 2 [REP2-002].

FWQ2.0.22: RSPB: Do NRW, NWWT and RSPB agree that the mitigation described in the MPSSSCoCP 8.3.3 would be sufficient to protect Chough nesting sites from construction noise?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
RSPB	The mitigation measures described in the above document are not considered sufficient as they are generic and cover a range of different wildlife receptors. The mitigation measures for chough should follow the advice of paragraph 9.5.226 of Chapter D9 of the Environmental Statement [EN010007] which reads: Chough can be vulnerable to disturbance from human activities, especially in the vicinity of nest sites and core feeding areas [RD62]. Noise has been demonstrated to cause behavioural effects upon birds, varying depending upon the time of year. The potential effects of noise disturbance to birds are described by various studies and have been summarised by Latimer et al. (2003) [RD65], although no specific information relating to threshold levels of noise disturbance upon chough is available. However, tolerance of chough to noise disturbance is predicted to be high given that nest site A is within a building which is part of the Existing Power Station and is subject to noise associated with its operation (including fire alarm tests and stack venting). Chough are considered to be generally resilient to disturbance as long as the disturbing factors are regular and present prior to breeding attempts, or occur later in the breeding period after the initial set up of breeding territories (Adrienne	Please refer to Horizon's response to this question (FWQ2.0.22), submitted at Deadline 2 [REP2-002].

	Stratford (Welsh Chough Project) / RSPB pers. comm. in March and June 2017). A ‘new’ disturbance event during the early stages of the breeding season can cause birds to desert the nest site for the season, whereas a similar level of disturbance taking place further in to the breeding season is much less likely to have an adverse effect. It would be helpful to transcribe these measures into the MPSSSCoCP to avoid any confusion or doubt.	

FWQ2.0.39: In its RR RSPB is concerned that the measures chosen to protect the Tern colony are deficient. What measures do the RSPB/NT/NWWT suggest that have not been committed to by the Applicant?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NWWT	NWWT agree with the joint response provided by the RSPB on this matter and cross referencing to the eNGOs written representation.	Please refer to Horizon's response to the eNGO document Written Representation on Biodiversity - Cemlyn Nature Reserve submitted at Deadline 3 (18 December 2018)

FWQ2.0.39: In its RR RSPB is concerned that the measures chosen to protect the Tern colony are deficient. What measures do the RSPB/NT/NWWT suggest that have not been committed to by the Applicant?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
RSPB	The DCO application contains limited measures aimed at protecting the SPA tern colony at Cemlyn Lagoon, despite the RSPB (and the other eNGOs) expressing serious concerns about the outstanding uncertainties regarding the long-term response of the tern colony to the potential impacts arising from the application, and the potentially serious consequences for the integrity of the SPA. The key measures proposed by the developer to protect the colony comprise 'embedded' mitigation that essentially attempts to control construction disturbance during sensitive nesting periods (including an 'establishment period') through the employment of specific noise thresholds and responsive management protocols.	Please refer to Horizon's response to the eNGO Written Representation Biodiversity - Cemlyn Nature Reserve submitted at Deadline 3 (18 December 2018).

Our criticisms regarding these measures are set out under our response to Q5.0.3 (and in further detail in the joint eNGOs' joint WR 'Biodiversity – Cemlyn Nature Reserve', submitted for Deadline 2 (4 December 2018) (see Chapter 3, paragraphs 3.32 – 3.64). In summary we have concerns regarding:

- Lack of justification for the adopted noise thresholds, which are considered insufficiently precautionary
- Inadequacy of the proposed sensitive period, including the narrow four-week 'establishment period'
- Efficacy of the reactive monitoring, including the soundness of the adopted flyup threshold and the ability to identify and modify sources of construction disturbance in a suitably timely manner.

It is important that robust measures are in place to reduce the impacts arising from noise and visual disturbance during construction, and that the proposed 'embedded' mitigation measures are sufficiently precautionary to prevent any avoidable impacts taking place. However, we remain seriously concerned that no mitigation measures at all are proposed to protect the tern colony from other potential sources of impact, such as the effects of predator displacement/attraction, effects on foraging terns during the construction and operation phases, and changes to coastal processes potentially affecting the long-term viability of the Esgair Cemlyn shingle ridge protecting the Cemlyn Lagoon tern colony.

The RSPB (along with the other eNGOs) has proposed a suite of measures, including a number that are aimed at helping reduce the effects of these additional potential sources of impact. As set out in our response to FWQ5.0.39, Horizon have committed to delivering some, but not all of these measures. However, they have chosen to class them not as SPA mitigation, but instead as voluntary “resilience” measures. We wish to see the measures already committed to, along with the additional recommended measures set out in our response to FWQ5.0.39, defined by Horizon as Natura 2000 site mitigation and properly secured as such.

We consider that, if properly implemented, this combination of measures offers the greatest chance of securing the Cemlyn Lagoon tern colony, and thereby protecting the SPA. Nevertheless, it is the eNGOs' view that the available evidence does not provide sufficient certainty that, despite the ameliorating effects of these measures, the Draft DCO proposals will not still lead to reduced breeding success in one or more seasons and/or the potential collapse of the Cemlyn Lagoon colony.

As a result of these remaining uncertainties, we do not consider that an overall conclusion of no ‘adverse effect on the integrity’ of the SPA can be reached, and therefore – subject to meeting the tests of ‘no alternative solutions’ and ‘imperative reasons of overriding public interest’ (as required

under Regulation 64 of the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) – a robust package of compensation measures (including suitable monitoring thereof) will be necessary to ensure that the overall coherence of the Natura 2000 network is protected (including sites forming part of the Irish Sea tern metapopulation – as further explained in the joint eNGOs' WR 'Biodiversity – Cemlyn Nature Reserve' (prepared by the North Wales Wildlife Trust, National Trust and the RSPB), submitted for Deadline 2 (4 December 2018)).

The RSPB understands that Horizon is exploring options for the compensation of potential damage to the Cemlyn Lagoon tern colony, to be put forward in the event that the Examining Authority supports the view of NRW and the eNGOs that, on the basis of the available evidence, it is not possible to reach a conclusion of no adverse effect on the integrity of the SPA. The RSPB considers that this information should be presented to the Examining Authority now in order to allow proper consideration and discussion of it and the proposals it includes – including Horizon's 'without prejudice' case regarding alternative solutions and imperative reasons of overriding public interest – during the Examination. Please also see the joint eNGO letter of 16 October 2018 (EV-008).

FWQ2.0.40: In its RR [RR-053] NT states that it is concerned about the lack of detail in relation to environmental monitoring. Can NT elaborate on these concerns?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NWWT	NWWT agree with the response provided by the National Trust on this matter. The response to this question should be read in conjunction with National Trust's response to FWQ4.0.113 in relation to the Mitigation Route Map and the eNGOs' commentary at chapter 6 of their WR.	NWWT Please refer to Horizon's response to FWQ4.0.113 submitted at Deadline 2 (4 December 2018) [REP2-002] and to Horizon's response to the National Trust's Written Representation at Deadline 3 (18 December 2018).

FWQ2.0.41: IACC: In its RR [APP-020] para 5.7.2 IACC expresses concern that the impacts on the natural environment have not been properly addressed. Can IACC elaborate on these concerns?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	IACC has concerns with the assessment of effects on some receptors and these are outlined in the ecology section of the WNDA LIR Chapter. These concerns refer in particular to the fact that the ES does not transparently assess the effects of the scheme on Section 7 (S.7) habitats, on the interest features of Trwyn Pencarreg Wildlife Site, effects on the Arfordir Mynydd y Wylfa–Trwyn Pen Carreg Wildlife Site and Chough due to visitor pressure (alone, and cumulatively with other effects) and effects on red squirrel and bats.	Please see Horizon's response to IACC's Local Impact Report: WNDA chapter, submitted at Deadline 3 (18 December 2018).

FWQ2.0.42: In its RR IACC has outstanding concerns regarding impacts on ecology including water voles. Can IACC elaborate on these concerns?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	IACC's concerns relate to the proposed Park and Ride site at Dalar Hir. The categorisation of the water vole population as 'low value' is potentially misleading. This may be consistent with the overall approach to the evaluation of ecological receptors undertaken by HNP, however established/self-sustaining water vole populations would almost certainly be of national (Wales/UK) nature conservation value. There is a focus of water vole activity within the site, which is part of the wider population associated with the ditch network. There is residual uncertainty as to whether water vole habitats/burrows will be avoided or the extent of mitigation and displacement. IACC considers that the effects on water voles should be clearly assessed specifically within the context of: - The anticipated extent of habitat loss, the methods of water vole displacement and exclusion and habitat reinstatement and reconnection. -The implications of effects on other Ditches (e.g. Ditches 6, 7 and 8) and any opportunities to retain/enhance ditches. A commitment is required to establishing/maintaining a fenced, 15m wide (minimum) riparian buffer to either side of waterbodies that support this species and any that are potentially suitable for future water vole colonisation. - Enhancing/strengthening the fenced	The concerns raised by IACC are noted. Any additional mitigation measures necessary to deal with the concerns will be considered by Horizon and implemented at Deadline 4 (17 January 2018).

riparian buffer through habitat enhancement and clarifying the status of the riparian buffer pre-development, post-development and post decommissioning and reinstatement. - Measures to mitigate the risk of increased predator (rat) populations associated with waste (in food/organic waste) arising from construction and the operational site. - Post-construction management and monitoring and post-decommissioning/reinstatement commitments to water vole habitats/conservation.

The majority of this information is covered/cross referenced generally in the document [APP-286], however an assessment clearly focused on these points would be more robust and in-keeping with the increasingly threatened status of water vole.

There remain uncertainties regarding the scale of habitat loss/disturbance along watercourses that support water voles, with associated uncertainty regarding the mitigation approaches to be employed. Water vole mitigation will need to be planned in considerable site-specific detail and set out clearly in a method statement. This should include the establishment, reinstatement and protection of a connected riparian habitat corridor and supervision of all works in proximity to ditches that support this species, as well as detailed, specific approaches to vegetation clearance, water vole displacement/exclusion, destructive searches and trapping. The mitigation method statement would be subject to review/approval by IACC in consultation

	with NRW. It has been assumed that water vole displacement and destructive searches of burrows can take place under an NRW licence and this will need to be clarified by NRW. Further detail is provided in the Dalar Hir LIR Chapter.	

FWQ2.0.43: In its RR NRW [RR-088] para 4.5.1 NRW advises that the duration of post- construction monitoring is not satisfactory. What duration would NRW consider to be satisfactory?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	Following a Statement of Common Ground meeting on 14th September to address this matter, NRW is awaiting confirmation from the Applicant on the agreed duration of post-construction monitoring. NRW expect confirmation that the duration will adhere to the following: (a) Great crested newt. • Main site – monitoring to be undertaken during years 1, 3, and 6 (monitoring would involve collection of Habitat Suitability Index information and two torch head count surveys). • A5025 – Habitat Suitability Index surveys to be undertaken annually for a minimum of 21 years. Two torch population surveys to be undertaken annually for the first 10 years then every other year for a minimum of 11 years (minimum 21 years total) (b) Bats • Main site only – 10 visits covering 15 year period (c) Water voles • Main site only – surveys to be undertaken in years 1, 3, and 6.	Please refer to Horizon's response to this question (FWQ2.0.43), submitted at Deadline 2 (4 December 2018) [REP2 -002].

FWQ2.0.49: Do NRW and IACC agree with the assumptions made in Chapter G9 [APP-312] paras 9.3.4- 9.3.8 regarding ecological receptors, as the survey data is more than two years old?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	Chapter G9 [APP-312] relates to the A5025 Off-Line highway improvements, although the question of data age is somewhat broader than this as several surveys for the main site and associated development sites are over two years old, including those surveys undertaken for bats [APP-172] and reptiles [APP-177]. Although 'two years' is often cited as the age-limit for ecological data, there are no set guidelines or requirements in this regard. In practice, an appropriate age for data will depend on the receptors and effects being considered, and the likelihood of potentially significant changes in baseline occurring between data collection and determination. With regard to the site as a whole, IACC considers it unlikely that the baseline conditions will have changed substantially for most receptors and would not consider it appropriate to apply generic data age criteria for acceptability. However, variations in the survey methods employed by Horizon and the areas surveyed over several years result in partial coverage for some receptors. For example, the reptile TSR [APP-177] does state that "[Survey] limitations are unlikely to significantly alter the conclusions...primarily due the quantity of data available from four years of survey data, coupled with background data from	Please refer to Horizon's response to this question (FWQ2.0.49), submitted at Deadline 2 [REP2-002].

Cofnod and incidental sightings". However, there are not 'four years of survey data' as stated but several surveys from several locations, undertaken during a four-year period. No locations have 'four years of survey data' – for most locations there are only one or two years of survey data. Some areas were only surveyed for reptiles in 2010 but some of these areas (based on the descriptions in the TSR) may remain suitable for reptiles. It is possible that survey limitations in a given year would affect results for locations surveyed in that year, which would not necessarily be ameliorated by further data from subsequent surveys.

IACC considers that those datasets over three survey seasons old (i.e. from before 2016) should be identified by Horizon, and specific justification for their use or robustness be provided; this is to ensure that IACC has confidence in the accuracy of the baseline, to enable the Examining Authority and the Secretary of State to undertake its responsibilities under the Environment Act Wakes 2017.

FWQ2.0.49: Do NRW and IACC agree with the assumptions made in Chapter G9 [APP-312] paras 9.3.4- 9.3.8 regarding ecological receptors, as the survey data is more than two years old?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	NRW consider the information to be sufficient for the purposes of demonstrating that the proposal is not likely to be detrimental to the maintenance of the favourable conservation status of local populations of European protected species provided long term issues (site security, management and surveillance) are appropriately considered. The same can be applied to British 'fully' protected species under the Wildlife and Countryside Act 1981.	Please refer to Horizon's response to this question (FWQ2.0.49), submitted at Deadline 2 (4 December 2018) [REP2-002].

FWQ2.0.56: 3 (4) attempts to limit the extent to which a tailpiece (or other drafting) might permit changes to the approved scheme to only those minor or immaterial changes which have been subject to EIA.		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NWWT	This question was asked and discussed at the opening Issue Specific Hearing 24th October. The question is directed to the Applicant, but NWWT indicated orally that we have specific concerns relating to how the dDCO is drafted and how biodiversity mitigation measures are secured either by Requirements and/or through other controlling documents (eg the Mitigation Route Map APP422 and the CoCPs Wylfa CoCP APP-414, Main Power Station CoCP APP-415 and the Marine CoCP APP-416.) NWWT indicated at the ISH that they intended to expand on this matter in their written representation to be submitted at deadline 2. We draw the Examiners' attention to Chapter 6 of the eNGOs' representation 'Biodiversity – Cemlyn Nature Reserve', which provides a brief initial commentary. Chapter 6 is not considered to be NWWT's final position on this matter, as it is anticipated that this theme ('tailpieces' and flexibility) will be the subject of further discussions during the Examination.	Please see Horizon's eNGO Written Representation response on these matters, submitted at Deadline 3.

FWQ2.0.62: Can NRW clarify why it suggests that long-term monitoring and management of land identified for mitigation and/or compensation measures is required to ensure that the project would not be detrimental to the maintenance of the Favourable Conservation Status of affected species?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	The Habitats Directive defines Favourable Conservation Status (FCS) in Article 1 (i). This states that the conservation status of a species means the “sum of the influences acting on the species concerned that may affect the long-term distribution and abundance of its populations within the territory referred to in Article 2”. The conservation status will be taken as "favourable" when: • population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats, and • the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future, and • there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis (our emphasis added). This highlights the need to consider the long term when assessing mitigation (including avoidance and compensation measures). Failure to consider the long term will mean that it is likely that the proposal cannot demonstrate that there will be no detriment to the maintenance of the favourable conservation status [of each local] population of European protected species. The 'Favourable Conservation Status' test	Horizon agrees that long-term management and monitoring are required to ensure that the Wylfa Newydd DCO Project would not have a detrimental effect on Favourable Conservation Status of affected species. This is why, in addition to committing to provide net habitat gains for species affected by the Wylfa Newydd DCO Project in Section 4 of the Landscape and Habitat Management Strategy (LHMS) [APP-424 and APP-425], Horizon has committed to the following management principles in Section 7 of the same document: • Delivery of the design principles set out in Section 4 of the LHMS for the lifetime of the Power Station. • Regular monitoring of the landscape and habitats to assess efficacy of management and inform management reviews. • Monitoring of species translocations and work undertaken as part of a protected species licences to assess the efficacy of mitigation provided.

is one of three tests that are to be applied in respect of European Protected Species derogation under Article 16 of the Habitats Directive. Regulation 9 (1) of the Conservation of Habitats and Species Regulations 2017 requires that this specific consent complies with the provisions of the Birds and Habitats Directives (it is not only a duty to have regard to these provisions).

FWQ4.0.2: Article 5 - Effect of the Order on the Site Preparation Permission Is IACC, as LPA, content with the mechanisms proposed to enable an interface between the planning permission for the site preparation works and authorisation under the DCO for Work No 12?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	No, the IACC is not content with the mechanism proposed and has objections to drafting of Article 5. The IACC has made detailed submissions on this point in its Written Representation, section [4.3].	Please refer to Horizon's response to FWQ 4.0.2 to 4.0.4 [REP2-002] and Horizon's response to paragraph 4.3 of IACC's Written Representation in respect of Article 5 and the relationship with the TCPA permission.

FWQ4.0.2: Article 5 - Effect of the Order on the Site Preparation Permission Is IACC, as LPA, content with the mechanisms proposed to enable an interface between the planning permission for the site preparation works and authorisation under the DCO for Work No 12?		
Interested Party	IP Response to FWQ	Horizon's Response to First Written Questions
Welsh Government	The Welsh Government wish to raise the point that the Associated Development allowed under Work No. 12 would allow for excavation works that are not included within the TCPA application. Therefore consideration should be given to whether the reliance on the SPC S106 for restoration funds would be adequate in this context. WG are concerned that if there are pre-existing breaches Article 5(1)(b) as currently drafted is unclear and conditions would be unenforceable on service of notice by the undertaker. The wording of Article 5(1)(b) needs tightening as it is currently silent on the position in respect of pre existing breaches. The wording must be clear that Article 5(1)(b)	Horizon notes that there is no policy support for an NSIP to provide a bond or insurance to cover a possible situation of abandonment. There is no precedent for such an imposition in any granted DCO. The Examining Authority has also made clear statements, in other DCOs, such as Hinkley and Swansea Bay, that such a requirement is inappropriate. Horizon made a number of amendments to article 5 in the updated draft DCO (Revision 3.0) submitted at Deadline 2 [REP2-020]. This included amendments to article 5(1)(b) to ensure enforcement of pre-existing breaches. Please refer to Horizon's response to FWQ4.0.2 to 4.0.4 [REP2-002] in respect of the amendments made.

doesn't effect pre-existing breaches. WG are concerned in respect of the link to the s106- in particular there are no restoration provision under draft DCO s106 agreement. Reliance has been placed by applicant on site preparation s106 agreement. However works under the DCO (including Work No. 12) are broader than those permitted and controlled pursuant to the SPC. WG will continue to liaise with applicant and IACC in respect of the DCO s106 agreement and Article 5 of the DCO.

FWQ4.0.3: Article 5 - Effect of the Order on the Site Preparation Permission Do the requirements set out in Schedule 3 correspond with the planning conditions?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	No, the planning conditions are considerably more detailed and specific than the requirements and much of the detailed covered in those conditions (which is stated by Horizon to be covered in the CoCPs) is not set out in those documents. In addition, given the greater scope of works in Work 12 than in the planning permission it is noted that the conditions, documents and plans approved for the planning permission would not have been drafted to cover all of the activities within the more extensive Work 12.	Please refer to Horizon's response to FWQ 4.0.2 – 4.0.4 [REP2-002] and Horizon's response to paragraph 4.3 of IACC's Written Representation in respect of Article 5 and the relationship with the TCPA permission.

FWQ4.0.4: Article 5 - Effect of the Order on the Site Preparation Permission

Would there be any unintended consequences for the LPA's ability to enforce/would there be any uncertainty? – eg if Horizon serves notice on IACC informing it that it intends to undertake and complete the SP&C works under the DCO and therefore all conditions of the planning permission would become unenforceable, are there any conditions which need to have a life beyond the planning permission?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The IACC considers that the approach proposed would create considerable uncertainty and a number of gaps in control, partly because the dDCO excludes site preparation and clearance works from the definition of commence, partly because the width of other works definitions sought is so wide that the IACC would find it extremely difficult to know if any element was unauthorised and partly because the CoCPs are unacceptably vague and the controls of the works are therefore very imprecise. The IACC has made detailed submissions on this point in its Written Representation.	Please refer to Horizon's response to FWQ 4.0.2 – 4.0.4 [REP2-002] and to Horizon's response to paragraph 4.3 of IACC's Written Representation in respect of Article 5 and the relationship with the TCPA permission.

FWQ4.0.5: Article 6 - Maintenance of the authorised development Justify the flexibility provided by this article.		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	Although this question is not directed at the IACC, the Council would like to note that it has serious concerns with the drafting of this definition and has made detailed submissions on this point in its Written Representation at section [4.2].	Please refer to Horizon's response to section 4.2 of IACC's Written Representation in respect of the definition of "maintain" in article 2.

FWQ4.0.6: Article 10 - Defence to proceedings in respect of statutory nuisance Is IACC, as Environmental Health Authority, content with the defence provided by article 10 – ie that there is sufficient mitigation for nuisance caused by noise, dust, vibration, dust or lighting proposed by the CoCPs.		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	No. The IACC considers that the defence sought is too wide, goes beyond the intention of the legislation and undermines public protection. The IACC has made detailed submissions on this point in its Written Representation at section [4.4]. The IACC does not accept that sufficient mitigation is provided by the CoCPs as they lack the necessary detail. The IACC has made detailed submissions on this point in its Written Representation at section [11].	Please refer to Horizon's response to section 4.4 of IACC's Written Representation in respect of this point.

FWQ4.0.7: Article 10 - Defence to proceedings in respect of statutory nuisance Does IACC, as Environmental Health Authority, wish comment on the Statement of Statutory Nuisances (APP-052)		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	A number of statutory nuisances will be caused; a robust justification for the number and levels of nuisance is not given. The proposals to control nuisance through the CoCPs are too vague and require considerably more detail to be provided. Horizon are relying heavily on section 61 notices to control nuisance; the IACC considers that more detail on detailed measures to prevent and reduce nuisance should be included in the CoCPs.	Please refer to Horizon's response to section 4.4 of IACC's Written Representation in respect of this point.

FWQ4.0.9: Article 11 - Power to alter layout etc of streets and Article 12 Street Works 11 (5) and 12 (3) Can the applicant confirm if the days referred to are working days or consecutive days? Have discussions been had, and agreement been reached with IACC, as local highway authority on deemed consent for applications after 56 days?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	Applicant to confirm. No discussions have been held between the applicant and the local highway authority. The IACC consents to the deemed consent provision in this case provided that the period remain 56 days and is not reduced. The IACC has made detailed submissions on deemed consents and guillotine provisions in its Written Representation at section [4.5].	Horizon will amend the deemed approval provisions in the draft DCO to reflect the request for 56 days.

FWQ4.0.10: Do you consider it necessary to stop up/extinguish the streets listed in Schedule 6?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	It is presumed that the question is referring to streets listed within Schedule 7. IACC are still reviewing the proposals and plans and will respond in detail on this point as soon that review is complete. Part 1 – Where a substitute is to be provided. From reviewing the Right of Way Plans (doc 2.4) and the streets identified in Schedule 7, the proposed stopping up/extinguishing of streets is a direct result of implementing the A5025 Off-line improvements and the proposed power station access alteration. It is not currently clear under the proposals precisely where the IACC's jurisdiction would end, including duties to maintain public highway. Plans showing these routes enlarged to a more appropriate scale.	Horizon will provide IACC with large scale Rights of Way Plans so that it can have clarity over the extent of the stopping up of the streets identified in Schedule 7 and the impact on its jurisdiction as the streets and highway authority. Horizon will liaise separately with IACC to determine the appropriate scale of these plans.

FWQ4.0.12: Article 16 - Temporary Stopping up of Streets and Article 18 - Access to Works

Is the 28 days in referred to in 16 (8) and 18(2) working days or consecutive days?

Have discussions been had, and agreement been reached with IACC, as local highway authority, on deemed consent for applications after 28 days in 16(8) given this would be outside the normal statutory process?

Given the definition of 'street' under Article 2 (Interpretation) what 'other public rights of way' may be temporarily stopped? Is the IACC satisfied that this would be necessary?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	Applicant to confirm. No discussions have been held between the applicant and the LHA. The IACC consents to the principle of the deemed consent provision in this case provided that the period is 56 days in line with other such provisions and revision 2 of the dDCO. The IACC has made detailed submissions on deemed consents and guillotine provisions in its Written Representation at section [4.5]. (c) The IACC has made detailed submissions on this article in its Written Representation at section [5.3]. The IACC would prefer to receive clarification as to which other public rights of way would require temporary stopping up and to see those listed in the DCO rather than a general power being included. The IACC notes that Rights of Way plans indicate that Cycle Path outside Logistics Centre is to be temporarily stopped up.	As noted in response to comments on FWQ4.0.9, Horizon will amend the deemed approval provisions in the draft DCO to reflect this request for 56 days. (c) Please refer to Horizon's response to section 5.3 of IACC's Written Representation in respect of article 16. Horizon notes that the streets and other public rights of ways (i.e. cycleways) that it intends to stop up temporarily have been set out in Schedule 9 of the draft DCO. As noted in Horizon's response to FWQ4.0.12 [REP2-002], the inclusion of "any other public right of way" within article 16 was intended to be for drafting simplicity and the avoidance of doubt as Schedule 9 includes 'footpaths' and 'cycleways'. Temporary stopping up of streets is a model provision as set out in The Infrastructure Planning (Model Provisions) (England and Wales) Order 2009. In this instance it has been provided as a safeguard in the event that Horizon has not identified a street in Schedule 9. If this occurred, Horizon would need to seek approval from IACC as the street authority before it could temporarily stop up, divert or alter the street.

FWQ4.0.13: Are there any differences between the proposed restrictions and those that would apply under Road Traffic Regulations Act 1984? If so how do they compare?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	Yes. The article provide a much wider power than TROs, it lacks public consultation, and stops up streets for an undefined period limited by the completion of the works. The IACC has made detailed submissions on this article in its Written Representation at section [5.3].	Please refer to Horizon's response to section 5.3.1 of IACC's Written Representation in respect of the traffic regulation measures under the Road Traffic Regulations Act 1984 (the "1984 Act"). While the 1984 Act provides a wider range of powers and measures, Horizon has only sought those controls from the 1984 Act that it considers necessary for the construction and operation of the authorised development, as explained in Horizon's response to FWQ4.0.13 [REP2-002]. Horizon notes that article 21 of the draft DCO does not provide powers to stop up a street; but enables Horizon to impose speed and clearway restrictions on the roads identified in Schedule 10 (without IACC's consent), or to seek other traffic measures to be imposed on any other road within the Order Limits (such as vehicle restrictions, prohibition of parking or unloading etc.) provided IACC's consent is obtained.

FWQ4.0.14: Article 17 - Use of Private Roads for Construction 17 – What private roads are intended to be used within the order limits during construction and have discussions been had, and agreement been reached with the owners of these roads regarding their use? Can the applicant confirm that there would be severance/access issues?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	NRW has no comment to make in response to this question, save that it would ask the Applicant to explain how such a wide-ranging power has been environmentally assessed. As NRW has stated in its comments on the Article 35 temporary possession power (see Written Representation at comment 2.5), the powers granted to the Applicant should be circumscribed to the specific locations for which it has carried out environmental assessments.	Horizon will engage with NRW in respect of these concerns through the ongoing Statement of Common Ground process.

FWQ4.0.15: Article 19 - Construction and Maintenance of new and altered streets		
Have discussions been had, and agreement reached over the proposed 12-month post completion maintenance proposals?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	No discussions have been held between the Applicant and the LHA. No agreement is in place for maintenance proposals. The IACC also has serious concerns about other effects of this article which include that highways constructed under the DCO which do not have to be constructed to the satisfaction of the highway authority. The IACC require that it has an opportunity to supervise the works of the roads which will become public highway and inspect the construction of these as required. In order to ensure that the Highway Authority is satisfied that new roads constructed are suitable and safe for public use before they open the DCO needs to be amended to provide that no new highway can be opened unless and until the authority agrees it is suitable. The IACC has made detailed submissions on this article in its Written Representation at section [5.4].	Please refer to Horizon's response to section 5.4 of IACC's Written Representation , relating to construction and maintainance of highways, in respect of this point.

FWQ4.0.21: 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.		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
WG	Section 2.2 of the Written Representation reiterates the Welsh Government's position in respect of Crown Land and its concerns. that the Applicant has included within the Book of Reference parcels of land belonging to Welsh Ministers, the National Assembly or which form part of the strategic highway for which Welsh Government is the Strategic Highway Authority. Such land has not been identified by the Applicant as Crown Land neither has the appropriate consent pursuant to s135 Planning Act been sought from Welsh Government.	Following the DCO Issue Specific Hearing (24 October 2018), Horizon wrote to the Welsh Government on 2 November 2018 seeking confirmation on the Welsh Government entities affected, the nature and location of the affected interest and further details on the plots identified so that it could update its Book of Reference and plans appropriately. The Welsh Government has advised on 12 November 2018 that it will respond "in due course on the specific Crown Land queries raised, but the basic position is that the relevant land is Crown Land". Horizon look forward to receiving the Welsh Government's response. Horizon is committed to ensuring that the DCO application documents reflect the nature of the Welsh Government's interests and obtaining its consent where necessary.

FWQ4.0.43: Article 53 Power to dredge

The applicant explains that Article 53 gives Horizon the right to dredge within the harbour limits for the purpose of constructing, maintaining and operating the Marine Works. These powers are subject to the requirements set out under the Marine and Coastal Access Act 2009 to obtain marine licences. In addition, the approval of NRW is required to deposit any dredging below mean high water springs, and this approval can be given subject to conditions and restrictions.

What is the additional approval to deposit referred to by the applicant and what does NRW need to consider before providing this approval? Having regard to the matters relevant to determining a marine licence (section 69 of the Marine and Coastal Access Act) is NRW content that sufficient conditions and restrictions on the power to dredge can be provided in the marine licence (and any other consent to deposit) and that no further controls are required in the DCO in relation to dredging?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	In order to deposit dredge arisings at sea, samples from the sediment of the proposed dredge areas must be taken and analysed to ensure the sediment is suitable for deposit. Previously, samples have been taken and analysed from these areas, however, the guidelines that govern the process (OSPAR) require that data should be no more than 3 years old at the time the marine works are undertaken, to provide assurance that the nature and composition of the sediment has not changed. The original samples were taken and analysed in 2016 and so further sampling should be conducted prior to the marine works commencing. The additional approval from NRW is therefore a marine licence to take samples from the dredge sites for subsequent testing and analysis. NRW will consider the sampling methodology and analysis plan when determining a licence application of this nature. Approval to deposit will be based on considering the	Horizon notes that it is currently discussing with Welsh Government the potential inclusion of an article relating to the application of the Marine and Coastal Access Act 2009 within Part 6 to make it clear that the DCO does not obviate the need to obtain a marine licence. This ongoing discussion is noted in the draft Statement of Common Ground between Welsh Government and Horizon submitted at Deadline 2 (4 December 2018) [REP2-043]. While discussions are ongoing, if agreed, Horizon considers that a separate article would be a neater approach to ensure that all works and powers under Part 6 are subject to the need for a marine licence (rather than amending a number of articles).

	sample analysis results in consultation with relevant parties. NRW is content that sufficient conditions and restrictions on the power to dredge can be provided in a marine licence (and any other consent to deposit) but the DCO should be amended to make clear that the provision does not obviate the need for a marine licence for these activities (and that the additional approval should be defined as a marine licence).	

FWQ4.0.47: Article 72: Explain and justify why, given the substantial archaeological investigation that has been carried out, it is necessary to introduce a special procedure for the removal of human remains? Identify any locations where there is a thought to be potential for the discovery of human remains that have not yet been identified.

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The IACC notes that the Order Land includes areas of greenfield land. Other developments on Anglesey have discovered previously unknown archaeological remains including settlements. The Council therefore considers that there is a realistic possibility that unknown, historic human remains may be uncovered during the works and that a process to allow Horizon to have these properly relocated is appropriate. The IACC therefore supports the inclusion of Article 72 within the DCO but would request that this is amended to provide that notices any notices served or published under this Article are required to be bi-lingual in both Welsh and English.	As noted in Horizon's response to paragraph 4.7.1 of IACC's Written Representation , Horizon will amend article 72 in the next update of the draft DCO to make it clear that notices will be provided in English and Welsh.

FWQ4.0.47: Article 72: Explain and justify why, given the substantial archaeological investigation that has been carried out, it is necessary to introduce a special procedure for the removal of human remains? Identify any locations where there is a thought to be potential for the discovery of human remains that have not yet been identified.		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
WG	The excavation of human remains requires compliance with the Burials Act, 1857 and it is a requirement to obtain an exhumation licence from the Ministry of Justice prior to excavation. A programme of archaeological excavation needs to be agreed in advance in order to justify the excavation of human remains.	Please refer to Horizon's response to FWQ4.0.47 [REP2-002]. Horizon notes that if remains are discovered, paragraph (12) requires any removal to comply with any directions of the Secretary of State, which in respect of this article will be the Secretary of State for Justice (see definition of "Secretary of State" in article 2 of the draft DCO). Horizon also notes IACC's support for the inclusion of article 72 (subject to minor amendments to the notice requirements), as set out at 4.7.1 of the IACC Written Representation.

FWQ4.0.50: Article 74: is the local planning authority content that the land within the Order limits is treated as 'operational land' and permitted development rights under (a) Part 17 of Schedule 2 of the T and CP (General Permitted Development) Order 1995; and (b) Class B (harbour undertakings) and Class G (electricity undertakers) under Part B of the GDPO applied?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The IACC considers it reasonable that the 'nuclear island' main site and marine elements are operational land for the purposes of the GDPO. The IACC does not consider that it is appropriate or necessary for these powers to apply to all of the order land. In particular these powers should not apply to the associated development sites as they are disproportionate to uses for which these sites are being consented.	Please refer to Horizon's response to FWQ4.0.49 [REP2-002] in respect of GDPO rights.

FWQ4.0.51: Article 75: is the local planning authority content with the disapplication of the Hedgerow Regulations 1997 as proposed?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	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 a land managers, developers, etc to remove a hedgerow in contravention of the Regulations. 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. 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. Therefore, Article 75 (3) should be more specific. IACC suggest this is reworded with the additional words (in red) as follows: 75 (3) The undertaker may, for the purposes of the authorised development: (a) subject to paragraph (2), remove any hedgerows that are not important hedgerows within the	Horizon generally accepts IACC's comments; however, has proposed some alternative drafting to ensure that the consenting exemption in respect of normal hedgerows is retained. Please refer to Horizon's response submitted at Deadline 3 to paragraph 4.5.3(f) of IACC's Written Representation [REP2-218] in respect of the proposed amendment to article 75 to address IACC's concerns.

Order Limits that may be required for the purposes of carrying out the authorised development; and
(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.**

75 (4) The power conferred by paragraph (3) removes any obligation upon the undertaker to secure ~~any~~ consent under the Hedgerow Regulations 1997 **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.**

FWQ4.0.51: Article 75: is the local planning authority content with the disapplication of the Hedgerow Regulations 1997 as proposed?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
WG	In Welsh Government representation EV-013 we stated that powers under the Hedgerow Regulations 1997 are devolved to Welsh Ministers. WG are considering applicant's latest response in respect of this matter which will be subject of further consideration.	WG and Horizon are to discuss proposed amendments to article 75, as referred to in the draft Statement of Common Ground between Welsh Government and Horizon [REP2-043].

FWQ4.0.57: PW7 / PW8 - The construction of the authorised development would be managed and controlled through either the Wylfa Newydd Code of Construction Practice [8.6] or a specific Code of Construction Practice [8.7- 8.13]. Is IACC satisfied with the level of detail contained within these documents?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	No. The IACC considers that these documents lack the detail necessary to control the development and to deliver the claimed mitigation for the project. The lack of detail in the CoCPs is in stark contrast to the detail that would have been expected in documents to be submitted for approval under requirements. The IACC maintains the criticism of these documents made at the first issue specific hearing (written summary REP1-018) and in response to action point 20 (REP1-019). The IACC has made detailed submissions on the CoCPs in its Written Representation at section [11]. The IACC has also noted in its Local Impact Report where specific detail for any topic is considered to be required in the CoCPs.	As noted at the DCO Issue Specific Hearing (24 October 2018), the control documents will continue to be developed and refined throughout the Examination in response to stakeholder and Examination Authority's concerns. Horizon is proposing to submit further updated versions of the Wylfa Newydd CoCP, the sub-CoCPs and the Wylfa Newydd CoOP at Deadline 4 (17 January 2019) which will build upon the updates made at Deadline 2 (4 December 2018). Horizon notes the specific comments made in respect of these documents in IACC's Written Representation. Please refer to Horizon's response to section 11 of IACC's Written Representation and Horizon's response to the IACC LIR in respect of the control documents.

FWQ4.0.60: 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?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	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.	Horizon notes that any amendment to the Code of Conduct must be in accordance with the principles of the Workforce Management Strategy [APP-413]. It is important to note that the DCO does not provide any tailpiece provision in respect of the Workforce Management Strategy, and so the principles that are approved as part of the Examination are the principles that will apply for the duration of the construction period. Therefore, although Requirement PW8 enables Horizon to submit revisions of the Code of Conduct, those revisions must comply with the set principles of the Workforce Management Strategy. For that reason, Horizon considers it is incorrect to say that Horizon can amend the Workforce Management Strategy (or the Code of Conduct) to rectify or validate any non-compliances. As noted in the response to the FWQ4.0.60, Horizon is considering amendments that would make the Workforce Management Strategy and its principles more effective and provide more certainty to IACC on the behaviour that will be required of the workforce and Horizon's construction partners and the controls and consequences of any non-compliance with those standards.

FWQ4.0.65: SPC12 – given the size of the proposed construction vehicles, is the proposed 8 meters setback for gates sufficient to ensure that waiting vehicles would be clear of the highway?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	Yes. This is in accordance with what was requested as part of the SPC TCPA application. However, it should be noted that the IACC would also seek adequate wheel washing facilities to be provided at each access point.	Horizon notes that the Main Power Station Site sub CoCP [REP-032] provides controls around the use of wheel wash facilities at the entrance of the concrete batching plant and at the site exit (refer to paragraphs 7.2 and 7.3). These have been identified as the risk areas where materials could transfer and so, it is appropriate that wheel washing facilities are provided at these points. For this reason, Horizon does not agree to a blanket provision of facilities at each and every access point as the key risk areas will have these facilities in place.

FWQ4.0.68: WN9 (1) – What is meant by 'commissioned' and should this be included in Article 2 - Interpretation? Is IACC satisfied with this as a trigger for the submission of the final landscape and habitat scheme? WN9 (2) Should this be reworded to include but not limited to details of? Should the list be expanded to include hard landscaping details; lighting; street furniture and signage; boundary treatment etc.? WN9 (4) as worded this seems to place the onus on IACC to identify seriously damaged or diseased trees and shrubs during the 5 year aftercare period. If this is the case, does IACC have the resource and expertise to undertake this requirement and if not, why not?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	In general, the triggers for submission of restoration plans are far too late in the development. Requirements SPC13, WN9, WN11, WN12 and 13, WN21, OH8 requirement submission of these pre-operation which could be post main construction of that element. The IACC requests that outline plans are required to be approved prior to the commencement of the relevant part of the development (this is being sought through a planning condition for the site preparation and clearance works). <u>WN9 (1)</u>	Appropriateness of Triggers Please refer to Horizon's response to paragraph 7.4.1 of IACC's Written Representation in response to the appropriateness of the triggers for SPC13, WN11, WN9, WN12 and 13, WN21 and OH8. Proposed amendments to Requirement WN9 Horizon generally accepts the proposed new paragraph (5); however, apart from the inclusion of references to "hedgerow", Horizon does not accept the amendments proposed to paragraph (4) to increase the aftercare period for trees and to provide that IACC may determine the species, provenance, size and maturity. The current drafting provides for a like-for-like replacement, unless otherwise approved by IACC. IACC's proposed amendment would enable it to request any replacement tree which would have significant cost implications. In addition, the current 5 year period is considered appropriate.

IACC expects the landscape and habitat scheme to be implemented in a phased way as areas of the site become available for reinstatement and enhancement, so the final landscape and habitat scheme does need to be submitted and agreed well in advance of areas becoming available to facilitate this phased approach. Detailed plans, in line with the approved outlines, should be required to be submitted for approval no less than 6 months prior to the anticipated completion date of the construction or use of the relevant part of the project.

Figure 2-1 in the Phasing Strategy (document 8.29) suggests that the final reinstatement of the site will commence in Q4 of Yr 7, well in advance of Unit 2 being commissioned in Q2 of Yr 9. Submission of the final landscape and habitat scheme to IACC 12 months prior to Unit 2 being commissioned is therefore considered much too late.

IACC notes the revision made to WN9(2) at revision 2 and considers it addresses the point raised.

WN9 (4)

IACC expects any necessary replacement of trees to be undertaken for a period of 10 years, with shrubs and other vegetation for a period of 5 years. Horizon has undertaken to use trees and shrubs of local or regional provenance, and this should be captured in this sub-paragraph. In some cases, trees and shrubs may have a screening role and IACC would expect this function to be replicated by the replacement planting, so specimens

Horizon will make amendments to the draft DCO at Deadline 4 (17 January 2019) to incorporate the agreed amendments.

Funding provision

In respect of funding for IACC to inspect the establishment of any landscape and habitat schemes, Horizon has committed to providing a service level contribution under the draft DCO section 106 agreement; which would replace the existing funding that is provided under the current Planning Performance Agreement.

In addition to this contribution, the draft DCO s.106 agreement will commit Horizon to a significant amount of funding in officer capacity annually (£300,000) for identified topic areas including:

- A Welsh Language Officer;
- A Tourism Officer;
- Two Economic Development Officers;
- A Community Involvement Officer;
- Between two and three Accommodation Officers (at various points in the development);
- A Transport Officer; and
- An Environment Officer.

In addition, Horizon will pay agreed landscape monitoring costs for IACC's costs or a Horizon-appointed consultant throughout the construction period (£540,000) and the operational life of the development (£2,400,000). Horizon considers that these substantial contributions will ensure that IACC has the necessary resourcing to undertake its monitoring and discharging functions under the DCO. (Noting that all amounts are still being negotiated.)

would need to have a maturity greater than those originally planted, subject to this being appropriate for the successful establishment of the species.

Therefore, IACC suggests that the wording of WN9 (4) is amended as follows (additional text in red):

WN9 (4) Any tree, hedgerow or shrub planted as part of an approved landscaping and habitat scheme under sub-paragraph (1) that, within a period of ten years (for trees) or five years (for hedgerows and shrubs) after planting, is removed, dies or becomes, in the opinion of IACC, seriously damaged or diseased, must be replaced in the first available planting season with a specimen of [the same] a species, provenance, size [as that originally planted, unless otherwise approved by IACC] and maturity to be approved by IACC.

IACC expects some of the grassland habitats in the final landscape and habitat scheme to be established by way of seeds sown in the appropriate sowing season, as well as trees and shrubs planted in the appropriate planting season. Therefore, IACC suggests that an additional sub-paragraph is added to WN9 to cover those habitats that would be established by seed sown in the appropriate sowing season as follows:

WN9 (5) Any vegetation sown as part of an approved landscaping and habitat scheme under sub-paragraph (1) that, within a period of five years after sowing, is removed, dies or becomes, in the opinion of IACC, seriously damaged or

diseased, must be reinstated in the first available sowing season with seeds of a species and provenance to be approved by IACC.

IACC's resources are limited and, consequently, its ability to inspect the landscape and habitat scheme for the main site and, indeed, the landscape and habitat schemes for all other land and sites forming part of the project would be restricted. IACC would, therefore, wish to see a commitment from Horizon to the funding of compliance officers to be employed by IACC for an agreed period of time beginning with the granting of consent. Such officers would be responsible for the discharge of requirements and for the monitoring of works against approved control documents.

FWQ4.0.68: WN9 (1) – What is meant by ‘commissioned’ and should this be included in Article 2 - Interpretation?

Is IACC satisfied with this as a trigger for the submission of the final landscape and habitat scheme?

WN9 (2) Should this be reworded to include but not limited to details of? Should the list be expanded to include hard landscaping details; lighting; street furniture and signage; boundary treatment etc?

WN9 (4) as worded this seems to place the onus on IACC to identify seriously damaged or diseased trees and shrubs during the 5-year aftercare period. If this is the case, does IACC have the resource and expertise to undertake this requirement and if not, why not?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
ONR	ONR has a definition of ‘commissioning’ in its standard set of nuclear site licence conditions – “The process during which plant components and systems, having been constructed or modified, are made operational and verified to be in accordance with design assumptions and to have met the appropriate safety criteria” ONR suggests that this definition could be used.	Please refer to Horizon's response to FWQ4.0.68 [REP2-002] which sets out why the proposed definition in the draft DCO (Revision 2.0) [REP1-005] was adopted. Horizon notes, that in determining what definition should be used, the definition proposed by ONR was considered; however, it was considered more appropriate in the context and for enforcement, certainty and consistency, to align the definition with the one used in the draft DCO section 106 agreement (submitted at Deadline 3).

FWQ4.0.69: WN11 (2) is IACC satisfied that the habitat and landscape works cover all the areas where management schemes would be needed?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	IACC considers the phrase “<i>sympathetic agricultural use</i>” in WN11 (2)(b) to be vague and unenforceable. With regards to the list of management schemes, IACC agrees that the list should be expanded to include <u>all</u> habitats and landscape works and features included in the final landscape and habitat scheme and suggests that the wording of WN11 (2) is amended as follow (additional text in red): WN11 (2) The management schemes will be prepared and submitted under sub- paragraph (1) for ~~[the following]~~ all habitat and landscape works ~~[or]~~ and features in the final landscape and habitat scheme, including but not limited to: existing habitats associated with watercourse diversions; all newly-created habitats and land returned to ~~[sympathetic]~~ agricultural use; drainage channels and ponds; Tre'r Goff SSSI; Cae Gwyn SSSI / Great Crested Newt Receptor Site (relating to the small portion which will be owned by the undertaken when option land is purchased); ~~Wylfa Head (including the coastal strip which extends towards Cemmaes)~~ That part of the Arfordir Mynydd y Wylfa – Trwyn Penrhyn Wildlife Site that is within the DCO limits; Woodland designed by Dame Sylvia Crowe for the Existing Wylfa Power Station; Retained ancient woodland; Development buffer zones (around watercourses and designated sites); ~~[and]~~ Wildlife structures (eg bat barns) and associated planting/buffers;	Sympathetic agricultural use Horizon will amend Requirement WN11(2)(b) to remove the phrase “<i>land returned to sympathetic agricultural use</i>” as Horizon has now committed to manage that land with the principal objective of enhancing its biodiversity value. At Deadline 2 (4 December 2018), Horizon updated its Landscape and Habitat Management Strategy (Revision 2.0) [REP2-039] to include a new design principle which will require Horizon to provide a mosaic of habitat types to meet the terrestrial habitat mitigation requirements of the Environmental Statement and which align with the Section 7 (Environment (Wales) Act 2016) list of habitats of principal importance for the purpose of maintaining and enhancing biodiversity in relation to Wales.” A new table was also included setting out the type of habitat to be created, the amount, and the corresponding section 7 habitat. “<i>Sympathetically managed agricultural grassland</i>” is no longer included in the list of habitat types that will be created. Proposed amendments to WN11(2) With the amendment to the design principle in the Landscape and Habitat Management Strategy, Horizon does not consider that all the amendments proposed to WN11(2) are required: • Horizon is willing to accept the amendment to the requirement to prepare and submit management schemes for “<i>all habitat and landscape works and features in the final landscape and habitat scheme...</i>”. • Horizon is willing to accept the amendment (2)(f) to use the Welsh name of Wylfa Head and inclusion of hard landscaping features. • Rather than amend WN11(2) to refer to “<i>all new and existing hedgerows, woodlands, scrub and other vegetation</i>” Horizon will amend (2) to refer to “<i>retained boundary habitats</i>” to ensure that existing hedgerow, scrub and other vegetation is covered by this requirement. Existing woodland is already addressed by (2)(g) and (e) and all new vegetation, scrub, hedgerows etc. will be addressed under (2)(b).

All new and existing hedgerows, woodlands, scrub and other vegetation;
Those parts of Cestyll Garden Registered Areas and Essential Setting (or Statutory Area once this has been confirmed by Cadw) that have been affected by the works, including but not limited to, the Kitchen Garden and original access lane;
Hard landscaping features, including but not limited to: lighting, street furniture, signage, stiles, gates, cloddiau, stone walls, all other boundary treatment, etc.

The terms of requirements WN11(2)(e) are objected to as the period of maintenance or aftercare is limited by Horizon retaining an interest in the site. Horizon's land interests must allow for a sufficient period of aftercare to be undertaken or the sites they have included, otherwise these are not appropriate sites for the purposes for which they are proposed. Please see the IACC's general objection to the limitations on aftercare proposals set out in its Written Representation at section [7.4].

- Horizon has also committed to providing a financial contribution under the draft DCO section 106 agreement for the delivery of improvement works and management of Cestyll Garden. Horizon and the NDA are in the process of agreeing heads of terms for acquisition of a number of land interests which include Cestyll Gardens, although it is currently subject to contract.

Terms of receptor sites

Horizon notes that Horizon will have a 15 year interest in the receptor sites listed in Requirements WN12 and WN13. Horizon considers this is ample time to manage these areas.

The land comprising the Great Crested Newt Receptor Site (Requirements WN11(2)(e) and WN14) are part of the option land and Horizon will own that land. Horizon is happy to amend Requirement WN14 to remove reference to "*for the duration of the undertaker's interest*", given that it will own that land.

FWQ4.0.72: WN15 and WN16 – These requirements control the number of parking spaces proposed during construction and operation. Can the Applicant:

Explain why this is worded as a maximum rather than a specific number?

Explain why there is no minimum number?

Indicate where in the DCO, the design and layout of the car parking, (including provision of disabled parking spaces; electric vehicle charging points; lighting; drainage; provision of petrol/oil interceptors or other methods of pollution control etc) is detailed and secured??

Is IACC, as Local Highways Authority, content that this refers only to a maximum number of spaces rather than a specific number of spaces?

Is IACC, as Local Highways Authority, satisfied that there is a mechanism by which it will be able to ensure approval of the design and layout of the car parking? If so, how?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	No, the IACC is not content that only maximum numbers are specified. Various requirements (SPC2, WN15, WN16, OPSF5, PR5, LC5, LC6 and OH7) provide for maximums for the provision of car parking, bike spaces but set out no minimums which must be provided at any stage, phase or time. This is not acceptable to IACC as it offers no control to ensure that these facilities are available for use at the appropriate stages of the development. The IACC require minimum level of provision for each phase to be in place prior to the start of that phase and that this is clearly secured either in the requirements or is set out in a certified document (such as fuller phasing strategy) to provide certainty and enforceability. No. The IACC notes that the terms of requirement WN3 Power Station detailed design approval would not currently include the design and layout of car parking and considers that there is no mechanism in place for it to approve these matters. The	Please refer to Horizon's response to FWQ4.0.72 [REP2-002] in respect of Requirements WN15 and WN16 and maximum parking provision and detailed design approval.

	IACC objects to this omission and considers that the design and layout should be added to the scope of details to be approved under requirement WN3.	

FWQ4.0.72: WN15 and WN16 – These requirements control the number of parking spaces proposed during construction and operation. Can the Applicant:

Explain why this is worded as a maximum rather than a specific number?

Explain why there is no minimum number?

Indicate where in the DCO, the design and layout of the car parking, (including provision of disabled parking spaces; electric vehicle charging points; lighting; drainage; provision of petrol/oil interceptors or other methods of pollution control etc) is detailed and secured??

Is IACC, as Local Highways Authority, content that this refers only to a maximum number of spaces rather than a specific number of spaces?

Is IACC, as Local Highways Authority, satisfied that there is a mechanism by which it will be able to ensure approval of the design and layout of the car parking? If so, how?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
WG	As set out in Welsh Government's written representation (9.5.3) Welsh Government is of the view that the following should be provided by the Applicant and secured by the DCO: • That the Park and ride at Dalar Hir must be operational before Construction commences and have 1,900 spaces by 2022 • A requirement to provide minimum parking spaces linked to either a defined phasing plan or the increase in worker numbers. • A specific maximum number, to provide certainty for enforcement.	Please refer to Horizon's response to Welsh Government's Written Representation and Horizon's response to FWQ4.0.72 [REP2-002] in relation to each of these points.

	• A commitment to delivering a layout for the Dalar Hir site that would allow for it to be constructed in phases that would secure earlier occupation rather than waiting 18 months for it to open. • Provision for EV charging within the sites and for various vehicle types in order to contribute towards meeting Welsh Government targets for decarbonisation. Welsh Government would also welcome • Clarification around measures pre the implementation of the Wylfa Travel Plan.	

FWQ4.0.73: WN19 - requires the submission and approval of the detailed design of the site campus.

This appears to be the only requirement that seeks to secure the design/provision of the site campus.

Is IACC satisfied that, with particular reference to the noise generated from plant; drainage (management and control); hours of use of the MUGAs; external lighting, parking and floodlighting etc, the requirement adequately secures these matters? If not, why not?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	No. IACC has fundamental issues with the approach to the site campus including the provision of leisure and recreational facilities, and parking and phasing being inadequate. The IACC has made detailed submissions on the site campus in the LIR. IACC objects to the requirement as the drafting limits it to being able to control only the detailed design of the building. This control is inadequate to deal with exterior lighting, noise, parking, hours of use of MUGA.	Please refer to Horizon's responses to IACC's LIR [in respect of the Site Campus and Horizon's response to FWQ10.1.25 [REP2-002] in respect of the design intentions and principles relating to the Site Campus.

FWQ4.0.75: WN21(2) - should this list be prefaced with "include but not limited to"?

Should (e) include a reference to hedges?

Should the list be expanded to include means of enclosure; external and street lighting; street furniture and signage?

Does IACC have the resource and expertise to undertake this requirement and if not, why not?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The additional text suggested by the IACC is included in red below; IACC agrees that WN21 (2) should be reworded to say "... and include, but not limited to:". IACC agrees that WN21 (2)(e) should include a reference to hedges and also to scrub, grasslands, cloddiau and stone walls. IACC agrees that the list in WN21 (2) should be expanded to include means of enclosure, external and street lighting, street furniture, paving, seating, signage, etc. Regarding resources and expertise, as noted in the answer to Question 71 above, IACC has no objection to being the relevant body within the requirement from which approval should be sought. Indeed, it is important for IACC to be the approval and enforcement body. However, IACC's resources are limited and, consequently, its ability to inspect the landscape and habitat schemes for the main site and, indeed, the landscape and habitat schemes for all other land and sites forming part of the project would be restricted. IACC would, therefore, wish to see a commitment from Horizon to the funding of compliance officers to be	"include but not limited to" As noted in Horizon's response to FWQ4.0.75 [RE2-002], reference to "include" is not exhaustive and this has been clarified in article 2(10) of the draft DCO submitted at Deadline 1 (13 November 2018) [REP1-005] Amendments proposed to Requirement WN21(2) <i>1. Additional matters in WN21(2)(e)</i> Horizon made a number of amendments to Requirement WN21 to incorporate the additional matters listed by the Examining Authority at Deadline 1 (13 November 2018) (refer to Revision 2.0 of the draft DCO [REP2-004). <i>2. Extension of WN21(1)</i> Horizon does not agree to the proposed reference to a "landscape and habitat scheme" for the Site Campus in WN21 as this requirement only relates to landscaping design in and around the Site Campus; there is no "habitat" to be created in the Site Campus. For this reason, the Requirement only refers to the landscaping principles in the Design and Access Statements [REP2-029/30], not the Landscape and Habitat Management Strategy [REP2-039] (which controls the creation and management of habitat and landscape across the entire WNDA). Maintenance of any landscaping planted in accordance with WN21 will be managed in accordance with paragraph (4) and new paragraph (5). <i>3. Amendments to WN21(4) and new (5)</i> As noted above at FWQ4.0.75, Horizon has agreed to amendment of this requirement to incorporate minor amendments to paragraph (4).

employed by IACC for an agreed period of time beginning with the granting of consent. Such officers would be responsible for the discharge of requirements and for the monitoring of works against approved controlled documents.

WN21 (4) also needs to be amended and an additional sub-paragraph (5) added, as per IACC's recommendations for WN9 (4) (see Question 71 above).

Therefore, IACC suggests that the wording of WN21 is amended as follows:

WN21: Landscape Detailed Design

(1) The occupation of the Site Campus may not commence until plans and written details of the landscape ~~design~~ **and habitat scheme** have been submitted to and approved by IACC **and those plans and details have been implemented.**

The **plans and** details submitted under sub-paragraph (1) must be prepared in accordance with the landscape principles relating to the Site Campus in volume 3 of the DAS and should include, **but not be limited to:**

location, number, species, **provenance**, size and planting density of any proposed planting;

cultivation, importing of materials and other operations to ensure plant establishment;

proposed finished ground levels;

hard **landscaping, including but not limited to:** surfacing materials, **means of enclosure, external and street lighting, street furniture, paving, seating, signage, etc;**

details of existing trees, **hedgerows, scrub, grasslands, cloddiau and stone walls** to be

Funding provision

Please refer to Horizon's comments in response to **FWQ4.0.68** above.

retained, with measures for their protection during the construction period; and implementation timetables for all landscaping works.

The landscaping of the Site Campus must be undertaken in accordance with the plans and details approved under sub-paragraph (1), unless otherwise approved by IACC.

Any tree, hedgerow or shrub planted as part of an approved ~~[detailed design]~~ landscape and habitat scheme under sub-paragraph (1) that, within a period of ten years (for trees) or five years (for hedgerows and shrubs) after planting, is removed, dies or becomes, in the opinion of IACC, seriously damaged or diseased, must be replaced in the first available planting season with a specimen of ~~[the same]~~ a species, provenance, ~~[and]~~ size ~~[as that originally planted, unless otherwise approved by IACC]~~ and maturity to be approved by IACC.

Any vegetation sown as part of an approved landscape and habitat scheme under sub-paragraph (1) that, within a period of five years after sowing, is removed, dies or becomes, in the opinion of IACC, seriously damaged or diseased, must be reinstated in the first available sowing season with seeds of a species and provenance to be approved by IACC.

FWQ4.0.76: WN23 - this does not appear to provide a trigger date/activity for the submission of the decommissioning strategy and therefore as currently worded, could the site campus facility be permanently retained?

As the site campus is defined as a temporary facility, how should the requirement be amended to include a trigger for the submission of these details?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The IACC considers that the phased removal of the site campus should be secured as part of the phasing strategy with the prohibition on the commissioning of unit 2 as agreed at that stage. It is noted that the ES confirms that removal will be phased however this is not secured in the DCO documents. The IACC considers that all decommissioning and restoration should be secured through the phasing strategy – please see section [7.2] of the Written Representation.	Please refer to Horizon's response to FWQ4.0.76 which sets out the amendments made to the draft DCO at Deadline 1 (Revision 2.0) [REP1-005] to provide more certainty on when the site campus decommissioning strategy would be submitted. Horizon does not consider that a prohibition on the commissioning of Unit 2 until the Site Campus is removed is appropriate. Horizon notes that Requirement WN23(2) already provides that the decommissioning strategy must include details of the timeframes and phasing of decommissioning and removal of the Site Campus. It is not considered appropriate to include the decommissioning of the Site Campus within the Phasing Strategy [APP-447] as this document is focused on the securing and delivery of key mitigation in order to avoid adverse effects of the Wylfa Newydd DCO Project – rather than the removal of this key mitigation at the end of the Project (which is already secured through a DCO Requirement).

FWQ4.0.77: WN25 - this only appears to require submission and approval of details for the marine works to NRW.

Are IACC and NRW content?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	No. IACC maintains the position set out in response to action point 8 (REP1-019). IACC does not agree to relinquish the role of discharging authority within the inter-tidal area under the DCO. The legal regimes overlap because they have different statutory purposes with different considerations being applied when proposals are discharged. There is a legitimate planning authority interest in the intertidal area at the same time a legitimate marine licensing authority interest.	Horizon notes IACC's position and will continue to engage with IACC, Welsh Government and NRW in order to resolve the appropriate discharge authority in respect of the marine requirements and reflect any agreement in the draft DCO. Horizon is nevertheless disappointed in IACC's current position which is at odds with the position taken by NRW and the Welsh Government during discussions between the parties and with NRW's responses to FWQ4.0.77. Horizon would welcome any alternative suggestions that IACC may have on resolving the risk of separate regulators having incompatible requirements over the same matter. Horizon is happy to update the Examining Authority on the progress of any further discussions between the parties.

FWQ4.0.78: WN26 (a), (b), (c) and (d) - is AOD the correct point of reference or would Above Chart Datum (ACD), Mean High Water (MHW) or Mean Low Water (MLW) be more appropriate?

Should definitions be provided for crest and roundhead in Table WN26a?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	IACC considers that other measurement which more readily allow for impact assessment (such as MLW) would be more appropriate. IACC notes that further definitions have been added at revision 2 but don't consider that these are particularly helpful.	See Horizon's response to FWQ4.078 on the appropriateness of AOD. Horizon also notes that NRW has also confirmed that the use of AOD is appropriate. As part of it's Deadline 2 (4 December 2018) submission, Horizon included two new definitions of "crest" and "base" to help define the measurement of the parameters relating to the breakwater. Given the trapezoid cross-section of the breakwater, "crest" is used for the measurement point for length and height as those dimensions are more relevant to the visible part of the breakwater that is above water. "Base" is considered more relevant to the breakwater than below water/on the seabed.

FWQ4.0.80: OPSF2 – Is IACC satisfied that the requirement would adequately secure the proposed facilities including for example: drainage, noise from plant, archaeological implications and management, car park design and layout, refuse collection, cycle storage etc?
(4) How would the landscaping details that would be managed by (4) submitted/approved? Should this be a separate requirement? Does IACC have the resource and expertise to undertake this requirement and if not, why not?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	No. IACC objects to the requirement as the drafting limits it to being able to control only the detailed design of the building. The council is not satisfied that any of the other matters could be secured or controlled. IACC considers that the landscaping and boundary treatment details should be subject to approval and should be added to the details to be approved under OPSF2. IACC has the expertise to undertake the work required but considers that the fees proposed for discharge of requirements are entirely inadequate to resource the officer time needed. Please see detailed submission on this point in the Written Representation at section [8, especially 8.4].	Please refer to Horizon's response to FWQ4.0.80 which demonstrates how each of the matters referred to are secured by the design principles in the Design and Access Statements [REP2-029/30]]. As set out above at FWQ4.0.68, Horizon is also making significant contributions in funding in order to assist IACC in monitoring and discharging under the DCO.

FWQ4.0.84: Confirm whether the detailed drawings relating to the park and ride facility in Schedule 2 of the draft DCO include details of landscaping and a maintenance regime given that there currently appears to be no requirement, apart from maintenance, regarding landscaping for the park and ride facility? IACC may wish to comment?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	WN0902-HZDCO-ADV-DRG-00035: Proposed Landscape Masterplan and WN0902-HZDCO- ADV-DRG-00040: Proposed Restoration Plan Post Operation illustrate the outline proposals for landscaping the site during the operational phase of the facility and once the site is decommissioned respectively. PR3 (4) refers to "any tree or shrub planted as part of a detailed design under sub-para (1)" and sub-para (1) refers to "the approved Detailed Design Drawings ... in Schedule 2 of this Order". Schedule 2 lists the plans already submitted, including the two above. Therefore, the draft DCO does include outline landscape and restoration plans. However, the plans in Schedule 2 do not included any detailed landscape schemes and IACC would like two additional requirements to be added to the DCO to that require detailed landscape and restoration schemes to be submitted to IACC for its approval.	Please refer to Horizon's response to FWQ4.0.84 on this point [REP2-002].

FWQ4.0.85: PR3 (4) explain how the landscaping details for any amended scheme that would be managed by (4) would be submitted/approved. Should this be a separate requirement?

Does IACC have the resource and expertise to undertake this requirement and if not, why not?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The IACC notes that unless the applicant determines to submit amended details there is no opportunity for it to consider any scheme beyond the outline submitted as part of the DCO application, as covered in the previous question IACC considers that an additional requirement is needed. IACC has the expertise to undertake the work required but considers that the fees proposed for discharge of requirements are entirely inadequate to resource the officer time needed. Please see detailed submission on this point in the Written Representation at section [8, especially 8.4].	As set out above at FWQ4.0.68, Horizon is also making significant contributions in funding in order to assist IACC in monitoring and discharging under the DCO and ensuring planting is established and maintained for a 5 year period. Please also refer to Horizon's response to section 8.4 of IACC's Written Representation in respect of the fee schedule proposed in Schedule 19 of the draft DCO.

FWQ4.0.87: PR5 Operational parking –includes cycle parking – should this be retitled operational car and cycle parking?

The parking spaces are stated as a maximum rather than a specific number, is this acceptable to the IACC/Highway Authority? Should a minimum number be defined?

The maximum figure given is 1,900 – however the Planning Statement [8.1] (paragraph 4.3.16) states that it would provide parking for 1,900 cars, 55 minibuses and 35 motorcycles –clarify whether the number of parking spaces proposed includes or excludes the parking for minibuses and motorcycles?

Unless details are provided as part of either PR2 or PR3 the design/layout of the parking including drainage, lighting, disabled parking spaces and electric vehicle charging points does not appear to need to be submitted and approved by IACC. Does IACC as Local Highways Authority, wish to comment?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	As per the response to 4.2.72, no, the IACC is not content that only maximum numbers are specified. Various requirements (SPC2, WN15, WN16, OPSF5, PR5, LC5, LC6 and OH7) provide for maximums for the provision of car parking, bike spaces but set out no minimums which must be provided at any stage, phase or time. This is not acceptable to IACC as it offers no control to ensure that these facilities are available for use at the appropriate stages of the development. The IACC require minimum level of provision for each phase to be in place prior to the start of that phase and that this is clearly secured either in the requirements or is set out in a certified document (such as fuller phasing strategy) to provide certainty and enforceability. The figures given should include figures for minibuses and motorcycles as well as cars. No. The IACC notes that the terms of requirement PR2 detailed design drawings would not allow any opportunity for the IACC to approve the design and layout of the facility. The dDCO requirements would	Minimum provision Please refer to Horizon's response to FWQ4.0.87 regard the inclusion of maximum provision within the DCO Requirements. Content of approved plans Horizon would like to note that the plans that have been submitted for approval for Park and Ride facility [APP-023] show building design, site layout and parking layout (including disabled and staff parking provision), location of electric charging points, external lighting, landscaping, fencing, signage, surface materials (i.e. asphalt), surface water and foul water drainage and utilities. Under Requirement LC2, Horizon would be required to construct the Logistics Centre in accordance with these approved plans. Hours of use are addressed through the Logistics Centre sub-CoCP (Revision 2.0) [REP2-373] Submission of detailed design PR3 Please refer to Horizon's response to FWQ4.0.87 which demonstrates how each of the matters referred to are secured by the design principles in the Design and Access Statement [REP2-029/30].

allow construction of the A5025 offline sections (OH2), the park and ride at Dalar Hir (PR2) and the logistics centre (LC2) on the basis of the detailed design drawings submitted and certified as part of the examination. The IACC has a number of concerns with and objections to the details submitted. While the Council would prefer that details came forward at a later stage for approval allowing the examination to focus on the principle issues, the approach taken in the DCO means that IACC is currently preparing responses on the detailed design of these elements which will be submitted in due course. The IACC considers that given the DCO would consent the detailed design of these elements it is important that these are subject to detailed scrutiny now. The IACC would therefore note at this time that it has objections to the detail of these proposals.

The IACC considers that the list of details for which drawings must be submitted under PR3 should include drainage, lighting, disabled parking spaces and electric vehicle charging points and cycle parking provision.

FWQ4.0.88: PR6 - does not appear to provide a trigger date/activity for the submission of the decommissioning strategy and therefore as currently worded the park and ride facility could potentially be permanently retained. As the park and ride is defined as a temporary facility, how should the requirement be amended to include a trigger for the submission of these details?

Is IACC satisfied with the list of details as to what the decommissioning strategy should include as set out in (2)?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The IACC considers that this should be set out in a fuller phasing strategy. Detailed comments on this point have been made in the IACC's Dalar Hir LIR Chapter. Please note that the IACC objects to the changes made to this requirement at revision to amend the timing of the submission of the restoration plan to 3 months prior to unit 2 commissioning. The handover environmental management plan must include an aftercare plan which includes a minimum aftercare period appropriate to the landscaping and ecological needs of that site for a period of not less than five years; together with an explanation of how this will be undertaken and funded by Horizon.	Horizon notes that Requirement PR6(2) already provides that the decommissioning strategy must include details of the timeframes of decommissioning and removal of the Park and Ride facility. It is not considered appropriate to include the decommissioning of the Park and Ride facility within the Phasing Strategy [APP-447] as this document is focused on the securing and delivery of key mitigation in order to avoid adverse effects of the Wylfa Newydd DCO Project – rather than the removal of this key mitigation at the end of the Project (which is already secured through a DCO Requirement). The revised timeframe for the submission of the decommissioning strategy in Requirement PR6 is a longstop date; this does not prevent Horizon submitting the plan earlier than this date. Horizon is happy to amend the Requirement PR6(2)(e) to refer to a 5 year term for an aftercare plan as part of the Handover Environmental Management Plan in the next version of the draft DCO to be submitted at Deadline 4 (17 January 2019).

FWQ4.0.89: LC3 (4) - explain how the landscaping details for any amended scheme that would be managed by (4) be submitted/approved – should this be a separate requirement? Does IACC have the resource and expertise to undertake this requirement and if not, why not?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The IACC notes that unless the applicant determines to submit amended details including this there is no opportunity for it to consider any scheme beyond the outline submitted as part of the DCO application, the IACC considers that an additional requirement is needed to secure this. IACC has the expertise to undertake the work required but considers that the fees proposed for discharge of requirements are entirely inadequate to resource the officer time needed. Please see detailed submission on this point in the Written Representation at section [8, especially 8.4].	As set out above at FWQ4.0.68, Horizon is also making significant contributions in funding in order to assist IACC in monitoring and discharging under the DCO and ensuring planting is established and maintained for a 5 year period. Please also refer to Horizon's response to section 8.4 of IACC's Written Representation in respect of the fee schedule proposed in Schedule 19 of the draft DCO.

FWQ4.0.90: PR2 requires the submission and approval of the detailed design of the logistics centre. This appears to be the only requirement that provides any control over the design /provision of the logistics centre.

Is IACC satisfied that, with particular reference to drainage (management and control); hours of use of use; external lighting etc, the requirement adequately secures these matters? If not, why not?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	It is assumed that this question is intended to refer to LC2. The IACC consider that LC2 as drafted would not require any submission or approval of detailed design for the logistics centre. No. LC2 would allow the construction of the facility in accordance with the approved drawings without any ability for IACC to consider any of the listed matters. This facility would in effect have a full planning permission under the DCO and such matter therefore need to be considered in this process. The IACC considers that the detail submitted so far is inadequate for that purpose. The dDCO requirements would allow construction of the A5025 offline sections (OH2), the park and ride at Dalar Hir (PR2) and the logistics centre (LC2) on the basis of the detailed design drawings submitted and certified as part of the examination. The IACC has a number of concerns with and objections to the details submitted. While the Council would prefer that details came forward at a later stage for approval allowing the examination to focus on the principle issues, the approach taken in the DCO means that IACC is currently preparing responses on the detailed design of	It is unclear what Requirement this question relates to. Content of approved plans LC2 In respect of IACC's comments on Requirement LC2, the plans that have been submitted for approval for the Logistics Centre [APP-024] show designs for buildings, site layouts, parking areas, external lighting, landscaping, fencing, signage, surface materials (i.e. asphalt), surface water and foul water drainage and utilities. Under Requirement LC2, Horizon would be required to construct the Logistics Centre in accordance with these approved plans. Hours of use are addressed through the Logistics Centre sub-CoCP [REP2-373]. If Horizon chose not to construct in accordance with the approved plans, it would then need to submit detailed plans for approval to IACC in accordance with the parameters and design principles in the Design and Access Statement (Requirement LC3) – which place restrictions on matters such as lighting, drainage and layout.

these elements which will be submitted in due course. The IACC considers that given the DCO would consent the detailed design of these elements it is important that these are subject to detailed scrutiny now. The IACC would therefore note at this time that it has objections to the detail of these proposals.

FWQ4.0.93: LC7 as currently worded appears not to provide a trigger date/activity for the submission of the decommissioning strategy and therefore as currently worded the logistics centre could potentially be permanently retained.

Given this is meant to be a temporary facility can the applicant reword the requirement to include a trigger for the submission of these details?

Is IACC satisfied with the list of details as to what the decommissioning strategy should include as set out in (2)?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The IACC considers that this should be set out in a fuller phasing strategy. Detailed comments on this point have been made in the IACC's Logistics Centre LIR Chapter. The IACC notes that it has no objection in principle to buildings on this site being retained where a further use has been identified but considers this would need to be done in line with the ES assessment or a future planning application.	Horizon notes that Requirement LC7(2) already provides that the decommissioning strategy must include details of the timeframes of decommissioning and removal of the Logistics Centre. It is not considered appropriate to include the decommissioning of the Logistics Centre within the Phasing Strategy [APP-447] as this document is focused on the securing and delivery of key mitigation in order to avoid adverse effects of the Wylfa Newydd DCO Project – rather than the removal of this key mitigation at the end of the Project (which is already secured through a DCO Requirement). Horizon notes that, as part of the Deadline 2 update to the draft DCO (Revision 2.0) [REP1-005], it included a new paragraph (5) to provide that a decommissioning strategy would not be required where IACC had granted or resolved to grant the ongoing use or redevelopment of the Logistics Centre.

FWQ4.0.95: OH8 (2) should lighting be included in this list?

(4) Does IACC have the resource and expertise to undertake this requirement and if not, why not?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	IACC notes that lighting has been added at revision 2 and agrees with this addition. IACC has the expertise to undertake the work required but considers that the fees proposed for discharge of requirements are entirely inadequate to resource the officer time needed. Please see detailed submission on this point in the Written Representation at section [8, especially 8.4].	Please refer to Horizon's response to section 8 of IACC's Written Representation in respect of the proposed fees in Schedule 19. As set out above at FWQ4.0.68 , Horizon is also making significant funding contributions in order to assist IACC in monitoring and discharging under the DCO.

FWQ4.0.96: OH9 (1) and OH10 (1) should this read 'prior to completion'?

Is this the right trigger for the submission of these details or should the information be submitted at the same time as the details for work No 8?

Given that the works relate to a water vole enhancement area would they require clearance from NRW as well as IACC?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	IACC do not consider 'prior to completion' to be the appropriate trigger for submission of these details. IACC consider 'prior to commencement of the relevant activity' would be a more appropriate trigger. Providing enhancement after construction could result in double disturbance by then doing works in areas which species have relocated to. IACC advise that the works should be approved by IACC in consultation with NRW.	Please refer to Horizon's response to paragraph 7.6.3 of IACC's Written Representation in respect of the appropriateness of the trigger for submission. The need for NRW to be a consultee has also been raised by NRW in paragraph 2.7 of its Written Representation. Horizon is happy to amend Requirements OH9 and OH10 so it is clear that details will be approved by IACC in consultation with NRW.

FWQ4.0.96: OH9 (1) and OH10 (1) should this read 'prior to completion'? Is this the right trigger for the submission of these details or should the information be submitted at the same time as the details for work No 8? Given that the works relate to a water vole enhancement area would they require clearance from NRW as well as IACC?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	NRW do not consider 'prior to completion' to be the appropriate trigger for submission of these details. NRW consider that 'prior to commencement of the relevant activity' would be a more appropriate trigger. This follows the precedented approach in relation to protected species (e.g. Requirement 7 in the recent A19/A184 Testo's Junction Alteration Development Consent Order 2018). NRW advise that the works should be approved by IACC in consultation with NRW. The works may also be subject to a Conservation Licence from NRW under the Wildlife and Countryside Act 1981. The need for such a licence should be made clear in the DCO.	Horizon would be happy to amend Requirements ECS2 and ECS3 to provide that IACC may consult with NRW in determining whether to approve the plans and details of the design of the water vole enhancement areas. This amendment will be included in the updated draft DCO to be submitted for Deadline 4 (17 January 2019). To the extent that any conservation licences are required from NRW under the Wildlife and Countryside Act 1981, these will be obtained.

FWQ4.0.97: ECS2 (1) given the works relate to ecological compensation sites would they require clearance from NRW as well as IACC? Are the IACC and NRW satisfied with the list contained within (2)?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	NRW advise that ECS2 should be approved by IACC in consultation with NRW. Parts of the fen restoration works will be undertaken on Caeau Talwrn SSSI. Insofar as the works would be carried out under a DCO which confers statutory powers upon the developer (and the detailed approval is delegated to IACC) it is deemed to override section 28E of the Wildlife & Countryside Act 1981 with regard to operations on or affecting, Caeau Talwrn SSSI. No SSSI consent is then required. However, as a statutory body, the determining authority would be required to consult NRW under section 28I of the Wildlife and Countryside Act 1981 (as amended) and obtain NRW's advice on the detail of design and implementation. We advise that NRW's advice and expertise is utilised in this regard, with details approved by the discharging authority in consultation with NRW. NRW is satisfied with the list included in ECS2.	Horizon would be happy to amend Requirements ECS2 and ECS3 to provide that IACC may consult with NRW in determining whether to approve the plans and details of the design and management of the Ecological Compensation Sites. This amendment will be included in the updated draft DCO to be submitted for Deadline 4 (17 January 2019).

FWQ4.0.99: ECS4 are the IACC and NRW satisfied with the list contained within (1) and do the works require clearance from NRW as well as the IACC?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	Subsection (1) of ECS 4 states that <i>"no construction of the Ecological Compensation Sites at Cae Canol-dydd or Cors Gwawr may commence until hydrological and hydrogeological monitoring has been undertaken comprising—</i> <i>(a) ground investigations to identify soils and geology of the sites; and; (b) hydrological monitoring comprising installation of boreholes, piezometers, surface water monitoring and any other relevant installations"</i>. NRW advise that the list in subsection (1) should also include hydrochemical monitoring (particularly nutrient and base status). We also advise that sufficient hydrological and hydrogeological baseline data should be collated and used to produce a hydrogeological/ecological conceptual model (which should be approved in consultation with NRW). The design for the fen creation should be based on the agreed conceptual site model. The works to undertake hydrological and hydrogeological investigations have already received consent from NRW where they are located within SSSI. Any harvesting of seed or green-hay material from the SSSI for inoculation of Ecological Compensation Sites could require consent.	Horizon is happy to amend Requirement ECS4 to: • Include hydrochemical monitoring (particularly nutrient and base status) in the list of matters in paragraph (1). • Include a new paragraph which requires Horizon to submit to IACC, in consultation with NRW, hydrogeological/ecological conceptual model based on sufficient hydrological and hydrogeological baseline data which would inform the design of fen habitat. • Provide that IACC may consult with NRW in determining whether to approve the plans and written details for the design of the drainage works at Cae Canol-dydd and Cors Gwawr (paragraph (3)). These amendments will be incorporated into the updated draft DCO to be submitted at Deadline 4 (17 January 2019).

	NRW advise that ECS4 should be approved by IACC in consultation with NRW. As stated in its Written Representation, NRW would request a consultative role in relation to this Requirement and the DCO should be amended to provide this.	

FWQ4.0.100: Schedule 17 (Article 75) is the local planning authority content with the list of Important Hedgerows to be removed?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	IACC has reviewed Schedule 17 and provided a Schedule of Corrections – See Appendix 1A and Appendix 1B.	Horizon will make the necessary amendments to Schedule 17 in the next update of the draft DCO at Deadline 4 (17 January 2019).

FWQ4.0.102: Schedule 18 (Article 79): Comment on the procedures; timescales; categorisation of scale of development and fees proposed in relation to the appeals procedure proposed in Schedule 18 (Article 79). Are the proposals reasonable and proportionate and would they be adequately resourced?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	No, the IACC does not consider that the process proposed in schedule 18 (now 19) is appropriate. The IACC has made detailed submissions on this in its Written Representation at section [8].	Please refer to Horizon's response to section 8 of IACC's Written Representation submitted at Deadline 2 in respect of Schedule 19.

FWQ4.0.102: Schedule 18 (Article 79): Comment on the procedures; timescales; categorisation of scale of development and fees proposed in relation to the appeals procedure proposed in Schedule 18 (Article 79). Are the proposals reasonable and proportionate and would they be adequately resourced?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	NRW is working with IACC, Welsh Government and HNP to consider whether the Applicant's proposal that NRW Permitting Service acts as the discharging authority for any requirements relating to land below the mean high water springs and the marine works is acceptable and if so, how the proposal could be practically implemented. This will include consideration of the procedures; timescales; categorisation of scale of development and fees in relation to the appeals procedure proposed in Schedule 18 (Article 79). NRW aims to reach agreement between parties and provide comments in good time for consideration during the Examination. See comments 2.1 - 2.4 in NRW's Written Representations.	Please refer to Horizon's response to paragraphs 2.1 to 2.4 of NRW's Written Representation in respect of issues raised on Schedule 18 (now 19) of the draft DCO (Revision 2.0) [REP1-005]

FWQ4.0.103: Schedule 19 Part 1 (Article 80) proposes exclusion, modifications, etc. to Public General Legislation.		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The disapplication of the above means that the IACC, as Local Highway Authority, cannot effectively and safely manage the public road network. IACC are willing and able to enter into agreements, or issue the necessary licenses (if applicable) to facilitate the works to the public highway in a manner which respects the Highway Authority's need to maintain control of the public highway network and to manage occupation of the carriageway it in the interests of public safety and effective traffic management. The CoCPs lack the necessary detail to provide any control of these matters and do not provide the reassurance which would be required to allow the IACC to be comfortable that these powers would be used in an appropriate and proportionate manner. The IACC would be happy to agree to disapplication of s141 for planting carried out in accordance with an approved landscaping plan, but not as general power. The IACC is not aware of where there would be any need or intention to erect scaffolding over the highway or to erect hoarding adjacent to the highway for this project and why that is necessary. It is considered Horizon should explain why and where they think they would need such a power.	Disapplication of the highways legislation is a standard approach taken in granted DCOs and is necessary to enable Horizon to undertake the necessary works within the highway. Horizon notes that it is seeking to agree protective provisions for IACC in order to ensure protection for the wider roading network and for IACC's rights as the highway and streets authority. As noted in above in response to FWQ4.0.57, Horizon is also intending to submit updated Wylfa Newydd CoCP, sub-CoCPs and CoOP at Deadline 4 (17 January 2019) which will respond to concerns raised regarding the content of these documents. Disapplication of Highways Act 1980 Horizon considers that the disapplication of section 141 of the Highways Act 1980 is appropriate; however, notes that, in any event, detailed landscaping plans for the Off-Line Highway Improvement Works have been submitted for approval which shows the anticipated planting in and around the proposed carriageway. Horizon does not intend to erect scaffolding over the highway or to erect hoarding adjacent to the highway and so will not seek to disapply section 169 (control of scaffolding on highways) of the Highways Act 1980. Where Horizon does not seek to construct in accordance with the approved plans, detailed landscaping designs need to be submitted to IACC for approval, and so planting would have to be undertaken in accordance with an approved landscaping plan. Disapplication of the New Roads and Streets Act 1991 Please refer to Horizon's response to FWQ4.0.105 as to why specific sections of the New Roads and Streets Act 1991 have been disapplied. Horizon notes that the disapplication follows precedent Orders and that IACC will have protective provisions under the DCO to enable coordination and safeguarding of the wider roading network. Extension of section 106 of the Town and Country Planning Act 1990 Paragraph 5(2) of Schedule 20 states that for the purposes of section 106 of the Town and country Planning Act 1990, the undertaker must be deemed as a person interested in the Order Land and that

The IACC has no objection to the exclusion from CIL as there is no CIL schedule in place but can make no comment on the legality of such an approach at this time.

These Sections of the 1991 Act relate to a wide range of highway matters such as Traffic Management, workmanship and reinstatement and works affecting a bridge structure.

The disapplication of these appears excessive and unreasonable, and means that the IACC, as Local Highway Authority, cannot effectively and safely manage the public road network, co-ordinate roadworks as it is required to do by statute or effectively plan its own maintenance programmes. The IACC seeks to maintain control of the public highway network and to manage occupation of the carriageway in the interests of public safety and effective traffic management.

No discussions have been held with the IACC as to the justification for the disapplication of such Sections of the 1991 Act.

Yes, the IACC is content for this provision to apply.

No, the IACC seeks an explanation from Horizon of the legal basis of this proposal and how they consider it to be lawful.

The IACC has no objection to the applicant's proposed application of section 239 of the Town and Country Planning Act 1990.

The IACC considers that the CoCPs are insufficiently detailed and precise to fulfil

section 106(3)(a) (which relates to enforceability of obligations) will include any transferee who is transferred the benefit of the Order under article 9.

This clause has been inserted to ensure that:

- Horizon can enter into a section 106 agreement in respect of the Order Land, even though it may not have a legal interest in all the land affected.
- Any transferee of the Order will effectively "step into" the shoes of Horizon in the event that Horizon transfers the benefit of the DCO under article 9. This will ensure that the section 106 obligations can be enforced against a transferee.

	this purpose and objects to the inclusion of paragraph 6. IACC accepts that s42 would introduce uncertainty to the project. The IACC is content to accept this provision.	

FWQ4.0.107: [RR-021] questions the ability of DCO Requirements to ensure high levels of site campus occupancy and thus, reduce pressures on other areas.

Would the draft DCO ensure high levels of campus occupancy and why?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
GCC	A: The DCO requirements for the site campus are set out within the Development Consent Order Schedule 3 WN17 to 23 (REP1-005). The requirements do not provide any control mechanism to ensure high levels of occupancy. Requirement PW2 Phasing Strategy requires that the delivery of key mitigations (which include the site campus) be undertaken in accordance with the frequency as set out within the document APP-447. The Phasing Strategy (APP-447) establishes the date by which the construction of the campus should be completed (Q1 Year 5) but does not identify the extent to which its construction and occupancy might be phased. The Workforce Accommodation Management Strategy (APP-412) does reference an intention to ensure a high degree of occupancy in the site campus (paragraph 9.6.1) but there is no quantification as to what this occupancy level might be. The same paragraph also states that the WAMs will be secured through planning obligations. Gwynedd Council notes that the WAMS is not referenced with the Development Consent Order and is not a certified document, therefore there is no means within the Development Consent Order to ensure high levels of campus occupancy. Whilst there is very limited discussion within the	Phasing In the updated Phasing Strategy to be submitted at Deadline 4 (17 January 2019), Horizon has proposed the following phasing for the Site Campus: • Phase 1 to deliver first 1,000 beds on or before Q8 post DCO grant; • Phase 2 to deliver 1,500 beds on or before Q15 (so that the total count of beds will be 2,500); and • Phase 3 to deliver final 1,500 beds on or before Q18 (so that the total count of beds will be 4,000). This will ensure that the Site Campus is operational well before peak construction as all three phases will be delivered by Q2 Year 5 (at the latest). Peak construction (in terms of workforce numbers reaching 9,000) is anticipated to occur in Q4 Year 7 (refer to Figure C1-4 in Chapter C1 - Socio-economics of the Environmental Statement [APP-088]. Please also refer to Horizon's response to the Local Impact Report on this point. Occupancy Gwynedd Council has requested a commitment from Horizon to an agreed level of occupancy. Gwynedd Council notes that without an ability to understand and ultimately control the phased construction and occupation of the campus and agree a minimum level of occupancy there is a risk that the site campus will not provide the mitigation required. In response to FWQ4.0.107, Horizon stated that the Workforce Accommodation Strategy sets out Horizon's commitment to maintaining high levels of occupancy in the Site Campus. The key driver for seeking to ensure a high occupancy of the Site Campus is to ensure that Horizon remains within its Environmental Statement, 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.

Planning Statement (Proposed Heads of Terms for the DCO Planning Obligation, Section 7.4) as to what accommodation mitigations might form part of the S106 obligation Gwynedd Council has not seen the draft obligation. It therefore has had no opportunity to comment upon the extent to which the measures contained within it might act as mitigations for impacts upon the local housing market and specifically it has not been able to discuss and agree occupancy levels.

Gwynedd Council requires a commitment from Horizon to an agreed level of occupancy. The site campus is promoted as a means of mitigating impacts yet without an ability to understand to ultimately control the phased construction and occupation of the campus and agree a minimum level of occupancy there is a risk that it will not provide the mitigation required by the Gwynedd Council.

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.

Further details are provided in Horizon's response to the Local Impact Report submitted at Deadline 3 (18 December 2018).

S106

The proposed draft DCO s.106 agreement has been discussed with IACC. Schedule 5 of the proposed draft DCO s.106 agreement highlights the range of measures that will, in addition to the Site Campus, be provided in relation to workforce accommodation including the terms of reference of the Workforce Accommodation Management Strategy and the delivery of the Worker Accommodation Portal.

Further details are provided in Horizon's response to the Local Impact Report.

FWQ4.0.107: [RR-021] questions the ability of DCO Requirements to ensure high levels of site campus occupancy and thus, reduce pressures on other areas. Would the draft DCO ensure high levels of campus occupancy and why?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Question
IACC	No, there is no mechanism in the DCO to ensure that the site campus is fully delivered or that it is occupied at all. The IACC has expanded on these points in the Site Campus Chapter of the LIR. The IACC considers it necessary that the completion of the site campus is delivered earlier (i.e. 4,000 bed spaces), maintained throughout the build and that the accommodation and facilities are not just suitable for but attractive to workers so that the occupancy is kept high through demand. To ensure this the design and quality of accommodation as well as pricing must be developed to ensure that this facility is preferred option by the requisite number of workers.	Phasing Please refer to Horizon's response above to GCC on this Question. Occupancy IACC has also requested a commitment from Horizon to an agreed level of occupancy. In their response to 'Would the draft DCO ensure high levels of campus occupancy and why?,' IACC states that it considers it necessary that the completion of the site campus is delivered earlier (i.e. 4,000 bed spaces), maintained throughout the build and that the accommodation and facilities are not just suitable for, but attractive to workers so that the occupancy is kept high through demand. Please refer to Horizon's response above to GCC on this Question.

FWQ4.0.107: [RR-021] questions the ability of DCO Requirements to ensure high levels of site campus occupancy and thus, reduce pressures on other areas.

Would the draft DCO ensure high levels of campus occupancy and why?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
WG	As currently drafted the DCO only commits to delivering the first phase of 1,000 bedspaces. There is no commitment to deliver all 4,000 bedspaces, and no detail or commitment as to the measures that would be employed to ensure high occupancy. Welsh Government's Written Rep (Paragraphs 12.4.5 – 12.4.7) sets out our concerns on this matter. This is a significant concern for WG because the applicant's assessment of impacts in relation to matters such as housing, transport and tourism were predicated on and rely on a high level of occupancy of the on site campus. If not achieved, impacts will be significantly greater than those assessed. Amendments are required so that the DCO secures a combination of requirement and S106 the necessary provisions that commits Horizon to ensure that a) all 4,000 units are constructed, and b) high occupancy is maintained throughout the construction period.	As noted in response to section 7.2 of the IACC's Written Representation, Horizon will update the Phasing Strategy to include phased triggers for the delivery of 4,000 bed spaces on the Site Campus. This will ensure that Phase 1 of the Site Campus, to deliver the first 1000 bed spaces, is fully operational before the number of non-home based workers exceeds 3,000 in the community (as assessed in the Environmental Statement). This will be on or before Q8 following DCO grant. In respect of occupancy, please refer to Horizon's response above to GCC on this Question and why a requirement is not considered necessary.

FWQ4.0.111: Section 7.4 of the Planning Statement [APP- 406] deals with Planning obligations and outlines the proposed heads of terms. Please set out how the proposals would meet with the tests for planning obligations. Can you confirm whether document 3.4 Draft Heads of Terms for Planning Obligations referred to in the Guide to the Application [APP-004] and in the Mitigation Route Map [APP-422] has been submitted or is intended to be submitted? If it has not been submitted or is not intended to be submitted can you confirm whether Section 7 of the Planning Statement [APP- 406] is the relevant document regarding the draft Heads of Terms and if this is correct can the application documentation be amended to correct the references to document 3.4?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The IACC considers that it is unable to answer this question on the basis of the heads of terms as they are too undefined to allow meaningful consideration. The section 106 and the definition of those terms is however progressing. The IACC has provided detailed comments on the section 106 at this stage in its Written Representation at section [10]. The IACC suggests that this point is revisited once the draft section 106 is further advanced as that drafting includes consideration of this point and a joint submission with other parties on it is likely to be achievable at a later stage.	The Development Consent Order Section 106 Agreement Status Note [REP1-010] was submitted at Deadline 1 (13 November 2018). Please also refer to Horizon's response to FWQ4.0.111 submitted at Deadline 1 (13 November 2018) which sets out how the planning obligations meet the statutory tests and this remains to be relevant and up-to-date.

FWQ4.0.111: Section 7.4 of the Planning Statement [APP-406] deals with Planning obligations and outlines the proposed heads of terms. Please set out how the proposals would meet with the tests for planning obligations.

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	NRW would defer to Welsh Government as the appropriate body to comment on how the proposals meet the tests for planning obligations in Wales. We refer to NRW's advice on planning obligations in section 3 of its Written Representations.	The Draft DCO s.106 [REP1-010] was submitted at Deadline 2 (4 December 2018). Please refer to Horizon's response to FWQ4.0.111 (also submitted at Deadline 2) which sets out how Horizon considers that the planning obligations meet the statutory tests and this remains to be relevant and up-to-date. Please also refer to Horizon's response to NRW's Written Representation including 'section 3 planning obligations' which has been submitted at Deadline 3 (18 December 2018).

FWQ4.0.114: A Programme Board would be responsible for setting and reviewing the monitoring programme and having an oversight of the funding from the Section 106. Can further details be provided as to how this would work in particular what process/mechanism would be put in place in the event of a dispute?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
BCUHB	Health Board and other public sector organisations were briefed by Horizon on 27.11.2018 on draft proposal for this Board. Further information is required on the governance and chairing arrangements etc.	Horizon's position on the WNMPOP (being the working title for the re-named programme board) is set out in its response to the Examining Authorities first written question FWQ4.0.114 submitted at Deadline 2 (4 December 2018) [REP2-002] and IACC's Written Representation, submitted at Deadline 3 (18 December 2018). Furthermore, Schedule 16 of the draft DCO s.106 agreement submitted at Deadline 3 (18 December 2018) details the WNMPOP operation and terms of reference and release and reporting of contingency funds.

FWQ4.0.114: A Programme Board would be responsible for setting and reviewing the monitoring programme and having an oversight of the funding from the Section 106. Can further details be provided as to how this would work in particular what process/mechanism would be put in place in the event of a dispute?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NWP	NWP has not been party to the discussion around the structure, governance or membership of the programme board and sub groups. NWP has raised concerns regarding membership and the lack of detail or consultation particularly with regard to governance and mechanisms including dispute resolution and decision processes through the Team Wales group* . NWP would welcome detailed discussions on the topic but at present do not feel, with the limited information available, that the structure is suitable to meet our needs to ensure that the impacts are adequately managed. * Team Wales Group – attendees include IACC, WAG, Gwynedd Council, Conwy Council, BCHUB, NWFRS, WAST, NWP, Public Health W.	Horizon's position on the WNMPOP (being the working title for the re-named programme board) is set out in its response to FWQ4.0.114 at Deadline 2 (4 December 2018) and its response to IACC's Written Representation, submitted at Deadline 3 (18 December 2018). In respect to North Wales Police (NWP), Horizon note the following points: It is not proposed that NWP sit on the WNMPOP. Although, it is proposed that the Welsh Government do. The WNMPOP terms of reference confirm that NWP and the emergency services would be invited to relevant WNMPOP meetings. Critically, the NWP are proposed to be part of the emergency services sub-group which would: • Work with Horizon to inform the preparation of the Community Safety Management Strategy (CSMS); • Monitor the implementation of the CSMS; • Review and input into reports from the Accommodation and Tourism sub group in relation to emergency services matters, in response to requests from that group; • Review and input into reports from the Community Involvement Officer in relation to emergency services matters; • Review any actual or potential community tension arising from the project; • Feed back to the Panel community comments and concerns not captured through the monitoring process; • Feed back to the Panel issues as seen from the stakeholder's area of expertise; • Feed back to the Panel any issues related to the implementation of the Worker Management Strategy, insofar as it effects the emergency services including implications in relation to its enforcement would have sub-group.

		There are no proposed contingency funds for NWP; Horizon is intensively reviewing the information provided by NWP so that it can engage to develop agreed contributions at appropriate trigger points. As such the WNMPOP's proposed role in allocation of contingency funds under the agreement is not directly relevant to NWP. Horizon is happy to discuss the WNMPOP in meetings with NWP.

FWQ5.0.2: In paras 4.3.1 and 4.3.2 of its RR [RR-088] NRW, and RSPB in its RR [RR084] consider that adverse effects on the Anglesey SPA cannot be ruled out due to noise, vibration and visual disturbance. Can NRW and RSPB explain why?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	NRW does not consider that the evidence and mitigation presented in the Shadow HRA demonstrates that disturbance associated with the construction activities will not have adverse effects on the sandwich, arctic and common tern populations at the Cemlyn colony. We refer you to section 7.8 of NRW's Written Representations.	Please refer to Horizon's response to NRW's Written Representation, where these issues are dealt with in detail.

FWQ5.0.2: In paras 4.3.1 and 4.3.2 of its RR [RR-088] NRW, and RSPB in its RR [RR-084] consider that adverse effects on the Anglesey SPA cannot be ruled out due to noise, vibration and visual disturbance. Can NRW and RSPB explain why?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NWWT	NWWT agree with the joint response provided by the RSPB on this matter and the cross referencing to the eNGO written representation.	Please refer to Horizon's response to the RSPB's response to FWQ5.0.2 (with which the NWWT agree). and Horizon's response to the eNGO's joint Written Representation 'Biodiversity – Cemlyn Nature Reserve' submitted at Deadline 3 (18 December 2018). Horizon's responses provide details as to why it believes adverse effects on the Anglesey Terns SPA due to noise, vibration and visual disturbance can be ruled out with confidence.

FWQ5.0.2: In paras 4.3.1 and 4.3.2 of its RR [RR-088] NRW, and RSPB in its RR [RR-084] consider that adverse effects on the Anglesey SPA cannot be ruled out due to noise, vibration and visual disturbance. Can NRW and RSPB explain why?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
RSPB	The RSPB does not consider it possible to definitively conclude that there will be no adverse effects on the Anglesey Terns SPA from the evidence and mitigation plans presented by Horizon, due to the following concerns. - The survey work conducted by Horizon has been insufficient to demonstrate with any degree of scientific certainty how the birds will respond to the levels of disturbance that will occur as a result of the development. - The literature reviewed (and indeed our knowledge of the wider scientific literature) shows that, whilst there is evidence that terns do respond to disturbance in some circumstances (and do not respond in others), there is currently limited scientific understanding of the levels of noise and visual disturbance that terns respond to and certainly not enough to allow us to predict the effect of the levels of visual and noise disturbance that will be caused by the development on the tern populations. - Some types of effects of disturbance on terns have not been considered at all in the assessment, even though they are very likely to occur. For example, there is no modelling of the energetic consequences to terns of flying around the disturbed areas on their regular flights between the	Please also refer to Horizon's response to the eNGO Written Representation – Biodiversity Cemlyn Nature Reserve, submitted at Deadline 3 (18 December 2018). Horizon do not agree with the conclusions reached by the RSPB in relation to adverse effects on the Anglesey Terns SPA and, in response to the specific points that are raised, provide the following comments. The site-specific survey work undertaken by Horizon provides critically important data on terns breeding at the Cemlyn Bay colony, both in terms of understanding their behaviour and responses when at the colony and their commuting routes and foraging areas in the offshore environment. The baseline disturbance surveys provide data on the response of terns at the colony to potential noise and visual disturbance, as well as on the frequency of 'fly up' responses under baseline conditions. When used in conjunction with the available evidence from the scientific literature, these survey data enable a high level of confidence in the assessment of the response of terns at the colony to potential noise and visual disturbance. The boat-based surveys (including the tracking of terns) define the main offshore areas used by the terns for foraging and establish the commuting routes between these foraging areas and the colony. This information enables assessment to be made of the potential loss of foraging resource and of the potential additional energy expenditure that would result under highly precautionary assumptions concerning avoidance of ZOIs for noise and visual disturbance in the offshore environment. Horizon considers that the available evidence from the scientific literature is sufficient to support the conclusions of the assessment included in the Shadow HRA [APP-050] in relation to the potential effects of noise and visual disturbance. However, it is important to note that the assessment conclusions are not solely based on this evidence but instead are based on the combination of the evidence from the scientific literature with that derived from the site-specific surveys. Horizon emphasise the importance of considering this evidence-base in its entirety. It is unclear exactly which types of disturbance effects on terns have not been considered in the assessment included in the Shadow HRA and Horizon would wish to seek more clarity on this point from RSPB. In terms of modelling the energetic consequences of circumventing the disturbance ZOIs

colony and foraging areas, nor how this increased energy expenditure might impact on reproductive success, survival rates or changes to the population size in the short- or long-term.

- Where there is significant uncertainty (as in this case) the Precautionary Principle should apply, but Horizon's impact assessment has taken the opposite approach and applied a very optimistic interpretation of the evidence to reach their conclusion of no adverse effect on integrity.

A detailed review of the effects of noise and visual disturbance on the SPA terns is presented in the joint eNGOs' written representation 'Biodiversity – Cemlyn Nature Reserve', submitted for Deadline 2 (see Chapter 3, paragraphs 3.3-3.145).

when commuting between the colony and foraging areas (work that has been undertaken), the estimated additional energetic costs are small (even under precautionary assumptions) and further modelling is not considered to be required. Given this, adverse effects on reproductive rates, survival rates and changes in population size are not predicted.

Horizon considers that the precautionary principle has been applied throughout the assessment of effects on the Anglesey Terns SPA. Examples of precaution within the assessment include:

- Noise modelling being based upon all plant being located at the closest point of the construction zone to the colony (for non-impulsive noise), all plant being operational 100% of the time, no correction for barriers or screening and no account of sound attenuation due to factors such as reflection of sound waves, terrain effects and atmospheric absorption.
- Establishing thresholds for the predicted maximum noise levels at the colony from construction activities which are considerably below those at which 'fly up' responses by the terns are expected to occur.
- Assuming complete avoidance by commuting and foraging terns of the offshore Project ZOIs.

FWQ5.0.3: What is NRW and RSPB's views on the effectiveness of the monitoring proposals described in paragraphs 10.3.43 – 10.3.53 of the Shadow HRA [APP-050]?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	NRW has significant concerns on the effectiveness and deliverability of the mitigation proposed in paragraphs 10.3.43 - 10.3.53 of the Shadow HRA. We refer you to comments in 7.8.31 in NRW's Written Representations.	Please refer to Horizon's response to NRW's Written Representation submitted at Deadline 3, where these issues are dealt with in detail.

FWQ5.0.3: What is NRW and RSPB's views on the effectiveness of the monitoring proposals described in paragraphs 10.3.43 – 10.3.53 of the Shadow HRA [APP-050]?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NWWT	NWWT agree with the joint response provided by the RSPB on this matter and the cross referencing to the eNGO written representation.	Horizon has prepared a response to the RSPB's response to FWQ5.0.3 (with which the NWWT agree). Please refer to this response and to Horizon's response to the eNGO Written Representation – Biodiversity Cemlyn Nature Reserve, which discusses the effectiveness and deliverability of the mitigation proposed by Horizon in relation to potential noise disturbance from construction activities to terns breeding at the Cemlyn Bay colony In this regard, it should be noted that Horizon has not proposed this mitigation as a result of predicted disturbance to terns, but rather to ensure that noise levels at the colony from construction works (including blasts) remain below those considered likely to elicit flight responses by the terns at the Cemlyn Bay colony. However, following further discussions between Horizon and NRW regarding the proposed mitigation, the mitigation measures proposed for noise disturbance at the colony have been revised. Details of the measures that are proposed to control, constrain and monitor noise levels (including from blasting) are detailed in the <i>Technical Note indicating how Horizon would meet committed noise levels</i>, submitted at Deadline 3. Horizon intends to make the amendments to relevant sub-CoCP documents [APP-415 and APP-416] at Deadline 4, but has provided them at this stage so they are available for the issue specific hearings in early January. Horizon believes that this approach to monitoring and mitigation is deliverable (it has been discussed and agreed with the Contractor) and will be effective (especially given that no adverse effects are predicted in the absence of the approach).

FWQ5.0.3: What is NRW and RSPB's views on the effectiveness of the monitoring proposals described in paragraphs 10.3.43 – 10.3.53 of the Shadow HRA [APP-050]?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
RSPB	A monitoring protocol is essential to establish how the SPA terns are responding to construction noise, and allow further controls to be put in place in order to protect them. However, the RSPB considers that the proposed monitoring to address impacts of construction disturbance is unlikely to be implementable or effective. We have the following concerns: 1. The proposed noise thresholds and management protocols are not considered reliable. For example: - The noise threshold is based on a coarse response from a proxy species (black-headed gull) that is not considered representative. - It is proposed that the threshold may be raised based on the ambient noise of the colony itself, which may lead to increased noise disturbance when the terns are already exhibiting a disturbance response. - Management protocols are likely to be difficult to apply and/or deliver quickly enough to safeguard the colony (see point 4). 2. The adoption of a four-week 'establishment period' (to allow for the sensitivity of terns arriving and establishing their nesting colony (as	A 'monitoring protocol' for the Cemlyn colony terns and construction noise has been proposed by Horizon and the details are set out in the <i>Technical Note indicating how Horizon would meet committed noise levels</i>, submitted at Deadline 3. Horizon intends to make the amendments to relevant sub-CoCP [APP-415 and APP-416] documents at Deadline 4, but has provided them at this stage so they are available for the issue specific hearings in early January. Horizon believe that this approach to monitoring and mitigation is deliverable (it has been discussed and agreed with Horizon's Contractors) and will be effective (especially given that no adverse effects are predicted in the absence of the approach). Specifically, in response to point 1 (first sub-bullet), Horizon's position is that the development of a noise threshold is much more considered than implied by the RSPB. It is not solely based a coarse response from a species that is not representative of the colony. The noise threshold proposed is based upon data collected from the site-specific baseline disturbance surveys undertaken on the response of terns to noise disturbance, together with available evidence from the scientific literature on the responses of tern species and wintering waterbirds to noise disturbance. The data on the response of roosting black-headed gulls at Cemlyn Bay to the trial blasts is used to augment the above evidence-base, but it does not provide the main evidence source and it is certainly not the case that the noise threshold is based upon the response of a proxy species. Horizon's disturbance monitoring is considered to be representative of the colony and the black-headed gull does have relevance. With regard to item 1 (second sub-bullet), it is important to note that it is the ambient noise <u>at</u> the colony which is important in this respect, as opposed to the ambient noise <u>of</u> the colony. It is of course possible (and in many circumstances likely) that the ambient noise at the colony will be governed by the activity of the terns at the colony, but other facts (e.g. noise from wind and sea) will also be relevant. As demonstrated by the baseline disturbance survey, 'fly up' responses by the terns usually extend over periods of 35 to 45 seconds. Therefore, whilst ambient noise at the colony is likely to be increased during disturbance responses by the terns, this will be for a short period only and should not affect the derivation of the noise threshold. Also, in the event that terns show a disturbance response over a prolonged period (rather than just causing an elevation in ambient noise), then the reactive response protocol would be initiated, suggesting that this concern is not valid.

defined in 1.1.33 of Shadow HRA [APP-050] and the Mitigation Route Map [EN010007]) is considered too limited. It does not capture the establishment of the black-headed gull colony (an important sympatric species) in March. Nor does it cover the full breeding season for the common, Arctic or roseate terns, as it does not accommodate the natural seasonal variability of tern arrival and nesting, or potential late arrival of terns to breed at the colony (as seen this year with the arrival of additional breeding Sandwich terns in mid-June, which bred successfully at Cemlyn following a failed breeding attempt elsewhere). The whole of the breeding season 7th March – 15th August should instead be used.

3. The reactive monitoring relies on a proposed threshold of 'fly-ups' per hour, which is considered unsafe. In practical terms, we do not believe it will be possible to ascribe fly-up responses to construction noise as opposed to other disturbance factors (such as a bird of prey flying overhead). The proposed threshold is also set at a higher hourly rate than resulted in colony collapse in 2017.

4. The reactive monitoring is intended to initiate a review/response of construction operations. However, we consider that, in reality it will be difficult to adjust/apply to the salient work operations within an adequate period in order to minimise disturbance to the terns. Aside from the problem of

In response to item 2, it is important to bear in mind that this refers to the establishment of the tern colony itself in any year (and not necessarily to the establishment of individual species at the colony). This is on the basis that it is the initial period of the colony establishment that is the 'vulnerable' period and that once the colony is established and substantive numbers of birds are engaged in breeding activities, then this period of higher 'vulnerability' will have passed. Furthermore, if the 'establishment period' was to be extended even to an eight-week period (as sought by NRW), the duration of the earthworks would extend by between 6 weeks (if the works occur during the summer months of the year) to 4.5 months (if the displaced works are affected by reduced winter productivity) over three breeding seasons. The cost of this to the Project would be at least £37 million and up to £100 million (based on additional monthly Project running costs for the supply chain and overhead costs, but not allowing for construction risks, the cost of delayed revenue or additional financing costs). Therefore, the true costs are likely to be higher. If the 'establishment period' was to be extended for the duration of the breeding seasons, the Project need and objectives cannot be met (i.e. the project schedule would be increased by 16 to 24 months and the 2025 operational target could not be achieved).

With regard to items 3 and 4, the mitigation proposals for tern disturbance have been modified and no longer rely on a particular number of 'fly ups' per hour in order for the reactive monitoring protocol to be initiated; rather it will be initiated once disturbance is observed and is determined (by the observers) to be associated with Project activities. The revised proposals will be submitted into the Examination at Deadline 3 (18 December 2018) and updated in the Main Power Station Site sub-CoCP for Deadline 4 (17 January 2018).

As a point of (important) detail, Horizon disagrees with the final sentence on item 3. It is not reasonable to suggest that 'fly-ups', of whatever frequency, resulted in colony collapse on 2017. It is known that the main cause of collapse was heavy predation by otter which, while inevitably causing fly-ups or more significant reactions (e.g. dreads) when the otters were present in the colony, cannot be compared with normal fly-up behaviour. The predation was largely nocturnal or crepuscular in timing. The measured 'fly up' rate was derived from diurnal surveys, and so was not directly affected by the otter predation activities. That is, the fly-up rate recorded and the colony collapse in 2017 were not related.

assigning fly-ups to construction disturbance rather than other environmental factors, it will be almost impossible to identify the source of the construction disturbance, as it may not necessarily be either the nearest or the highest decibel activity.

A detailed review of the efficacy of the noise and behavioural monitoring of the breeding SPA terns is presented in the joint eNGOs' written representation 'Biodiversity – Cemlyn Nature Reserve', submitted for Deadline 2 (see Chapter 3, paragraphs 3.32 – 3.73).

FWQ5.0.11 Can NRW and RSPB confirm that they agree that the seabird survey described in the Seabird Baseline Review [APP-225] and the Shadow HRA [APP-050] is adequate for the purposes of assessing effects on European sites?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	NRW consider that the baseline seabird information collected through boat-based transect and tracking surveys are adequate to inform the assessment. However, NRW do not agree that the disturbance monitoring described in section 5 is adequate to inform the assessment. Also, NRW do not agree that the evidence presented in the Shadow HRA on the response of breeding Sandwich, Arctic and common terns to disturbance to be adequate to inform the assessments. We refer you to our comments in section 7.8 in NRW's Written Representations.	Please refer to Horizon's response to NRW's Written Representation submitted at Deadline 3, where these issues are dealt with in detail.

FWQ5.0.11: Can NRW and RSPB confirm that they agree that the seabird survey described in the Seabird Baseline Review [APP-225] and the Shadow HRA [APP-050] is adequate for the purposes of assessing effects on European sites?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NWWT	NWWT agree with the joint response provided by the RSPB on this matter and the cross referencing to the eNGO written representation.	Please refer to Horizon's response to the RSPB's response to FWQ5.0.11 (with which the NWWT agree) and Horizon's response to the eNGO's joint Written Representation 'Biodiversity – Cemlyn Nature Reserve'.

FWQ5.0.11: Can NRW and RSPB confirm that they agree that the seabird survey described in the Seabird Baseline Review [APP-225] and the Shadow HRA [APP-050] is adequate for the purposes of assessing effects on European sites?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
RSPB	A range of relatively comprehensive ornithological surveys have been undertaken by the Applicant. However, the RSPB has identified some limitations in the scope and analysis of the data gathered which could have a bearing on the assessment of impacts on the Anglesey Terns SPA. Wylfa Newydd baseline surveys Tern survey work was initially undertaken through land-based vantage point surveys during 2010 - 2015. This was supplemented in July 2016 with additional vantage point surveys to document tern behaviour during the presence of jack-up rigs in Porth-y- Pistyll. The RSPB considers that the results of these surveys did not contribute to the understanding of the usage of the area by the terns at a fine level of detail. However, during 2016 and 2017 boat-based transect surveys were additionally undertaken as recommended by NRW to address shortfalls of the land-based surveys and to provide greater resolution of both terns and seabirds of other SPAs. These results provide a more robust baseline for the impact assessment, although it is unfortunate that they were not carried out over a longer period to allow for interannual/seasonal variations.	Wylfa Newydd baseline surveys The 2010-2015 vantage point (VP) surveys for seabirds, using methods agreed by NRW (formally CCW in 2010) as appropriate for the purposes of the study at the time, show data for terns from the period Apr 2011 to Sep 2014. The four shore-based VP locations used for these surveys gave a study area from Cemlyn Bay to Cemaes, out to c. 1km from the coastline. The data, collected monthly, show typical routes taken by the terns when flying to/from the Cemlyn colony on foraging trips and give a passage rate of birds. The data show very little feeding behaviour (e.g. <1% of records for Sandwich tern) within the VP study area, consistent across all study years, showing almost all feeding takes place in waters beyond the VP study area. The VP data therefore provide useful information on how terns use the waters and airspace within the VP study area, relatively close to and within the WNDA. The data do not enable an estimate of the VP study area population size - the population sizes of the tern species breeding at Cemlyn are known from NWWT annual colony counts. The July 2016 VP surveys at the temporary jack-up rigs in Porth-y-pistyll were opportunistic and recorded behaviour of Sandwich terns in flight in the vicinity of the rigs to see if/how the birds reacted to the presence of the rigs. A small proportion of the birds observed made minor deviations to their flight paths when flying close to the rigs, showing the birds were not deterred from using the airspace/area by the presence of a new visual and noise stimulus in the water. Boat-based surveys, undertaken to enable data collection on seabird abundance and distribution within a much larger study area than the VP study area, involved transect surveys carried out monthly from May 2016 to May 2017 inclusive – thereby covering seasonal variation within the study year. The abundance and distribution of tern species within the study area was very similar to that recorded by JNCC transect surveys carried out around Anglesey in 2010 and 2011, showing good interannual correlation for this target species group. In consultation with NRW, transect surveys were not repeated for a further period beyond May 2017, rather they were supplemented by the tern tracking surveys undertaken in 2016, 2017 and 2018, which provided detailed information on the foraging patterns and feeding activity for all tern species from the Cemlyn colony. Tern tracking in 2018 took place from 12 June to 05 August, covering the breeding season for all tern species and including the late-arriving birds. The results of this work will be provided into examination at Deadline 3 (18 December 2018).

In addition to the transect surveys, tern tracking studies have been conducted to provide more up-to-date information on the areas used by terns. Unfortunately, the delayed start of the tern tracking surveillance in 2016 did not capture the early period of chick rearing phase of the terns, which gave an incomplete understanding for that year as the location of prey species may vary over time and influence foraging and commuting dynamics.

Disturbance monitoring

Horizon further undertook a series of behavioural studies at the Cemlyn tern colony in order to inform the Shadow HRA [APP-050]. Although the RSPB broadly welcome this work, we do not consider the developer's analysis of the results to be reliable owing to insufficient scientific literature to support the conclusions drawn. As stated in our response to Q5.0.2, the RSPB considers this survey work to be insufficient to demonstrate with any degree of scientific certainty how the birds will respond to the levels of disturbance that will occur as a result of the development.

A detailed review of the efficacy of the survey techniques used in both the foraging and the behaviour studies and their analysis in relation to the SPA terns is presented in the joint eNGOs' written representation 'Biodiversity – Cemlyn Nature Reserve', submitted for Deadline 2 (see Chapter 3, paragraphs 3.86-3.98).

Tern tracking surveys in 2016 commenced on 22 June. Sandwich tern chicks at Cemlyn typically start hatching during the first week of June therefore there were no tracking surveys carried out during the early part of the Sandwich tern chick provisioning period in 2016. Common and Arctic tern chicks typically hatch later at Cemlyn (mid-June) therefore the early chick provisioning period for those species was not missed. Sandwich tern tracking data gathered in 2016 showed good correlation (length of flights, distance from shore, directions taken, feeding activity) with data gathered using the same technique in 2009 by JNCC and ECON – whose surveys did cover the early part of the Sandwich tern chick provisioning period. There is therefore no evidence to suggest that Sandwich terns exhibit significant variation in foraging behaviour during the early part of the chick provisioning period. Further tern tracking surveys were undertaken in 2018, focussing on Sandwich terns from 12 June, thereby covering the early chick provisioning period in that year. The results correlate well with previous years, again showing no significant differences in foraging behaviour between periods.

Disturbance monitoring

RSPB, in their response to Q5.0.2, consider the analysis of the results of the disturbance monitoring (of the terns and black-headed gulls) at Cemlyn to be unreliable 'owing to insufficient scientific literature to support the conclusions drawn'. The disturbance monitoring work was undertaken because of the lack of published literature on the topic and presents a baseline of the typical noise levels and visual stimuli experienced by the colony in 2017 and 2018 - and does not in itself present conclusions. Conclusions drawn in the Shadow HRA [APP-050 / 051] and chapter D13 of the ES [APP-132] are that the terns are unlikely to abandon the colony as result of noise/visual stimuli from the development. The disturbance monitoring work shows how the terns react to various stimuli – almost always in the form of a low-level fly-up immediately followed by a re-settling to the nest islands when the stimulus carries no actual threat to the adult birds, their eggs or chicks. This response only varies when a much greater threat becomes apparent to the birds, as was documented during instances of e.g. a hunting peregrine (direct threat to adult birds) or the wardens' visits to the nest islands (direct threat to adults, eggs and chicks). RSPB / the eNGOs criticise the approach (of the disturbance monitoring work) for its inability to predict how birds will respond to disturbances which will occur as a result of the development, as it (the monitoring) did not detect significant differences in colony fly-up behaviour between 2017 (the year of colony abandonment due to otter predation) and 2018, a year without such events. The metric of a fly-up was chosen as a simple, pragmatic and measurable threshold of tolerance to disturbance. The results of the disturbance monitoring work show that colony behaviour, as measured by the fly-up metric, was consistent across both study years despite the differences in pressures on the colony and numbers of birds present. The monitoring work therefore shows the birds' response to disturbing stimuli is entirely predictable. The difference between study years is that the Cemlyn colony was wiped out by otters in 2017 and consequently

Disposal site

The proposed disposal site at Holyhead Deep is located within proximity of tern foraging areas forming part of the Anglesey Terns SPA. The Applicant has access to ongoing baseline studies undertaken by Minesto (marine renewables developer) in order to assess the potential effects of these works. We understand these monthly boat-based transect surveys conform to NRW's scoping opinion (dated 26 April 2017) which recommends a minimum of 2 years survey effort to address natural inter-annual variation. However, the Applicant has presented summaries of just five separate survey visits to Holyhead Deep. We are therefore concerned that sufficient contemporary seabird data for the disposal site may not have been acquired, and recommend that the Examining Authority seek clarification from Horizon on this matter.

abandoned – providing evidence that terns abandon a colony only when faced with a deterrent of significant magnitude.

RSPB point out, in Q5.0.2, there could be adverse effects on the terns due to their having to fly increased distances around areas disturbed by the scheme when foraging/commuting, and the energetic costs involved therein. The average flight length for foraging Sandwich terns recorded during tern tracking surveys in 2018 was c. 27km. If flying terns are displaced by noise/visual disturbance stimuli from the development, it is likely to be by no more than a few hundreds of metres – a negligible extra distance involving a negligible increase in energetic cost.

Disposal site

The Minesto seabird survey data that were accessed for the purposes of the Shadow HRA are presented in summary form within the Shadow HRA for those SPA qualifying features considered to have connectivity to the Disposal Site. These summaries are presented in Figures 6-36 to 6-42. Presentation of further details from these data is limited by the conditions under which they were purchased from Minesto.

FWQ5.0.15 Can the Applicant and NRW comment on the decision to exclude in combination air quality effects where the process contribution from the Proposed Development is less than 1% of the critical load in light of the judgement in Wealden v SSCLG [2017] EWHC 351 (Admin)?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	With regard to paragraph 7.4.118 of the Shadow HRA, NRW do not agree that "where the process contribution (PC) (meaning the contribution made by the activity) is less than 1% of the relevant critical level or critical load, the emission is not likely to be significant alone or in-combination". In light of the Wealden judgement, NRW consider that (even when the Process Contribution is less than 1%), consideration of other relevant projects may be required to ascertain whether there are possible in-combination effects. However, with respect to Cemlyn Bay SAC, NRW is not aware of other relevant projects which may act in-combination to cause a significant effect or adverse effect on site integrity.	Please refer to Horizon's response to FWQ.5.0.15 submitted at Deadline 2 (4 December 2018) [REP2-002]. With respect to the Cemlyn Bay SAC, Horizon is similarly not aware of any other plans or projects that may act in-combination with the Wylfa Newydd DCO Project to have a significant air quality effect on the site.

FWQ5.0.16: Are NRW, RSPB and NWWT content with the Applicant's conclusion regarding likely significant effects on European sites as expressed in the Shadow HRA and the Shadow HRA Addendum [AS-0101]? If not, why not?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NWWT	NWWT agree with the joint response provided by the RSPB on this matter and the cross referencing to the eNGO written representation.	Please refer to Horizon's response to the RSPB's response to FWQ5.0.16 (with which the NWWT agree) [REF2-002] which addresses the one area of disagreement with respect to LSE Screening between the RSPB and Horizon i.e. predator displacement. Please also refer to Horizon's response to the eNGO's joint Written Representation 'Biodiversity – Cemlyn Nature Reserve'. Horizon's opinion is that predator displacement would not have a significant effect on the Anglesey Terns SPA because it is unlikely that Cemlyn lagoon would be the focus of displaced mammalian and avian predators, due to the abundance of suitable alternative habitats immediately outside WNDA; Cemlyn lagoon is already within the foraging range of most mammalian predators, corvids (and other species) likely to be associated with the Project site and so displacement would not necessarily increase the likelihood of the tern breeding areas being favoured for foraging; and territoriality would operate to limit local densities.

FWQ5.0.16 Are NRW, RSPB and NWWT content with the Applicant's conclusion regarding likely significant effects on European sites as expressed in the Shadow HRA and the Shadow HRA Addendum [AS-0101]? If not, why not?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
RSPB	The RSPB considers Horizon's screening of issues that could have likely significant effects (LSE) on the European sites, as set out in the Shadow HRA [APP-050] and the Shadow HRA Addendum [AS-0101], to be incomplete. We note and agree with the additional matters that have been screened into the Shadow HRA (as set out in AS-0101) in light of recent case law, where the assumed implementation of mitigation had previously led to an assessment of no LSE. However, we consider that the potential impacts of predator displacement from the WNDA on the interest features of the Anglesey Terns SPA (specifically the Cemlyn Lagoon tern colony) should also be screened in for Stage 2 assessment. The effect of the arrival and establishment of just a small number of predators that choose to prey on a vulnerable population, such as the tern colony, is potentially serious, as has been documented from recent experience at Cemlyn Lagoon. Although we appreciate that such changes may be difficult to predict, we consider that it is important that the Shadow HRA considers the potential changes to the population dynamics and behaviour of predators within the WNDA (particularly during the construction phase), and that mitigation	The potential for an increase in predation risk to terns at the Cemlyn lagoon colony from mammalian and avian predators has been raised as a risk by the RSPB, the NWWT and the National Trust. Horizon considers, however, that it can be concluded with confidence that an LSE would not arise in this due to predator displacement from the WNDA, as detailed below. This risk was also raised in connection with the proposed Site Preparation and Clearance (SPC) works (planning application 38C310F/EIA/ECON) and was addressed by Horizon in a statement prepared in response to a Regulation 22 request for further information and in an addendum to the Environmental Statement for SPC. In August 2018, IACC considered the risk of increased predation within its assessment of the SPC works under The Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations). IACC concluded that any changes to predation risk associated with the SPC works are likely to be imperceptible and that significant effects, as a result of the SPC works, would not occur. Although this conclusion is specific to the SPC works – which do not involve soil stripping – Horizon's opinion is that a number of IACC's justifications for this conclusion are equally relevant to the Project as a whole and a summarised as follows: • It is unlikely that Cemlyn lagoon would be the focus of displaced mammalian and avian predators, due to the abundance of suitable alternative habitats immediately outside WNDA. • Cemlyn lagoon is already within the foraging range of most mammalian predators likely to be associated with the Project site and so displacement would not necessarily increase the likelihood of the tern breeding areas being favoured for foraging. • Territoriality would operate to limit local densities. • Cemlyn lagoon is already within the foraging range of corvids (and other species) that may have territories on the Project site, so the opportunities to exploit this resource are already present and unlikely to increase.

measures are secured to manage the risk of effects from this source. Further discussion on this issue is presented in the joint eNGO written representation 'Biodiversity – Cemlyn Nature Reserve', submitted for Deadline 2 (see Chapter 3, paragraphs 3.192 – 3.209). The RSPB further disagrees with the conclusions drawn in the Shadow HRA regarding adverse effects on the integrity of the European Sites (in particular the Anglesey Terns SPA) as explained in our response to Q2.0.39 and in the joint eNGO written representation 'Biodiversity – Cemlyn Nature Reserve', submitted for Deadline 2 (see Chapter 3, paragraphs 3.243-3.246).

For the above reasons, Horizon's opinion is that predator displacement would not have a significant effect on the Anglesey Terns SPA.

In its response to **FWQ.5.0.16**, the RSPB goes on to make the point that it disagrees with the conclusions of the Shadow HRA [APP-050] regarding adverse effects on the integrity of European Designated Sites (particularly the Anglesey Terns SPA). Horizon's response to this point is provided in Horizon's response to the joint eNGO Written Representation *Biodiversity – Cemlyn Nature Reserve* and in Horizon's response to NRW Written Representation, both submitted at Deadline 3 (18 December 2018).

FWQ5.0.19: Do NRW agree that there will be no adverse effects on integrity on the Cemlyn Bay SAC from the levels of dissolved copper, lead and zinc from discharges during construction, as described in section A2 of the Shadow HRA?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	With reference to section A2 of the Shadow HRA, NRW is satisfied that the discharges of copper, lead and zinc into the marine environment will not result in adverse effects on the site integrity of Cemlyn Bay SAC. However, NRW do have outstanding concerns with regard to the discharges from Mound E into the Cemlyn catchment (including impacts on water quality when the drainage pumped over to Afon Cafnan is re-connected to Nant Cemlyn). We refer you to comment 7.10.5 of NRW's Written Representations.	Please refer to Horizon's response to NRW's Written Representation, where these issues are dealt with in detail.

FWQ5.0.32: Do NRW or RSPB have any concerns about effects on the Anglesey Terns SPA for impacts resulting from change or loss of foraging habitat, changes in marine water quality or impingement/entrainment of prey species during construction and operation?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NWWT	NWWT agree with the response provided by the RSPB on this matter and the cross referencing to the eNGO written representation.	Please refer to Horizon's response to the eNGO's joint Written Representation 'Biodiversity – Cemlyn Nature Reserve'.

FWQ5.0.32: Do NRW or RSPB have any concerns about effects on the Anglesey Terns SPA for impacts resulting from change or loss of foraging habitat, changes in marine water quality or impingement/entrainment of prey species during construction and operation?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
RSPB	The RSPB has previously highlighted that the direct/indirect loss of potential tern foraging habitat from within the Anglesey Terns SPA, as a result of the proposed marine works, could have an effect on the SPA tern populations. However, it is accepted that the area affected, which lies within Porth Y-Pistyll, currently exhibits low usage by the terns for foraging, which generally favour areas of the sea at greater distances from the coast. Nevertheless, although the effects of the loss of potential foraging habitat within Porth Y-Pistyll are likely to be relatively minor in isolation, the RSPB has raised concerns about a number of other impacts arising from the DCO proposals (as explained in our response to Q2.0.39 and in the joint eNGOs written representation 'Biodiversity – Cemlyn Nature Reserve', submitted for Deadline 2) that we consider could have more significant implications for tern foraging/feeding, and which any loss of potential foraging habitat could contribute towards. Together, the poorly understood consequences of the various effects of the DCO proposals could result in reduced breeding success in one or more years and/or complete colony collapse.	Please refer to Horizon's response to these issues in the response to the eNGO's joint Written Representation 'Biodiversity – Cemlyn Nature Reserve', submitted at Deadline 3 (18 December 2018).

FWQ5.0.33: Can NRW provide the evidence that supports para 4.3.7 of its RR [RR-088] that some Sandwich Terns that breed at Cemlyn also form part of the passage Tern feature of the Dee Estuary SPA and Ramsar site?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	NRW does not have any direct evidence of connectivity between Cemlyn and the Dee. However, there is the potential for the loss of the colony at Cemlyn to have adverse effects on the Dee and therefore under the precautionary principle, we cannot rule out an adverse effect on the Sandwich tern feature of the Dee Estuary SPA.	Please refer to Horizon's response to Q.5.0.4 as submitted at Deadline 2 (4 December 2018) [REP2-002].

FWQ5.0.34: Do NRW agree that the Sandwich Tern population of the Anglesey SPA is approximately five times larger than it was at the point that the SPA was designated (para 10.3.59 of the Shadow HRA), and if so would the conservation objectives for the SPA be undermined if the Sandwich Tern colony at the Cemlyn Bay colony experienced a reduction in numbers for the period of construction?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	NRW agree that the most recent five-year mean population of Sandwich terns was approximately five times larger than it was at the point that the SPA was designated (460 pairs). However, there are more conservation objectives to consider than just the numbers of breeding pairs. If the number of breeding pairs remained above 460 during the construction phase, then this conservation objective would be met; however, when tern colonies are affected by disturbance they do not reduce by small amounts but are well known to fail catastrophically, with all birds leaving. This happened to this colony in 2017 and has been seen in other tern colonies in the UK, for example Shotton common tern colony in the Dee estuary. The conservation objectives for productivity and range within the SPA also require consideration. Looking at the failure in 2017 and the reduction in productivity in recent years it is evident that this colony is stressed and that added disturbance could lead to issues such as abandonment and increased loss of productivity potentially affecting the conservation objectives.	Horizon agrees with NRW that there are more conservation objectives to consider than just the numbers of breeding pairs. However, Horizon would question NRW's analysis of the status of the Sandwich tern population at the Cemlyn Bay colony and do not believe that the evidence for the population being stressed is as strong as NRW suggest (albeit that the abandonment of the colony due to predation in 2017 is a cause for concern). As a first point, it is important to be clear on the cause of the breeding failure and abandonment in 2017, which was associated with persistent predation by otters (with no evidence obtained by or shared with Horizon for traditional disturbance effects having any role in this). The Cemlyn Bay colony has experienced years of complete (or near complete) breeding failure previously (2007 and 2008), with associated colony abandonment (2007). However, these previous instances were also associated with high levels of predation (but by grey heron in this case). The marked population-size fluctuations that are often observed at Sandwich tern colonies are often attributable to such predation events, and such predation events can be the cause of colony abandonment where they occur over successive years. Following the previous years of breeding failure, the Sandwich tern population at the Cemlyn Bay colony declined but then recovered rapidly to reach its highest recorded levels in 2014 – 2016 (increasing year-on-year between 2008 and 2015). This suggests a good degree of resilience within the colony population. It is also notable that, in 2018, a maximum of 2,300 Sandwich terns (individuals) were recorded at the colony in the counts undertaken as part of the Horizon baseline disturbance surveys (which were repeated in 2018). Although, a high proportion of these birds arrived late in the season and it seems likely that only a proportion of them attempted to breed, it is again suggestive of resilience in the colony population and an ability to recover from the 2017 abandonment. Horizon agrees with NRW that there is evidence that the breeding productivity of Sandwich terns has been lower in recent years than for much of the period for which records are available (with this difference exacerbated by the complete breeding failure in 2017). However, there is notable between-year variation in breeding productivity, and despite the recent low productivity (relative to historical levels), the population was continuing to increase up to 2014-2016. It is also notable that there are indications of a relationship between population size and productivity (suggesting that these conservation objectives are inversely related). That is, when the population size is high (as has been

		the case for the Cemlyn colony for a number of years), productivity declines. There are a number of plausible reasons for such a relationship and it is likely to explain, at least in part, the reduction in productivity of the colony in recent years.

FWQ5.0.39: Can RSPB, NWWT, NT and NRW confirm if delivery of the 'resilience measures' proposed in section 11.3 of the Shadow HRA would be sufficient to allay their concerns about the effects on the Anglesey Terns SPA? If not, why not and what additional measures would be required?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	NRW consider that the resilience measures may improve the condition of the Anglesey Terns SPA. However, NRW do not consider that the measures will mitigate the disturbance effects of the project. NRW is not aware of mitigation measures that would effectively mitigate the disturbance effects of the project without adding potentially significant constraints to when construction activities could take place (e.g. such as restricting noisy construction activities to outside the tern breeding season). We refer you to section 7.8 of NRW's Written Representations.	Horizon's position with regard to the proposed resilience measures is that they are not required as mitigation for predicted effects of the Wylfa Newydd DCO Project (as reported in section 11.3 of the Shadow Habitats Regulations Assessment Report (Part 1 of 2) [APP-050]). Horizon's position on mitigation for predicted effects on the Anglesey Terns SPA is set out in Horizon's response to NRW's Written Representation.

FWQ5.0.39: Can RSPB, NWWT, NT and NRW confirm if delivery of the 'resilience measures' proposed in section 11.3 of the Shadow HRA would be sufficient to allay their concerns about the effects on the Anglesey Terns SPA? If not, why not and what additional measures would be required?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NWWT	NWWT agree with the joint response provided by the RSPB on this matter and the cross referencing to the eNGO written representation.	Please refer to Horizon's response to the RSPB's response to FWQ5.0.39 (with which the NWWT agree) and to Horizon's response to NRW's Written Representation, which discuss the nature and delivery of the proposed resilience measures. Please also refer to Horizon's response to the eNGO's joint Written Representation 'Biodiversity – Cemlyn Nature Reserve'.

FWQ5.0.39: Can RSPB, NWWT, NT and NRW confirm if delivery of the 'resilience measures' proposed in section 11.3 of the Shadow HRA would be sufficient to allay their concerns about the effects on the Anglesey Terns SPA? If not, why not and what additional measures would be required?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
RSPB	The proposed resilience measures identified in the Shadow HRA [APP-050] consist of setting up an annual fund during the construction phase; developing an incident response plan for Cemlyn Lagoon; and the introduction of weir/sludge at the mouth of the lagoon to help manage water levels. These measures all derive from the joint Ecological Options paper (as requested by the Examining Authority in Q2.0.38). The RSPB (and the other eNGOs) welcomes these measures, which the Applicant agrees will improve the "resilience" of the SPA tern colony and benefit the management of Cemlyn Lagoon for that colony. However, we are deeply concerned that the Applicant does not consider any of the measures necessary as SPA mitigation under the Habitats Regulations. Consequently, although broadly referenced in the Shadow HRA, these critical measures lack the clarity (regarding their scope, duration, funding or indeed their actual delivery) and legal certainty that would be expected of SPA mitigation measures as opposed to voluntary "resilience" measures. Our concerns are further exacerbated by Item 11 of the Section 106 status report (REP1-010) submitted by Horizon at Deadline 1, which appears to further	Horizon considers that the scope of the environmental funds set out in schedule 11 of the draft DCO s.106 agreement submitted at Deadline 3 is appropriately flexible to respond to the variety of potential measures which have been proposed, while still providing an appropriately managed scope. It is correct that these are offered on a voluntary basis in that Horizon does not consider that they meet the tests for planning obligations. However, the practical effect of this is only that the Secretary of State must not have regard to these measures in coming to his decision. Horizon has committed itself to these funds and they are secured in the draft DCO s.106 agreement submitted at Deadline 3 (18 December 2018) and are otherwise treated the same as other obligations. These proposed funds comprise: • a £245,000 Environment (Cemlyn Lagoon) Fund from which relevant stakeholders (anticipated to be National Trust, North Wales Wildlife Trust or Royal Society for the Protection of Birds) can make applications for funding for projects which enhance the understanding or improve the resilience of, or enhance, the Cemlyn Lagoon habitat. It is proposed that the applications will be considered by the Environment and Built Heritage Sub Group. • a £400,000 Environmental Enhancement Fund for agri-environment schemes and works to improve the resilience of the Chough Network Horizon notes that the RSPB refers to other mitigation measures that, in its view, should be secured. Horizon maintains that such additional measures are not required as mitigation for predicted effects of the Wylfa Newydd DCO Project. For example, no effects on Esgair Gwynn are predicted, therefore, no mitigation measures are proposed to increase the resilience of the ridge; increased predation is not predicted; and Horizon has proposed to provide additional funding for a Cemlyn lagoon wardens (of relevance to the HRA) during the construction phase. The RSPB goes on to state that, regardless of the implementation of any mitigation it refers to as being necessary, it considers that a conclusion of no adverse effect on the integrity of the Anglesey

reduce the measures listed within the Shadow HRA and indicates that, instead of securing these individual items of work, a fund will be available on application to be shared across several of the measures. This is not considered acceptable.

Given the numerous and potentially serious impacts arising from the DCO proposals (as explained further in the joint eNGOs' written representation 'Biodiversity – Cemlyn Nature Reserve', submitted for Deadline 2), and the uncertainty of the effectiveness of the limited (embedded) mitigation measures proposed by Horizon, the RSPB considers that the measures proposed in the Ecological Options paper are essential to help reduce the potential effects and, as far as possible, to protect the SPA tern colony at

Cemlyn in situ.

Therefore, we consider that further mitigation measures identified in the Ecological Options paper that Horizon have not to-date committed to should also be secured. These include:

- Remediation measures for Esgair Gernlyn, including the re-use of dredged materials in increasing the resilience of the shingle ridge and/or the tern breeding islands.

- Wylfa Newydd Development Area (WNDA) Estate Predator/Undesirable Species Risk Management Strategy

- Visitor Management Strategy for accessible natural greenspace within Horizon's ownership or provisions suggested for sites outside of its

Terns SPA cannot be reached. Horizon's position on this latter point is addressed in its response to the joint eNGO written representation (*Biodiversity – Cemlyn Nature Reserve*) submitted at Deadline 3 (18 December 2018).

ownership but within close proximity to the WNDA (Cemlyn Nature Reserve and Trwyn Pencarreg Wildlife Site and CRoW access land).
Nevertheless, it is considered that, even if these additional mitigation measures are secured, uncertainties remain regarding the long-term response of the Cemlyn Lagoon tern colony to the combined impacts of the DCO, including the potential for reduced breeding success in one or more season and/or the potential complete collapse of the colony. These uncertainties lead the RSPB (together with the other eNGOs) to conclude that an overall conclusion of no adverse effect on the integrity of the SPA cannot be reached. Please see further comments on this matter under Q2.0.39 and in Chapter 3 (paragraphs 3.236-3.242) of the joint eNGOs' written representation 'Biodiversity – Cemlyn Nature Reserve', submitted for Deadline 2.

FWQ5.0.41: Can NRW advise if it would be possible to develop a package of compensatory measures for the effects of the Proposed Development on the Anglesey Terns SPA? What measures should be included in such a package?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	NRW consider it may be possible to develop a package of compensatory measures for the Anglesey Terns SPA. NRW has been advising the applicant on its development of possible compensatory measures. Measures to be included in the package should include: a selection of suitable compensation sites (due to the uncertainty of success at a single site and the risk of competition between tern species that colonise); initial management works to make the sites appropriate for colonisation; and the subsequent management (both habitat management and wardening, including predator control) of colonised sites. The package should also demonstrate that the sites and their management can be secured. We refer you to comment 7.8.47 in NRW's Written Representations.	Please refer to Horizon's response to FWQ.5.0.40 submitted at Deadline 2 (4 December 2018).

FWQ5.0.44: Can NRW and NWWT confirm if, in their view, the measures proposed in the Workforce Management Strategy [APP-413] would be sufficient to avoid adverse effects on integrity from trampling and increased visitor use? If not, why not?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	NRW consider that the Workforce Management Strategy may reduce effects on the site integrity of protected sites. However, there is insufficient detail to demonstrate that the Strategy will ensure that adverse effects are avoided. The Shadow HRA (table 11-1) and Shadow HRA Addendum (paragraph 4.4.1) state that the Strategy will be agreed with NRW prior to works being initiated. However, we also note that the Workforce Management Strategy sets out the principles that will inform the development of the Code of Conduct which will be secured as a DCO Requirement. NRW advise that the Code of Conduct should be approved by the discharging authority, in consultation with NRW.	Horizon generally agrees with NRW as regards the first point but considers that the WMS will reduce effects. The Workforce Management Strategy (WMS) [APP-413] 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. Horizon believes the WMS is essential to delivering the project safely, to budget and on schedule as well as minimise the potential effects of large numbers of temporary construction workers on the local community. As noted in the response to the FWQ, Horizon is considering what amendments that could be made to the Workforce Management Strategy so that the principles provide more certainty to NRW and others on the behaviour that will be required of the workforce and Horizon's construction partners and the controls and consequences of any non-compliance with those standards, while remaining legal complaint and practically enforceable. Changes (including the change flagged in Horizon's response to the ExA first written question Q5.0.43 at Deadline 2) will be provided at Deadline 4 (17th January 2019). Horizon notes that the Code of Conduct must be in accordance with the principles of the Workforce Management Strategy. It is important to note that the DCO does not provide any tailpiece provision in respect of the Workforce Management Strategy, and so the principles that are approved as part of the Examination are the principles that will apply for the duration of the construction period and that the Code of Conduct must accord with. Horizon notes that the level of detail included within the WMS is more detailed than that that has been provided in Codes of Conduct for other granted DCOs (for example, Hinkley). Horizon considers that given the principles will be scrutinized during Examination and approved as part of the DCO, it is not necessary to have a requirement requiring approval of the subsequent Code of Conduct.

FWQ5.0.44: Can NRW and NWWT confirm if, in their view, the measures proposed in the Workforce Management Strategy [APP-413] would be sufficient to avoid adverse effects on integrity from trampling and increased visitor use? If not, why not?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NWWT	NWWT are of the opinion that the measures proposed in the Workforce Management Strategy [APP-413] are not sufficient. NWWT do not believe that the baseline analysis provides Horizon with sufficient understanding of this impact pathway or its consequences. As a result, it is considered that Horizon have provided a disproportionately small response to the significant matter of recreational disturbance as a cumulative impact. In NWWT's view (as well as National Trust and the RSPB), the WMS in isolation from any other measures will not be effective. It will be almost impossible to monitor or enforce effectively and will be reliant on the vigilance of external third parties for reporting and dealing with issues as they arise. In relation to visitor usage (worker or non-worker), NWWT, and the other eNGOs, do not consider that measures undertaken at Cemlyn Nature Reserve in isolation will be sufficient to control any adverse effect. In the absence of a strategic approach to the consideration of accessible natural greenspace* it is highly probable that measures to be implemented elsewhere within the WNDA or the Temporary Site Campus (TSC) will increase the likelihood of adverse effects at the SPA/SAC.	Horizon has prepared a response to the eNGO's joint WR 'Biodiversity – Cemlyn Nature Reserve' (submitted at Deadline 3 (18 December 2018)) that responds to the concerns raised about the Workforce Management Strategy (WMS) and recreational disturbance. Importantly, the WMS is not being proposed in isolation from other measures. That is, the package of measures to manage recreational pressures include: • The WMS, reinforced by induction and tool box talks and signage. • The provision of funding for tern wardening at Cemlyn Bay, during tern breeding season. • Funding for a FTE IACC environmental officer (note this will be included in the next update to the draft DCO s.106 agreement) • The provision of recreation facilities on the Site Campus and significant funding for the upgrade of leisure facilities offsite. • Establishment of two voluntary environmental funds from which applications for funding to deliver: agri-environment schemes, coastal resilience measures, and Cemlyn Bay resilience measures These measures, particularly in the context of the Cemlyn Lagoon SAC and Anglesey Terns SPA, will ensure that adverse effects can be avoided. There is certainly no evidence that measures to be implemented elsewhere (within the WNDA and at the Site Campus) will increase the likelihood of an adverse effect arising on European designated sites. These measures will be secured through the DCO s.106 agreement, and the DCO (see draft DCO s.106 agreement submitted at Deadline 3 and the Draft DCO) [REP2-020]. The WMS is identified in the Draft DCO as a Certified Document and Requirement PW8 requires Horizon to prepare a Wylfa Newydd Code of Conduct in accordance with the principles set out in the WMS and, thereafter, to implement this throughout the construction of the authorised development.

This matter is discussed fully in the eNGOs' biodiversity evidence: -

- Non-worker visitors from paragraph 3.157
- Site workers from paragraph 3.173

There is no securing mechanism within the draft DCO (APP-029), which requires agreement from IACC as to how the WFM Strategy will be translated into a Workers Code of Conduct.

* The eNGOs have defined other accessible greenspace within the vicinity of the WND/TSC to include Wylfa Head, Trwyn Pencarreg (National Trust estate) and the Coastal Footpath, which all also have biodiversity sensitivities to recreational pressures.

FWQ5.0.45: Can NRW either confirm that the conservation objectives in the Shadow Habitat Regulations Assessment are correct or provide the conservation objectives for the sites for which they feel likely significant effects cannot be excluded?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	For the sites in/partly in Wales, NRW advise that the correct conservation objectives, where specified in the Shadow HRA, have been used with the exception of the following where the conservation objectives used are out-of-date. However, the content of the updated conservation objectives are largely the same - we provide a link to the updated versions below. Please also note that this advice is based only on those sites where conservation objectives have been specified in the Shadow HRA. As mentioned above, we advise that the following up to date conservation objectives are used: Pen Llyn a'r Sarnau/Lleyn Peninsula and the Sarnau SAC: https://naturalresources.wales/media/684531/pen-llyn-arsarnau-r37.pdf Bae Ceredigion / Cardigan Bay SAC: https://naturalresources.wales/media/684522/cardigan-bayreg-37.pdf Afon Teifi/ River Teifi SAC: https://naturalresources.wales/media/682845/afon-teifi-riverteifi-management-plan.pdf Sir Benfro Forol / Pembrokeshire Marine SAC: https://naturalresources.wales/media/684530/pembrokeshire-marine-council-regulation-37.pdf Ynys Seiriol / Puffin Island SPA: https://naturalresources.wales/media/687220/sac_uk003020_2_sumset_reg-37.pdf	Horizon has reviewed the conservation objectives for each of the European Designated Sites referred to in NRW's response to Q.5.0.45. As noted by NRW, the content of the conservation objectives is largely the same as reported in the Shadow HRA [APP-050] and consideration of the most recent conservation objectives does not have any implications for the findings of the Shadow HRA.

FWQ5.0.46: Can the Applicant and NRW review the recent judgement Case C-164/17: Reference for a preliminary ruling from Supreme Court (Ireland) made on 3 April 2017 — Edel Grace, Peter Sweetman v An Bord Pleanala and advise on any implications they think the judgement has for the Appropriate Assessment of the Proposed Development?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	In this case, the CJEU confirmed that measures designed to compensate for (as distinct from mitigating) the negative effects of a project should not be taken into account in the appropriate assessment carried out under Art. 6(3) of the Habitats Directive. Compensatory measures should be examined at the IROPI stage in accordance with Art. 6(4), it was held. The CJEU reaffirmed that, to avoid having to go to the IROPI stage, the appropriate assessment must contain complete and precise findings and conclusions capable of removing all reasonable scientific doubt as to the effects of the development on the site concerned. The judgment in this Case C-164/17 is recent. NRW considers that the Applicant should issue a note (preferably in table form) confirming that it has taken account of the CJEU's judgment in this case, and confirming which of the measures proposed as part of the project as a whole are (1) mitigating measures designed to avoid or reduce the adverse effects of the project on the protected site (Art. 6(3)); and (2) measures aimed at compensating for the adverse effects of the project on a European site (Art. 6(4)). NRW will then advise promptly on whether it agrees with these classifications, expecting the applicant to comply fully with the judgment in Case C-164/17.	Please refer to Horizon's response to FWQ.5.0.46 as submitted at Deadline 2 (4 December 2018) [REP2-002].

FWQ6.0.2: With reference to 6.2.11 ES Volume B - Introduction to the environmental assessments B11 - Cultural heritage [APP-076] are you content with the Applicant's methodologies; assessment criteria; measures of magnitude of change and impact and conclusions for Cultural Heritage across the project in relation to:

(a) Planning Inspectorate Scoping Opinion particularly in relation to the 'action taken';

(a) Statutory and non-statutory consultations carried out by the Applicant;

(b) Topic specific methodologies and assessment criteria; particularly:

i. Assessment of parameters; ii. Identification of study areas; iii. Identification of receptors; iv. Identification of baseline conditions v. Assessment of effects; vi. Limitations If not outline your concerns and explain how the issues might be resolved.

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	a) The IACC is content that the assessment presented in the ES represents an appropriate response to the Planning Inspectorate Scoping Opinion, with the following exception: The statutory boundary for Cestyll Garden – this has been proposed by Cadw but is not yet confirmed. The proposed statutory boundary, as supplied by Cadw to IACC and Horizon, encompasses the Valley Garden, Kitchen Garden, House Plot and most of the Essential Setting including the driveway and Felin Gafnan. This has not been taken into account by Horizon yet but the statutory status and proposed statutory boundary should be taken into account in the Examination process.	The designated status of Cestyll Garden was taken into account in the assessment of value presented in chapter D11 (cultural heritage) [APP-130] (see paragraph 11.3.92). As stated in table B11-9 of chapter D11, a figure showing a draft of the proposed revisions to the designated boundary of the of Cestyll Registered Historic Park and Garden (G2096) was provided to Horizon by Cadw. However as this boundary has not been formally adopted by Cadw and could be subject to change the existing boundary was used for assessment purposes. Nevertheless, in the assessment presented in chapter D11 Horizon took Cestyll Garden to comprise the whole of the Essential Setting, the valley garden, the kitchen garden and site of Cestyll House and the trackway that follows the former access to Cestyll House (see figures D11-20 and D11-21 [APP-237 and APP-238]). While the contribution made by these elements to the value of the Cestyll Garden may vary, for the purposes of the assessment the whole of the garden was assessed to be of high value. This is reflected in the assessment of the unmitigated and the residual significance of effect presented in chapter D11 (major adverse during construction and operation, moderate adverse during decommissioning). An assessment of the effects of Felin Gafan Mill, including potential effects on the relationship of the mill with the valley garden, was also presented in chapter D11. Horizon understand that the proposed statutory boundary, while extended to include Felin Gafan Mill, sits within the extent of Cestyll Garden as assessed to be of high value in chapter D11 of the Environmental Statement (ES). Horizon therefore consider that adoption of the proposed statutory boundary has been appropriately considered.

	b) The IACC is generally content with consultation undertaken by the applicant to date, with the following exception: In its consultations with Horizon, IACC has repeatedly emphasised the need to avoid impacts on Cestyll Garden and its Essential Setting. IACC has also provided Horizon with a detailed letter setting out the mitigation measures it would like to see incorporated into the Wylfa Newydd Power Station and Marine Works to avoid, minimise or compensate for the impacts on Cestyll Garden and its Essential Setting (see Q6.0.11). IACC considers that some of the actions taken by Horizon so far in relation to consultations are not sufficient.	Please refer to Horizon's Written Representation submitted at Examination Deadline 2 (4 December 2018) for information on the case for the Wylfa Newydd Project. The need for the set-down area, western breakwater and MOLF is also presented in Horizon's response to the IACC's LIR
	c) The IACC have some concerns about the assessment methodology, which is based on DMRB. While the IACC notes that DMRB is a widely-used methodology for EIA assessment of effects on the historic environment, the assessment criteria do not adequately reflect the significance-based approach to understanding value of, and effects on, heritage assets as set out in NPS EN-1 or Cadw 2011 Conservation Principles: Policies	Horizon does not agree with the IACC's position that assessment criteria do not adequately reflect the significance-based approach to understanding value of, and effects on, heritage assets as set out in NPS EN-1 or Cadw (2011) Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment in Wales. As identified in paragraph 11.4.16 chapter B11 (cultural heritage) [APP-076] the value of cultural heritage assets was assessed using professional judgement informed by the criteria presented in table B11-11, which has been developed with reference to Conservation Principles. This is expanded in paragraph 11.4.17. The approach taken in chapter D11 was that effects on heritage assets were assessed by taking into account their value (significance) and the magnitude of change that could result from the WNDA development. This was assessed using professional judgement, informed by the matrix presented in figure B1-2 in chapter B1 [APP-066]. This approach is consistent with that outlined in the Environmental Impact Assessment Scoping Report and Addendum [APP-060] and is also consistent with the approach used on other nationally significant infrastructure schemes which have been consented.

	and Guidance for the Sustainable Management of the Historic Environment in Wales and does not clearly reflect Cadw 2017 Setting of Heritage Assets in Wales. Uncritical use of DMRB can lead to some questionable assessments and can affect the consideration of appropriate mitigation. Specific issues are highlighted in the responses to questions where this uncritical use of DMRB appears to have influenced the assessment adversely. Key issues of principle are set out below, but due to the case-specific nature of these concerns, suggested courses of action to achieve resolution are set out in the response to the appropriate questions.	It is also unclear why these concerns had not been identified by the IACC earlier in the process. As detailed in chapter B11 Volume B - Introduction to the environmental assessments B11 - Cultural heritage [APP-076] during September 2017, draft Environmental Statement chapters were provided to statutory and key non-statutory stakeholders. In the comments received the IACC did not challenge the approach to the assessment of effects presented in chapter D11. Nevertheless, the IACC have noted in their response to FWQ Q6.0.5 that their concerns with regard to assessment method do not materially affect the results of the assessment, but that have in certain cases either stated more information is required or an additional judgement needs to be made. This information is provided below or (where identified) in Horizon's response to the IACC's LIR.
	i) The parameters of development assessed within the ES appear to be generally appropriate. However, the development parameters are very broad and Horizon has assessed only the worst case scenario and has not considered options that could avoid these impacts, nor provided sufficient information as to how these impacts could be mitigated within these parameters. For example, as explained in the WNDA Historic Environment	Assessing the worst-case scenario used in Chapter D11 (cultural heritage) is consistent with the 'Rochdale Envelope' or parameter approach used in ES. Please refer to chapter B1 (Introduction to the assessment process) [APP-066] for more information on this approach. This approach is also consistent with that identified in the Environmental Impact Assessment Scoping Report and Addendum [APP-060].

	LIR, the platform height for the Power Station could vary by up to 16m and so could be up to 10m above or up to 6m below the level of the Kitchen Garden. Consequently, 10m above has been assumed in the ES and the Kitchen Garden is shown buried beneath a steep wooded slope. It may be that the platform height could be level with the Kitchen Garden thereby making it possible for the Kitchen Garden and Gardener's Cottage to remain in place and be fully restored (or be reinstated at the end of the construction phase). The only option considered involves the loss of the Kitchen Garden and Gardener's Cottage and, despite a commitment to "restore and/or enhance the former location of the Kitchen Garden" (ES Appendix D11-6 [APP-213] and ES Appendix D11-8 [APP-215]), there are no details as to how this will be achieved (see Q6.0.11).	
	ii) Study areas identified for the baseline studies and Environmental Statement appear to be appropriate and sufficient to identify all significant direct effects on the historic environment, although there is a lack of clarity on how the ZTV of	The rationale for the size and extent of the study areas used for cultural heritage are set out in paragraphs 11.4.3 to 11.4.8 of chapter B11. Paragraph 11.4.3 identifies that the study area for the WNDA Development was based on the ZTV while paragraph 11.4.4 states that the assessment of potential effects on the setting of heritage assets was informed not only by the ZTV, but also by the area modelled for potential noise effects.

	the proposed development and modelled noise parameters have influenced the study areas considered for the assessment of effects arising through change to setting.	
	iii) The receptors identified for assessment appear to be appropriate with some exceptions, which are set out in the responses to the ExA questions below. It is requested that assessments of effects on these assets be supplied to the examination. iv) The baseline environment has generally been appropriately identified. There are, however, some specific concerns regarding the valuation of some heritage assets: - The ES assessment methodology does not reflect the valuation of listed buildings set out in NPS EN-1. Grade II listed buildings are identified in the ES (following DMRB) as of 'medium' value, scheduled monuments as 'high' and World Heritage sites as 'very high'. NPS, however, distinguishes only between designated and non-designated heritage assets (NPS EN-1 5.8.15). Any subdivision or ranking of designated heritage assets within NPS EN-1 applies only to	As identified above, the approach taken in chapter D11 was that the effect on the value (significance) of heritage assets was assessed taking into account their value and the magnitude of change that could result from the WND development. The significance of effect was assessed using professional judgement, informed by the matrix presented in figure B1-2 in chapter B1 [APP-066]. As can be seen in figure B1-2, using this matrix as a guide, there is potential for effects with a small magnitude of change to result in significant effects on heritage assets assessed to be of medium value. In the absence of specific examples, it is not clear why the harm to Grade II Listed Buildings has not been appropriately weighted due to the methodology used for the assessment of value (see chapter B1). In Chapter 4, paragraph 4.5.6 of their LIR the IACC have stated that the harm to the Grade II Listed Corn Drying House and Mill House at Felin Gafnan is less than substantial, which accords with the assessment of effect presented in chapter D11 (please refer to paragraph 11.7.12). In addition the method presented in B11 and used in the cultural heritage assessment presented in ES does not preclude any harmful impact on the significance of a designated heritage asset being weighed against the public benefit of development in the manner identified in paragraph 5.8.15 of EN-1.

	the substantial harm test (NPS EN1 5.8.14) and not to whether harm should be considered in the planning balance. This means that harm to the significance of listed buildings has not been appropriately weighted.	
	- The ES assessment primarily considers individual features. This approach means that features such as the remains at Tyddyn Gele, which are assessed in the ES as of 'low' or 'medium' value in isolation, may have greater significance. For example, the remains at Site 05 South (Asset 547, Romano-British settlement at Tyddyn Gele) comprises a coherent group of roundhouses, burnt mounds and other features. The ES assesses this site as of 'high' significance, but also identifies individual features (e.g. Asset 565, sub-circular pit, Asset 537, ring ditch and burnt mound) as of between negligible and medium significance. It is not clear whether these features have been considered as components of this more significant feature. This approach is also problematic with regards to Cestyll Garden, where the assessment of significance provided in Appendix D11-4	Based on the sources of information identified in Chapter D11, for the purposes of assessment the approach taken in chapter D11 (cultural heritage), professional judgement was used to identify individual heritage assets. In some cases, for example Asset 565 these comprised individual features. In other cases, for example Asset 537 and 547 these were concentrations of features. This took into account attributes such as date and form. So, for example, Asset 565, contained a chert core and was therefore assessed to be of prehistoric date and therefore unlikely to be associated with Asset 547 which is of Romano-British date. Likewise Asset 537 was assessed to be of prehistoric date due to the presence of a burnt mound, and therefore unlikely to be associated with the Romano-British Asset 547. Based on the method presented in chapter B11, professional judgement was used to assess the value of heritage assets. So, for example, as an isolated pit which was partially excavated during trial trenching Asset 565 was assessed to be of negligible value, while as a burnt mound, one of a number identified within the WNDA, associated with a shallow ring gully, Asset 537 was assessed to be of medium value. Based on information from the trial trenching, personal communication from Horizon's on-site archaeologist and consultation with GAPS, Asset 547 was assessed to be of high value. The association of Asset 547 with Asset 566 and Asset 568 was also identified. Please refer to the gazetteer presented in Appendix D-11 Wylfa Newydd Proposed New Nuclear Power Station Cultural Heritage Baseline Report [APP-202 and APP-203] for more information on these and other heritage assets. As stated previously, as presented in chapter D11 (cultural heritage) Horizon took Cestyll Garden to comprise the whole of the Essential Setting, the valley garden, the kitchen garden and site of Cestyll House and the trackway that follows the former access to Cestyll House (see figures D11-20 and D11-21 [APP-237 and APP-238]). While the contribution made by these elements to the value of the Cestyll Garden may vary (see Wylfa Newydd Proposed New Nuclear Power Station Assessment of the significance of Cestyll (Grade II) Registered Historic Park and Gardens Final Report [APP-211], for the purposes of assessment the whole of the garden shown on figures D11-20 and D11-21 was assessed to be of high value. This is reflected in the assessment of the unmitigated and the residual significance of effect presented in chapter D11 (major adverse during construction and operation, moderate adverse during decommissioning).

(6.4.75) assesses the significance of the Valley Garden, Kitchen Garden and House Plot individually, but does not assess the contribution that the Essential Setting, driveway or Felin Gafnan make to the significance of the garden, or the group value of all these elements. Consequently, this assessment under-estimates the significance of the Kitchen Garden and House Plot and ignores the contribution that the driveway and Essential Setting make to the significance of the garden.

-The significance of the Dame Sylvia Crowe designed landscape has been assessed as "medium" on the basis of a high historic value and medium evidential, aesthetic and communal values (ES Appendix D11-5). However, for the reasons set out in the WNDA Historic Environment LIR, IACC is of the opinion that the historic, evidential and aesthetic values of this heritage asset should all be high and, consequently, the significance of this heritage asset should also be "high" rather than medium.

Based on the evidence presented in Appendix D11-5 Assessment of Significance of Dame Sylvia Crowe's Landscape Design at the Existing Power Station [APP-212], Horizon maintain that the assessment of medium value for Dame Sylvia Crowe's Landscaping is appropriate.

v) the assessment of effects is generally appropriate, although:

-The effect criteria cited in the assessment methodology reflect loss of historic fabric rather than loss of significance. This means that the historic interest of many heritage assets have not been appropriately considered in the assessment and that mitigation for this loss has not been considered in the proposed mitigation.

-The effect criteria cited in the assessment methodology do not offer any guidance for assessment of whether or not harm would arise to the significance of a designated heritage asset or non-designated asset of equivalent significance. There are cases in this assessment where harm, including substantial harm, is likely to arise but has neither been considered as part of the planning balance within the Planning Statement nor has justification for that harm been offered. These comprise: loss of archaeological heritage assets identified as of 'high' significance at Tyddyn Gele, Porth-yr-Ogof, Porth Wylfa and Pennant; harm to the significance of listed buildings at Felin Gafnan and Llanbadrig, loss of non-designated historic buildings at

Horizon do not agree that the historic interest of many heritage assets has not been appropriately considered. As identified in paragraph 11.4.17 of chapter B11, while the value of many archaeological remains is derived from their evidential value, where relevant historical value was also considered. In addition, as identified in table B11-11, historical associations were one of the criteria used to inform professional judgement in the assessment of the value of historic buildings, and where relevant was considered to be one of the historic building elements identified in table B11-11. As requested by PINS (please refer to table B11-4 in chapter B11) LANDMAP data was used as the basis for the identification and the assessment of value of Historic Landscape Types (HLT) and this includes the identification of associations with people/ movements /institutions/event/trends/technical/scientific discoveries.

As identified in paragraph 11.4.28 of chapter B11, substantial harm in line with the Overarching National Policy Statement for Energy (EN-1) [RD1], was taken to be commensurate with permanent, adverse effects on designated heritage assets with a major or very large residual significance of effect.

In addition, in paragraph 11.7.11 of chapter D11 it is stated that the effects on Cestyll Garden during construction would constitute substantial harm while as identified in paragraph 11.7.12 of the same chapter no other effects have been assessed to constitute substantial harm.

While the public benefits resulting from the Wylfa Newydd DCO Project would outweigh the harm resulting from their removal (required for the construction of the Power Station) in the case of effects on archaeological remains assessed to be of high value, it is Horizon's view that through the completion of archaeological investigations (including archaeological excavation which have been agreed with Cadw and GAPS and monitored by GAPS in their role as Curator) and the programme of reporting, analysis, publication, dissemination and archiving means that substantial harm to these heritage assets have been avoided. This position is reflected in paragraph 13.3.31 of the Welsh Government's Written Representation which states that:

"To avoid any substantial harm (as described in EN-1) to archaeological assets within the WNDA, Horizon must provide:

- 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.
- A Written Scheme of Investigation for the 18-remaining archaeological 'hot-spots'."

	Tyddyn Gele and Nant Orman, and harm to the significance of the Cestyll Garden and the Dame Sylvia Crowe designed landscape.	In the case of Grade II Listed Buildings at Felin Gafnan, comprising the Corn-drying House (Asset 141) and Mill House (Asset 144), in paragraph 4.5.6 of their LIR the IACC have stated that the Wylfa Newydd Development would not result in substantial harm to these historic buildings or to the Grade II* St Patrick's Church, Llanbadrig (Asset 26). While the mitigation identified in chapter D11 should prevent accidental damage to Felin Gafnan Corn Mill (Asset 137) from vibration, some residual risk remains and, on this basis, the residual significance of effect has been assessed to be Moderate. While this effect is considered to be significant with respect to the Infrastructure Planning EIA Regulations (2009), it is not assessed to be commensurate with substantial harm. As identified in chapter D11, construction of Power Station buildings, the MOLF, temporary causeway and breakwater would introduce noise and visual intrusion into the setting of the mill, transforming its tranquil coastal setting and introducing intrusion into the views of the mill from Cestyll Garden (HLT 2, high value) and the Wales Coast Path. While the residual significance of this effect has been assessed to be Major adverse, due to the temporary nature of noise and visual effects from construction plant, and that the association of the mill with the Corn drying house at Felin Gafnan (Asset 141, medium value) and the Mill House at Felin Gafnan, Cylch-y-Garn (Asset 144, medium value) would be maintained, this effect is not assessed to be commensurate with substantial harm. The significant visual intrusion from the Power Station and the western breakwater which started during construction would continue during operation. The significance of this residual effect was assessed to be Moderate adverse. Again while this effect is considered to be significant with respect to the Infrastructure Planning EIA Regulations (2009), it is not assessed to be commensurate with substantial harm as the association of the mill with the Corn drying house at Felin Gafnan (Asset 141, medium value) and the Mill House at Felin Gafnan, Cylch-y-Garn (Asset 144, medium value) would be maintained. As identified in chapter D15, decommissioning works would result in temporary noise and visual intrusion on the setting of the asset as a result of the operation of demolition plant, the removal of Power Station structures and remediation of the site. These works would be prominent and intrusive within the heritage asset's setting and has been assessed to have a residual effect of Moderate Significance. Again while this effect is considered to be significant with respect to the Infrastructure Planning EIA Regulations (2009), it is not assessed to be commensurate with substantial harm as the association of the mill with

		the Corn drying house at Felin Gafnan (Asset 141, medium value) and the Mill House at Felin Gafnan, Cylch-y-Garn (Asset 144, medium value) would be maintained. Likewise, whilst the breakwater would form a permanent intrusive feature in the mill's coastal setting, the association of the mill with the Corn drying house at Felin Gafnan (Asset 141, medium value) and the Mill House at Felin Gafnan, Cylch-y-Garn (Asset 144, medium value) would be maintained. As presented in Appendix D11-6 Effects on Heritage Assets [APP-213] the residual significance of this effect has been assessed to be negligible it is not assessed to be commensurate with substantial harm. The results of the Level 3 Historic Building recording of Nant Orman (Asset 138) undertaken by GAT (Davidson, J. 2012. Wylfa Archaeological Building Recording Report. (GAT Report 1066)) was reviewed. Based on this review, the value of this historic building has been revised from medium to low. Horizon consider that the negligible adverse residual significance of effect predicted in chapter D11 is appropriate and does not constitute substantial harm. Historic building recording of Tyddyn Gele, and Tyddyn Gele Garage (Asset 263) has been undertaken and report is being prepared (GAT, in prep.). The survey found that while the layout of Tyddyn Gele is little changed since the late 19th century, the entirety of the exterior and interior of the main house has been substantially renovated and modernised in recent years, and a significant proportion appears to have been entirely rebuilt. The roof, windows, floors, doors and fireplaces are all modern and all walls are recently rendered or plastered. The results of the historic building recording therefore support the assessment of low value presented in chapter D11 of the ES. Horizon also consider that the negligible adverse residual significance of effect predicted in chapter D11 is appropriate and does not constitute substantial harm. Paragraph 5.8.4 of EN-1 states that: There are heritage assets with archaeological interest that are not currently designated as scheduled monuments, but which are demonstrably of equivalent significance. These include: • those that have yet to be formally assessed for designation; • those that have been assessed as being designatable but which the Secretary of State has decided not to designate; and

		those that are incapable of being designated by virtue of being outside the scope of the Ancient Monuments and Archaeological Areas Act 1979. Paragraph 5.5.8 further states that: <i>“The absence of designation for such heritage assets does not indicate lower significance. If the evidence before the IPC indicates to it that a non-designated heritage asset of the type described in 5.8.4 may be affected by the proposed development then the heritage asset should be considered subject to the same policy considerations as those that apply to designated heritage assets”</i> Based on the evidence presented in Appendix D11-5 Assessment of Significance of Dame Sylvia Crowe's Landscape Design at the Existing Power Station [APP-212], Horizon maintain that the assessment of medium value for Dame Sylvia Crowe's Landscaping is appropriate. Thus while significant, this heritage asset is not designated, nor is it demonstrably of equivalent significance to a Scheduled Monument, and while, as per the guidance provided by EN-1, the effect on this heritage should be considered in the decision making process, it is not clear why the policy tests for substantial harm should apply. It is also Horizon's position that while the residual effects during construction without mitigation are predicted to be significant (moderate without mitigation reducing to minor adverse after mitigation) and the moderate residual significance of effect predicted during operation are significant, they are not commensurate with substantial harm to, or total loss of, the significance of Dame Sylvia Crowe's Landscaping.
	The significance of effect on heritage assets is considered, as is common practice in EIA, following the application of mitigation. This does not reflect the NPS provision (NPS EN-1 5.8.19) that the ability to record archaeological remains should not be a factor in deciding whether consent should be	As identified, in paragraph 11.7.11 of chapter D11 it is stated that that the effects on Cestyll Garden during construction would constitute substantial harm while as identified in paragraph 11.7.12 of the same chapter no other effects have been assessed to constitute substantial harm. The justification for substantial harm to Cestyll Garden is provided in the Planning Statement [APP-406] and expanded on in Horizon's response to the IACC's LIR.

	given. It is therefore necessary to consider the justification for substantial harm to non-designated heritage assets of equivalent significance to scheduled monuments regardless of whether archaeological mitigation can be put in place. Archaeological mitigation should only be considered for these heritage assets where loss is demonstrably justifiable in policy terms.	
	- It is concerning that the 10-year construction duration is characterised as 'short-term' and the 50-year operational life of the proposed development is considered 'medium-term'. These durations should be described as 'medium-term' and 'long-term' respectively as the combined 60 year duration of effects is a significant proportion of the lifespan of these heritage assets and of the people who would be denied the opportunity to properly experience them.	Noted.
	In addition, the reversibility if any adverse change is a matter of some uncertainty. Consequently, the IACC does not consider that reversibility should be considered as a mitigating factor in any assessment.	As identified in paragraph 11.4.19 of chapter B11 the assessment of the magnitude of change was informed by the duration of that change. As identified in table B11-13 in the same chapter the term reversible was to distinguish short-term, medium-term and long-term effects (which are reversible) from permanent effects (which are not reversible).

	vi) Limitations of the assessment are generally appropriately considered. However, IACC is concerned about the implications of specific limitations to the assessment of particular heritage assets, specifically: -There is no consideration of the implications of the absence of survey or additional documentary research at the Bristol Beaufighter crash site, which means that discussion of these remains in the ES is entirely conjectural.	Please see Horizon's response to the IACC's LIR.
	There is no consideration of the implications of the absence of survey at non-designated buildings at Tyddyn Gele and Nant Orman, which means that conclusions on their significance and the acceptability of their loss remain entirely conjectural.	As noted above the results of the historic building recording undertaken at Nant Orman (Asset 138) and Tyddyn Gele, and Tyddyn Gele Garage (Asset 263) have been reviewed. Based on this review both historic buildings have been assessed to be of low value.
	There is no consideration of the absence of detailed baseline or projected noise levels at Cestyll, Felin Gafnan, Cemlyn and Llanbadrig, which means that that little confidence can be placed in the assessments of effect on these heritage assets presented in the ES. There is also no clear statement of how noise effects have been considered.	As identified in chapter D11 (cultural heritage) this assessment was supported by the noise assessment presented in D6 (noise and vibration) [APP-125] (see specially figures D6-3 to D6-10) [APP-237]. It took into account the contribution that the existing noise environment made to the value of a heritage asset (based on professional judgement informed by site inspections) and change to that environment that could result from construction or operation of the project, based on the results of noise modelling presented in chapter D6 (Noise and vibration).

-Horizon has not provided an arboricultural survey of the wooded mounds in the Dame Sylvia Crowe designed landscape and, as explained in the WNDA Historic Environment LIR, the assessment of the cumulative effects of the Wylfa Newydd and NGET projects on this heritage asset (ES Appendix I5-1, 6.9.12) does not appear to have fully taken into account the likely extent of the loss of woodland on these mounds.

While an arboricultural survey was not undertaken, as identified in Appendix D11-5, (Appendix D11-5 Assessment of Significance of Dame Sylvia Crowe's Landscape Design at the Existing Power Station [APP-212]) the assessment of value was based on a range of sources including a site inspection. Based on the evidence presented in Appendix D11-5, Horizon maintain that the assessment of medium value for Dame Sylvia Crowe's Landscaping is appropriate.

FWQ6.0.5: Are you content with the Applicant's approach to Cultural Heritage for each site as set out in D11 [APP-130]; E11 [APP-248]; F11 [APP276]; G11 [App-314] and H11 [APP-365] and the Baseline Studies in APP-202 and APP-204 in relation to: (a) the study area; (b) the description and analysis of the baseline environment; (c) the design basis and proposed activities for the assessment of effects; (d) the approach to the assessment of effects methodology; (e) the proposed approach to additional mitigation, including the proposed mechanisms to secure additional mitigation through the Codes of Construction Practice, sub Codes of Construction Practice and the proposed Section 106 Agreement; and (f) the analysis of residual effects; during construction, operation and decommissioning for terrestrial archaeology, historic buildings and historic landscape types? If not please state the nature of the concern and how any issue might be dealt with.

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The IACC is content that the Applicant's approach to Cultural Heritage is generally appropriate, although some concerns remain and need to be resolved: a) The study areas for the EIA appear to be appropriate, although information on how observed and modelled noise has influenced the definition of study areas should be provided to the examination in order to demonstrate the robustness of these study areas.	The rationale for the size and extent of the study areas used for cultural heritage are set out in paragraphs 11.4.3 to 11.4.8 of chapter B11 of the Environmental Statement [APP-076]. Paragraph 11.4.3 identifies that the study area for the WNDA Development was based on the ZTV while paragraph 11.4.4 states that the assessment of potential effects on the setting of heritage assets was informed not only by the ZTV, but also by the area modelled for potential noise effects.
	b) The description and analysis of the baseline environment refers to an appropriate range of sources and is informed by an extensive programme of archaeological evaluation work. However, specific concerns remain:	
	i) The description and analysis of the baseline environment for the Main Site (D11, APP-130) does not effectively synthesise archaeological information	Please refer to Horizons response to the IACC's Local Impact Report (LIR) (Chapter 17, Historic Environment).

	from the extensive programme of evaluation. The results of archaeological fieldwork presented at appendices D11.2a (APP-204 and APP-205) and D11.2b (APP-206) do not form a complete record of archaeological works that have taken place. It is not clear to what extent the results of later works have been considered in the ES. A clear statement of what works have been carried out subsequent to those reported at AP-204, APP-205 and APP-206, setting out their scope, outline methodology and summary results, and a statement of how analysis of all of the archaeological evaluation works carried out to date have informed the ES, should be provided to the examination to fulfil the requirements set out at NPS EN-1 5.8.9 and 5.8.10 and at JLDP Policy AT 4.	Please also note that summary reports on the results of the archaeological investigations are due to be submitted at Deadline 6 (19 February 2018).
	ii) The description and analysis of the baseline environment presents an assessment of the significance of the Dame Sylvia Crowe designed landscape (ES Appendix D11-5) that appears to be based on a selective understanding of the LANDMAP data rather than on the extensive documentary and field study that was carried out to support this assessment. The conclusions on the significance of this heritage asset are also at odds with the totality of the LANDMAP assessment and appear to be a discernible understatement of its value.	Please refer to Horizons response to the IACC's LIR (Chapter 17, Historic Environment).

	iii) As explained in the answer to Q4.0.100 (and the Schedule 17 corrections provided), there are some omissions in Schedule 17 and in some of the associated plans in terms of the Important Hedgerows that will be affected by the A5025 and development on the WNDA.	The schedule will be revised based on the comments received.
	c) The ES assessment does not consider the policy requirement for a more detailed understanding of the basis for design proposals in order to justify substantial harm to designated heritage assets or those of equivalent significance.	Please refer to Horizons responses to the IACC's LIR (Chapter 17, Historic Environment) and to the IACC's response to FWQ Q6.0.2.
	-The justification provided for the extensive disturbance to the Registered Park and Garden at Cestyll in the Planning Statement (Vol 8.1, APP-407) does not reference any options appraisal documents or detailed design process that would have supported the iterative design process have arisen. While it is recognised that harm to the historic environment should be balanced with other environmental and technical factors, there is no evidence that this balancing has been undertaken and it is therefore not clear that any regard has been had to these opportunities. This is particularly concerning in that the NPS EN-6 Site Selection study (NPS EN-6 Volume 2) did not consider direct harm to Cestyll Garden and, consequently, cannot be considered to support substantial harm to the significance of this asset. Evidence of iterative design, demonstrating explicitly how harm to Cestyll Garden has been considered and	Please refer to Horizons response to the IACC's LIR (Chapter 17, Historic Environment).

	minimised as part of a balanced design decision should be provided to the examination in order to establish that the tests set out at NPS EN-1 5.8.15 and JLDP Policy AT 1 have been met.	
	-Justification for substantial harm to other designated heritage assets or non-designated heritage assets of equivalent significance, including archaeological remains within the Main Site, is not provided. Appropriate justification of this harm, including evidence of an iterative design process, demonstrating explicitly how harm to these heritage assets has been considered and minimised as part of a balanced design decision should be provided to the examination in order to establish that the tests set out at NPS EN-1 5.8.15 and JLDP Policy AT 4 have been met.	Please refer to Horizon's response to the IACC's LIR (Chapter 17, Historic Environment).
	- As explained in the Park & Ride Landscape LIR, the design of the Park & Ride facility has not minimised the effects on Important Hedgerows and modifications to the design should be undertaken to reduce the loss of these heritage assets.	Please refer to Horizons response to the IACC's LIR (Chapter 19, Landscape and Visual).
	d) The approach to the assessment of effects methodology raises a number of concerns as set out in the answer to Q6.0.2. In general, these do not materially affect the results of the assessment, but in certain cases as identified below, either more information is required or an additional judgement needs to be made.	Please refer to Horizons response to the IACC's response to FWQ Q6.0.2.

	-Effects on non-designated heritage assets of 'high' significance (i.e. of equivalent significance to scheduled monuments) within the Main Site at Tyddyn Gele, Porth Wylfa and Porth-yr-Ogof. It is not clear whether features identified as of 'high' significance at Porth-yr-Ogof and Porth Wylfa are considered in the assessment of effects on the early-medieval cist cemetery at Porth Wylfa. It is also not clear whether prehistoric features of low and medium significance at Tyddyn Gele have been considered within the assessment of the effects on the Romano-British settlement at Tyddyn Gele. A clear statement of exactly how these heritage assets relate to the most significant archaeological remains should be provided to the examination. It is considered that the loss of these heritage assets should be considered as harm to significance of heritage assets of equivalent significance to scheduled monuments and would still need to be justified, regardless of the ability to record these heritage assets in line with NPS EN-1 5.8.15 and 5.8.19 and JLDP policy AT 4.	Please refer to Horizons response to the IACC's response to FWQ Q6.0.2.
	-the use of DMRB methodologies for assessment means that loss of historic interest at Capel Soar has not been considered and appropriate mitigation has not been offered. -The ES does not consider potential positive change in the settings of listed buildings and	Horizon do not consider that that historic interest contributes significant to the value of Capel Soar Scheduled Monument, but rather the value of this standing stone is derived primarily from its evidential value for its potential to enhance our knowledge of prehistoric burial and ritual practices. Nevertheless in addition to the mitigation identified in chapter G11 [APP 314], and pending the identification of an appropriate location, Horizon are content to explore the provision of an interpretation board at Capel Soar Standing Stone. As set out in the Draft DCO s.106 Agreement Status Note submitted at Deadline 2 (4 December 2018) [REF1-010], the Draft DCO s.106 Agreement secures provision for a Heritage Interpretation Board Contribution to fund this.

	other heritage assets within the villages of Llanfaethlu and Llanfachraeth resulting from the removal of through traffic.	
	- The historic significance of the Trefignath burial chamber and Ty Mawr standing stones is not considered and no mitigation is proposed. This is contrary to JLDP Policy AT 4 and SPG Policy GP23	Horizon do not consider that that historic interest contributes significantly to the value of either the Trefignath burial chamber and Ty Mawr Standing stone, but rather the value of these heritage assets is derived primarily from the evidential value for its potential to enhance our knowledge of prehistoric burial and ritual practices. This has been taken into consideration in chapter H11 (cultural heritage) of the Environmental Statement [APP-365]. In addition potential effects on the relationship between these Scheduled Monuments, and their settings were also assessed. Nevertheless in addition to the mitigation identified in chapter G11 [APP 314], and pending the identification of an appropriate location, Horizon is content to explore the provision of enhanced interpretation in the form of an additional interpretation board at Capel Soar Standing Stone. As set out in the Draft DCO s.106 Agreement Status Note submitted at Deadline 2 (4 December 2018) [REF1-010], the Draft DCO s.106 Agreement secures provision for a Heritage Interpretation Board Contribution to fund this.
	e) The IACC does not accept that sufficient mitigation is provided by the CoCPs as they lack the necessary detail. The IACC has made detailed submissions on this point in its Written Representation at section [11] The proposed approach to additional mitigation of direct effects appears complex, lacks transparency and does not address the loss of historic interest inherent in the heritage assets that would be removed by the proposed development. The structure and means of securing additional mitigation is discussed in more detail in the response to Q6.0.8, but general points are raised below.	The additional mitigation is identified in chapter D11 (cultural heritage) [APP-130] and in Appendix D11-6 (effects on heritage assets) [APP-213] while the securing mechanism is provided by the Wylfa Newydd CoCP [APP-414] and various sub-CoCPs [APP-415 to 420]. As identified in paragraph 11.6.6 of the chapter D11 (cultural heritage) archaeological recording would be undertaken in accordance with relevant guidance provided by the Chartered Institute for Archaeologists and Written Scheme of Investigations (WSI) which would be agreed with Gwynedd Archaeological Planning Service (GAPS). The WSI would provide the detailed required.
	i) The agreement of a written scheme of investigation (WSI) including appropriate analysis and dissemination would, in	As identified in paragraph 11.6.6 of the chapter D11 (cultural heritage) archaeological recording would be undertaken in accordance with relevant guidance provided by the Chartered Institute for Archaeologists and WSIs which would be agreed with Gwynedd Archaeological Planning Service

principle, be appropriate to mitigate loss of archaeological interest.

ii) Any WSI should be agreed with GAPS in advance of the conclusion of the Examination to provide confidence that the proposals set out are appropriate and enforceable.

iii) Any WSI must include proposals for the integration and appropriate dissemination of the results of works carried out to date in addition to any additional mitigation works carried out post-consent.

iv) The securing of the WSI through a Construction Environmental Management Plan or Code of Construction Practice does not, as currently worded, set out an appropriate mitigation response. This document could be an appropriate mechanism, although it must remain clear that in many cases, archaeological field works should be completed in advance of construction.

v) The WSI should include a table demonstrating the concordance of the DCO WSI with the WSIs submitted for the programme of investigation carried out under Horizon's PD rights and the WSI agreed for the TCPA application for the Site Clearance works. The WSI should also include a statement to the effect that in the event of any discrepancies between the provisions of the WSIs that the procedures set out in the DCO WSI have primacy.

vi) Archaeological investigation and recording would not offer mitigation of loss of historic

(GAPS). The information to be included in the WSIs would be based on the relevant standard and guidance from the Chartered Institute for Archaeologists and other information as required by GAPS.

Please see Horizon's response to IACC's LIR (Chapter 17, Historic Environment) for a response on the timing of the delivery of the WSIs.

	interest, and further proposals for mitigation which would address this loss should be provided to the examination. This mitigation is discussed in more detail in the response to Q6.0.8, but should include proposals for: - engagement of various different audiences before, during and after the completion of archaeological fieldwork; - display and promotion of materials recovered during fieldwork; - enhanced interpretation materials to be provided in public-access areas; - enhanced public access to areas of archaeological interest; and - provision of a project-specific engagement officer to coordinate public engagement initiatives and act as a liaison between different stakeholders within the engagement process. This could be part of a community liaison brief. All other mitigation and compensation measures outlined in the Historic Environment LIRs should be secured by way of DCO requirements and S106 obligations. The s106 is still at an early draft stage and is being progressed. The IACC has provided comments on that in its Written Representation at section [10]	
	f) The assessment of residual effects is generally appropriate. However, the assessment raises a number of specific concerns that need to be addressed. In some cases, further information is required. These are:	Please see Horizon's response to the IACC's LIR (Chapter 17, Historic Environment) for information on vibration monitoring.

	-The Grade II* listed Corn Mill at Felin Gafnan. Insufficient information is provided to allow for an informed understanding of the effectiveness of mitigation for potential vibration effects on the structure of the asset to be able to confirm that substantial harm would not arise. More detail of these mitigation proposals should be submitted to the examination;	
	-Nationally significant archaeological remains, including those at Porth Wylfa, Porth-yr-Ogof, Pennant and Tyddyn Gele, where no justification for the total removal of these heritage assets has been offered. More detailed justification for the requirement to remove these heritage assets should be provided to the examination;	Please see Horizon's response to the IACC's LIR (Chapter 17, Historic Environment).
	-Non-designated historic buildings at Tyddyn Gele and Nant Orman, where the valuation of these assets is in question as a result of limited survey work. Further information should be submitted to allow the examination to understand the significance of these heritage assets.	Please see Horizon's response to the IACC's LIR (Chapter 17, Historic Environment).
	-The assessment of the Dame Sylvia Crowe designed landscape appears to be understated as a result of a lack of baseline information (i.e. an arboricultural survey), the understatement of its value (should be high instead of medium), the lack of acknowledgement of its relationship with the wider landscape and an underestimation of the likely significant effects with the NGET project. Consequently, effects on this heritage	Please see Horizon's response to the IACC's LIR (Chapter 17, Historic Environment).

	asset should be treated as significant and adverse, and proposals for landscape mitigation, enhancement and ongoing management above and beyond the recording proposed should be provided to the Examination and a Woodland Management Plan should be secured by a DCO requirement or a S106 obligation.	
	-While the ES assessment acknowledges that harm to the significance of Cestyll Garden will be significant, it does not acknowledge or consider a number of other potential effects. These include change to hydrology and drainage, the effect of noise and vibration on the specific soundscape of the valley garden, and the effects of the fundamental change to the landscape through which the Garden is approached. These effects should all be considered when developing an effective mitigation response. See response to Q6.0.11 for more detail.	As identified in paragraphs 11.5.32 to 11.5.40 of chapter D11 of the Environmental Statement (Cultural heritage) [APP-130] potential effects on Cestyll Garden during construction would result from: • removal of the kitchen garden; • removal of the plot of land where Cestyll House formerly stood; • removal of part of its Essential Setting; • changes in air quality potentially affecting plants within the valley garden; • noise intrusion from construction, especially construction of the temporary causeway, proposed breakwaters and the MOLF. This assessment was supported by the noise assessment presented in D6 of the ES (Noise and vibration) [APP-125] (see specially figures D6-3 to D6-10) [APP-237 and APP-238]. • visual intrusion, including visual intrusion from the temporary causeway, proposed breakwaters and the MOLF into the valley garden and the Essential Setting of the garden, significantly detracting from its tranquil character, and the temporary causeway and the breakwater would be dominant and incongruous in the Significant View from the garden. The magnitude of these effects was assessed to be large and the significance of effect has been assessed to be major adverse. As identified in paragraph 11.5.40 of chapter D11, no effects on Cestyll Garden are predicted due to changes to surface water or groundwater that may result from construction activities (see chapter D8 of the ES [APP-127]. As stated in paragraph 11.5.54 of chapter D11 (Cultural heritage) [APP-130] and illustrated by illustrated by the photomontage from Viewpoint 15 [see appendix D10-8, APP-199] the Power Station

		would be a dominant feature in the setting of Cestyll Garden (HLT 2; high value), while the breakwater would be a continued presence in the Significant View from the valley garden. The magnitude of this effect was assessed to be large and the significance of effect to be major adverse. In addition no significant effects are predicted to result from vibration. As can be seen from the above potential effects from change to hydrology and drainage, the effect of noise and vibration have been assessed.

FWQ6.0.5 : Are you content with the Applicant's approach to Cultural Heritage for each site as set out in D11 [APP-130]; E11 [APP-248]; F11 [APP276]; G11 [App-314] and H11 [APP-365] and the Baseline Studies in APP-202 and APP-204		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	With regards to d) Cadw still have concerns (see Written Representation 13.3.15 and 13.3.16) that the impact of the temporary waste water treatment plant on the registered garden and its setting has not been assessed in the heritage chapter of the Environmental Statement.	Please refer to Horizon's response to the Welsh Government's Written Representation
	Cadw also note the relevant representation made by the Welsh Historic Gardens Trust (AS-004) and minutes from a recent meeting between Horizon, IACC and National Trust which raise concerns over the proposed redirection of ground water into the Afon Cafnan and through the valley garden which could cause erosion to the stream bed and banks and damage to the planting in the valley garden.	The Flood Consequence Assessment [APP-150] states (at paragraph 8.3.8): "The groundwater pumped from the main excavations would be pumped to a sedimentation pond to be treated prior to being discharged to the sea at Porthy-pistyll. This would not increase the flood risk off-site, therefore, the risk of the pumped groundwater to receptors is negligible with the resulting significance of effect and flood risk from this source also considered negligible." The only activity which would result in groundwater being redirected to the Afon Cafnan is from the dewatering of the coffer dammed areas to maintain a dry working area. The water would consist of rainfall plus seawater and groundwater seepages and would be discharged at surface water drainage outfall point(s) at the Afon Cafnan. The Construction Water Discharge Activity – Environmental permit identifies that the volume, and therefore significance, of the groundwater component would be small and was not considered further. Chapter D8 of the ES – Surface water and groundwater [APP-127] identifies reduced groundwater baseflow to the Afon Cafnan as a result of the mounding and dewatering during construction and as a result of mounding during operation, such that there will be no erosive effect from changes to groundwater in the Afon Cafnan. An increase in flood flows is predicted as a results of a higher runoff rate and more rapid response. The scale of velocity increases with flood risk across all scenarios modelled (2020's, 2080s, 2180s, pluvial, fluvial etc) amounts to +0.096m/s, which is for an extreme 0.1% AEP event. This amounts

		to a 7.9% increase in average velocity, which would not result in catastrophic erosion as the bulk of the change would be in the centre of the water column where velocities are highest. Please refer to Appendix D8-7 – surface water and ground water modelling results (Part 1 of 7) [APP-160] for more information on the results of surface and ground water modelling.
	With regard to e) Cadw consider the current mitigation proposals to be inadequate. We would like commitment from the developer to the long-term funding for the management, maintenance and enhancement of the remaining areas of the registered park and garden to be secured through the production and implementation of a Conservation Management Plan.	Please refer to Horizon's response to Welsh Government's Written Representation on this matter.
	In addition we have raised concerns with the developer in respect to the formation of a bank (identified as Landscaping Mound D) and its impact upon parts of the registered Cestyll Park and Garden.	Mound D would remove part of the Essential Setting of Cestyll Garden and the route of the former access to site of Cestyll House which has been removed. This would contribute to the major adverse residual significance of effect during construction and operation predicted on the garden Cestyll Garden (please refer to Chapter D11 - Cultural heritage [APP-130] for more information). It is Horizon's view that the adverse effects on the Cestyll Garden need to be balanced against the function of Mound D which, as identified in paragraph 6.3.18 of the Landscape and Habitat Management Strategy [APP-424] include: • Helping to protect views into the site from the south which would include the spent fuel storage area; • Softening views of the Power Station Site from the west and south-west, including views from existing PRoWs and diverted Wales Coast Path; • Providing screen mitigation up to a height of approximately 8m above existing ground level.
	The mechanism for securing additional mitigation is a planning issue and we expect there to be a robust mechanism for securing mitigation and offsetting the impact of the proposals.	As identified in Chapter D11 – Cultural heritage of the ES [APP-130] additional mitigation measures would be secured through inclusion in section 12 of the Wylfa Newydd CoCP [APP-414], the Main Power Station Site sub-CoCP [APP-415] being secured through requirements in the draft DCO [REP2-020] or would be secured through the Draft DCO s.106 agreement to be entered into between Horizon, the Isle of Anglesey County Council (IACC) and others that have an interest in the land.

		As IACC is aware, Horizon does not have control over Cestyll Garden; however, Horizon and the NDA are in the process of agreeing heads of terms for acquisition of a number of land interests which include Cestyll Gardens, although it is currently subject to contract, Horizon note NDA's desire to safeguard the amenity of Cestyll Garden and Horizon's proposals align with this objective. Heads of Terms for the draft DCO s.106 agreement were submitted at Deadline 1 (13 November 2018) [REP1-010] and includes for a payment to be made to the NDA to deliver the CMP for Cestyll Garden and a commitment to use reasonable endeavours to enter a deed of covenant to develop and deliver a CMP.
	The impact of the development could be mitigated through reconfiguration of the temporary laydown area to avoid direct impact (removal) on the kitchen garden and house site. Slight redesign of the proposed mounding (Mound D) to avoid the drive way to Cestyll would also mitigate the impact on the registered park and garden – if mound D was redesigned to stand to the east of the Cestyll drive this would avoid direct impact. Cadw would prefer there to be no impact on the kitchen garden so that it can be restored and public access allowed	Please refer to Horizon's response to Welsh Government's Written Representation on this matter, and to the response above with regard to Mound D.
	Cadw also consider that the mitigation proposed at the church of St Padrig for disruption during construction is also inadequate, and would like the developer to make a commitment to contribute to enhancement of the visitor experience, to be agreed with the church community.	Please refer to Horizon's response to Welsh Government's Written Representation on this matter.
	With regards to (d) it is not clear why potential vibration effects have not been considered for the corn drying kiln and mill-house.	These properties are included in the vibration assessments which inform ES Chapter D11 – Cultural heritage [APP-130]. However, due to their distance from potential sources, no residual significant effects from vibration were predicted for Grade II Listed Corn-drying house at Felin Gafnan (Asset 141), and Grade II Listed Mill house at Felin Gafnan, Cylch-y-Garn (Asset 144), and therefore an effect from vibration on these historic buildings was not identified in ES Chapter D11 – Cultural heritage [APP-130].

		Nevertheless, these buildings will be included in vibration risk assessments undertaken as part of the applications for prior consent under Section 61 of the Control of Pollution Act 1974 that Horizon has committed to in the Wylfa Newydd CoCP [REP2-031]. Continuous vibration monitoring will also be undertaken in the vicinity of Felin Gafnan during construction. Please refer to the Horizon's response to the National Trust's Written Representation on Noise and Vibration Impact on Tenanted Properties and Heritage Assets for more information on the approach that would be taken.
	With regard to (e) Cadw consider the mitigation measures to be inadequate and would like commitment from the developer to the repair and making good of any physical damage to the mill, mill house and corn-drying kiln that may occur as a result of vibration, to be secured through development and delivery of a conservation management plan.	Please refer to Horizon's response to Welsh Government's Written Representation on this matter.
	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.	Please refer to Horizon's response to Welsh Government's Written Representation on this matter.

FWQ6.0.6: 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:

- (a) the likely effects;
- (b) the proposals for additional mitigation; and
- (c) the significance of residual effects

Satisfactory for archaeological remains; historic buildings; and historic landscapes and gardens during construction, operation and decommissioning? If not explain why and outline what needs to be done to address any issues.

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	a) The applicant's assessment of the likely effects of the proposed scheme is generally appropriate. However, there are a number of specific issues where the assessment of IACC varies from that set out in the ES. D11-6 (APP-213) There is a lack of clarity over the significance of non-designated buildings at Tyddyn Gele and Nant Orman which are considered as of equivalent significance to Grade II listed buildings under the ES assessment criteria, and consequently may be of listable quality. There is therefore insufficient information within the ES and appendices to confirm that the loss of nondesignated buildings at Tyddyn Gele and Nant Orman would not be significant and would not constitute substantial harm to heritage assets of equivalent significance to a listed building. Further evidence of the significance of these features, including building survey and desk-based records, should be provided to the Examination in order to allow an informed understanding of these effects in line with NPS EN-1 5.8.8 and JLDP Policy AT 3.	Noted. Please refer to Horizon's response to the IACC's response to FWQ Q6.0.2[REP2-002]

	The Grade II listed church of St Patrig at Llanbadrig, where it is assessed that a significant adverse effect would arise, although no supporting evidence for this assessment is provided. Further information on baseline and projected noise levels (including results of any noise monitoring and modelled noise contours during construction) and their contribution/effect on significance should be provided to the Examination in order to fully understand the nature and magnitude of this effect in line with NPS EN-1 5.8.8.	As identified in paragraph 11.4.20 of chapter D11 (cultural heritage) Response to 3.29 assessment was supported by the noise assessment presented in D6 (noise and vibration) (Application Reference Number: 6.4.6) (see specially figures D6-3 to D6-10) (Application Reference Number: 6.4.101).
	The Grade II listed Old Farmhouse at Plas Cemlyn, where it appears likely that harm to significance would arise as a result of change to setting. A satisfactory basis for this asset having been scoped out of the assessment has not been offered. Further information regarding baseline and projected noise levels (including results of any noise monitoring and modelled noise contours during construction) and baseline and predicted views and their contribution to significance should be provided to the examination to fully understand the nature and magnitude of any effect in line with NPS EN-1 5.8.8.	Please refer to chapter 17 of Horizon's response to the IACC's LIR.
	The Dame Sylvia Crowe designed landscape - IACC considers that the significance of this asset is high and the effects would be significant and adverse.	Please refer to chapter 17 of Horizon's response to the IACC's LIR.
	The magnitude of lasting change in the setting of the Grade II* Corn Mill and other listed buildings at Felin Gafnan appears understated. Mitigation proposals are considered in more detail in the responses to Q6.0.11 and 6.0.13.	Please refer to Horizons response to the IACC's response to FWQ Q6.0.2 on the assessment of the effect on Felin Gafnan and the other listed buildings at Felin Gafnan.

	E11-2 (APP-263) - The IACC is content with the findings of the Assessment.	Noted.
	F11-5 (APP-301) - The IACC is content with the findings of the Assessment, albeit that the impacts on Important Hedgerows have not been assessed and further mitigation should be secured to reduce the impacts on these heritage assets.	As presented in paragraph 11.3.22 of chapter F11 (cultural heritage) [APP-276], eight important hedgerows, as defined under The Hedgerows Regulations 1997, were identified within the Park and Ride site. These hedgerows were identified as part of the Fieldscape, Central Eastern Mon HLT (HLT 1) and are shown on figure F11-1 [APP-303]. As detailed in appendix F11-5 [APP-301], elements of HLT 1 would be removed as a result of construction of the Park and Ride, comprising field boundaries. Field boundaries to be removed would be subject to photographic survey to mitigate this impact. These can be effectively implemented and secured through inclusion in chapter 12 of the chapter 12 of the Wylfa Newydd CoCP [APP-414] and chapter 12 of the Park and Ride sub-CoCP [APP-418], both being secured through Development Consent Order requirements.
	G11-5 (APP-351) - While the assessment does not acknowledge limited degrees of short-term harm to Grade II listed buildings at Siop Soar and the Black Lion Inn during construction, IACC considers that best-practice mitigation of visual, noise, air quality and traffic effects during construction would present an appropriate response to these effects.	Potential effects on Siop Soar and the Black Lion Inn (Assets 149 and 150) during construction were identified in paragraph 11.5.20 of chapter G11 (cultural heritage) [APP-314]. As identified in in paragraph 11.4.9 of chapter G11 "While no good practice mitigation has been identified specifically for effects on cultural heritage assets, the construction good practice mitigation identified in chapter G5 (Application Reference Number: 6.7.5), chapter G6 (Application Reference Number: 6.7.6), chapter G8 (A5025 Off-line Highway Improvements - surface water and groundwater) (Application Reference Number: 6.7.8) and chapter G10 (Application Reference Number: 6.7.10) would also help to mitigate potential effects on heritage assets; such as measures to reduce dust generation, noise and vibration as set out in sections 7 and 8 of the A5025 Off-line Highway Improvements sub-Code of Construction Practice (CoCP) (Application Reference Number 8.12)."
	- The assessment does not acknowledge the limited degree of lasting harm to the Capel Soar standing stone, which would arise primarily through loss of historic interest. No mitigation proposals are set out, and the IACC consider that some additional mitigation is warranted under the provisions of SPG Policy GP 23.	A permanent effect with a moderate residual significance of effect on Capel Soar Standing Stone (Asset 146) was identified in chapter G11 (please refer to paragraph 11.5.23 and table G11-8. Horizon do not consider that that historic interest contributes significant to the value of Capel Soar Scheduled Monument (Asset 146), but rather the value of this standing stone is derived primarily from its evidential value for its potential to enhance our knowledge of prehistoric burial and ritual practices.) Nevertheless in addition to the mitigation identified in chapter G11 [APP-314], and pending the identification of an appropriate location, Horizon are content to explore the provision of enhanced interpretation in the form of an additional interpretation board at Capel Soar Standing Stone. The draft

		DCO s.106 submitted at Deadline 2 (4 December 2018) includes provision under Heritage Interpretation Board Contribution for this.
	- The assessment does not consider potential positive change in the settings of listed buildings and other heritage assets within the villages of Llanfaethlu and Llanfachraeth resulting from the removal of through traffic which should be balanced against the potential increased noise or visual intrusion from the proposed bypasses. These effects should be considered and the results provided to the Examination.	While it is noted that there may be a beneficial effect on the settings of heritage assets within the villages that would be bypassed, as these benefits would not materially change the assessment as presented in appendix G11-5 [APP-351], Horizon consider that no further assessment is required.
	H11-5 - Harm to significance of the Trefignath burial chamber and Ty Mawr standing stones is not recognised. The historic significance of these heritage assets is not considered and no mitigation is proposed.	Please refer to Horizons response to the IACC's response to FWQ Q6.0.5.

FWQQ6.0.6: 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: (a) the likely effects; (b) the proposals for additional mitigation; and (c) the significance of residual effects Satisfactory for archaeological remains; historic buildings; and historic landscapes and gardens during construction, operation and decommissioning? If not explain why and outline what needs to be done to address any issues.

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
Welsh Government	Cadw are in agreement with a) the likely effects on Cestyll registered park and garden and its setting. Cadw do not consider the current mitigation proposals (b) to be adequate (see above comment to Q6.0.5).	Please refer to Horizon's response to the Welsh Government's Written Representation submitted at Deadline 3 (18 December 2018)
	Overall, Cadw are content with the approach taken for dealing with the terrestrial archaeology and historic landscape. However, see 6.0.19.	Noted.
	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.	Please refer to Horizon's response to the Welsh Government's FWQ 6.0.5. submitted at Deadline 3 (18 December 2018)

FWQ6.0.8: Are the proposals for delivering a Cultural Heritage Management Strategy set out in section 12 of the relevant Code of Construction Practice and sub-Codes of Construction Practice [APP-414 to APP-420] adequate to effectively plan, manage and control all construction activities in relation to Cultural Heritage and deliver acceptable outcomes that meet the criteria set out in EN-1Part 5.8 (Historic Environment) and heritage policies at national (Wales) and local levels? Indicate where there might be deficiencies and the action that might be taken to remedy them.

Interested Party	IP response to FWQ	Horizon's Comments
IACC	The proposals for delivering a Cultural Heritage Management Strategy (CHMS) as set out in Section 12 of the Code of Construction Practice do not represent an appropriate response to such a large and complex project and do not afford confidence that an enforceable programme of archaeological works would be undertaken in a way that would allow information recovery to be maximised and consistency of standards to be achieved. They also do not offer appropriate mitigation for loss of historic interest. Specifically, the CoCP sets out a piecemeal and ad-hoc approach that does not appear to address all of the measures that will be necessary to mitigate adverse effects on the historic environment. The CHMS does not address mitigation measures other than archaeological recording of at-risk heritage assets. The CHMS should set out a clear list of all specific documents that contain provisions for mitigation of effects on the historic environment to ensure that the delivery of these provisions can be effectively monitored. This concordance should also refer to any obligations/requirements that are used to secure mitigation measures.	

	Mitigation proposals need to be considered in terms of four specific areas:	
	a) Archaeological recording. An overarching Written Scheme of Investigation (WSI) for the whole Wylfa scheme, including Associated Development, should be set out. This document would set out the structure, aims and methods for any archaeological investigation of below-ground heritage assets, historic buildings and historic landscapes as set out in the WNDA Historic Environment of the LIR.	Horizon are in the process of preparing a Cultural Heritage Mitigation Strategy (CHMS). The CHMS will be supported by Written Schemes of Investigation (WSI) which will detail how these mitigation measures will be implemented, along with post-fieldwork assessment, reporting, analysis, publication (if required) and archiving. The need for the WSI and mitigation identified will be secured through section 12 of the Wylfa Newydd CoCP [APP-414], the Main Power Station Site sub-CoCP [APP-415], the Off-Site Power Station Facilities sub-CoCP [APP-417]) the Park and Ride sub-CoCP [APP-418] and Logistics Centre sub-CoCP [APP-419] and A5025 Off-line Highway Improvements sub-CoCP [APP-420].
	b) Landscape mitigation i) The agreed CMP for Cestyll and Felin Gafnan should be appended as a sub CoCP. ii) The agreed Woodland Management Plan for the Dame Sylvia Crowe designed landscape should be appended as a sub-CoCP.	Horizon has committed to providing a financial contribution under the draft DCO section 106 agreement for the delivery of enhancement, interpretation and maintenance the valley garden at Cestyll Garden. However, Horizon and the NDA are in the process of agreeing heads of terms for acquisition of a number of land interests which include Cestyll Gardens, although it is currently subject to contract. It is therefore anticipated that an updated position will be offered. As identified in the historic environment section of Chapter 17 of Horizon's response to the IACC's LIR on this matter. landscape management is secured by the Main Power Station Site sub-CoCP [APP-415]; paragraphs 11.19) and the Wylfa Newydd Code of Operational Practice [APP-421] so as to be in-line with the Landscape and Habitat Management Strategy [APP-424 and 425]. This would include requirements for management and enhancement of landscape features, including areas of Dame Sylvia Crowe designed woodland and how new areas of landscaping would completed areas of retained landscape mounding.
	c) Best Practice Construction Mitigation Proposals for the management of dust, vibration, noise and visual intrusion of the proposed works should be cross-referenced in the historic environment section of the CoCP.	The cultural heritage chapters D11 [APP-130], E11 [APP-249], F11 [APP-276], G11 [APP-314] and H11 [APP-365] cross-refer to 'controlling' documents that secure the various construction mitigation measures relied upon to reach the findings reported in the Environmental Statement. Furthermore, the Mitigation Route Map [APP-422] is provided to sign-post where mitigation is committed as part of the DCO application.

		In many instances, the Wylfa Newydd CoCP [APP-414] and relevant sub-CoCPs [APP-415 to APP-420] are those 'controlling' documents. They are certified documents (to be approved under article 76 of the Draft DCO (REP1-005) and Requirements in Schedule 3 of the Draft DCO that state the construction of the Wylfa Newydd DCO Project, as described in Schedule 1 of the Draft DCO, must be carried out in accordance with the Wylfa Newydd CoCP and relevant sub-CoCP applying to a specific site. Therefore, the CoCPs in their entirety will influence the construction management of the Wylfa Newydd DCO Project, and as such there is no need to cross-refer from one topic section to another
	In particular, a more robust description of the in-principle mitigation strategy for Felin Gafnan than has been set out in the ES, is required. A statement of how potential harm could be identified, before it reached a stage where damage has occurred and would be irreversible, should be provided to the Examination to provide confidence that any such effect could be avoided.	As identified in paragraph 11.6.13 of chapter D11 cultural heritage [APP-130] a vibration risk assessment undertaken as part of the applications for prior consent under Section 61 of the Control of Pollution Act 1974 that Horizon has committed to in the Wylfa Newydd Code of Construction Practice [APP-414]. Continuous vibration monitoring will also be undertaken in the vicinity of Felin Gafnan during construction. Please refer to the Horizon's response to the National Trust's Written Representation on Noise and Vibration Impact on Tenanted Properties and Heritage Assets for more information on the approach that would be taken.
	d) Heritage Outreach Detailed proposals for heritage outreach aimed at mitigating loss of historic interests of heritage assets should be produced and appended as a sub-CoCP. This should set out proposals for heritage-based engagement as set out in the Historic Environment section of the WND A LIR Chapter.	Please see the historic environment section of Chapter 17 of Horizon's response to the IACC's LIR on this matter.

FWQ6.0.8: Are the proposals for delivering a Cultural Heritage Management Strategy set out in section 12 of the relevant Code of Construction Practice and sub Codes of Construction Practice [APP-414 to APP-420] adequate to effectively plan, manage and control all construction activities in relation to Cultural Heritage and deliver acceptable outcomes that meet the criteria set out in EN-1Part 5.8 (Historic Environment) and heritage policies at national (Wales) and local levels? Indicate where there might be deficiencies and the action that might be taken to remedy them.

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
WG	With regard to the impact on the RPG, the Main Power Station Site sub-Code of Construction Practice (APP-415) lists the proposed mitigation for the 'Loss of Kitchen Garden and effects on Valley Garden at Cestyll Gardens' and for 'Cestyll House, Former Site of, Porth-y-pistyll (Asset 132) and 'Air Quality Effects on Cestyll Garden.' See Cadw's comments regarding inadequate proposed additional mitigation at Q6.0.5.	In relation to Welsh Government's comments regarding FWQ6.0.8 , please see Horizon's response FWQ6.0.5.
	Cadw also note concerns raised in the Relevant Representation submission from the Welsh Historic Gardens Trust which raises concerns over vibration impacts and hydrology on the registered garden: 'The consequences of potentially destabilising vibration during construction, these effects may take years to show, especially with regards to the health of mature trees.' 'The proposed redirection of ground water into the Afon Cafnan and through the valley garden, this, in times of heavy rainfall could cause potentially catastrophic erosion of the planting and banks of the stream running through the Valley garden.' (Quoted from WHGT relevant representation).	Please see Horizon's response to FWQ6.0.5.
	With regards to Historic buildings, please see the response to Q6.0.5 about the inadequacy of the mitigation measures,	Please see Horizon's response to the Welsh Government's Written Representation submitted at Deadline 3 (18 December 2018)

	and Chapter 13 of the Written Representation.	

FWQ6.0.11: With reference to Cestyll Garden (Historic Landscape Type 2) and on the Register of Parks and Gardens of Special Historic Interest in Wales and the sites of Cestyll House and kitchen garden, do you agree with the Applicant's assessment of effects; proposals for additional mitigation; and the analysis of the significance of residual effect during construction, operation and decommissioning, as set out in 6.4.11 ES Volume D - WNDA Development D11 - Cultural heritage [APP-130]?

Referring to the Relevant Representations submitted on this issue [RR-020; RR-053; RR-092]:

(a) What further evidence is required to identify the extent of potential impacts?

(b) What further detail is required to enable assessment of the harm? (c) Are there any additional measures that could be taken to mitigate the impact of the development on this heritage asset?

(d) What should be included in the planning obligation to be agreed with

National Trust, Cadw and Gwynedd Archaeological Planning Service referred to in para. 6.4.203 of 8.1 Planning Statement [APP-406] intended to address the designs of appropriate landscape measures to restore and/or enhance the former location of the Cestyll Garden kitchen garden?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	a) As identified and explained in more detail in the Historic Environment Section of the WNDA LIR Chapter, the following further evidence is required:	Please refer to Horizon's response to Chapter 17 of IACC's Local Impact Report submitted at Deadline 2 (4 December 2018). Horizon also refers to responses that Horizon gave to a number of the Examining Authority's First Written Questions [REP2-002] as noted below. In addition to these responses, Horizon makes the following comments.
	- Clear and convincing justification that demonstrates what, if any, loss is necessary in order to deliver the project.	
	- Clarity regarding exactly what is to be lost and the mitigation and restoration proposed within and around the Garden.	Figures to illustrate potential effects on Cestyll Garden were provided to the Examining Authority at Deadline 2 (4 December 2018) in response to FWQ Q6.0.17 [REP2-002] and should help to clarify effects on Cestyll Garden.
	- The implications of the parameter approach on Cestyll Garden, including varying the height and location of the Power Station platform and associated elements of the project (such as Mound D) and the extent to which these measures could reduce the impacts on the Garden.	Please also refer to Horizon's response to Q6.0.2 [REP2-002]. As identified in that response, assessing the worst-case scenario used in Chapter D11 (cultural heritage) of the ES [APP-130] is consistent with the 'Rochdale Envelope' or parameter approach used in ES. Please refer to chapter B1 (Introduction to the assessment process) [APP-066] for more information on this approach. This approach is also consistent with that identified in the Environmental Impact Assessment Scoping Report and Addendum [APP-060].

	- Potential changes to drainage, air quality and vibration across the site which may indirectly give rise to physical changes to the asset through erosion or damage to planting	The potential effects resulting from construction of the Wylfa Newydd DCO Project on Cestyll Garden have been assessed in detail throughout the Environmental Statement. Of particular relevant, Horizon notes the following. As identified in response to Q6.0.5, and as stated in paragraphs 11.5.32 to 11.5.40 of chapter D11 (Cultural heritage) of the ES [APP-130] potential effects on Cestyll Garden during construction would result from: • removal of the kitchen garden; • removal of the plot of land where Cestyll House formerly stood; • removal of part of its Essential Setting; • changes in air quality potentially affecting plants within the valley garden; • noise intrusion from construction, especially construction of the temporary causeway, proposed breakwaters and the MOLF. This assessment was supported by the noise assessment presented in D6 of the ES (Noise and vibration) [APP-125] (see specially figures D6-3 to D6-10) [APP-237 and APP-238]; • visual intrusion, including visual intrusion from the temporary causeway, proposed breakwaters and the MOLF into the valley garden and the Essential Setting of the garden, significantly detracting from its tranquil character, and the temporary causeway and the breakwater would be dominant and incongruous in the Significant View from the garden. The magnitude of these effects was assessed to be large and the significance of effect has been assessed to be major adverse. As identified in paragraph 11.5.40 of chapter D11, no effects on Cestyll Garden are predicted due to changes to surface water or groundwater that may result from construction activities (see chapter D8 of the ES [APP-127]. As stated in paragraph 11.5.54 of chapter D11 (Cultural heritage) [APP-130] and illustrated by illustrated by the photomontage from Viewpoint 15 [see appendix D10-8, APP-199] the Power Station would be a dominant feature in the setting of Cestyll Garden (HLT 2; high value), while the breakwater would be a continued presence in the Significant View from the valley garden. The magnitude of this effect was assessed to be large and the significance of effect to be major adverse.

		In addition no significant effects are predicted to result from vibration. As can be seen from the above potential effects from change to hydrology and drainage, the effect of noise and vibration have been assessed.
	- The understanding of noise across the site needs to be more clearly modelled so that the extent of audible change can be better established. For example, in Horizon's assessment of effects on Cestyll Garden, it is stated that "it will get noisy here". However, their noise assessment predicts LAEQ 1hr levels of 70-75d (loud vacuum cleaner in the same room) at peak and 60-65db (loud enough to disrupt normal conversation) for much of the construction period during the day at Cemlyn and at Cestyll, and 45-50dB at night. Such high noise levels would result in harm to this heritage asset for the duration of the construction period.	Potential effects on Cestyll Garden during construction, operation and decommissioning including noise effects were assessed in detail in chapter D11 of the ES [APP-130]. As detailed in this assessment, increases in noise during construction would contribute to the major adverse significance of effect predicted during construction in chapter D11. As identified in paragraph 11.4.2 of Chapter D11, this assessment was supported by the noise assessment presented in D6 (Noise and vibration) [APP-125] (see specially figures D6-3 to D6-10) [APP-237 and APP-238].
	- An assessment of the combined impacts (noise, dust, vibration, lighting, visual impact, etc) on Cestyll Garden and its associated Grade II* Listed Building (Corn Mill), and the measures proposed to mitigate these.	As identified in chapter D11 of the ES [APP-130] possible effects from noise, dust, vibration, lighting, visual impact have been taken into considered in the assessment of the magnitude and significance of effect on Cestyll Garden resulting from the Wylfa Newydd DCO Project. Appropriate mitigation measures to address these effects have also been identified and are assessed in chapter D11.

FWQ6.0.11: With reference to Cestyll Garden (Historic Landscape Type 2) and on the Register of Parks and Gardens of Special Historic Interest in Wales and the sites of Cestyll House and kitchen garden, do you agree with the Applicant's assessment of effects; proposals for additional mitigation; and the analysis of the significance of residual effect during construction, operation and decommissioning, as set out in 6.4.11 ES Volume D - WNDA Development D11 - Cultural heritage [APP-130]?

Referring to the Relevant Representations submitted on this issue [RR-020; RR-053; RR-092]:

(a) What further evidence is required to identify the extent of potential impacts?

(b) What further detail is required to enable assessment of the harm? (c) Are there any additional measures that could be taken to mitigate the impact of the development on this heritage asset?

(d) What should be included in the planning obligation to be agreed with

National Trust, Cadw and Gwynedd Archaeological Planning Service referred to in para. 6.4.203 of 8.1 Planning Statement [APP-406] intended to address the designs of appropriate landscape measures to restore and/or enhance the former location of the Cestyll Garden kitchen garden?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
Welsh Government	Paragraph 13.3.2 – 13.3.8 of the Written Representation Cadw agree that there will be a significant adverse impact on the registered park and garden and its setting. It is considered that the currently proposed mitigation and offsetting measures to be inadequate. With regards to a) see comment above (Q6.0.5) regarding potential impact of the temporary waste water treatment plant and potential impact of the redirection of ground water – further evidence required for clarification); with regards to c) the impact of the development could be mitigated through reconfiguration of the temporary laydown area to avoid direct impact (removal) on the kitchen garden and house site.	Please refer to Horizon's response to Welsh Government's Written Representation for a response on the potential effect of the temporary waste water treatment plant on Cestyll Garden. Please refer to Horizon's response to Welsh Government's answer to FWQ 6.0.5 with regard to potential effects from ground water on the valley garden at Cestyll Garden. Please refer to Horizon's response to the IACC's LIR (chapter 17, historic environment) for justification for the siting of the laydown area which required removal of the kitchen garden.
Welsh Government	The redesign of the proposed mounding (Mound D) to avoid the drive way to Cestyll would also mitigate the impact on the registered park and garden – if mound D was redesigned to stand to the east of	Please refer to Horizon's response to Welsh Government's answer to FWQ 6.0.5. Horizon notes that all of Horizon's responses referred above were submitted at Deadline 3 (18 December 2018).

	the Cestyll drive this would avoid direct impact; d) we would prefer there to be no impact on the kitchen garden so that it can be restored and public access allowed. The detail of the planning obligation required to provide mitigation and restoration is still under discussion. However Cadw consider that as the laydown area is temporary the kitchen garden site should be included in the Conservation Management Plan to ensure long term restoration and enhancement.	

FWQ6.0.13: With reference to: Felin Gafnan Corn Mill (Grade II* Listed Building); Mill House at Felin Gafnan (Grade II* Listed Building); and The Corn-drying House at Felin Gafnan (Grade II Listed Building);(a) Do you agree with the Applicant's assessment of effects; proposals for additional mitigation; and the analysis of the significance of residual effect during construction, operation and decommissioning, set out in 6.4.11 ES Volume D - WND A Development D11 - Cultural heritage [APP-130]? (b) Are there any additional measures that could be taken to mitigate the impact of the development on these heritage assets?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
	a) The ES states that, following the application of mitigation, the Grade II* listed Corn Mill would be subject to a 'short-term' adverse change of major significance during construction (a 10-year period) and a lasting adverse change of moderate significance, even following the offsetting and mitigation measures. This assessment appears to be understated given: -the uncertainty over the effectiveness of mitigation for damage arising from vibration; -the duration of the effects during construction; -the permanent transformation of the setting of this asset resulting from construction of the breakwaters, which would permanently transform the existing coastal setting into a predominantly industrial aspect. It is therefore considered that even where structural damage to the asset can be avoided, that the transformation of the setting during construction would constitute, or approach, substantial harm. While this change would reduce following the completion of construction, the proximity and scale of the new power	Please refer to Horizon's response to Horizon's response to FWQ6.0.13 of the submitted at Deadline 2 (4 December 2018) [REP2-002].

	station and the retained MOLF and cooling water breakwaters would still present dominant and detracting elements in the setting of the asset. There would be a sizeable magnitude of harm that would remain for an indefinite duration.	
	IACC is content that an assessment of harm to the significance of the Grade II listed buildings at Felin Gafnan is appropriate, given their increased separation from the proposed development and the nature of the contribution of views into Porth-y-Pistyll from these assets.	Noted.
IACC	Proposals for mitigation of adverse effects comprise a combination of monitoring the effects of vibration on the Corn Mill, recording and landscape mitigation. -The Corn Mill is a fragile structure containing surviving mill machinery. It is likely to be particularly sensitive to damage caused by vibration. It is appropriate that provision should be made to avoid any such effects and to monitor the effectiveness of such mitigation. Further detail of this potential mitigation is required, specifically: -a statement of the magnitude of vibration where it is considered likely that structural damage might arise, taking into account the specific conditions of the site and the nature and structural condition of the buildings; -a statement of the magnitude of vibration likely to arise, modelled on the observed ground conditions and the range of	Please refer to Horizon's response to chapter 17 of the IACC's Local Impact Report submitted at Deadline 3 (4 December 2018). Horizon considers that the measures to mitigate effects on Grade II* Listed Felin Gafnan Corn Mill (Porth y Felin) (Asset 137), Grade II Listed Corn-drying house at Felin Gafnan (Asset 141), and Grade II Listed Mill house at Felin Gafnan, Cylch-y-Garn (Asset 144) identified in chapter D11 of the ES (cultural heritage) [APP-130], can be effectively implemented and are appropriately secured through inclusion in chapter 12 of the Wylfa Newydd CoCP [REP2-031] and chapter 12 of the Main Power Station Site sub-CoCP [REP2-032], compliance with which is secured through requirements in the Draft DCO [REF2-020]..

construction plant and activities anticipated to be used.

-a statement of how monitoring would be undertaken and how potentially damaging effects would be identified and curtailment process put in place before damage occurs.

-a statement of any alternative method to be used where observed vibration levels preclude the further use of planned plant or activities.

-a clear statement of whether any structural works planned or required in advance of construction works that would reduce the potential for inadvertent harm.

-a clear statement that non-damaging construction activities have been considered, providing clear reasons why these techniques have not been considered further.

-a clear undertaking that any inadvertent damage will be appropriately repaired

ii) Recording of these heritage assets in their current setting should be undertaken. A more detailed drawn and photographic survey of the Corn Mill and the historic mill machinery within it should be undertaken in advance of construction work to stand as a record in case of inadvertent damage and to inform any structural works that may be necessary.

iii) Landscape mitigation should be delivered in accordance with an agreed Conservation Management Gafnan and Cestyll Garden (Q6.0.11, Q6.0.16)

FWQ6.0.13: With reference to: Felin Gafnan Corn Mill (Grade II* Listed Building); Mill House at Felin Gafnan (Grade II* Listed Building); and The Corn-drying House at Felin Gafnan (Grade II Listed Building);(a) Do you agree with the Applicant's assessment of effects; proposals for additional mitigation; and the analysis of the significance of residual effect during construction, operation and decommissioning, set out in 6.4.11 ES Volume D - WND A Development D11 - Cultural heritage [APP-130]? (b) Are there any additional measures that could be taken to mitigate the impact of the development on these heritage assets?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
Welsh Government	Cadw have concerns that the potential effects of vibration have not been identified for the mill house and corn drying kiln, and do not consider that the proposed mitigation measures are adequate. Cadw would like the developments to make a commitment to the repair and making good of any physical damage to the mill, mill house and corn-drying kiln that may occur as a result of vibration, to be secured through development and delivery of a conservation management plan.	Please refer to Horizon's response to Q6.0.5 [REP2-002] for information on the assessment of vibration effects on Grade II Listed Corn-drying house at Felin Gafnan (Asset 141), and Grade II Listed Mill house at Felin Gafnan, Cylch-y-Garn (Asset 144). As identified in Horizon's response to the Welsh Government's Written Representation where Horizon is responsible, they are content to make good damage to the following historic buildings: • Grade II* Listed Felin Gafnan Corn Mill (Porth y Felin) (Asset 137); • Grade II Listed Corn-drying house at Felin Gafnan (Asset 141); and • Grade II Listed Mill house at Felin Gafnan, Cylch-y-Garn. This will be secured through inclusion in chapter 12 of the Wylfa Newydd CoCP [REP2-031] and chapter 12 of the Main Power Station Site sub-CoCP [REP2-032], compliance is secured through requirements in the Draft DCO [REP2-020].

FWQ6.0.16: Is there merit in drawing up a comprehensive Conservation Management Plan for the group of heritage assets comprising: Cestyll Garden (Historic Landscape Type 2) The sites of Cestyll House and kitchen garden Felin Gafnan Corn Mill (Grade II* Listed Building); Mill House at Felin Gafnan (Grade II* Listed Building); and The Corn-drying House at Felin Gafnan (Grade II Listed Building); Cafnan House (Grade II Listed Building) If so, how might this be done and how might it be secured through the dDCO?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	It is difficult to see how effective mitigation for the Cestyll and Felin Gafnan group of heritage assets could be secured without a comprehensive Conservation Management Plan (CMP) that sets out overall aims, methods and principles for the restoration, management and enhancement of these heritage assets. Attempts to deal with these heritage assets piecemeal would preclude any attempt to manage these features as a coherent group and would increase the risk of further fragmentation and loss of these highly significant heritage assets. The CMP should be: -developed by the applicant in consultation with the relevant landowners. This plan would set out proposals for further work required to restore elements of these heritage assets and their settings based on a clear understanding of their significance. -submitted to the Examination, and secured by a DCO requirement that ensures that the works set out in the CMP are carried out in line with the scope of works, standards for work and timetable set out within the CMP. It is recognised that the CMP would be enforceable only in terms of works that	Please refer to Horizon's response to Q6.0.16 of the Examining Authority's First Written Questions submitted at Deadline 2 (4 December 2018) [REP2-002]. In light of IACC's response, Horizon makes the following further points. The mitigation for Cestyll Garden includes a commitment for Horizon to work with the landowners and other interested parties to consider appropriate enhancement measures such as greater interpretation, including on-site interpretation boards at the valley garden, enhanced public access to the valley garden, regular maintenance and restoration of the valley garden. As previously advised, Horizon does not have control over Cestyll Garden, but is in discussions with the Nuclear Decommissioning Authority (NDA) (the owners of Cestyll Garden) with regard to the production and implementation of a CMP for the Cestyll Garden. Please refer to Horizon's Statement of Common Ground with the NDA [D2-20] submitted at Deadline 2 (4 December 2018) for more information. In addition, as noted in the draft DCO s.106 Agreement Status Note submitted at Deadline 2 (4 December 2018) [REP1-010], the Draft DCO s.106 Agreement Status Note includes for a payment to be made to the NDA to deliver and deliver the CMP for Cestyll Garden which will comprise restoration works, the installation of interpretation boards, and a programme of maintenance for the duration of the operational period of the Wylfa Newydd Power Station. Further, Horizon and the NDA are in the process of agreeing heads of terms for the acquisition of a number of land interests which include Cestyll Garden, although it is currently subject to contract. Horizon's proposal will align with the NDA's objectives to safeguard the amenity of Cestyll Garden. The mitigation for effects on the Grade II* Listed Felin Gafnan Corn Mill (Porth y Felin) (Asset 137), Grade II Listed Corn-drying house at Felin Gafnan (Asset 141), and Grade II Listed Mill house at

	would be funded or carried out by the Applicant in mitigation of adverse effects on the Garden and associated heritage assets. It is important to note that the CMP sets out overarching aims and principles for work to ensure consistency between works carried out by the applicant and by third-party landowners in addition to detailed specifications and scopes of works required by the DCO as mitigation of the effects of the construction and operation of the proposed development, and which are set out as advisory principles for ongoing management. Funding for the works required as mitigation for adverse effects of the scheme that would be carried out by third parties or on land not controlled by the applicant should be secured through an appropriate legal agreement in order to provide assurance that such works would be carried out.	Felin Gafnan, Cylch-y-Garn (Asset 144) are set out in section 11.6 of chapter D11 (cultural heritage) of the ES [APP-130]. In addition, the following mitigation measures will also be undertaken: • Historic England Level 4 Historic Building Recording of the Grade II* Listed Felin Gafnan Corn Mill (Porth y Felin) (Asset 137), Grade II Listed Corn-drying house at Felin Gafnan (Asset 141), and Grade II Listed Mill house at Felin Gafnan, Cylch-y-Garn (Asset 144); and • Pending the identification of an appropriate location, Horizon are content to explore the provision of enhanced interpretation in the form of an additional interpretation board at Felin Gafnan with the landowner. Horizon consider that the measures to mitigate effects Grade II* Listed Felin Gafnan Corn Mill (Porth y Felin) (Asset 137), Grade II Listed Corn-drying house at Felin Gafnan (Asset 141), and Grade II Listed Mill house at Felin Gafnan, Cylch-y-Garn (Asset 144) identified in chapter D11 (cultural heritage), and above, can be effectively implemented and are appropriately secured through inclusion in chapter 12 of the Wylfa Newydd CoCP [APP-414] and chapter 12 of the Main Power Station Site sub-CoCP [APP-415]/ Compliance with the Wylfa Newydd CoCP and Main Power Station Site sub-CoCP is then secured through requirements in the Draft DCO [REF1-005]. Horizon considers this mitigation is sufficient and any additional or combined CMP for this group of heritage assets is unnecessary.

FWQ6.0.16: Is there merit in drawing up a comprehensive Conservation Management Plan for the group of heritage assets comprising: Cestyll Garden (Historic Landscape Type 2); The sites of Cestyll House and kitchen garden; Felin Gafnan Corn Mill (Grade II* Listed Building); Mill House at Felin Gafnan (Grade II* Listed Building); and The Corn-drying House at Felin Gafnan (Grade II Listed Building); Cafnan House (Grade II Listed Building)

If so, how might this be done and how might it be secured through the dDCO?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
WG	As referred to a paragraph 13.4.5 of the Welsh Government 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.	In relation to Welsh Government's comments on FWQ6.0.16, please refer to Horizon's response to the Welsh Government's Written Representation.

FWQ6.0.19: 6.8.1 ES Volume H - Logistics Centre H1 - Proposed development [APP355]

proposes the maintenance of the view between the Ty Mawr Standing Stone and the Trefignath Burial Chamber across the southern corner of the site.

(a) Do the proposals illustrated in Fig A2-5 Logistics Centre Masterplan in 8.1.10 ES Figure Booklet- Volume A [APP-06] achieve this objective in a satisfactory manner?

(b) Are impacts on the significance of the setting of these scheduled monuments adequately mitigated?

If not explain how the issues might be addressed.

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The construction of the logistics centre between the Ty Mawr Standing Stone and Trefignath Burial Chamber is considered by IACC to give rise to harm to the significance of these heritage assets. While the direct sightline would be retained in its narrowest sense, the logistics centre would still intrude on this visual link which contributes to historic and archaeological interest. Lighting of the logistics centre would also have the potential to further intrude on views of the winter solstice sunrise from Ty Mawr. The proposed mitigation set out in the ES (APP-355) is not adequate to mitigate the potential harm. In addition to the proposed mitigation, these effects could be minimised by designing the vehicle parking lighting schemes to minimise intrusion on the sightline and by careful planning of any visual screening primacy of the existing sightlines between the assets. Mitigation of loss of historic and archaeological interest	All matters raised by IACC has been addressed in Horizon's response to IACC's Local Impact Report: Chapter 20 Parc Cybi Logistics Centre, submitted at Deadline 3 (18 December 2018).

	provided by management of lighting around the particular sunrise and sunset times that are understood informed the siting of these assets and through provision of enhanced interpretation materials at the assets themselves.	

FWQ6.0.19: 6.8.1 ES Volume H - Logistics Centre H1 - Proposed development [APP355] proposes the maintenance of the view between the Ty Mawr Standing Stone and the Trefignath Burial Chamber across the southern corner of the site. (a) Do the proposals illustrated in Fig A2-5 Logistics Centre Masterplan in 8.1.10 ES Figure Booklet- Volume A [APP-06] achieve this objective in a satisfactory manner? (b) Are impacts on the significance of the setting of these scheduled monuments adequately mitigated? If not explain how the issues might be addressed.

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
WG	Please refer to paragraph 13.3.38 – 13.3.43 of the Written Representation However, in summary: a) Yes – in that the intervisibility between the two monuments is retained. b) No – the assessment has not adequately assessed the impact that the logistics centre will have on the setting of the monument. There will be additional noise, movement and lighting introduced within the immediate vicinity of the monument. In line with our Written Representation Cadw would expect to be consulted on the detail design of the Logistic Centre to ensure that impacts such as light pollution, landscaping, and noise attenuation measures can be considered.	All of the matters raised by the Welsh Government have been addressed in Horizon response to the Welsh Government's written representation submitted at Deadline 3 (18 December 2018).

FWQ6.0.23: Would archaeological digs and/or archaeological finds be accessible to local groups as suggested by Cemaes Bay History Group [RR-016] and Jesse Hughes Youth Club [RR-051] and if so how would this be secured?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	IACC considers that the provision of appropriate access to archaeological investigations and their results is a policy requirement under NPS EN-1 5.8.20, and would be consistent with Wylfa Newydd SPG GP 23 Conserving and Enhancing the Historic Environment. While it is acknowledged that it would be impracticable to provide physical access to all investigations, it is reasonable to expect that reasonable provision should be made for public access, both physically and through a wider engagement programme. If consented, the archaeological works for Wylfa Newydd would represent unique opportunity to engage with the archaeology and history of Anglesey and Wales, and there will be considerable public interest at local and national levels. IACC has set out, in the response to Q6.0.8, its expectations for mitigation of loss of historic interest of assets within the site, which includes provision for access to archaeological investigations.	Please refer to Horizon's response to Q6.0.23 of the Examining Authority's First Written Questions submitted at Deadline 2 (4 December 2018) [REP2-002]. Please also refer to Horizon's response to IACC's Local Impact Report (Chapter 17) which also addresses this matter.

FWQ7.0.1: The Applicant has made an assessment of the proposed development against National Policy Statements (NPS) EN-1 and EN-6, as well as considering planning policy specific to Wales (PPW and TANs) and local development plan policies which are considered to be relevant to the development.

(a) Are the IACC and the Welsh Government satisfied that the Planning Statement addresses all relevant aspects of National Policy Statements, Welsh policy and development plan policies?

(b) Are the IACC and the Welsh Government in agreement with the applicant's conclusions that the 'Proposed Development complies with the relevant planning policy tests'?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The IACC considers that there is considerable detail required to properly answer this question and therefore includes the full response in appendix 2A. The reasoning and justification for the summary responses given below are set out in that appendix. a) No, because the worst case scenario is not always assessed b) Yes, in general, the study areas are sufficient to identify all significant effects on landscape character and landscape designations. c) No, not all receptors which should be included are identified and assessed. d) No, there is not a comprehensive inventory of the distribution and condition of individual landscape elements within the sites. e) No; the approach of relying almost entirely upon representative viewpoint assessments has substantially weakened the visual assessment. The result is an absence of quantitative assessment of significant adverse	Horizon note the opinion expressed by the IACC on the methodology used to prepare the landscape and visual chapters of the Environmental Statement (ES). Horizon confirm that their assessment of landscape and visual effects is based on the widely recognised best practice guidelines, set out in the <i>Guidelines on Landscape and Visual Assessment, Third Edition (GLVIA3) (Landscape Institute and Institute of Environmental Management and Assessment, 2013)</i>. The IACC have made several detailed comments on the approach to the assessment based on their interpretation of these guidelines. However, Horizon wish to note that the GLVIA3 are not intended to be prescriptive and instead provide guidance on best practice, advocating a proportionate approach to assessment, stating that <i>"it is especially important (a) to note the need for proportionality, (b) to focus on likely significant adverse or positive effects, (c) to focus on what is likely to be important to the competent authority's decision"</i>. Horizon also wish to note that a stakeholder meeting was held with the IACC and NRW on 1 April 2016, to discuss the proposed methodology for the LVIA, following which minor amendments were made to address their comments. In this response, Horizon have responded to the main points raised by the IACC but reference should also be made to Horizon's response to chapter 17 of the Local Impact Report (LIR) for a more detailed response on the practical application of their approach to the assessment of the likely significant landscape and visual effects of the Wylfa Newydd Development.

effects.

f) In general the IACC is highly supportive of the use of the DRMB for the A5025 Off-line Highway Improvements for the landscape and visual assessments, however the descriptors and definitions for the sensitivity, magnitude, significance and duration criteria are different to those used for the assessments of the other aspects of the Wylfa Newydd Project, which makes it difficult to compare the impacts of the A5025 and the other developments, and also makes it difficult to undertake the assessment of cumulative intraproject impacts based on these assessments. The approaches at these development sites do not reflect the methodology set out in ILP Professional Lighting Guide 04 for night-time visual effects.

g) IACC disagree with the statement in section 10.4.70 that "There are no limitations to the assessment undertaken within the scope of the methodology set out above"; the IACC considers that a number of limitations apply.

(a)

Assessment of parameters

Horizon confirm that the worst-case scenario of each of the Wylfa Newydd Project developments has been assessed. This is clearly set out in section 10.4 of each landscape and visual chapter, as follows;

- paragraphs 10.4.2 to 10.4.5 of chapter D10 of the ES [APP-129] for the Power Station;
- paragraph 10.4.2 of chapter E10 of the ES [APP-248] for the Off-Site Power Station Facilities;
- paragraph 10.4.2 of chapter F10 of the ES [APP-275] for the Park and Ride;
- paragraph 10.4.2 of chapter G10 of the ES [APP-313] for the A5025 Offline Highway Improvements; and
- paragraph 10.4.2 of chapter H10 of the ES [APP-364] for the Logistics Centre.

(b)

Identification of study area

Horizon wish to clarify that the ZTVs have been generated based upon Natural Resources Wales LiDAR data with 2m resolution. The references to OS DTM on the ZTV figures are errata, which will be formally confirmed. However, this does not affect the accuracy or validity of the ZTVs in any way. Horizon acknowledges the comments made by IACC that the *"study areas are sufficient to identify all significant effects on landscape character and landscape designations."*

(c)

Identification of receptors

Horizon wish to note that whilst NPS EN-1 (Department of Energy and Climate Change, 2011) states that assessment should include effects on "landscape components and landscape character", the policy is not prescriptive on how this assessment should be done, neither does it state that the effects on landscape components and landscape character should be assessed separately. Horizon confirm that the effect on constituent elements, such as trees, woods or hedgerows, has been considered as part of the effects on landscape and seascape character and not as individual receptors. Horizon wish to note that effects on 'perceptual aspects' of landscape character have been included in the assessment of landscape effects for all landscape receptors. This is recognised in the methodology in chapter B10 of the ES [APP-075] in paragraph 10.1.3 and 10.4.39, which states in the latter that *"The size and scale of change in the landscape is mainly a reflection of the extent or*

		<i>proportion of landscape elements lost or added and/or the degree to which aesthetic or perceptual aspects are altered, both of which may result in erosion or enhancement of landscape character.”</i> Intervisibility has been established not only by ZTV modelling, but also by site appraisal. The approach taken to the Horizon assessment of community views has been to assess the visual impact on ‘representative viewpoints’ within communities from publicly accessible locations rather than individual resident’s views (which forms part of residential amenity) from private land. As explained in chapter B10 of the ES (landscape and visual) [APP-075], this approach was set out in the methodology document provided to the IACC and discussed during the stakeholder meeting held on 1 April 2016 where the IACC expressed support for a community views approach to the assessment. The use of representative viewpoints accords with GLVIA3, which advocates a proportionate approach to LVIA and recommends that representative viewpoints should be “<i>selected to represent the experience of different types of visual receptor, where larger numbers of viewpoints cannot all be included individually and where the significant effects are unlikely to differ</i>”. Horizon wish to clarify that the assessment of representative viewpoints in appendix D10-7 [APP-198] is detailed, rather than as suggested by the IACC, ‘high level’. Refer to the Horizon response in LIR chapter 17 for ‘visual’ for further detail regarding the community views approach. At the request of the IACC in a meeting held on 17 October 2018, Horizon has agreed to consider providing supplementary assessment of three additional representative viewpoints for Cemaes and one additional viewpoint at Tregelle, to provide further information on the likely effects on visual amenity within the communities of Cemaes and Tregelle. Horizon is planning to submit this into examination at Deadline 6. Horizon consider the assessment of community views for the Logistics Centre, the Park and Ride and the Off-Site Power Station Facilities to be proportionate and are therefore not proposing further assessment of community effects for these developments. (d) Identification of baseline conditions Horizon wish to clarify that paragraph 5.36 of GLVIA3 does not require a “<i>comprehensive inventory of the distribution and condition of individual landscape elements</i>” to be produced, as suggested by the IACC. The surveys provided are considered to ‘identify and map’ the main landscape elements of relevance to the assessment and the landscape baseline descriptions in section 10.3 of each landscape and visual chapter is consider to provide a concise description of landscape elements, as follows:

- paragraphs 10.3.5 to 10.3.22 of chapter D10 of the ES [APP-129] for the Wylfa Newydd Development Area;
- paragraphs 10.3.12 to 10.3.21 of chapter E10 of the ES [APP-248] for the Off-Site Power Station Facilities;
- paragraph 10.3.9 to 10.3.18 of chapter F10 of the ES [APP-275] for the Park and Ride;
- paragraphs 10.3.6 to 10.3.8 (section 1), 10.3.19 to 10.3.21 (section 3), 10.3.39 to 10.3.41 (section 5), paragraph 10.3.55 to 10.3.57 (section 7) and paragraphs 10.3.70 to 10.3.72 (Power Station Access Road Junction) of chapter G10 of the ES [APP-313] for the A5025 Offline Highway Improvements; and
- paragraph 10.3.11 to 10.3.25 of chapter H10 of the ES [APP-364] for the Logistics Centre.
- A plan illustrating those elements that would be retained, as well as 'new elements', is provided for each chapter as follows:
- the reference point 5 drawing of the Landscape and Habitat Management Strategy [APP-425] for the Power Station;
- figure 20 (indicative landscape masterplan) and figure 21 (indicative planting strategy) of volume 3 of the Design and Access Statement, appendix 1-1 (Off-site Power Station Facilities) [APP-409] for the Off-site Power Station Facilities;
- figure 21 (landscape masterplan) and figure 22 (planting strategy) of volume 3 of the Design and Access Statement, appendix 1-3 (Park and Ride Facility at Dalar Hir) [APP-410] for the Park and Ride;
- the A5025 Landscape Scheme, figures 1 to 10 in appendix G10-9 [APP-344] for the A5025 Offline Highway Improvements; and
- figure 19 (landscape masterplan and general arrangement) and figure 20 (planting strategy) of volume 3 of the Design and Access Statement, appendix 1-4 (Logistics Centre) [APP-410] for the Logistics Centre.

This baseline information has informed the assessment of landscape effects in section 10.5 of each landscape and visual chapter, which includes a description of landscape elements that would be lost, as well as the addition of new landscape elements, and is considered to provide a "Good, clear and concise description of the effects that are identified" to help "a wide range of people understand what

		<i>may happen if the proposed change or development takes place</i>" in line with paragraph 5.36 of GLVIA3. The main description of landscape elements to be lost is set out in each chapter as follows: • paragraphs 10.5.43, 10.5.45 and 10.5.49 to 10.5.51 (in relation to the AONB) and paragraphs 10.5.59 to 10.5.62 and 10.5.66 (in relation to the non-designated wider landscape) of chapter D10 of the ES [APP-129] for the Wylfa Newydd Development Area; • disruption and loss of some landscape features such as hedgerows and trees, as referred to in paragraph 10.4.5 of chapter E10 of the ES [APP-248] have been considered in the assessment of landscape character for the Off-site Power Station Facilities; • paragraph 10.5.18 of chapter F10 of the ES [APP-275] for the Park and Ride; • paragraphs 10.5.5 to 10.5.7 (section 1), 10.5.28 to 10.5.31 and 10.5.46 to 10.5.47 (section 3), 10.5.63 to 10.5.64 and 10.5.66 (section 5), and, 10.5.101 to 10.5.102 and 10.5.104 (section 7) of chapter G10 of the ES [APP-313] for the A5025 Offline Highway Improvements; and • paragraph 10.5.19 and 10.5.21 of chapter H10 of the ES [APP-364] for the Logistics Centre. As additional mitigation, Table D10-40 of chapter D10 of the ES [APP-129] also includes a commitment to <i>"Undertake a detailed survey of stone wall and cloddiau construction (vernacular detailing), and hedgerow/tree species for field boundaries to be removed, to help ensure a degree of authenticity and historical continuity in the reinstatement of these features as part of the final landscape scheme, in accordance with the Main Power Station Site sub-CoCP"</i> [APP-415]. The detailed plans for sections 1, 3, 5 and 7 of the A5025 Offline Highway Improvements [APP-019 to APP-022] illustrate the landscape elements for removal. (e) Assessment of effects <i>Sensitivity of receptors</i> The criteria for determining the value of landscape receptors in chapter B10 of the ES [APP-075] is considered to accord with the guidance in GLVIA3, including the range of factors set out in Box 5.1,

		and are considered to provide a broad enough range of criteria for the assessment. The conclusion that all landscape receptors outside the AONB and SLAs are considered to be of 'medium' value, not only reflects the community value locally of these landscapes (which up until recently were designated as a SLA), but also other factors such as the recreational value associated with the landscape on Anglesey, which attract many visitors, as IACC note. It would not therefore seem appropriate to suggest that these landscapes would be of 'low' value. The fact that no landscape within the study areas are considered to be of 'low' or 'negligible' value is more a reflection of the Anglesey landscape context. The category negligible is sometimes used to describe landscapes which are degraded. While the description of value of the Landscape and Seascape Character Areas in appendix D10-3 (local landscape and seascape character study) [APP-194] focus on the key contributors to value for proportionality, all aspects listed in each value criteria in appendix B10 of the ES have been considered when deriving the conclusions. Factors other than designation status and LANDMAP value have also been considered. This is for instance apparent from references to Dame Sylvia Crowe's design (a cultural association) for Local Landscape Character Area (LLCA) 2 (Wylfa Landscape Setting). Horizon note that, while the IACC suggest that there is "<i>potential for landscape value to be incorrectly assessed</i>", no examples of such instances are provided. For transparency, a summary of the evaluation of susceptibility for each landscape and seascape receptor is set out in paragraphs 10.5.16 to 10.5.22 of chapter D10 of the ES [APP-129], as part of the description of evaluation of sensitivity or receptors. The susceptibility of LLCAs and Local Seascape Character Area (LSCAs) is respectively described in paragraphs 10.5.19 and, 10.5.21 to 10.5.22 of chapter D10 of the ES [APP-129]. The landscape value and susceptibility is not, as suggested by the IACC, the same for a number of landscape receptors, as is evident from appendix D10-6 (landscape effects schedule) [APP-197]. However, to ensure that the landscape sensitivity is not understated, the conclusion on sensitivity generally reflects the 'worst case' criteria, whichever is the higher of the value or susceptibility. Horizon note that, while the IACC suggest that there is potential for "<i>inaccuracies in the landscape sensitivities ascribed to landscape receptors</i>", no examples of such inaccuracies are provided. The summaries of the evaluation of value, susceptibility and sensitivity for the associated developments are described in the following paragraphs: • paragraphs 10.5.7 to 10.5.8 of chapter E10 of the ES [APP-248] for the Off-Site Power Station Facilities; • paragraph 10.5.8 of chapter F10 of the ES [APP-275] for the Park and Ride;

- table G10-8 of chapter G10 of the ES [APP-313] for the A5025 Offline Highway Improvements; and
- paragraph 10.5.8 to 10.5.9 of chapter H10 of the ES [APP-364] for the Logistics Centre.

Refer to response above (d) regarding the IACC request for an 'inventory' of landscape elements

The IACC suggest that there are "*shortcomings ... identified for baseline visual conditions and assessment of impacts on visual receptors*", with respect to value and susceptibility. However, for transparency, a summary of the evaluation of value, susceptibility and overall sensitivity of each visual receptor group is set out in the following paragraphs of each landscape and visual chapter:

- paragraphs 10.5.24 to 10.5.35 of chapter D10 of the ES [APP-129] for the Power Station;
- paragraphs 10.5.10 to 10.5.13 of chapter E10 of the ES [APP-248] for the Off-Site Power Station Facilities;
- paragraphs 10.5.10 to 10.5.14 of chapter F10 of the ES [APP-275] for the Park and Ride;
- table G10-8 of chapter G10 of the ES [APP-313] for the A5025 Offline Highway Improvements; and
- paragraphs 10.5.11 to 10.5.15 of chapter H10 of the ES [APP-364] for the Logistics Centre.
- Horizon consider the assessment of landscape and visual effects to be transparent and proportionate with respect to each development.

Magnitude of change - landscape

Horizon wish to clarify that the size and scale of change in the landscape not only relates to the loss of landscape elements. The full wording of paragraph 10.4.39 in chapter B10 of the ES [APP-075] states that "*The size and scale of change in the landscape is mainly a reflection of the extent or proportion of landscape elements lost or added and/or the degree to which aesthetic or perceptual aspects are altered, both of which may result in erosion or enhancement of landscape character.*" As explained above, surveys and descriptions of baseline landscape elements are included in the ES for each landscape and visual chapter, which is considered to provide a robust baseline for undertaking the assessment. An inventory of landscape elements is not required to assess landscape effects, as

	landscape assessment is not a 'quantitative' process. This is recognised in paragraph 5.49 of GLVIA3 which states that the assessment of size and scale of change <i>"should be described, and also categorised on a verbal scale that distinguishes the amount of change but is not overly complex."</i> Horizon consider that the assessment of effect narrative in each landscape and visual chapter, and the detailed assessment in each landscape effects schedule accords with this guidance. Horizon wish to clarify that the criteria for 'geographical extent' are clearly set out in table B10-16 of chapter B10 of the ES [APP-075] on a scale of 'large', 'medium', 'small' and 'negligible'. Horizon consider that these criteria are in line with GLVIA3, which suggests that <i>"there can be no hard and fast rules about what categories to use"</i> to describe the geographical extent of change (paragraph 5.50). An assessment of both indirect and direct effects on the landscape character of the AONB and North Anglesey Heritage Coast has been undertaken, as described in appendix D10-6 of the ES (landscape effects schedule) [APP-197] and in the chapter D10 narrative. As well as including an assessment of effects on the overall designation, an assessment has been made of both the direct and indirect effects on the designated area within the Wylfa Newydd Development Area and of the indirect effects on the locally affected area of the AONB and North Anglesey Heritage Coast beyond the Wylfa Newydd Development Area. A combined assessment of indirect and direct effects has been presented in appendix D10-6 and the chapter narrative. As noted in the Horizon response to FWQ7.0.4 for Deadline 2, the assessment column references in appendix D10-6 to 'directly affected area' should read 'directly and locally affected area', since the assessment of indirect effects is not confined to the Wylfa Newydd Development Area boundary. This is evident by both the description of change in the landscape effects schedule and in the chapter narrative. It is also evident from the explanatory note in the landscape effects schedule, which sets out the IACC landscape and seascape character areas that the AONB and North Anglesey Heritage Coast assessment has been based on, including those which lie outside the Wylfa Newydd Development Area. Horizon wish to note that there is a difference between worst case receptor views and worst case development outcomes. Paragraph 10.4.43 specifically refers to worst case receptor views. As explained above in response to the IACC comment on assessment of parameters, both the landscape and visual assessment for each development is based upon a 'worst case' development scenario. This has been applied to the assessment of all landscape and visual receptors. Horizon note that while the IACC claim that <i>"the worst-case scenario has not always been assessed with regards to impacts on historic landscape, landscape character and designations (eg on the AONB, Cestyll Garden and Dame Sylvia Crowe's designed landscape)"</i>, this claim is not substantiated.

		Horizon consider the four categories of magnitude of change criteria to be balanced, as there are also four significance of effect criteria; two of which relate to significant effects and two of which relates to effect that are not significant. GLVIA3 is not prescriptive about the number of criteria to be used for magnitude of change, although it is noted that it is suggested that judgements on size and scale (which contribute towards conclusions on magnitude of change) may be refer to as; “<i>major, moderate, minor or none, or other equivalent words</i>”, i.e. four categories (paragraph 5.49). <i>Magnitude of change – visual</i> Horizon wish to note that a detailed description of the change in view at each representative viewpoint is provided in all of the visual effect schedules, including appendix D10-7 [APP-198]. Professional judgement has been used to determine the ‘size and scale’, and ‘geographical extent’ of change at each viewpoint in line with the criteria set out in table B10-17 of chapter B10 of the ES [APP-075] and commonly accepted practice for LVIA. Horizon wish to clarify that the description of ‘change in view with embedded and good practice mitigation’ in appendix D10-7 [APP-198], is not intended to describe how the additional mitigation affects the ‘post-mitigation’ conclusions, as is apparent from the column title. Horizon notes that the IACC recognise that the assessment contains “<i>large amounts of information and utilise large numbers of viewpoint assessments</i>”. The use of representative viewpoints in visual impact assessment is consistent with good practice guidance in GLVIA3, which advocates a proportionate approach to LVIA, as set out above. This is because “<i>the emphasis in EIA is on [identifying] likely significant effects rather than on comprehensive cataloguing of every conceivable effect that might occur</i>” (paragraph 7.5 of GLVIA3). GLVIA3 makes it clear that “<i>assessing visual effects is not a quantitative process</i>” (paragraph 6.3). Although paragraph 6.15 of GLVIA3 states that “<i>Where possible an estimate should also be made of the numbers of the different types of people who might be affected in each case.</i>”, it goes on to explain that “<i>Where no firm data is available this may simply need to be a relative judgement, for example noting comparatively few people in one place compared with many in another</i>” (paragraph 6.15). The visual impact assessment for all of the Wylfa Newydd developments is considered to be consistent with this guidance, as the assessment at each representative viewpoint has considered the number of viewers who would be likely to be affected and the geographical extent of the route likely to be affected by a particular type of view where applicable, as part of the conclusions drawn on ‘geographical extent’. Refer to the Horizon response in LIR chapter 17 for ‘visual’ for further detail regarding this issue and the further detail raised in relation to the PRow network, Wales Cost Path, Copper Tail (NCN Route 566), local road network and community receptor groups.

(f)
The use of Design Manual for Roads and Bridges assessment methodology for the A5025 Off-line Highway Improvements

Horizon acknowledges the comments made by the IACC and would add the following regarding the differences between the criteria used in the assessment of landscape and visual effects arising from the A5025 Off-line Highway Improvements (using Design Manual for Roads and Bridges) and those used for the other developments:

It is considered that the methodology used for the assessment of landscape and visual effects arising from the A5025 Off-line Highway Improvements reports effects relating to that specific development and does not need to be compared with the effects arising from the other developments.

In relation to intra-project cumulative effects, the fact that the criteria for the A5025 Off-line Highway Improvements differ from those of other developments has not affected the outcome of the assessment. The significance terms for the A5025 Off-line Highway Improvements were translated into those used in the cumulative assessment using professional judgement, taking account of the qualitative descriptions of the effect. A similar approach was used for the inter-project cumulative assessment where criteria differed between assessments.

(i)
Night-time visual effects assessment methodology for the Power Station

Horizon wish to clarify that the assessment of 'night-time visual effects' is set out in appendix D10-7 [APP-198] and uses a different methodology to the Environmental Lighting Impact Assessment (ELIA) in appendix D10-10 [APP-201]. The methodology for the assessment of night-time visual effects is set out in chapter B10 of the ES [APP-075], and has been developed, taking into account guidance within both *PLG 04 Guidance on Undertaking Environmental Lighting Impact Assessments* (PLG-04) (Institute of Lighting Professionals, 2013) and GLVIA3. This is because PLG 04 is mainly aimed at providing guidance to lighting professionals, while GLVIA3 provides the main guidance for assessment of visual effects. The methodology for the ELIA is set out in D10-10 [APP-201] and the criteria used are based on guidance in PLG 04, although the terminology has been adapted to align with the rest of the ES. For detailed response regarding the IACCs suggestion that the ELIA is flawed reference should be made to the Horizon response in LIR chapter 12.

		(g) Limitations Horizon maintain that it is correct that “<i>there are no limitations to the assessment undertaken within the scope of the methodology set out</i>” in chapter B10 of the ES [APP-075]. For the reasons set out above, the assessment is considered to be transparent and, compliant with GLVIA3 guidance on the use of representative viewpoints and relative judgements made in relation to the geographical extent of visual effects, as well as the baseline information provided on landscape elements. The parameter approach taken is a common approach to this type of assessment, where full details of the proposed development is subject to further design development post grant of DCO.

FWQ7.0.2: Is the Applicant's approach to the landscape and visual effects of the development in relation to the Wylfa Newydd Development Area as set out in 6.4.10 ES Volume D - WNDA Development D10 - Landscape and visual [APP-129] adequate and if not how should any issues be addressed;		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The IACC considers that there is considerable detail required to properly answer this question and therefore includes the full response in appendix 2B. The reasoning and justification for the summary responses given below are set out in that appendix. a) No, IACC disagrees with the presentation of the ZTVs being restricted to either A3 scale or 4no ZTVs per A3 sheet. IACC requests that ZTVs are generated to provide linear diagrammatic representations of the visibility of the main components of the construction and operation periods along linear routes. b) IACC broadly agrees with the attribution of landscape value as set out in Table D10-3 and that no landscape receptors possess low or negligible value. However, the categories are broad and the categorisation coarse such that no distinction is made between the values of the locally designated and undesignated landscapes. IACC agrees with the selection of the viewpoints in the overarching study area as shown in Figure D10-14 but are not in agreement with the viewpoint typology adopted that is set out in Section 10.4.23 of B10	Horizon notes that IACC has made numerous detailed comments in this Examining Authority's First Written Questions on the methodology used to undertake the landscape and visual impact assessment for the Wylfa Newydd DCO Project, including several pages of comments in appendix 2B to their response. Since many of these comments repeat those made in the response to FWQ7.0.1 and accompanying IACC appendix 2A and or the IACC LIRs for each development (in particular, chapter 17). Horizon refers the reader to Horizon's Response to First Written Questions made on IACC's response to FWQ7.0.1 and Horizon's response to chapter 17 of the IACC LIR (submitted at Deadline 3 (18 December 2018)).

[APP-075]. IACC requests the inclusion of the additional Representative and night-time Viewpoints (please see appendix).

d) The approach in ES Chapter D10 [APP-129] does not separately assess the direct and indirect impacts and “averages” the impacts over each landscape and seascape character unit. It is also vague in terms of the geographical areas within which the impacts would be significant. The majority of the assessments in ES Chapter D10 are of daytime effects. Assessments of night-time effects have been undertaken for the construction and operational phases and for visual receptors only. For local communities IACC agree with the overall evaluation of high sensitivity for residents in Cemaes and Tregele but considers that residents in Llanfairynghornwy and Llanfechell should also be ascribed with high sensitivity as opposed to medium sensitivity. IACC does however highlight several shortcomings and omissions in the visual assessment. These are set out in the WNDA Visual chapter of the LIR

e) IACC welcomes all the embedded, good practice and additional mitigation measures specified in the application, however, IACC also expects various additional mitigation and schemes identified in the LIR to be secured by way of DCO requirements and some compensation measures to be secured by way of S106 obligations

f) IACC is in broad agreement with the residual effects and mitigation contained in Tables D10-43, D10-44 and D10-45 [APP-

	129]. However, IACC is of the opinion that there would be some significant residual impacts on landscape and/or seascape character during the operational phase. IACC also notes that due to the large and spatially extensive nature of the visual receptor groups included, the assessments are too general to allow the effectiveness of the adoption of the additional mitigation measures to be meaningfully evaluated.	

FWQ7.0.2: Is the Applicant's approach to the landscape and visual effects of the development in relation to the Wylfa Newydd Development Area as set out in 6.4.10 ES Volume D - WNDA Development D10 - Landscape and visual [APP-129] adequate and if not how should any issues be addressed;

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	We refer you to section 7.19 of NRW's Written Representations for detailed comments in response to this question. NRW's Designated Landscape remit means that we have no comments to make on the residual landscape effects or the approach taken to the assessment of community views.	Horizon acknowledges the comments made by NRW in respect of residual landscape effects and the approach taken to the assessment of community views has nothing further to add. Please see Horizon's response to NRW's Written Representation, submitted at Deadline 3 (18 December 2018) in respect of NRW's comments.

FWQ7.0.3: (a) Bearing in mind the special qualities of the Isle of Anglesey AONB as set out in the AONB Management Plan (see para 2.1.30 of 8.16 Landscape and Habitat Management Strategy (Part 1 of 2) [APP-424]) are the mitigation measures outlined in D10.14 of ES Volume D - WNDA Development D10 - Landscape and visual [APP-129] in relation to the Isle of Anglesey AONB sufficient to meet the policy objectives of EN-1 paras. 5.9.9 to 5.9.11 and both Welsh national and local planning policies, including policies in the AONB Management Plan, as summarised in paragraphs 6.4.244 to 6.4.257 of 8.1 Planning Statement [APP-406]? (b) If not what additional measures could be taken to meet the policy objectives and how might they be secured through the dDCO?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The AONB Management Plan (Table 4) identifies three features and fourteen special qualities that make up the resources in the AONB and states (para 4.1) that the maintenance of these resources is central to the sustainability of the AONB. The LHMS (para 2.1.30) lists these slightly out of order as the features are the 1st, 2nd and 5th bullets and the special qualities are the other bullets. Also, the 13th bullet should read "rural	This question is directed to NRW, IACC, NT and IPs. However, please refer to the Horizon's response to FWQ.7.0.4 submitted at Deadline 2 (4 December 2018) which addresses this question.

agricultural/coastal communities". IACC is not sure what is meant by "D10.14" in ES Chapter D10 [APP-129]. However, all the embedded and good practice mitigation described in the Wylfa Newydd CoCP (8.6), the Main Power Station Site sub-CoCP (8.7) and ES Chapter D10 (6.4.10, paras 10.4.19 – 10.4.28, paras 10.4.36 – 10.4.41, and paras 10.4.44 – 10.4.47) and the additional mitigation described in ES Chapter D10 (6.4.10, Table D10-40, Table D10-41, Table D10-42, Table D10-43, Table D10-44 and Table D10-45) are necessary to mitigate the impacts of the development on the AONB and Heritage Coast. As identified by Horizon in Table D10-43, even with all these mitigation measures, the impacts on the special qualities of the AONB will still be Major adverse significant during the construction phase and early part of the operational phase, will remain Moderate adverse significant throughout the remainder of the operational phase and will be Major adverse significant during the decommissioning phase. Also, as identified by Horizon in Table D10-43, even with all these mitigation measures, the impacts on the special qualities of the Heritage Coast will be Major adverse significant throughout the construction, operational and decommissioning phases. However, as noted in the IACC WNDA Landscape LIR, these impacts are predicted by Horizon for those parts of the AONB and Heritage Coast that are within the WNDA only and Horizon considers the impacts on the AONB and Heritage Coast

“overall” to be not significant during the operational phase. However, as explained in the IACC WNDA Landscape LIR, there would also be Negative (Moderate adverse significant) indirect impacts on the wider AONB and Heritage Coast during the operational phase up to 5km from the WNDA.

As noted in the list in the LHMS and AONB Management Plan, two of the special qualities of the AONB are “Built Environment including Conservation Areas and Listed Buildings” and “Archaeology and Ancient Monuments/ Historic Landscapes, Parks and Gardens”. As noted in the IACC WNDA Historic Environment LIR, there would also be Negative (adverse significant) direct and indirect impacts on Listed Buildings, archaeology and historic landscapes, parks and gardens within the AONB, including Cestyll Garden and its associated listed buildings and Dame Sylvia Crowe’s designed landscape. IACC is extremely concerned that these long term Negative direct and indirect impacts could significantly affect the ability of the AONB and Heritage Coast to fulfil their purposes in this part of North Anglesey. Consequently, additional mitigation measures and compensation proposals will need to be agreed and secured, which could include mitigation and compensation measures elsewhere in the AONB and Heritage Coast, to protect and strengthen these designations. These additional mitigation and compensation measures are described in the IACC WNDA

	Landscape and Historic Environment LIRs and should be secured by way of DCO requirements and S106 obligations. Compliance with EN1 and PPW cannot currently be agreed as the proposal lacks the detail necessary to demonstrate that the development has been sensitively designed or that harm to the landscape is minimised; the colour palette for the external finishes is not defined (the DAS gives options for schemes only, at p93 stating buildings could be green to blend with the landscape or have a painted finish to create a bold structure) and landscaping proposals are too high level for any meaningful assessment to be undertaken. Please see the WNDA chapter of the LIR for a more detailed consideration of the proposals and the IACC's proposals for mitigation.	

FWQ7.0.3 Could the IACC provide the following information:

- (a) The Development Plan policies that they consider relevant;**
- (b) Any Development Plan policies with which the scheme is considered to conflict;**
- (c) Whether any identified conflict would amount to a reason to refuse consent; and**
- (d) Whether any further mitigation would be required and if it is what this should be?**

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	We refer you to paragraph 7.19.6 of NRW's Written Representations. There are areas outside of the WNDA where additional measures could mitigate/offset significant effects upon the AONB's special qualities to better support the conservation and enhancement of Statutory Designated Landscapes in accordance with national policy.	This question is directed to NRW, IACC, NT and IPs. However, please refer to Horizon's response to FWQ.7.0.4 submitted at Deadline 2 (4 December 2018) [REP2-002] which addresses this question. Please also refer to Horizon's response to NRW's Written Representation submitted at Deadline 3 (18 December 2018).

FWQ: Q7.0.5: Are the photomontage views across all sites as set out in [APP-199]; [APP-200]; [APP-261], [APP-378], [APP-296] and [APP-343] adequate and are you satisfied with: The choice of selected locations; The methodology for photomontage; The chosen timeframes for the images? (a) Are there any additional viewpoints that would be helpful? (b) Do the images raise any issues or concerns and how might these be addressed?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	WNDA – IACC are satisfied that the locations selected and shown on Figures D10-15 and D10-16 [APP-237] are suitable but as set out in response to Q7.0.2 IACC strongly recommends that a number of additional photomontages are provided to illustrate a greater range of the views that will be available to residents in the settlements of Cemaes, Tregele and Llanfairynghornwy. A proportion of these additional locations are either Illustrative Viewpoints or Representative Viewpoints whilst some are new locations that have been identified by IACC. Revised Representative Viewpoint 16 (Cemaes) should be located on the western end of Maes Cynfor. Revised Representative Viewpoint 12 (Cemaes) should be located further to the east along Stad Castellor. Revised Representative Viewpoint 13 (Cemaes/Wales Coast Path) should be located on the Wales Coast Path to the immediate north-west of the house shown in the current viewpoint photograph. Illustrative Viewpoint F – Western end of Ffordd y Traeth in Penrhyn. New Photomontage Viewpoint - Illustrative Viewpoint G (Cemaes) should be moved approximately 50m further.	WNDA Horizon acknowledges the comment made by IACC, confirming that the photomontage locations provided in appendix D10-8 of the ES (photomontage viewpoints) [APP-199] are suitable. Horizon notes the IACC recommendation to provide three revised photomontage views and ten new photomontage views but considers the 26 photomontages provided in the ES to be a proportionate level of provision and adequate to support the landscape and visual impact assessment (LVIA) in chapter D10 of the ES [APP-129]. As explained in our response to the IACC response to FWQ Q7.0.2 submitted at Deadline 2 (4 December 2018) [REP2-002], Horizon consulted with the IACC on the selection of photomontage viewpoint locations and draft photomontage viewpoints were provided to the IACC as part of the Pre-Application Consultation Stage Two in September 2016. The IACC have not previously suggested any revisions or additions and their response to FWQ7.0.5 does not provide any rationale for these requests. However, as explained in our response to the IACC Local Impact Report (chapter 17) at section 1.4 submitted at Deadline 3 (18 December 2018), Horizon has agreed to consider providing three additional photomontage views from Cemaes and one additional photomontage view from Tregele. Horizon is planning to submit these three additional photomontages into examination at Deadline 6. Llanfairynghornwy is at some distance from the Wylfa Newydd Development Area and would experience middle-distance views towards the central part of the Wylfa Newydd Development Area, with views of the western part restricted by the intervening drumlin landform. In addition, landscape mounds would help to soften views of the lower parts of some buildings during operation. Off-Site Power Station Facilities Horizon acknowledges the comment made by IACC, confirming that the photomontage locations provided in appendix E10-5 of the ES (photomontage viewpoints) [APP-261] are suitable. However, IACC recommend that two additional photomontages are provided (from the eastern side of Llanfaethlu Primary School and from the north at the A5025 entrance to Pant).

New Photomontage Viewpoint - to be sited at the elevated eastern end of Maes Capel in southwestern Cemaes.
New Photomontage Viewpoint - A second location on the PRow that skirts the western edge of Cemaes.
New Photomontage Viewpoint – On the pavement outside No 9 Gwelfor in the elevated eastern part of Cemaes.
New Photomontage Viewpoint – Wales Coast Path close to Trwyn y Parc at the entrance to Cemaes Bay.
New Photomontage Viewpoint –midway along Esgair Gemlyn along Cemlyn Bay which forms a seasonal variation of the Wales Coast Path.
New Photomontage Viewpoint - South-eastern end of Cae Garnedd in Treglele.
New Photomontage Viewpoint - Parking bay on road through Llanfairynghornwy between Representative Viewpoint 8 and Illustrative Viewpoint Y.
Off-Site Power Station Facilities – IACC are satisfied that the photomontage locations selected and shown on Figure E10-5 [APP-265] are suitable but recommends new photomontages are provided from two additional locations:
New Photomontage Viewpoint – eastern side of Llanfaethlu Primary School in open carpark location. This is a closer variant on Viewpoint 2 avoiding the screening effect of the Primary School itself. Worst case scenario for any residents in Llanfaethlu.
New Photomontage Viewpoint – southern view from A5025 driveway entrance at Pant to the immediate north of the

It is noted that photomontage locations were agreed with IACC and NRW in July/August 2016, as reported in section 10.3 Table B10-11, chapter B10 of the ES (landscape and visual) [APP-075] including a follow up site meeting that took place in August 2016 to confirm the location of photomontage viewpoints.

The additional photomontages requested by IACC are not considered necessary to understand the effects of the scheme. This is because the photomontage from Viewpoint 7 in appendix E10-5 of the ES [APP-261] shows the effects of the proposals in close proximity to the west and can be used to interpret effects from the additional locations suggested by IACC. Further explanation of the proposals and the illustration in figure 26 is set out in the Design and Access Statement – Volume 3 – Associated Developments and Off-Site Power Station Facilities (Part 1 of 2) [APP-409].

The representative viewpoints have been carefully selected to illustrate views from the communities being assessed. The assessment is based on site survey of the wider context of the receptor. Viewpoint 2 in appendix E10-4 of the ES [APP-261] illustrates the view from the road next to the Church. This is a publicly accessible location. It is at the highest point on the road and so over the view extends above the school in the middle ground. There is no public access from the houses further to the east of the community with views across the site. Whereas the school building forms the middle ground in views from this edge of the community, it does not entirely screen views to the Off-site Power Station Facilities. It is not considered that a view from the school car park would significantly help with the assessment of the effects of the proposals on the whole community.

There is no publicly accessible location from the immediate north of the site from which to take a view as there is no footpath on the north side of the road and the south side is too oblique. Viewpoint 4 is used as a representative view, to assess the effect of the scheme on the community immediately to the north (CR2) (Appendix E10-3 of the ES [APP 259]).

Logistics Centre

Horizon acknowledges the comment made by IACC, confirming the photomontage locations provided in appendix H10-5 of the ES (photomontage views) [APP-379] are suitable.

However, the IACC recommends that the photomontages are revised to show colours for the main components of the Logistics Centre, especially the lorries. The photomontages have been produced to show scale and massing of proposals only as detailed in appendix H10-5 of the ES (Photomontage views) [APP-379] methodology, paragraph 1.1.4. Section 2.3 regarding modelling assumptions states that the photomontages have been restricted to show the scheme buildings, internal roads, earthworks, fencing and year one planting as wireframe massing in a grey material.

Facilities site. At present there are no viewpoints or visualisation from the small group of residential properties close to the north of the Facilities.

It should be noted that Figures 01 and 02 [APP-265] describe Viewpoint 7 as being on a footpath in the AONB south of the MEEG but, as illustrated by the location plans on these figures, Viewpoint 7 is located on a footpath in the AONB west-northwest of the MEEG.

Parc Cybi Logistics Centre IACC are satisfied that the photomontage locations selected and shown on Figure H10-5 [APP-383] are suitable being close to the two Scheduled Monuments. IACC recommends that the photomontages are revised to show colours for the main components at the proposed operational Logistics Centre, especially the lorries. The use of a universal grey rendering in the photomontages in APP-6.8.26 makes them more difficult to understand. IACC recommends that an additional photomontage is provided from one location:

Representative Viewpoint 7 – Penrhyn Giergol and Hunter's Close, Trearddur. This is recommended to show the scale and mass of the operational Logistics Centre in the visual context of the former Aluminium Works and how would impact on views to the sea and north-west Anglesey coast that are likely to be valued by residents in this settlement.

Dalar Hir Park and Ride

IACC are satisfied that the photomontage locations selected and shown on Figure

The IACC recommends that an additional photomontage viewpoint is provided for one location (viewpoint 7 Penrhyn Giergol and Hunters Close, Trearddur). The location of the Logistics Centre is labelled on viewpoint 7 appendix H10-4 of the ES (Representative viewpoints) [APP-378]. The view would be obscured by intervening rock outcrops and filtered by garden vegetation. A photomontage is not considered necessary from this location to understand the visual effects of the development.

Park and Ride

Horizon acknowledges the comment made by IACC, confirming that the photomontage locations provided in appendix F10-5 of the ES (photomontage viewpoints) [APP-296] are suitable. However, IACC recommend that two additional photomontages are provided (from Representative Viewpoint 5 – NCR8 and minor road and Representative Viewpoint 6, on the A5).

It is noted that photomontage locations were agreed with IACC and NRW in July 2016, as reported in section 10.3 Table B10-11, chapter B10 of the ES (landscape and visual) [APP-075] including a follow up site meeting that took place in August 2016 to confirm the location of photomontage viewpoints including a discussion of the photomontage/ viewpoints to consider views for travellers along the A5/A55 corridor and Holyhead Road. The photomontage viewpoint was requested to be located at the new Park and Ride access point.

The location of the Park and Ride is labelled on viewpoint 5 appendix F10-4 of the ES (Representative viewpoints) [APP-295]. As stated in Chapter F10 of the ES (landscape and visual) [APP-275] views would be available for only a 200m section of the route for travellers on the National Cycle Route 8 and transient receptors.

The location of Representative viewpoint 6, Appendix F10-4, is a layby on the A5 and the only suitable and safe location. As transient receptors would pass this location at speed, this is not considered to be a typical view as most views along this section of the A5 are filtered by intervening 10m wide woodland belt.

A5025

Horizon acknowledges the comments made by the IACC and has nothing further to add.

F10-5 [APP-303] are suitable. IACC have reviewed the Representative Viewpoints [APP-295] for Dalar Hir and recommend the photomontages are produced from two additional viewpoints:
Representative Viewpoint 5 – NCR8 and minor road to the south to provide an understanding of the operation of the Park and Ride Facility in a wider landscape and its visual context.
Representative Viewpoint 6 – A5 on south side of Park and Ride. Representative of the most widely available view to visual receptors using A5 and to a lesser extent, the A55.
A5025
IACC are satisfied that the photomontage locations selected and shown on Figures G10-13 to G10-17 [APP-354] are suitable.
[Methodology]
The photomontage methodology as set out in Appendix D10-8 [APP-199], which is common to all the photomontage visualisations, is fit for purpose with only minor points raised. Section 1.2.4 in Appendix D10-8 [APP-199] describes ascertaining the correct field of view for the photomontage images using landmark features cross referenced against corresponding features in AutoCAD. This is an acceptable way to ascertain alignment it may have potential to equate to inaccuracies on the horizontal angle of view shown on the final drawings. The current drawings show a 400mm wide image as being an 80° horizontal angle of view, which need

Methodology

Horizon acknowledges the comment made by IACC, confirming that the photomontage methodology as set out in Appendix D10-8 [APP-199], common to all the photomontage visualisations, is fit for purpose with only minor points raised. Therefore, the only comment that Horizon wish to make is as follows:

With regard to the IACC comment on Section 1.4.2 in appendix D10-8 [APP-199], it is not considered necessary to add a note regarding the need to trim some photomontage buildings in Adobe Photoshop to contain them within the extent of the parameter envelope, since this approach has been applied generally. Furthermore, it should not be considered controversial that buildings are not illustrated outside maximum parameter envelopes.

Regarding development of the colour scheme for the Power Station, Horizon notes the key design principle in volume 2 of the Design and Access Statement (Power Station Site) [APP-408] (number 31) states:

‘A palette based on natural colours found in the landscape or seascape setting will be developed for the Power Station buildings where this is compatible with operational and safety requirements. The palette will seek to:

- break down the scale and massing of the Power Station buildings; and,
- help integrate the Power Station buildings into the landscape using a similar approach to that used for the Existing Power Station.”

Design principles 32, 33 and 34 provide additional commitment.

Construction images

With regard to the IACC comment regarding provision of images representing the construction period, Horizon note the practical issues in providing photomontage views during construction. Practical issues include the constantly changing nature of the construction site, the availability of information on the specific types of plant and machinery to be used and the detailed sequence of work, for example, landscape mounding and the appearance of temporary features such as temporary mounds and stockpiles.

Horizon is considering providing illustrative construction visualisations to supplement the current information on construction effects.

to be checked for accuracy dependent upon the pixel dimensions of the original photography.

Section 1.3.9 in Appendix D10-8 [APP-199] explains the decision to render all the proposed buildings in the Power Station using a plain grey colour to represent a concrete finish. IACC understand the justification for this decision and concur that the final choice of the colour scheme will subject to "ongoing design development following grant of a DCO". However, IACC also note that for the Power Station, as set out in the Visual Effects Schedule in Appendix D10-7 [APP-199], the adoption of a naturalistic colour scheme as an additional mitigation measure is assessed at a limited number of Representative Viewpoints as justification for reducing the residual magnitude of visual change at these viewpoints. The ability to select a bold scheme under the DAS is therefore not allowed for under that mitigation; to accord with the DAS both colour scheme options should be assessed or the bold option should be removed from the DAS. Section 1.4.2 in Appendix D10-8 [APP-199] explains about the need to "trim" some photomontage buildings in Adobe Photoshop to contain them within the extent of the parameter envelope. Where the 3D model has been adjusted in this way it could be suggested that these specific photomontages should state this as having been the case in the drawing notes to allow IACC and other parties to

understand where this measure has been implemented.

IACC concur with the chosen time frame for the images at all the AD and A5025 off-line photomontages.

At the WNDA IACC agree that the selection of season variations and that for the operation period the selection of Year 1 and Year 15 represent established best practice.

At the WNDA IACC object to the omission of images representing the construction period given its longevity and the intensity and spatial extent of the construction activities. As demonstrated in the landscape and visual effects schedules (Appendices D10-6 & D10-7 [APP 198 &199] and the main LVIA [APP-129], for many landscape and visual receptors the greatest magnitude of change will be sustained during the construction period. For the visual impact assessment this statement is especially relevant to residential visual receptors in properties in parts of Tregele and Cemaes. As a consequence, IACC have requested (letter of 011018) images of the formation of Mounds A and B from a limited number of viewpoints:

- IACC recommends wireline visualisations at the end of construction year 1 from the viewpoints listed below.
- Representative Viewpoint 16 - Cemaes;

- Illustrative Viewpoint F – Cemaes;
- Illustrative Viewpoint G – Cemaes; and
- Representative Viewpoint 18 – Tregele.
- The wirelines should be imposed upon the winter baseline photography.

IACC acknowledge that visualisations of the Site Campus are provided in the Appendix 1-2 of Volume 3 of the Design and Access Statement [APP-409]. IACC recommend that these are supplemented by photomontage visualisations showing the fully operational Site Campus during the construction period.

Photomontages are to be provided from:

- Representative Viewpoint 10: Wylfa Head;
- Representative Viewpoint 13: Wales Coast Path at Penrhyn; and
- Representative Viewpoint 11: Porth Llanbadrig.

FWQ7.0.5: Are the photomontage views across all sites as set out in [APP-199]; [APP200]; [APP-261], [APP-378], [APP-296] and [APP-343] adequate and are you satisfied with: The choice of selected locations; The methodology for photomontage; The chosen timeframes for the images? (a) Are there any additional viewpoints that would be helpful? (b) Do the images raise any issues or concerns and how might these be addressed?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	We are satisfied with the photomontages. The images illustrate the significant scale and nature of change to AONB views that would occur from the power station and associated buildings within the WNDA. The WNDA and Site Campus have not been illustrated together. Photomontage Viewpoints within the AONB (7,8,11,19,24,25,27,28 and 29) show the effect that building scale and massing would have upon the AONB coastal landscape and its openness. A well-considered colour scheme for the power station, associated buildings and the worker's campus is therefore important to develop to aid the combined development's visual integration. This was done successfully for the existing power station. The ES understands the importance of colour design to landscape and seascape integration and the ES includes an illustrative image for one elevation of the power station, and elevations of the worker's campus. This suggests an appropriate scheme could be developed. What is required next and needs to be enabled through a DCO Requirement is the development of detailed colour proposals for all visible components of the development seen from	Horizon acknowledges the comments made by NRW and would add the following regarding the colour scheme for the Power Station: - Requirement WN3 in Schedule 3 of the Draft DCO [REP2-020] requires Horizon to submit detailed design drawings for the Power Station to IACC for approval. These designs must be in accordance with the design principles in volume 2 of the Design and Access Statement [APP-408], the parameters in Requirements WN4 and WN5 and must (among other things) include detail of the external appearance of any buildings and structures. The colour palette that is adopted for the Power Station must comply with the following design principles: <i>Design Principle 31:</i> A palette based on natural colours found in the landscape or seascape setting will be developed for the Power Station buildings where this is compatible with operational and safety requirements. The palette will seek to: - break down the scale and massing of the Power Station buildings; and, - help integrate the Power Station buildings into the landscape using a similar approach to that used for the Existing Power Station. - Design Principle 32: Contrasting colours should be selected and used in small quantities where appropriate to provide interest and support wayfinding around the site, where this does not detract from the design principle of blending the Power Station into the landscape, as far as reasonably practicable. - Design Principle 34: Where colour is adopted then darker colours may be used at low levels to reduce massing. (Similar design principles also apply to the Site Campus)

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

Given these principles, Horizon considers that there is sufficient control within the control documents and in the Requirements that a specific requirement relating to colour is not required.

Horizon also notes that while IACC is the discharging authority for this requirement, there is nothing to prevent it consulting with NRW in whether or not to approved the designs submitted. In response to IACC's Written Representation submitted at Deadline 2, Horizon has advised that it will amend Schedule 19 (the Schedule that relates to the discharge of approvals under the draft DCO) to make it clear that IACC can consult with other statutory bodies (please refer to Horizon's comments in response to section 8 of IACC's Written Representation).

Horizon recognise the importance of mitigating the visual impact of the Site Campus in views from the surrounding landscape and AONB as discussed in the Design and Access Statement - Volume 2 - Power Station Site [APP-408] but notes that on completion of Power Station construction the Site Campus will be removed and the landscape restored. Therefore, the two completed developments will only be seen in conjunction with each other for a very short duration.

FWQ7.0.9: Is the Applicant's approach to the landscape and visual effects of the development in relation to the Off-Site Power Station facilities as set out in 6.5.10 ES Volume E - Off-Site Power Station Facilities: AECC ESL and MEEG 67 Reference Respondent: Location: Question: E10 - Landscape and visual [APP-248] adequate and if not how should any issues be addressed

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	(a) The approach to the Study Area, as detailed in Section E10.2 [APP-248] is acceptable and IACC agrees that effects on landscape character, landscape designations and notable views to the Off-Site Power Station Facilities are likely to be limited to the area described and illustrated in the 2km detailed study area. The approach to the ZTV should take note of IACC responses to Q7.0.1 and Q7.0.2, above. (b) IACC agrees with the general observations of the Landscape Baseline as set out in Section E10.3 [APP-248], but requests that detailed surveys of the hard and soft landscaping on the site are provided to inform the final design and mitigation options, as noted in the Dalar Hir LIR Chapter. (c) In terms of Visual baseline, IACC considers that there are gaps in the assessment presented by Horizon. The manner in which residential receptors in a settlement or community are grouped together results in gaps. Consequently, variations in baseline conditions, in the magnitude of change and hence upon the significance of residual effects that are likely to be sustained between residential receptors are missed. IACC considers that the assessment of effects upon individual residential properties is also	(a) Horizon acknowledges the comments made by the IACC that effects on landscape character, landscape designations and notable views are likely to be limited to the 2km detailed study area. Additional comments relating to ZTV have been addressed in the response to FWQ7.0.1 above. (b) Horizon acknowledges that IACC agree with the general observations of the landscape baseline. Detailed information is set out in the Design and Access Statement – Volume 3 – Associated Developments and Off-Site Power Station Facilities (Part 1 of 2) [REP2-029] and provides a thorough understanding of site conditions and the surrounding context used to inform the design. In accordance with the Requirement OSPSF2 (2), design proposals will be submitted for approval by IACC based on the parameters and parameter plan identified in Requirement OPSF3 and the design and landscaping principles relating to the Off-Site Power Station Facilities in the Design and Access Statement – Volume 3 – Associated Developments and Off-Site Power Station Facilities [REP2-029 and 2-030]. (c) IACC consider that the visual baseline should include residential receptors with a corresponding assessment of effects. This point is also made in chapter 21 of the IACC LIR where the following response is made: As stated in the methodology in chapter B10 (landscape and visual) [APP-075], table B10-4 Key issues raised through Scoping, “<i>Visual effects on views from individual private residential properties are not assessed in chapter E10 of this Environmental Statement. Instead, the effects on the visual amenity of local communities have been assessed. This approach was set out in the methodology document provided to the IACC and discussed during the stakeholder meeting on LVIA methodology held on 1 April 2016 where the IACC expressed support for a community views approach to the Assessment</i>”. The assessment of visual effects in chapter E10 (landscape and visual) [APP-248] and appendix E10-3 [APP-259] has been aligned with this approach and an assessment of effects on community receptors is therefore included, while individual residential properties are not considered.

necessary to properly inform the consideration of effects and the necessity or otherwise of further mitigation.

d) IACC is satisfied with the location and selection of viewpoints as shown in App E10-4 [APP-260].

e) As is noted in detail in both the Landscape and Visual chapters of the LIR, additional mitigation proposals should be secured by DCO requirements.

- evaluation of sensitivity of receptors As is noted in the Local Impact Report, the IACC does not agree with the manner in which residential receptors in a settlement or community are grouped together, which does not allow assessments to be sufficiently accurate. IACC considers that the assessment of effects upon individual residential properties is also necessary to properly inform the consideration of effects and necessity or otherwise of further mitigation.

- effects on landscape character IACC agrees that the effects on landscape character (of the site and surrounding area) would not be significant during the early construction and decommissioning phases). However, IACC is of the opinion that the presence of the buildings during the operational phase would be a very noticeable additional feature which would contrast with the current landscape character in both the AONB (Viewpoint 7) and in the local landscape (Viewpoint 8). The proposed new planting would progressively ameliorate these adverse effects on local landscape character

(d)

Horizon acknowledges the comments made by the IACC in relation to the selection of viewpoints and has nothing further to add to this point.

Refer to (c) above for response to residential properties as visual receptors.

- While the buildings would be of a larger size than those currently on the site, the character and proportions would be similar to that which currently exists on the site and would be similar in scale to a number of the agricultural buildings in the wider landscape; the proposed planting would progressively help to integrate the development. The additional measures suggested by IACC to ameliorate both landscape and visual effects, are addressed in Horizon's response to chapter 21 of the IACC's LIR, submitted at Deadline 3 (18 December 2018).
- daytime and night-time effects; Horizon acknowledge that IACC consider the assessment of daytime and night-time effects is adequate. Detail of the lighting proposals is set out in the Design and Access Statement – Volume 3 – Associated Developments and Off-Site Power Station Facilities (Part 1 of 2) [REP2-029].

(f)

Horizon acknowledge that IACC agree with the general approach to mitigation. In accordance with the Draft DCO [REP2-020], OSPSF2 sub-paragraph (2), design proposals will be submitted for approval by IACC, which will include timing of planting. Horizon's response to the additional planting proposals both on site and off-site, is addressed in response to chapter 21 of the LIR. Horizon do not consider additional mitigation is necessary as the effects, other than during the temporary periods of construction and decommissioning, would not be significant.

(g)

IACC propose that compensation in the form of improvements to the local public footpath network should also be provided. This point is also made in the chapter 21 of the IACC LIR. Horizon in their response submitted at Deadline 3 state at section 1.3: *As part of the wider Wylfa Newydd DCO Project, contributions for IACC to undertake improvements to the PRow Network in proximity to the WNDA or the A5025 Highway Improvements, or along any section of the Wales Coast Path have been proposed as part of the Draft DCO s.106 Agreement (submitted at Deadline 3 December*

within 15 years (Figure 08) but would have no ameliorating effects on landscape character within the AONB (Figure 02). Various additional measures are suggested in the Landscape LIR to help assimilate these buildings into their surroundings (see answer to (f) below).

- daytime and night-time effects; The assessment of daytime and night-time effects is considered adequate, although the proposals for "low lighting levels" as described in Chapter E10 [APP-248] are not adequate and a detailed lighting scheme should be provided.

- visual effects. As is noted in detail in the Local Impact Report, in addition to the effects identified by Horizon, IACC concludes that there are a number of visual receptors where the magnitude of visual change should be assessed as being higher than that which has been reported within Appendix E 10-3. Also please refer to general comments in response to Q7.0.1 (e) above.

f) Additional mitigation during operation (Table E10.30); IACC agrees with the general approach to mitigation, but considers that additional mitigation measures should be secured to minimise impacts upon both the landscape and visual receptors. Proposed mitigation is suggested in the LIR Additional planting should be undertaken both within and outside the site at the earliest possible opportunity, to allow the screening to become effective early in the life of the development.

2018)). *Given the proximity of the Off-Site Power Station Facilities to the A5025, these funds could be used by the IACC on these PRoW should IACC consider them to be a priority.*

	g) Residual effects (Table E10.4) for construction, operation and decommissioning. As is noted in the LIR, IACC has identified negative impacts in addition to those assessed by Horizon. IACC recommends that additional landscape planting be undertaken within and outside of the site. Compensation in the form of improvements to the local public footpath network should also be provided.	

FWQ: Q7.0.10: Is the Applicant's approach to the landscape and visual effects of the development in relation to the Logistics Centre as set out in 6.8.10 ES Volume H - Logistics Centre H10 - Landscape and visual [APP-364]

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	(a) The approach to the Study Area, as detailed in Section H10.2 [APP-364] is acceptable and IACC agrees that effects on landscape character, landscape designations and notable views to the Logistics Centre are likely to be limited to the area described and illustrated in the 2km detailed study area. The approach to the ZTV should take note of IACC responses to Q7.0.1, above. (b) IACC agrees with the general observations of the Landscape Baseline as set out in Section H10.3 [APP-364] In terms of Visual baseline, please refer to the response to Q7.0.1 (d) above. (c) IACC is satisfied with the location and selection of viewpoints as shown in Figure H10-5 [APP-383], notwithstanding general comments in response to Q7.0.1 and Q7.0.2. (d) As noted in the LIR, IACC agrees with the embedded and good practice mitigation proposals (but not the detail of the draft CoCPs which does not secure all of the identified measures) and requires additional mitigation and schemes to be secured by way of the DCO requirements. These include modifications to the design in order to retain more of the existing mature woodland on the site, the materials, colour and design of the proposed	(a) Horizon acknowledges the comment made by IACC confirming that the approach to the study area, as detailed in section H10-2 [APP-364], is acceptable and the effects are likely to be limited to the area described and illustrated in the 2km detailed study area. Additional comments relating to ZTV have been addressed in the response to FWQ7.0.1 above. (b) Horizon acknowledges IACC agrees with the general observations of the landscape baseline set out in Chapter H10, section H10.3 of the ES [APP-364]. (c) Horizon acknowledges IACC is satisfied with the location and selection of viewpoints as shown in figure H10-5 of the ES [APP-383]. Additional comments relating to landscape and visual receptors have been addressed in the response to FWQ7.0.1. (d) Horizon acknowledges the IACC agrees with the embedded and good practice mitigation proposals. The following IACC responses are as noted in the LIR; please refer to chapter 20 of the Landscape Impact Report – Logistics Centre for more detail: The IACC requires additional mitigation measures, which include modifications to the design in order to retain the existing mature woodland on site. The site layout has been developed to retain as many of the existing landscape features as possible driven by site constraints and the functional criteria of the number of vehicles, circulation requirements and turning circles. A strip of existing woodland/scrub edge would be retained along the western boundary of the site, as shown on figure 20, (planting strategy) on page 42 of the Design and Access Statement Volume 3, appendix 1-4 (Logistics Centre) [REP2-030]. The IACC wish to agree the colour of fencing and other structures. Design principles for the Logistics Centre site are set out in section 3.4 of Volume 3 of the Design and Access Statement, appendix 1-4 (Logistics Centre) [REP2-030]. Paragraph 3.4.22 states that the architectural design of proposed buildings and structures will use simple building forms to recognise the function of the facility and its

buildings, fencing and other structures, a detailed lighting design, a detailed materials handling scheme and detailed hard and soft landscape schemes for both on and off-site planting, all to be submitted to and agreed with IACC.

(e)

- evaluation of sensitivity of receptors; Please see detailed response to Q7.0.1, above.

- effects on landscape character; IACC agrees that the residual impacts on landscape character will be moderate adverse (in the short to medium term, up to the end of the operational phase of the Logistics Centre) with no significant long-term adverse effect (once the site is satisfactorily decommissioned).

- visual effects for recreational, community and transient receptors and visitors to the Trefignath Burial Chamber and the Ty Mawr Standing Stone; IACC agrees that significant adverse effects will be sustained by visitors to the two nearby scheduled monuments, community receptors in the closest parts of Kingsland (some properties around Cweryd Villas) and Trearddur and recreational and transient receptors using the closest sections of two cycle ways and the Service Road.

- long distance views; IACC considers the range of viewpoints provided to be sufficient.

- night-time views. As is noted in the LIR, IACC requires the provision of a detailed lighting scheme that minimises

industrial location, whilst still complementing its surroundings, integrating with the landscape and reducing adverse visual effects.

The IACC questions the requirement for 12m high lighting columns and their visual prominence, for example, as seen from Viewpoint 1 Trefignath Burial Chamber. For site safety, lighting columns located within the central part of the site have been specified at 12m high, to ensure the area where drivers walk to and from their vehicles is well lit and visible to moving vehicles. The lighting columns are required to be higher than the large HGVs using the site to ensure no light is blocked by the HGVs which would create unsafe, shaded/unlit where drivers will be walking to and from their vehicles.

The waste and materials management strategy, which describes the handling of soils for example, is set out in section 9 of the Logistics Centre sub-CoCP [REP2-373].

Landscape proposals are shown on the Planting Strategy figure 20 in Volume 3 of the Design and Access Statement, appendix 1-4 (Logistics Centre) [REP2-030].

(e)

Additional comments relating to the evaluation of sensitivity have been addressed in the response to FWQ7.0.1 above.

Horizon acknowledges the IACC agrees that the residual impact on landscape character will be moderate adverse (in the short and medium term, up to the end of the operational phase of the Logistics Centre) with no significant effects in the long term (once the site is satisfactorily decommissioned).

Horizon acknowledges the IACC agrees that significant adverse effects will be sustained during the construction and operational phases of the Logistics Centre by visitors to two nearby scheduled monuments, community receptors in the closest part of Kingsland and Trearddur, and recreational and transient receptors using the closest sections of two cycleways and the service road.

Horizon acknowledges the IACC considers the range of viewpoints provided to be sufficient.

Horizon's response to the LIR request for a detailed lighting scheme can be found in Chapter 20 of the Local Impact Report – Logistics Centre.

(f)

Horizon's response to the LIR request for additional mitigation and detailed schemes can be found in Chapter 20 of the Local Impact Report – Logistics Centre (see sections 1.3.6 – 1.3.8).

the number of lighting columns and avoids light spill onto surrounding buildings, watercourses and boundary features (to minimise night-time glow and effects on landscape character, the special qualities of the AONB and Anglesey's Dark Sky status aspirations), to be submitted to and approved by IACC prior to work commencing on the site.

(f) Additional mitigation during construction (Table H10-3) and operation (Table H10-4);. Please see the Dalar Hir LIR chapter for the additional mitigation and detailed schemes that should be secured by way of DCO requirements.

(g) Residual effects for landscape (Table H10.5) and visual (Table H106) for construction and operation. IACC generally agrees with the conclusions reached by Horizon in the landscape and visual assessment but has identified opportunities for additional mitigation including both on and off-site planting. This would provide additional screening of views into the site.

(g)

Horizon acknowledges the IACC generally agrees with the conclusions reached in chapter H10 of the ES [APP-364]. It is not considered that off-site planting within the adjoining area would be appropriate given allocation of the wider Parc Cybi site in the IACC and Gwynedd Council, Anglesey and Gwynedd Joint Local Development Plan 2011-2026, Written Statement, July 2007 and limited information on how the wider site will be developed in the future.

FWQ: Q7.0.11: Is the Applicant's approach to the landscape and visual effects of the development in relation to the Park and Ride facility at Dalar Hir as set out in 6.6.10 ES Volume F - Park and Ride F10 - Landscape and visual [APP-275] adequate and if not how should any issues be addressed		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	(a) The approach to the Study Area, as detailed in Section F10.2 [APP-275] is acceptable and IACC agrees that effects on landscape character and notable views to the Park and Ride are likely to be limited to the area described and illustrated in the 3km detailed study area. The approach to the ZTV should take note of IACC responses to Q7.0.1, above. (b) IACC general comments made in Q7.0.1 and Q7.0.2 apply. It is considered that the baseline information provided is not sufficiently detailed, is inconsistent and should be updated, as noted in the Landscape and Visual sub-section of the Dalar Hir Park and Ride chapter of the LIR. (c) IACC is generally content with the selection of viewpoints. However please refer to response to Q7.0.1(e) for further comments on viewpoints and their use in the assessment. d) As is noted in the Landscape and Visual sub-section of the Dalar Hir Park and Ride chapter of the LIR, it is considered that the layout could be modified in order to retain more of the Important Hedgerows on the site. There is a lack of information on the lighting and security measures proposed and there is insufficient mitigation included in Horizon's proposals. These can be	(a) Horizon acknowledges the comments made by IACC and has nothing further to add. Please refer also to Horizon response to FWQ7.0.1 above. (b) Please refer also to Horizon response to FWQ7.0.1 and FWQ7.0.2. Horizon will review figures 2 and 3 in Appendix F9-1 Dalar Hir Extended Phase 1 Habitat Survey and HIS Survey [APP-282] and issue an update in due course. (c) Horizon acknowledges the comments made by IACC and has nothing further to add. Please refer also to Horizon's response to FWQ7.0.1. (d) The design has been developed with cognisance of the constraints identified in the chapter F11 Cultural heritage [APP-276], including the requirement to maintain important hedgerows where operationally feasible. Please also refer to the section on Important hedgerows in Horizon's response to the Local Impact Report – Dalar Hir. Horizon will be providing further details on the Lighting Strategy which will be contained in the updated Wylfa Newydd CoCP [APP-414] and Park and Ride sub-CoCP [APP-418] that will be submitted at Deadline 4 (17 January 2019). Paragraph 6.1.4 of volume 3 of the Design and Access Statement, appendix 1-3 (Park and Ride Facility at Dalar Hir) [REP2-030] states that: "Consideration has been given to meeting the dual aims of security and minimising visual impact in the selection of the perimeter fencing system." Please also refer to the section on Detailed lighting design in Horizon's response to the Local Impact Report – Dalar Hir.

addressed by a DCO requirement(s) for a modified design to be submitted to and approved by IACC that incorporates these modifications, mitigation measures and additional detailed schemes. (e) Please refer to response to Q7.0.1 (c) for general comments on receptors. • effects on local landscape; Please note the comments made in the Landscape and Visual subsection of the Dalar Hir Park and Ride chapter of the LIR, and the mitigation required to reduce the impacts on landscape fabric and character. IACC is of the opinion that there would be significant effects on landscape fabric (not assessed by Horizon) and that, without the additional mitigation suggested by IACC, the significant effects on landscape character would be greater than predicted by Horizon. Visual effects for recreational, community and transient receptors; As is noted in the LIR, IACC considers that there are gaps in the assessment present by Horizon, overlooking residential visual receptors in properties located within the study area and ZTV but outside the communities of Bodedern and Llanfihangel-yn-Nhuwyn. Whilst IACC accepts that the methodological approach under which visual effects upon residential receptors as confined to residents in communities was agreed between Horizon and IACC, the Council considers that the assessment of effects upon	(e) Please refer to Horizon response to FWQ7.0.1 for general comments on receptors and night-time views. Please refer to (f) below regarding on-site and off-site mitigation. Please also refer to the section on Requirement for additional on-site planting and off-site planting in Horizon's response to the Local Impact Report – Dalar Hir. As stated in the methodology in chapter B10 (landscape and visual) [APP-075], table B10-4 Key issues raised through Scoping: <i>“Visual effects on views from individual private residential properties are not assessed in chapter D10 of this Environmental Statement. Instead, the assessment of visual effects in chapter F10 (landscape and visual) [APP-275] and appendix F10-3 [APP-294] has been aligned with this approach and an assessment of effects on community receptors is therefore included, while individual residential properties are not considered.”</i> Please also refer to the section on Assessment of residential views in Horizon's response to the Local Impact Report – Dalar Hir. A high-level assessment of effects of lighting on night-time views is included in chapter F10 (landscape and visual) [APP-275]. The context of the proposals at Dalar Hir adjacent to the already lit trunk road junction, together with the construction periods being generally scheduled for daylight hours, meant that an Environmental Lighting Impact Assessment was not included in the proposed scope of Environmental Impact Assessment. Horizon will be providing an update to the Lighting Strategy which will be contained in the updated Wylfa Newydd CoCP [APP-414] and Park and Ride sub-CoCP [APP-418] that will be submitted at Deadline 4 (17 January 2019). (f) Additional on-site mitigation measures proposed by IACC in the Landscape and Visual sub-section of the Dalar Hir Park and Ride chapter of the LIR are: • larger trees alongside the existing northern and eastern boundary hedgerows; • similar planting [larger trees] on the proposed [access] roundabout [to the west];

individual residential properties is also necessary to properly inform the consideration of effects and necessity or otherwise of further mitigation. Night-time views Please refer to response to Q7.0.1 (f, ii).

f) IACC has identified a number of additional mitigation measures beyond those identified by Horizon. Full details of these mitigation measures can be found in the Landscape and Visual sub-section of the Dalar Hir Park and Ride chapter of the LIR. As noted in answer to (e) above, IACC is of the opinion that there would be significant effects on landscape fabric (not assessed by Horizon) and that, without the additional mitigation suggested by IACC, the significant effects on landscape character would be greater than predicted by Horizon. The construction, operation and decommissioning of the park and ride facility would generate a small number of adverse significant visual effects upon the groups of visual receptors located within the ZTV and the study area. Some of these effects have been identified by Horizon; however IACC concludes that there are in addition, a small number of visual receptors where the magnitude of visual change should be assessed as being higher than that which has been reported within (Table 1-1 Visual Effects, Appendix 10-3, [APP-259]).

Additional off-site planting mitigation measures proposed by IACC are:

- off-site planting along the western site boundary. Such planting could be placed either within the Gwyddfor Residential Home's curtilage or in the form of a shelterbelt on the eastern side of the adjacent field.
- field boundary hedgerows or cloddiau located to the north and north-east of the site.

As the development is temporary, proposed planting would not provide effective mitigation, given the length of time required for establishment. As explained in chapter F10 [APP-275] the site would be restored at the end of operation.

Please also refer to section on Requirement for additional on-site planting and off-site planting in Horizon's response to the Local Impact Report – Dalar Hir.

The visual receptors where IACC have assessed the magnitude of visual change as being higher than that which has been reported are described in the sub-section of the Dalar Hir Park and Ride chapter of the LIR and are:

- Viewpoint 1 (representative view from a minor road to the north of the Park and Ride) at year 1 and 5 of the operational period;
- Viewpoint 6 (representative view north from the A5 Holyhead Road) for construction and for Year 1; and
- Gwyddfor Residential Home construction, year 1 and 5 of the operation period and decommissioning.

It is not clear why IACC has identified additional significant adverse visual effects at these viewpoints. Horizon does not agree with IACC's assessment and has discussed this in more detail in the section on Assessment of visual effects and section 1.5 Assessment of effects on Gwyddfor Residential Home in Horizon's response to the Local Impact Report – Dalar Hir.

FWQ7.0.13: Is the Applicant's approach to the landscape and visual effects of the development in relation to the A5025 Off-line highway improvements as set out in 6.7.10 ES Volume G - A5025 Off-line Highway Improvements G10 -

Landscape and visual [APP-313] adequate for: Section 1: Valley; Section 2: Llanfachraeth; Section 3: Llanfaethlu; Section 7: Cefn Coch; and Power Station Access Road Junction and if not how should any issues be addressed.

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	(a) IACC finds the approach to the Study Area and ZTV acceptable, with note of general comments made in response to Q7.0.1 and Q7.0.2, above. (b) IACC generally agrees with the presentation of landscape and visual baseline information although some of the baseline information is inconsistent and out-dated, and none of the baseline surveys include a survey of the existing hard landscape elements (including stone walls and cloddiau) within the DCO limits, which needs to be provided. The inconsistencies and gaps in the baseline data are set out in the A5025 off-line Highway Improvements Landscape chapter of the LIR. (c) Generally the IACC agrees with the selection of viewpoints. (d) IACC will require substantially more detailed information for landscape and visual mitigation, the scope of which has been described in detail within the Landscape and Visual sub-section of the A5025 Off-line Highway Improvements chapter of the LIR. • evaluation of sensitivity of receptors; IACC generally agrees with the approach to evaluating the sensitivity of receptors.	Horizon acknowledges the comments made by the IACC on the approach to the Study Area and ZTV and has nothing further to add. General comments noted by the IACC have been addressed in Horizon's responses to IACC's responses to FWQ7.0.1 and FWQ7.0.2. With regard to baseline information being inconsistent and outdated, this is not considered to be the case as discussed in Horizon's response to IACC's Local Impact Report, Chapter 22, submitted at Deadline 3 (18 December 2018). Details of hard landscape elements are provided on the detailed plans for sections 1, 3, 5 and 7 of the A5025 Offline Highway Improvements [APP-019 to APP-022]. Horizon acknowledges the comments made by the IACC on the selection of viewpoints and has nothing further to add. Horizon has noted comments made by the IACC on the requirement for greater detail regarding landscape and visual mitigation measures and has provided a response in Horizon's response to IACC's Local Impact Report, Chapter 22, submitted at Deadline 3 (18 December 2018). Generally, it is not considered that greater detail is required. Horizon acknowledges the comments made by the IACC on the evaluation of sensitivity and assessment of effects on local landscape resources and has nothing further to add. Horizon has noted comments made by the IACC on the differences they have identified regarding the magnitude of impact on visual receptors and has provided a response in Horizon's response to IACC's Local Impact Report, Chapter 22, submitted at Deadline 3 (18 December 2018). Generally, Horizon consider the assessment of visual effects to be accurate. Comments relating to night-time views have been addressed in Horizon's response to IACC's response to FWQ7.0.1. Horizon has noted comments made by the IACC on additional and off-site mitigation measures and has provided a response in Horizon's response to IACC's Local Impact Report, Chapter 22s,

- effects on local landscape; IACC generally agrees with the assessment of effects on local landscape resources.
- visual effects for residential, users of community areas, users of PROW, transport routes and visitors to selected receptors; As is noted in the Landscape and Visual sub-section of the A5025 Off-line Highway Improvements chapter of the LIR, the IACC agrees with the levels of impact identified by Horizon for landscape resources and the majority of receptors but has identified an additional number of receptors where it considers that the magnitude of change experienced by the viewer would be greater than that reported, leading to an additional number of negative impacts.
- night-time views; Please refer to the response to Q7.0.1, above, for general comments regarding night-time views.

(e) All the additional mitigation during construction and operation, as described in Tables G10-9 and G10-10, are welcomed and the various detailed schemes will need to be submitted to and approved by IACC prior to work commencing on-site. As is noted in the Visual section of the WNDA LIR Chapter, for locations where negative impacts have been identified, either by Horizon or, in addition by IACC, there are a number of additional mitigation measures which could be introduced in addition to those currently proposed within the ES documentation. IACC has identified a number of locations for offsite planting

submitted at Deadline 3 (18 December 2018). Generally, it is not considered that further mitigation measures, including off-site planting, are required.

and requests that consideration be given to them.

(f) As noted above, IACC is of the opinion that further mitigation measures should be incorporated into the design that could further reduce the adverse impacts and bring about greater benefits to the landscape and visual resource of the study area. These mitigation measures are outlined in the LIR.

(g) As noted above, IACC is of the opinion that further mitigation measures should be incorporated into the design that could further reduce the adverse impacts and bring about greater benefits to the landscape and visual resource of the study area. These mitigation measures are outlined in the LIR.

FWQ8.0.17 Is NRW content that the enhancement described in Chapter D13 paragraph 13.8.8 would be sufficient to reduce the significance from moderate to minor for effects on subtidal and intertidal habitats from direct loss under the footprint of the Marine Works?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	NRW is not content that the marine enhancements proposed would be sufficient to reduce the significance from moderate to minor. We refer you to comment 7.18.4 in NRW's Written Representations.	In response to paragraph 7.18.4, Horizon has considered the views raised by NRW's comments – that it is not content that the marine enhancements proposed would be sufficient to reduce the significance from moderate to minor through the SOCG discussion and the DCO examination process. Horizon is currently preparing a report which sets out the details of the additional information that has been requested by NRW through SOCG meetings, to expand upon the details submitted in the SOCG with NRW at Deadline 2 (4 December 2018) (see SOCG appendix A). This new report will expand on the engineering options appraisal that has been undertaken, to determine the ecological enhancement measures that are viable, and can be considered as part of the Wylfa Newydd DCO Project to mitigate loss of marine habitats and species. Horizon intends to provide this report to NRW early in 2019 through the SOCG process, in order to facilitate ongoing engagement with respect to this matter. This report will be updated to take account of any further comments made by NRW and submitted into examination at Deadline 4 (17 January 2019).

FWQ8.0.21: NRW in para 4.2.9 of its RR does not agree that “there are no effects predicted on the bathing water at Cemaes, and that the Wylfa Newydd Project is considered to be compliant with the Bathing Water Directive”. Can the two parties resolve NRW's concerns?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	NRW's has discussed these concerns with the Applicant and we understand that further modelling is proposed by the Applicant to address the additional information required. We refer to section 7.6 in NRW's Written Representations.	Horizon has considered the potential impacts on bathing water from a variety of perspectives including discharges of elevated suspended solids and sewage discharges into the marine environment. These are as set out in chapter D13 of the ES [APP-132]. Horizon has also undertaken a qualitative assessment of the effects on the Cemaes Bathing Water cumulatively with other discharges operated by Dŵr Cymru Welsh Water (DCWW) by comparing the modelled discharge against existing bacte levels in Cemaes bay. These assessments are summarised in sections 13.6.52 – 13.6.53 of chapter D13 of the Environmental Statement. Furthermore, as presented in the Water Framework Directive Compliance Assessment [APP-444], the Wylfa Newydd DCO Project is not considered to risk further deterioration in bathing water quality in that the modelled concentrations are not sufficient enough to result in a change in quality based on the levels within the Bathing Water Directive existing modelling. Horizon considers that its assessment is conservative due to the assumptions incorporated into the modelling and assessment work. Horizon has made an application to NRW for construction water discharge activity under the Environmental Permitting Regulation 2016. This application includes the discharge of sewage effluent through the construction of the Power Station. NRW has exercised its powers under Paragraph 4 of Part 1 of Schedule 5 to request further information. Through these requests NRW have raised concern over the modelling outputs and the cumulative effect of the sewage discharge with other DCWW assets. Horizon considers that NRW's concerns can be resolved and is actively engaged with NRW to agree a scope for the additional modelling elements and is working with DCWW and consulting with NRW to agree a set of input parameters to model. The outcome of the modelling will be to further understand the risk of the project in combination with existing assets to result in failures of the Cemaes Bathing Water against the Bathing Waters Directive.

FWQ8.0.23: In its RR para 4.6.1 NRW advise that there is insufficient evidence to demonstrate that cumulative effects of the project on benthic habitats are insignificant? Can the Applicant comment?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	NRW consider that cumulative effects on benthic habitats during the operational phase as a result of the footprint of the structures as well as possible changes in coastal process and the operational water discharges (thermal plume and biocide) have not been fully assessed.	Please refer to Horizon's response submitted at Deadline 2 to FWQ8.0.23 [REP2-002]. Horizon considers that the cumulative effects on benthic habitats during the operational phase as a result of the footprint of the structures as well as possible changes in coastal process and the operational water discharges have been fully assessed as presented in chapter D13 (the marine environment) of the Environmental Statement [APP-132]. Chapter D13 concludes that the Wylfa Newydd DCO Project could potentially result in: a) two significant effects representing a medium magnitude of change and a moderate adverse effect to benthic habitats resulting from the direct loss of habitats and species under the footprint of the Marine Works, and secondly, from the potential introduction of invasive non-native species during Main Construction.; and b) two additional minor non-significant effects to benthic habitats due to the discharge of Cooling Water and the associated thermal and Total Residual Oxidants (TRO). These assessments are outlined in paragraphs 13.6.679, 13.6.690, 13.6.784 and 13.6.789 of chapter D13. No other topic assessments in the Environmental Statement identified effects to benthic habitats. It is noted that sub-lethal effects of TRO and thermal discharge are expected to be highly localised being limited to the immediate zone of discharge (i.e. within a few 100 metres of the outfall). Whilst effects of smaller magnitude may occur further afield, these would remain reasonably localised, covering a subtidal and intertidal area of 4.2ha and 0.3ha, respectively (see paragraphs 13.6.679 and 13.6.690 of chapter D13). The subtidal and intertidal habitats (including those of conservation importance) that would be affected cumulatively by the Wylfa Newydd DCO Project are considered common on a regional scale and therefore any loss would not result in wider effects on the structure and function of benthic habitats. The magnitude of change and combined effect to benthic habitats is therefore considered to be negligible and on this basis Horizon does not consider further mitigation and/or enhancement measures are required.

FWQ8.0.24: Paragraph 6.4.127 of the Planning Statement [APP-406] makes reference to the fact that there is a flood risk for the proposed Park and Ride. It then states that 'Proposed additional mitigation measures would be implemented...' Can the applicant confirm what these additional mitigation measures would be and whether they would be implemented? Can the IACC and NRW confirm what additional measures they consider would be necessary and how they would wish to see these additional measures secured?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	As confirmed in the Dalar Hir LIR chapter, the IACC has significant concerns about potential flood risk impacts at the site and the implications that these may have for the operational phase of the park and ride facility. It notes that Horizon has committed to further mitigation following more detailed assessment, and states that it will 'design out' the risk. Despite this the ES does judge the potential flood risk effect as 'significant' and Horizon states that the detail to address the risk referred to will be provided post-DCO. This is not acceptable to IACC which has not seen the details of the mitigation referred to and requires sufficient information to be provided in advance of any decision to enable it to fully assess the implications of flooding at the site. IACC will assess the appropriateness of the 'further mitigation' in liaison NRW before considering whether it is acceptable. The IACC's concern is twofold: 1) That satisfactory deliverability (to TAN-15 requirements) of a mitigation within the available land is unclear without sight of the further modelling proposed by Horizon and 2) That it remains concerned about the safe operation of the park and ride for site personnel at all times during the	Please see Horizon's response to FWQ 8.0.24 submitted at Deadline 2 (4 December 2018) [REP2-002].

	construction phase. Without understanding how the stated flood risk issues will be managed it is not possible to confirm the park and ride will be operationally safe, and the knock-on effects to congestion/travel of site construction workers should sections of the park and ride become unavailable due to a flood event. Further detail on managing the future car parking areas that will be at risk of flooding - people, vehicles and movements and impacts on construction operations are required. This should set out what will happen during a flood event with regard to forecasting, evacuation and the process of notification.	

FWQ8.0.24: Paragraph 6.4.127 of the Planning Statement [APP-406] makes reference to the fact that there is a flood risk for the proposed Park and Ride. It then states that 'Proposed additional mitigation measures would be implemented...' Can the applicant confirm what these additional mitigation measures would be and whether they would be implemented? Can the IACC and NRW confirm what additional measures they consider would be necessary and how they would wish to see these additional measures secured?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	NRW is not aware of additional mitigation measures that would demonstrate that the flood risk at the proposed site would be acceptable and compliant with TAN 15. NRW would expect additional measures to be presented to the Examining Authority / Secretary of State to demonstrate that flood risk can be managed at the site. We refer you to section 9.1 in NRW's Written Representations. We understand the Applicant has undertaken further assessment with regard to flood risk - NRW is awaiting this additional information from the Applicant.	Please see Horizon's response to FWQ 8.0.24 submitted at Deadline 2 (4 December 2018) [REP2-002].

FWQ 8.0.25: The requirements as currently worded rely on the CoCP [APP-414-APP-421] to deliver the detail with regards to drainage strategies and flood mitigation plans. Whilst the CoCPs refer to the drafting of these documents by the applicant it does not appear that they would have to be submitted to or be approved by either the IACC or NRW (eg section 10.5 of the WNCOP [APP- 414]). Given the concerns in relation to drainage and flooding (particularly in relation to the proposed Park and Ride) are the IACC and NRW satisfied with these proposals and if they are not what mechanisms would they want to see put in place to control these elements of the scheme?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The IACC does not accept that sufficient mitigation is provided by the CoCPs as they lack the necessary detail. The IACC has made detailed submissions on this point in its Written Representation at section [11]. The IACC would wish to be fully involved in the drafting of these detailed drainage strategies/ flood mitigation plans. The following mechanism is proposed: In the event that the detailed drainage strategies and flood mitigation plans are not submitted prior to the close of examination then IACC would propose that the most appropriate mechanism is to include either a new project-wide DCO Requirement or specific requirements for each project/ site component such that a detailed drainage strategy for the control of surface water and for the mitigation of flood risk is submitted to and approved by IACC prior to commencement of development. IACC would consult with NRW on the information received.	Please refer to Horizon's response to Section 11 of the IACC WR submitted at Deadline 3 (18 December 2018).

FWQ9.0.12: In relation to the construction of the radioactive waste facilities, the Applicant concludes in paragraph 6.5.115 of ES document D6 Noise and vibration [APP-125] that the potential effects are not likely to be significant. It is also stated that the plant list and programme for the construction of the spent fuel store have not yet been compiled and as a result no noise or vibration modelling has been undertaken. Please could the Applicant justify the conclusions reached as to the absence of likely significant effects from activities associated with the waste facilities when there is so little detail currently available regarding their construction?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	IACC has responded to the Reasonably Foreseeable Future Projects (RFFPs) that have been proposed by Horizon for inclusion in the Cumulative Impact Assessment (CIA). Consensus has been reached between IACC and Horizon with respect to a majority of the RFFPs which have been scoped-in for the purpose of the CIA. IACC has, however, requested that Horizon include the following RFFPs in the project's Cumulative Impact Assessment: • Project AN12 – West Anglesey Demonstration Zone (Mentor Mon) IACC identified to Horizon in December 2017 that this demonstration tidal energy project was actively progressing via Morlais Tidal Energy with project management by Mentor Mon and that the latter had advertised for a number of posts for key personnel to take the project forward. IACC recommended that Horizon contact Mentor Mon to obtain relevant information such that it could be included in the CIA. • Project AN17 – House building programme (IACC)	Please see Horizon's response to IACC's Local Impact Report Chapter 16 – Cumulative, submitted at Deadline 3 (18 December 2018), regarding the additional RFFPs requested by IACC.

IACC stated to Horizon that the Council had secured funding to bring forward the construction of 400 units over the period 2018-2022. IACC requested that Horizon should include the provision of this significant number of new dwellings within the scope of the CIA.

- Project AN22 – Third bridge across the Menai Straits (Welsh Government)

IACC response for this project is provided in relation to PINS Question Ref: Q11.1.50.

- Project CN02 – Improvements to Junctions 15 and 16 of the A55

IACC identified to Horizon that the Welsh Government has confirmed a single option strategy for this scheme and that a contractor has been appointed to progress and develop the delivery of this option through to the construction phase of the project. A public enquiry is anticipated in Summer/Autumn 2019 with construction planned to occur between Autumn 2020 and Autumn 2022. IACC has noted to Horizon the potential for significant effects on travel times related to the 90 minute catchment applied for the WNP.

Further to the above, IACC has provided additional advice on the scope of the RFFPs that should be included within the scope of the CIA via email to Horizon dated 31st January 2018 as follows:

- Stena Ports Ltd and IACC - Holyhead Outer Harbour Breakwater Restoration / Improvements Scheme - IACC

recommends that Horizon should make enquiries with the Port Authority to gain confirmation as to the environmental information that is available.

- Joint Local development Plan Allocations - IACC referred Horizon to The Planning Inspectorate's Advice Note 17 which states that sites identified in the Joint Local Development Plan are recognised as Tier 3 'other developments'. IACC provided their opinion to Horizon that the LDP allocations should be included in the list of Reasonably Foreseeable Future Projects (RFFP) and thus included in the cumulative impact assessment.

Horizon confirmed (in an email from Sarah Price addressed to Dylan Williams of IACC dated 6th February 2018) that the request made by IACC for the inclusion of the RFFPs identified above was not possible due to the need to finalise the DCO documentation as a whole.

FWQ9.0.14: Paragraph 6.4.26 of ES document D6 Noise and vibration [APP-125] states that compliance with the Noise and Vibration Management Strategies set out in the Wylfa Newydd Code of Construction Practice ('CoCP') and the MPSSSCoCP [APP-414 and APP-415, respectively] would be a requirement of the contract between Horizon and the contractors appointed to undertake the works. Section 2.4 of APP-414 notes that the contractors would be required to prepare Construction Environmental Management Plans ('CEMPs') accordingly, which would be 'reviewed and accepted' by the Applicant prior to commencement of the works. Please could IACC indicate if they are content with this approach?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The IACC does not accept that this approach is acceptable as the CoCPs lack the necessary detail and there is no opportunity for IACC to review and approve the CEMPs which will sit under those CoCPs. The CEMPS are not control documents in any sense as they are approved only by the applicant. The requirements to be complied with and which are enforceable by the IACC as LPA therefore need to be set out in the requirements or the certified CoCPs. The IACC has made detailed submissions on the inadequacy of the CoCPs in its Written Representation at section [11]	As noted in response to section 11 of IACC's Written Representation, Horizon has already submitted pro-active revisions of the Wylfa Newydd CoCP [REP2-031] and relevant sub-CoCPs [REP2-032 to REP2-036, REP2-373] at Deadline 2 (4 December 2018) and are expecting to submit further updates at Deadline 4 (17 January 2019). This will ensure that by the end of Examination, the Wylfa Newydd CoCP and the relevant sub-CoCPs resolve stakeholder concerns regarding certainty and enforceability. The Wylfa Newydd CoCP [APP-414] and relevant sub-CoCPs [APP-415 to APP-420] will be certified and approved documents under article 76 of the Draft DCO [REP1-005]. The Requirements in Schedule 3 of the Draft DCO state that the construction of the Wylfa Newydd DCO Project, as described in Schedule 1 of the Draft DCO, must be carried out in accordance with the Wylfa Newydd CoCP and relevant sub-CoCP applying to a specific site, unless otherwise agreed by the IACC. As IACC will be well aware, non-compliance with a term of a development consent order is a criminal offence under the Planning Act 2008 and IACC has a range of enforcement powers that it can take against Horizon if a breach occurs. As noted at section 1.2 and 2.4 of the Wylfa Newydd CoCP [REP2-031] Horizon is the company responsible for the delivery of the Wylfa Newydd DCO Project, in whom the powers of the DCO would be vested. It is responsible for all of the works, which include overseeing and assuring the activities carried out by their contractors, and the co-ordination between contractors. The appointed construction contractors will be contractually required to prepare a CEMP, which will detail how the practical execution of the construction works will be planned, managed and controlled to meet the requirements of this Wylfa Newydd CoCP [REP2-031] and relevant sub-CoCPs [REP2-032 to REP2-036, REP2-373], other necessary consents, legislation and common good practices. This contractual requirement is therefore one of the mechanisms that will secure the mitigation provided in the DCO and ensure that the CEMPs comply with, and give effect to, the control

		documents. For this reason, Horizon considers that it is appropriate that CEMPs do not need to be approved by IACC.

FWQ9.0.15: Section 6.4 of ES document D6 Noise and vibration [APP-125] provides a high level description of the proposed mitigation measures and states in relation to a number of them that they will be implemented 'as far as practicable'. Although cross-reference is made to the Wylfa Newydd Code of Construction Practice [APP-414] no more specific information is provided within that document. Are IACC and NRW satisfied that implementation of the proposed measures is sufficiently certain?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	In addition to the objections to the CoCPS referenced in the previous question the IACC submits that requiring the implementation of measures only so far as practicable renders them unsecured due to being enforceable in practice as proving that something was not practicable is extremely difficult due to the vagueness of that standard. Such measures therefore cannot be relied upon to deliver any mitigation and should not be given weight. The lack of precision and uncertainty caused by such wording is entirely inappropriate in the DCO context where non-compliance can carry criminal consequences.	Horizon provided an initial response to FWQ.9.0.15 as part of its Responses to the Examining Authority's First Written Questions submitted at Deadline 2 [REP2-002]. The following builds on this initial response in light of IACC's response. BS5228-1 [13] provides recommendations for basic methods of noise control relating to construction sites, including sites where demolition, remediation, ground treatment or related civil engineering works are being undertaken. The following table (table 9.015.1) catalogues the recommended noise control measures for construction sites contained in BS5228-1 [13] that are committed to within the DCO application. A value of '1' in the table indicates that the mitigation measure has been adopted fully, using identical or very similar language to BS5228-1 [13]. A value of '2' indicates that the principle of the mitigation measure has been adopted but not the detail, or alternatively that the mitigation measure has only partially been adopted. As an example, where the adoption has been scored a '2', BS5228-1 [13] states in separate bullet points that: 'regular balancing of equipment should be undertaken', 'regular sharpening of tools should be undertaken', and 'regular lubrication should be undertaken'. The Horizon commitment in the Wylfa Newydd CoCP [REP2-031] to 'maintaining all construction plant and machinery in accordance with the manufacturers' instructions' is considered to adopt the principles of all three of these BS5228-1 [13] requirements, but in a generalised form. Where there is no value, the mitigation measure has not been expressly adopted by Horizon (highlighted in red). It can be seen in Table 9.015.1 that the majority of the construction site noise control measures recommended in BS5228-1 have been adopted either explicitly, in principle or partially. With regard to the practicality of implementing such measures, construction sites are dynamic environments with many competing demands. BS 5228 states that: <i>"The intention throughout any construction programme should be to minimize levels of site noise whilst having due regard to the practicability and economic implication of any proposed control or mitigation measures".</i> BS 5228-1 also states:

"Local authorities should ensure that any noise level limits or restrictions being imposed are necessary and practicable".

The consideration of 'practicality' is reiterated many times within BS5228, for example:

- "Where practicable, alternative reversing warning systems should be employed to reduce the impact of noise outside sites".
- "For an existing operational site, where reasonably practicable, noisy plant or activities should be replaced by less noisy alternatives (see Annex B for examples) if noise problems are occurring".
- "As far as reasonably practicable, sources of significant noise should be enclosed".
- "Plant from which the noise generated is known to be particularly directional should, wherever practicable, be orientated so that the noise is directed away from noise-sensitive areas".
- "Materials should be lowered whenever practicable and should not be dropped".
- "Where practicable, noisy static site elements should be located to take advantage of the screening effects of overburden and soil mounds".
- "Where practicable, plant should be selected which will have the least impact in terms of noise".
- "The movement of plant on and off the site should be restricted as far as practicable to within the agreed working hours for the site".
- "On each day that blasting takes place it should be restricted as far as practicable to regular periods".

The principle of practicality is therefore well established, and BS 5228-1:2009+A1:2014 is clear that many mitigation measures may not be appropriate or practical in all situations; safety, economic, or programme related factors may all make a particular measure unsuitable in a given situation. It is clearly not reasonable to impose requirements on Horizon to provide mitigation measures which are impractical, unnecessary, or which have excessive economic implications.

In relation to enforcement, Horizon disagrees with IACC's assertion that "requiring the implementation of measures only so far as practical renders them unsecured". Horizon has committed to submitting applications for prior consent for each phase of works in accordance with Section 61 of the Control of Pollution Act 1974. These applications will generally be submitted around six months ahead of the

		work phase when better information about working methods, locations and plant selection is known. The applications require the contractor to demonstrate to the satisfaction of IACC that Best Practicable Means (BPM) of noise control will be used; this process therefore allows specific mitigation measures which are appropriate to the activities being undertaken to be specified when sufficient information is available to do so. This is the appropriate mechanism by which specific noise mitigation will be secured, and this statutory process is used to control construction noise from the vast majority of other major infrastructure schemes (e.g. Thameslink, Crossrail, Thames Tideway, Hinkley Point C).

ID	BS5228-1 Paragraph	Plant	Control measure	Horizon implementation			
				WN CoCP [APP-414]	Main site sub-COCP [APP-415]	A5025 sub-CoCP [APP-420]	AD sub-CoCPs [APP-417 418, 419]
001	8.2.1 (A)	All plant	Avoid unnecessary revving of engines and switch off equipment when not required	1			
002	8.2.1 (B)	Haul Vehicles	Keep internal haul routes well maintained and avoid steep gradients.		2		
004	8.2.1 (D)	All plant	Minimize drop height of materials.	1			
006	8.2.1	All plant	Audible reversing warning systems on mobile plant and vehicles should be of a type which, whilst ensuring that they give proper warning, have a minimum noise impact on persons outside sites.	1			
007	8.2.1	All plant	When reversing, mobile plant and vehicles should travel in a direction away from NSPs whenever possible.	2			
008	8.2.1	All plant	Where practicable, alternative reversing warning systems should be employed to reduce	1			

ID	BS5228-1 Paragraph	Plant	Control measure	Horizon implementation			
				WN CoCP [APP-414]	Main site sub-COCP [APP-415]	A5025 sub-CoCP [APP-420]	AD sub-CoCPs [APP-417 418, 419]
			the impact of noise outside sites.				
009	8.2.2	All plant	Where a construction site is within a noise-sensitive area, the plant and activities to be employed on that site should be reviewed to ensure that they are the quietest available for the required purpose.	1			
010	8.2.2	All plant	For an existing operational site, where reasonably practicable, noisy plant or activities should be replaced by less noisy alternatives (see Annex B for examples) if noise problems are occurring.	2			
011	8.2.3	All plant	Noise from existing plant and equipment can often be reduced by modification or by the application of improved sound reduction methods.			2	2

ID	BS5228-1 Paragraph	Plant	Control measure	Horizon implementation			
				WN CoCP [APP-414]	Main site sub-COCP [APP-415]	A5025 sub-CoCP [APP-420]	AD sub-CoCPs [APP-417 418, 419]
012	8.2.3	Stationary Plant	It might be possible in certain circumstances to substitute electric motors for diesel engines.	1			
013	8.2.3	Generators	On-site generators supplying electricity for electric motors should be suitably enclosed and appropriately located.	1			
014	8.2.4	Stationary Plant	As far as reasonably practicable, sources of significant noise should be enclosed.	1			
015	8.2.5	All plant	Care should be taken to site equipment away from noise-sensitive areas.	1			
016	8.2.5	Cranes	Machines such as cranes that might be in intermittent use should be shut down between work periods or should be throttled down to a minimum. [Duplicates 8.2.1. (A)].	1			

ID	BS5228-1 Paragraph	Plant	Control measure	Horizon implementation			
				WN CoCP [APP-414]	Main site sub-COCP [APP-415]	A5025 sub-CoCP [APP-420]	AD sub-CoCPs [APP-417 418, 419]
017	8.2.5	Stationary Plant	Plant from which the noise generated is known to be particularly directional should, wherever practicable, be orientated so that the noise is directed away from noise-sensitive areas.	2			
018	8.2.5	All plant	Acoustic covers to engines should be kept closed when the engines are in use and idling.	1			
019	8.2.5	Compressors	If compressors are used, they should have effective acoustic enclosures and be designed to operate when their access panels are closed.	2			
020	8.2.5	All plant	Materials should be lowered whenever practicable and should not be dropped. [Duplicates 8.2.1. (D)].	1			

ID	BS5228-1 Paragraph	Plant	Control measure	Horizon implementation			
				WN CoCP [APP-414]	Main site sub-COCP [APP-415]	A5025 sub-CoCP [APP-420]	AD sub-CoCPs [APP-417 418, 419]
022	8.2.5	Lorries	When a site is in a residential environment, lorries should not arrive at or depart from the site at a time inconvenient to residents.	1			
023	8.2.5	Stationary Plant	Care should be taken in location, having due regard also for access routes.	2			
024	8.2.5	Stationary Plant	When appropriate, screens or enclosures should be provided for such equipment.	1			
025	8.2.5	Stationary Plant	Additional mitigation might be required at night, e.g. by moving plant away from sensitive areas to minimize disturbance.	1			
026	8.2.6	All plant	Regular and effective maintenance by trained personnel is essential.	1			

ID	BS5228-1 Paragraph	Plant	Control measure	Horizon implementation			
				WN CoCP [APP-414]	Main site sub-COCP [APP-415]	A5025 sub-CoCP [APP-420]	AD sub-CoCPs [APP-417 418, 419]
027	8.2.6	All plant	Sound-reducing equipment can lose its effectiveness before failure is indicated by visual inspection. [Control measure: regular acoustic tests of equipment to check performance].	1			
028	8.2.6	All plant	Noise caused by vibrating machinery having rotating parts can be reduced by attention to proper balancing. [Control measure: regular balancing of equipment should be undertaken].	2			
029	8.2.6	All plant	Frictional noise from the cutting action of tools and saws can be reduced if the tools are kept sharp. [Control measure: regular sharpening of tools should be undertaken].	2			

ID	BS5228-1 Paragraph	Plant	Control measure	Horizon implementation			
				WN CoCP [APP-414]	Main site sub-COCP [APP-415]	A5025 sub-CoCP [APP-420]	AD sub-CoCPs [APP-417 418, 419]
030	8.2.6	All plant	Noises caused by friction in conveyor rollers, trolleys and other machines can be reduced by proper lubrication. [Control measure: regular lubrication should be undertaken].	2			
031	8.3.2	Compressors, Generators	Stationary plant such as compressors and generators should be located away from any noise-sensitive area. [Duplicates 8.2.5]	1			
032	8.3.3	All plant	Where it is not possible to reduce a noise problem by increasing the distance between the source and receiver, screening might have to be considered. See 8.3.3. for guidance on placement.	1			
034	8.3.3	Stationary Plant	Areas which have been excavated below ground level such as basements or river works can be	1			

ID	BS5228-1 Paragraph	Plant	Control measure	Horizon implementation			
				WN CoCP [APP-414]	Main site sub-COCP [APP-415]	A5025 sub-CoCP [APP-420]	AD sub-CoCPs [APP-417 418, 419]
			used to position static plant such as generators, compressors and pumps.				
035	8.3.3	All plant	Earth bunds can be built to provide screening for major earth-moving operations and can be subsequently landscaped to become permanent features of the environment when works have been completed.	1			
036	8.3.3	All plant	The construction of a bund can be a noisy activity and should be planned carefully, e.g. it might be possible to construct the outer side of the bund first so that remaining work on the bund is shielded from NSPs.	1			

ID	BS5228-1 Paragraph	Plant	Control measure	Horizon implementation			
				WN CoCP [APP-414]	Main site sub-COCP [APP-415]	A5025 sub-CoCP [APP-420]	AD sub-CoCPs [APP-417 418, 419]
037	8.3.3	All plant (esp. road construction)	Protective features ultimately needed as permanent noise screening to be built in during the early stages of site work. [Control measure: build noise barriers (e.g. alongside road) early in programme].	1			
038	8.4	All plant	Monitoring of noise at sites where noise is an issue should be regarded as essential.	1			
039	8.4	All plant	Monitoring positions should reflect the purpose for which monitoring is carried out.	1			
040	8.4	All plant	Monitoring to ascertain whether an item of plant or particular process is meeting an anticipated noise criterion or if noise control methods are working, might require measurements to be carried out close to the plant or process to avoid	1			

ID	BS5228-1 Paragraph	Plant	Control measure	Horizon implementation			
				WN CoCP [APP-414]	Main site sub-COCP [APP-415]	A5025 sub-CoCP [APP-420]	AD sub-CoCPs [APP-417 418, 419]
			undue interference from other noise sources.				
041	8.4	All plant	Monitoring to confirm that planning conditions imposed to protect local occupants have been met may be undertaken at NSPs or at the site boundary, with a correction applied.	1			
042	8.4	All plant	Monitoring is the responsibility of the site operator and should be carried out by suitably trained personnel.	1			
047	8.5.2.5	All plant	Monitoring: Steady noise levels should normally be expressed in terms of the LAeq,T over a period of several hours or for a working day. Impulsive noise levels cannot	1			

ID	BS5228-1 Paragraph	Plant	Control measure	Horizon implementation			
				WN CoCP [APP-414]	Main site sub-COCP [APP-415]	A5025 sub-CoCP [APP-420]	AD sub-CoCPs [APP-417 418, 419]
			always be controlled effectively using this measure alone.				

Table 9.015-1 – Mitigation measures from the British Standard committed to in the DCO Application.

FWQ9.0.15 Section 6.4 of ES document D6 Noise and vibration [APP-125] provides a high level description of the proposed mitigation measures and states in relation to a number of them that they will be implemented 'as far as practicable'. Although cross-reference is made to the Wylfa Newydd Code of Construction Practice [APP-414] no more specific information is provided within that document. Are IACC and NRW satisfied that implementation of the proposed measures is sufficiently certain?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	We refer you to IACC's advice in relation to mitigation measures to consider for human receptors. NRW has concerns about the effectiveness and deliverability of the mitigation measures proposed to address disturbance (including as a result of noise) on the tern colony at Cemlyn. We refer you to comments in 7.8.31 in NRW's Written Representations.	A detailed response to the concerns raised by NRW at paragraph 7.8.31 of its Written Representation is given in Horizon's response to NRW's Written Representation. This response is not repeated here. However, Horizon notes that the matters raised by NRW also relate to FWQ5.0.27 raised by the Examining Authority in its First Written Questions [PD-009]. Horizon has proposed some clarified text in its response to FWQ5.0.27 submitted at Deadline 2 (4 December 2018) [REP2-002]. As set out in that response, the relevant sub-CoCPs are being revised to include these further refinements and the updated sub-CoCPs will be submitted to the ExA at Deadline 4 (17 January 2019). For completeness, detailed tern noise mitigation text is repeated in section 11.4 of the Main site sub-CoCP [REP2-032] and section 8.3 of the Marine works sub-CoCP [REP2-033].

FWQ10.1.2: Do you consider that the proposed site campus would comply with policy PS 10 of the JLDP? If not, why not?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The proposed site campus does not fully comply with Policies PS9 and PS10. Horizon has not demonstrated that it has properly and meaningfully considered and excluded other sites, permanent buildings and existing consents before selecting this site. The proposal includes development of greenfield land but does not satisfactorily justify which is necessary. The proposal also includes inadequate provision of health care, open space, recreation and leisure services which will have an adverse impact on community facilities as well as resident amenity, and does not mitigate the impacts of the population on the environment, ecology, Welsh language and culture and local communities. Policy PS 9 is the overarching Policy for development linked to Wylfa Newydd. Criterion 7 links Policy PS 9 and Policies PS 10 – 12 together. Criterion (6) of Policy PS 9 states that where proposals are for a temporary period both the site selection and the proposal detail shall be informed by a consideration of legacy uses. This is an essential test that should be satisfied before regard is then given to the detailed matters contained within the criteria of Policy PS 10. The on-site Campus Chapter in the LIR outlines the IACC's position on the justification provided by Horizon of the	Horizon's consideration of the Site Campus against JLDP Policies PS9 and PS10 is summarised in Horizon's Written Representation [REP2-003]. With specific regard to the IACC's response to FWQ10.1.2, firstly criterion (6) of Policy PS 9 is not an 'essential test' that needs to be passed before considering any other factors. It is one component of a local planning policy which may be considered 'important and relevant' in the context of section 105 of the 2008 Planning Act. In any event, it does not preclude the Site Campus proposals. It simply states that where proposals are for a temporary period <i>"the site selection and proposal shall be informed by a consideration of legacy uses so that investment in elements such as infrastructure, buildings, ecological and landscape works bring long term benefits"</i>. Horizon's rationale for delivering the Site Campus on the WNDA extend beyond the consideration of whether the temporary worker accommodation could later physically be utilised beyond the construction period. There are specific benefits of delivering the Site Campus on the WNDA rather than a location or locations remote from the Power Station Site, including (as set out at Appendix C of the Planning Statement): • reducing impacts elsewhere on Anglesey, in particular effects on Welsh language and culture (addressed further below); • minimising the number of construction workers travelling on local roads on a daily basis; • enabling key workers to have immediate and easy access to the Power Station Site so they can respond to emergencies and out of hours needs; and • efficiencies from sharing utilities and services with the Power Station Site. With regard to Criterion (1) of Policy PS10, the need for purpose built temporary workers accommodation is addressed in detail at section 4.2 of Appendix C of the Planning Statement [APP-406], in section 7 of the Workforce Accommodation Strategy (WAS) [APP-412] and in Horizon's Written Representation [REP2-003].

locating of approximately 4,000 workers on an on-site campus which is to be entirely removed at the end of use. Whilst the Council would not support a legacy that would result in the retention of the entire campus on this greenfield site in open countryside, these matters need to be resolved for the Council to support the provision of this scale of campus on the Wylfa Newydd site.

The following matters within the criteria of policy PS 10 should be considered:

Criterion (1) –demonstrable need for temporary accommodation:

The IACC's Housing Chapter within the LIR clearly states that there is insufficient capacity within the existing housing / Tourism market to accommodate all of the non-home based Wylfa Newydd workforce. In fact, the IACC questions Horizon's current assumptions over the capability of the existing stock and the impact on it to accommodate the current level of workers they assume will be accommodated in such stock. Therefore, the IACC and Horizon agree in principle that the existing residential accommodation cannot accommodate all the needs of the non – home based construction workers. The IACC is also of the view that there is a lack of available large-scale buildings that could be converted and/or used to accommodate a significant amount of construction workers. The area where the IACC does not feel that Horizon has addressed sufficiently is the provision of new permanent buildings of a sufficient scale and capable of being

In relation to IACC's comments on legacy provision, Horizon has committed to providing a Housing Fund through the draft DCO section 106 agreement which will also deliver legacy or new build housing and empty homes being returned to use.

Horizon also has decided to revisit the provision of legacy housing at Madyn Farm. Horizon is considering the options available to provide legacy housing on this site (as the current planning permission may be extant); although it notes that any proposal would need the support of IACC.

In respect of the consented sites, Horizon has thoroughly considered the use of the existing consents at Kingsland and Cae Glas (which include conversion to permanent residential and tourist accommodation respectively) before concluding that temporary accommodation was required. This included significant discussions with the land owner following the grant of consent. Horizon was not consulted by the applicant of these sites during their development and consenting stages and did not have any involvement in the design of the proposals, or in discussions on the practicality and feasibility of the consent or accompanying section 106 agreement.

As a result, the consents that were obtained cannot be reasonably used by Horizon without significant amendments. This would still not overcome the overriding concern of distance from the WNDA, which makes the location less sustainable than locating the Site Campus within the WNDA and significantly reducing the need for travel.

With regard to Criterion (2), this provides explicit support for the location of temporary worker accommodation on the WNDA. While there is no previously developed land within the "Wylfa Newydd Project Site", the Site Selection Report- Volume 4 [APP-439] included the use of brownfield land as a criterion when determining the most appropriate location for the Site Campus.

With regard to Criterion (3) Horizon agree with the IACC that the Site Campus proposals should ensure that appropriate mitigation against any adverse impact on the Welsh language is provided. The Welsh Language and Culture Mitigation and Enhancement Strategy (WLCMES) within the Welsh Language Impact Assessment (WLIA, APP-432 and 433) sets out a range of mitigation measures, which are secured through the draft DCO section 106 agreement to mitigate adverse impacts of the proposed development on the Welsh language and culture.

Horizon's Written Representation [REP2-003] paragraphs 3.3.88 to 3.3.93 address Criterion (4). The site campus proposals include a range of on-site facilities for use by the workforce, including leisure, recreational, retail and healthcare facilities. Horizon is also committed, through planning obligations secured by the draft DCO s.106 agreement, to making appropriate contributions for upgrades to existing indoor and outdoor leisure facilities in addition to contributions to BCUHB for impacts on NHS services.

adapted for permanent use following their use by construction workers. A large, already consented site on Ynys Môn (i.e. Land and Lakes) would if developed, provide a long term legacy of both residential and tourism use on the Island.

Criterion (2) – location of proposal:

Subject to the tests in criterion (6) of policy PS 9 and criterion (1) of Policy PS 10 on legacy use (as outlined above) this criterion identifies areas of search for a temporary campus site. This criterion recognises that the Wylfa Newydd Project site could be suitable location for a campus style temporary accommodation for construction workers. The criterion in line with Policy PS 5 Sustainable Development also places a preference for previously developed land. Therefore, whilst the criterion provides an in principle support for a campus on the WNDA it does so on the proviso that the benefits of development on a greenfield site outweighs development on a previously developed site or that such a suitably located site is not available or viable to develop. The LIR Chapter about the proposed campus style development on the WNDA sets out the IACC's concern about Horizon's approach to criterion 1 and 2.

Criterion (3) – mitigate adverse impact on the Welsh language:

The close proximity of the on-site campus to the construction site could, subject to suitable mitigation measures, lessen its impact on the wider community and thereby the Welsh language. However, such an advantage could also be provided

Horizon's Written Representation [REP2-003] paragraphs 3.3.93 to 3.3.95 address Criterion (5). The Workforce Accommodation Management Service (WAMS) which forms part of the WAS [APP-412] (and which will be secured in the DCO s.106 agreement) will provide a Worker Accommodation Portal that will be a database of suitable vacant properties offered by landlords and other providers, including the Site Campus. Horizon will, via the WAMS and the Worker Accommodation Portal, monitor the construction workforces' accommodation choices including the location of the accommodation and the type of accommodation. An Accommodation, Tourism and Leisure Sub-Group (to be established in accordance with the draft DCO s.106 agreement) will determine if monitoring data provided indicates a significant adverse effect on the accommodation sector within any particular area.

on an alternative campus site. Consideration needs to be given to the level of on-site facilities and their attractiveness, and how likely would the construction workers seek services and facilities available off-site and the frequency of that inter-action with local households who would also be using the off-site facilities, e.g. leisure, health care (see response to criterion (4) below). In addition, consideration also needs to be given to whether the on-site facilities and infrastructure reinforce the fact that the site is located in a predominantly Welsh speaking area. The IACC's Welsh language and Culture chapter in the LIR notes that the 'presence of up to 4,000 construction workers residing at the Site Campus without a robust mitigation strategy would have potential major adverse effects on the use and prominence of the Welsh language within the communities near the Wylfa Newydd Development Area, including Tregele, Cemaes, Amlwch, Llanfachraeth and Llanfaethlu. The chapter sets out mitigation measures required to manage the impacts.

Criterion (4) – onsite provision of ancillary facilities:

The criterion states where access to off-site leisure, recreational, retail and healthcare facilities and such facilities are not available within an acceptable distance for pedestrian or cycle access then appropriate mitigation is required. This mitigation could include onsite provision of ancillary facilities for the use of the

	occupiers. The Chapter in the LIR that deals with the on – site campus sets out the Council’s current concerns about the onsite ancillary provision. <i>Criterion (5) – occupancy information to facilitate monitoring:</i> The Introduction Chapter of the LIR deals with the IACC’s concerns regarding the proposed monitoring framework.	

FWQ10.1.8: Policy TAI 14 of the JLDP covers the use of caravans, mobile homes and other non-permanent forms of accommodation for temporary workers. However, this is subject to a number of criteria. (a) Can the applicant confirm if, when they assessed camping and caravanning headroom, these criteria were considered and only those sites/pitches that met the criteria were included in the final calculations and if not, why not? (b) Can the IACC and GCC indicate how many caravan/camp sites in the KSA they consider would meet the criteria set out in the policy and what headroom they would deliver?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
GCC	A: For the avoidance of doubt, none of the touring caravan and camping sites would meet the criteria set in Policy TAI 14. The second part of the Policy sets out the tests to consider proposals for the temporary use of units as accommodation for construction workers. In addition to tests that require an applicant to demonstrate alignment with a project's construction workers' accommodation (criteria 3 and 5), it also sets locational tests, i.e. the accommodation site needs to be located where workers can either access the construction site or a park and ride facility provided by the project promoter (in this case Horizon) via sustainable modes of transport (criterion 4). The accommodation site would also be expected to be well related to existing serviced settlement in order to facilitate access to services and facilities, such as health and retail. Criterion 6 requires consideration of the impact of loss of the units for holiday accommodation on the tourism industry. Additionally, there may be site specific issues that could trigger the need to consider other Policies in the Plan. Therefore, each proposal to change the use of existing units for a time limited	GCC state that for the avoidance of doubt, none of the touring caravan and camping sites would meet the criteria set in Policy TAI 14. Please refer to Horizon's response to the FWQ Q10.1.8 submitted at Deadline 2 [REP2-002] which sets out compliance with the criteria in Policy TAI 14. 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. Policy TAI 14 has 5 key criteria. Horizon believes the first three criteria are likely to be met for most sites that might apply to have restrictions lifted. This is for the following reasons: • It is common ground with IACC that temporary residential accommodation is needed to support the delivery of the Wylfa Newydd DCO Project. • The large-scale caravan site provision is all well located for access to the site by the proposed shuttle bus network or car. The cluster of sites south of Holyhead are also well located for the Park and Ride. In addition, the large sites are along the A5025 to the north of Valley and in the east of the island on the A5025 from Llanbedrgoch to Brynrefail are also likely to be served by the Horizon shuttle bus network. • Use of caravans is part of Horizon's Workforce Accommodation Strategy and extensions to occupancy periods would facilitate the delivery of the strategy. It Criteria 4 requires applications for residential use of caravans to not have to significant detrimental impact on the tourism industry. Horizon's WAS 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.

	period to allow for residential use would need to be considered on its merits. The Council is therefore not in a position to indicate how many sites and how much headroom could be delivered.	Criteria 7 requires consideration against Policy TWR 3. This relates to static caravan sites and chalet sites. It sets out a range of considerations that would apply within and outside of the AONB, principally regarding impact on landscape, the requirement for high quality design and layout and that the site is close to the main highway network and adequate access can be provided within significantly harming the landscape. These considerations would be taken into account in any application for planning permission required for new caravan sites and it is considered that it would be possible to ensure that sites came forward that complied with these policy requirements, given the general availability of sites (see Site Selection Reports [APP-436] to [APP-442] and the relatively small number of caravans required Further details in relevant to this question have been provided in Horizon's response to the Local Impact Report submitted at Deadline 3.

FWQ10.1.8: Policy TAI 14 of the JLDP covers the use of caravans, mobile homes and other non-permanent forms of accommodation for temporary workers. However, this is subject to a number of criteria. (a) Can the applicant confirm if, when they assessed camping and caravanning headroom, these criteria were considered and only those sites/pitches that met the criteria were included in the final calculations and if not, why not? (b) Can the IACC and GCC indicate how many caravan/camp sites in the KSA they consider would meet the criteria set out in the policy and what headroom they would deliver?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	A: For the avoidance of doubt, none of the touring caravan and camping sites would meet the criteria set in Policy TAI 14. The second part of the Policy sets out the tests to consider proposals for the temporary use of units as accommodation for construction workers. In addition to tests that require an applicant to demonstrate alignment with a project's construction workers' accommodation (criteria 3 and 5), it also sets locational tests, i.e. the accommodation site needs to be located where workers can either access the construction site or a park and ride facility provided by the project promoter (in this case Horizon) via sustainable modes of transport (criterion 4). The accommodation site would also be expected to be well related to existing serviced settlement in order to facilitate access to services and facilities, such as health and retail. Criterion 6 requires consideration of the impact of loss of the units for holiday accommodation on the tourism industry. Additionally, there may be site specific issues that could trigger the need to consider other Policies in the Plan. Therefore, each proposal to change the	(b) IACC in their response state that for the avoidance of doubt, none of the touring caravan and camping sites would meet the criteria set in Policy TAI 14. Please refer to Horizon's response to the FWQ10.1.8 submitted at Deadline 2 [REP2-002] which sets out compliance with the criteria in Policy TAI 14. 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. Policy TAI 14 has 5 key criteria. Horizon believes the first three criteria are likely to be met for most sites that might apply to have restrictions lifted. This is for the following reasons: • It is common ground with IACC that temporary residential accommodation is needed to support the delivery of the Wylfa Newydd DCO Project. • The large-scale caravan site provision is all well located for access to the site by the proposed shuttle bus network or car. The cluster of sites south of Holyhead are also well located for the Park and Ride. In addition, the large sites are along the A5025 to the north of Valley and in the east of the island on the A5025 from Llanbedrgoch to Brynrefail are also likely to be served by the Horizon shuttle bus network. • Use of caravans is part of Horizon's Workforce Accommodation Strategy and extensions to occupancy periods would facilitate the delivery of the strategy. It Criteria 4 requires applications for residential use of caravans to not have to significant detrimental impact on the tourism industry. Horizon's WAS considers that up to 650 workers can

	use of existing units for a time limited period to allow for residential use would need to be considered on its merits. The Council is therefore not in a position to indicate how many sites and how much headroom could be delivered.	be accommodated in caravans without a significant effect on the availability of tourist accommodation. This would be controlled through the Worker Accommodation Management Service. Criteria 7 requires consideration against Policy TWR 3. This relates to static caravan sites and chalet sites. It sets out a range of considerations that would apply within and outside of the AONB, principally regarding impact on landscape, the requirement for high quality design and layout and that the site is close to the main highway network and adequate access can be provided within significantly harming the landscape. These considerations would be taken into account in any application for planning permission required for new caravan sites and it is considered that it would be possible to ensure that sites came forward that complied with these policy requirements, given the general availability of sites (see Site Selection Reports [APP-436 to APP-442] and the relatively small number of caravans required Please also refer to Horizon's response to the Local Impact Report submitted at Deadline 3.

FWQ10.1.10: 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?

(a)What is the current number of students at Bangor University? (b)Of these how many need accommodation? (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? (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? (e)Do you have any comments you wish to make on this matter to the ExA?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
GCC	(a) According to the University, c. 8,900 students are currently enrolled (November 2018) (b) Of the 8,900, c. 7,500 need accommodation. (c) Of the 7,500: c. 300 Nursing students taught on our Wrexham campus; c. 150 off-campus students (outgoing exchange, year abroad); and 2,960 University rooms. This leaves an underlying demand for private accommodation of c. 4,090.(d) The University is in the best position to provide information about their property/ accommodation strategy.(e) GC is able to confirm that the private sector has provided a number of properties (new build and conversion of existing buildings) for students only in Bangor. Prior to the private sector intervention students had relied on the University's own halls of residence and a considerable number of domestic properties (whereby students lived together as single households) and HMOs, all owned by private landlords and rented to students. The JLDP supports the provision of additional suitably located 'purpose built' student accommodation and	Horizon notes GCC's concerns regarding the impact of construction workers on the private rented accommodation in Bangor. Horizon's DCO application identifies a range of mitigation to avoid adverse effects on the local housing stock: - the provision of an on-site Site Campus with 4000 beds, which will be made as attractive as possible to workers. - The Worker Accommodation Portal, which will be secured through the DCO s106 agreement (see the draft DCO section 106 agreement submitted at Deadline 3 (18 December 2018)), will be the first port of call for workers to find accommodation, and this will provide a list of suitable accommodation. All workers will have to register for the portal and will be encouraged to use it. - From the Worker Accommodation Portal, monitoring data will be gathered on the choices of the workers that are new to the area. This information can then be used to work with providers to ensure suitable accommodation is provided. - The draft DCO section 106 agreement also provides: - A Housing Fund which can be spent on officer time and measures to prevent / address homelessness if required. - The provision for the employment of 3 Accommodation Officers, who will be responsible for liaising with Gwynedd Council and Conwy Council to ensure a collaborative approach to monitoring accommodation matters relating to the Project. The accommodation officers will support the WAMS and interpret monitoring data which will link to accommodation on the mainland.

provides an area of search (which excludes primarily residential areas), and also limits the provision of additional HMOS in residential areas within the City. Anecdotal evidence suggest that there may be a surplus supply of private sector student accommodation in the City. GC's Statement of Local Impact (Housing and Welsh language Chapters) notes that the level of impact that Wylfa Newydd will have on the demand for accommodation in Gwynedd will be dependent upon the ability to absorb demand on Anglesey and/or the containment of demand in close proximity to the site, especially within the Temporary Workers Accommodation (TWA). It sets out GC's concerns that even with a maximum provision of 4000 TWA there will be significant demand on local provision. North West Wales is predominantly a rural area with a sparse population and demand is focused on a very limited area. The business case presented by Horizon claims that it will be possible to meet demand and that it will be possible to minimise local impact. Challenges will arise if it is unable to adhere to the central business case and any degree of variance from that case. It is unclear as to the level of influence and control that Horizon will be able to exert on large number of sub-contractors and how behaviours can be controlled modified or influenced via inducement. The impact upon Bangor, as the regional service centre needs to be considered. Given the demography of the projected workforce, the availability of certain

- Enhancement contributions, where 20% of the Worker Accommodation (capacity enhancement) contribution will be provided to GC. This equates to £2 million over a 2 year period, to be used towards initiatives to ensure adequate supply of local housing provision.

support facilities, proximity to educational, shopping and entertainment offerings and transport networks, the city is likely to be perceived as an attractive and convenient location. Compared to other Centres, and no doubt due the historic and on- going presence of a large student population, Bangor does have a higher proportion of rental properties and HMO and subsequently may have more capacity to absorb workers and it may also be possible to deliver accommodation options at a beneficial cost. Nonetheless, the rental and HMO properties usually occupied by students during term- time are predominantly within residential areas within the City. Their use by construction workers, even in the relatively short –term during the construction period, will mean that domestic properties will continue to be unavailable to permanent households. It is currently impossible to secure private rented accommodation in Bangor at Local Housing Rates if Wylfa Newydd creates additional demand then this could lead to displacement and increase demand on social housing provision in the area. There are concern about social housing capacity within the city and we are experiencing difficulty in sourcing supply for vulnerable groups.

FWQ10.1.11: In your RR [RR-020] (paragraph 5.10.1) you states that you consider that the figures used by HNP in determining the capacity of existing accommodation is unreliable and overestimates capacity. What evidence can you provide to verify this statement?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The IACC have undertaken a detailed assessment of accommodation capacity in the preparation of the Housing Chapter of the LIR. Please see the following sections: • Sections 5.2 and 5.3 for owner occupation; • Sections 5.14 and 5.15 for PRS; • Sections 5.17 and 5.18 for Tourism; and, • 5.19 for Second Homes and Holiday lets.	In response to IACC's comments in relation to FWQ10.11.11, please refer to Horizon's response to the LIR which addresses these points. Horizon's assessment has presented the best evidence available. IACC's assessment is based on an unevidenced assumption of 10% capacity and Horizon therefore believes it should not be used.

FWQ10.1.12: Do you consider that the proposed mitigation measures set out in Section 1.6 of the ES volume C [APP-088] with regards to monitoring and managing housing and supporting the provision of additional housing would be satisfactory?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
GCC	The proposed mitigations relevant to housing are referenced between paragraph 1.6.8 to 1.6.15. Essentially, they cross-refer to the submitted Workforce Accommodation Management Strategy (APP-412) to the Workforce Accommodation Management Services and to the Housing Fund. In principle Gwynedd Council welcomes the intended provision of the three elements of accommodation mitigation and its position alongside IACC as part of the oversight board (Figure C1-9). However, it has residual concerns regarding Horizon's declared proposals for monitoring which appear to be focussed upon where workers choose to live as opposed to the monitoring of effects arising from their accommodation choices. Gwynedd would wish to see monitoring of homelessness, displacement, average house and rental prices for example. Additionally, it has had no sight of the proposed HousingFund which would form part of the DCO Obligation and as such the extent to which it might potentially mitigate effects upon Gwynedd's housing market. The delivery, availability and take up of the Temporary Workers Accommodation are critical components of the central business case. Minor variations, or delays could have disproportional impacts which will be	Please refer to Horizon's response to the GCC's Written Representation and Horizon's response to the Local Impact Report submitted at Deadline 3.

	difficult to reverse due to the time required to bring forward supply. Access arrangements and triggers need be confirmed and to ensure measures are implemented quickly to try and ensure problems do not escalate or reach a level which could be difficult to reverse.	

FWQ10.1.12: Do you consider that the proposed mitigation measures set out in Section 1.6 of the ES volume C [APP-088] with regards to monitoring and managing housing and supporting the provision of additional housing would be satisfactory?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	No. There has been no detail on how Horizon propose to pro-actively support the provision or facilitation of additional housing. Given the long lead in time to build houses (together with a potential shortage of a skilled workforce to build these houses due to displacement of construction workers to work at Wylfa Newydd), Horizon's approach is wholly unacceptable. The IACC's position in relation to required mitigation measures are set out in detail in section 6.0 (Summary of IACC's Position) and Section 7.0 (DCO Requirements & Obligations) in the Housing Chapter of the LIR.	IACC's request for 520 units for mitigation (in addition to empty homes being returned to use) is not evidence-based. Further detail is set out in Horizon's response to the LIR. The Housing Fund will be secured through the DCO s106 agreement (see the draft DCO section 106 agreement submitted at Deadline 3 (18 December 2018)) and will also deliver legacy or new build housing and empty homes being returned to use. Provision is made in the draft DCO s 106 agreement for the provision of an Accommodation (Contingency) Fund which can be drawn upon if a significant adverse effect is identified within the accommodation sector within the KSA. In response to concerns raised about legacy, Horizon has decided to revisit the provision of legacy housing at Madyn Farm. Horizon is considering the options available to provide legacy housing on this site (as the current planning permission may be extant); although it notes that any proposal would need the support of IACC.

FWQ10.1.12: Do you consider that the proposed mitigation measures set out in Section 1.6 of the ES volume C [APP-088] with regards to monitoring and managing housing and supporting the provision of additional housing would be satisfactory?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
WG	Section 12.5 of the Written Representation The mitigation measures in Section 1.6 are not adequately quantified. Given the scale of impact, a significant fund will be required to meet predicted impacts on the housing market as well as provision for contingency funding to meet unforeseen impacts on the housing market. WG has not seen any evidence from Horizon to suggest how such a contingency fund might operate nor any proposals to carry out monitoring beyond WAMS to pick up and respond to unanticipated adverse consequences to the housing market. Section 1.6 of the ES provides for officer support (unspecified) in IACC. The impact on the housing market will extend beyond Anglesey and officer support (as with other S106 funding) will be required for the KSA as a whole.	Horizon's response to the Welsh Government's Written Representation sets out its concerns about the lack of evidence underpinning the Welsh Government's assessment. The quantum of the Housing Fund was shared with the Welsh Government on 30 November 2018 (via the draft DCO s.106 agreement). It provides significant funding for capacity enhancement (across Anglesey, Gwynedd and Conwy), additional annual funding, and officer funding. The officer provision (focussed in Anglesey) responds to the EIA which evidences most accommodation pressures occurring in Anglesey and also responds IACC demand for officer time. However in recognition of the Welsh Government's position, an amendment was included in the draft DCO s.106 agreement to explicitly refer to an obligation to liaise with Gwynedd Council and Conwy Council to ensure a collaborative approach to monitoring accommodation matters relating to the Project. The proposed Accommodation (Contingency Fund) is a separate contingency fund which can be release funds across the KSA if the Accommodation, Tourism and Leisure Sub-Group determines that the accommodation monitoring data provided pursuant to the draft Section 106 indicates a significant adverse effect on the accommodation sector within the [KSA] or forecasts trends that are likely to lead to a significant adverse effect on the accommodation sector within the [KSA] (in each case as a result of the Wylfa Newydd DCO Project). Horizon will further discuss monitoring with IACC and the Welsh Government.

FWQ10.1.14: (a) Please provide details of the amount of affordable housing that has been constructed within the KSA in the last five years broken down into housing type (eg flat, house), size (eg 1 bed, 2 bed) and tenure type (eg social rented, intermediate or discount market rent); (b)What is the current demand for affordable housing in the KSA? (c) Has sufficient housing been provided to meet the current need for affordable housing and if so is there currently any spare capacity? (d)What measures are proposed to ensure local people retain access to affordable housing?

Interested Party	IP response to FWQ	Horizon’s Response to First Written Questions																						
IACC	(a) Over the past 5 years in the KSA 287 affordable units have been completed. Type of units – 89 Flats, 98 semi-detached, 37 detached and 63 terrace. No of bedrooms – 31 one bed, 143 two bed, 93 three bed, 13 four bed and 7 unknown due to uncertainty which affordable units were completed in which year on certain sites. Tenure – 28 Intermediate, 91 social rent and remaining were granted permission subject to a S 106 agreement for either social rented or intermediate. The existing monitoring system does not record what tenure type was finally delivered on these sites. (b) Current Demand for Affordable Housing in the Wylfa Newydd KSA 1,467 people are on a waiting list for social housing in the Wylfa Newydd KSA (297 on the waiting list for Anglesey, and 1,170 on the waiting list for Arfon). The number of applications per band for Anglesey can be seen in the table below: Anglesey Housing Applications by Band: <table><tr><th></th><th>Band Urgent</th><th>Band 1</th><th>Band 2</th><th>Band 3</th></tr><tr><td>Number of applications per band</td><td>15</td><td>163</td><td>1</td><td>118</td></tr></table> Anglesey Housing Applications by Number of Bedrooms: <table><tr><th></th><th>1 bedroom</th><th>2 bedroom</th><th>3 bedroom</th><th>4 bedroom</th><th>5 bedroom</th></tr><tr><td>Number of applications by number of bedrooms</td><td>151</td><td>96</td><td>26</td><td>21</td><td>3</td></tr></table> The number of applications for Arfon cannot be separated by band, as Gwynedd Council operate a points system. There are 185 people registered on the Tai Teg website who want to purchase an affordable home in the Wylfa Newydd KSA (79 in Arfon, 106 in Anglesey). In addition, there is 143 people registered on the		Band Urgent	Band 1	Band 2	Band 3	Number of applications per band	15	163	1	118		1 bedroom	2 bedroom	3 bedroom	4 bedroom	5 bedroom	Number of applications by number of bedrooms	151	96	26	21	3	Please provide details of where the sources of this information can be found.
	Band Urgent	Band 1	Band 2	Band 3																				
Number of applications per band	15	163	1	118																				
	1 bedroom	2 bedroom	3 bedroom	4 bedroom	5 bedroom																			
Number of applications by number of bedrooms	151	96	26	21	3																			

Tai Teg website who want to rent an affordable home in the Wylfa Newydd KSA (68 in Arfon, 75 in Anglesey).

There are some people who are eligible to both buy and rent, and will have therefore been counted under both purchase and rent.

In total there are 165 people registered on the Tai Teg website for affordable housing on Anglesey:

	1 bedroom	2 bedroom	3 bedroom	4+ bedroom	Not specified
Ynys Mon	3	61	84	8	9

Gwynedd – The following table is from the Draft Gwynedd LHMA (2018) and refers to Social Housing

Demand derived from the Gwynedd Common Housing Register in Wellbeing areas in Gwynedd. The wellbeing areas of Bangor and Caernarfon form the Gwynedd part of the KSA:

Wellbeing Area	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms
Bangor	288	457	242	65
Caernarfon	256	440	238	66

Note: double counting potential as applicants can choose multiple selections within relevant selected bedroom category.

These figures do not include information from the Tai Teg Register which identified intermediate need in the locality. This register was re-launched in 2018 and requested applicants to resubmit applications to the new register. Therefore at present it is not possible to provide specific figures for the Gwynedd part of the KSA from this register. This would be an additional need to that shown in the Table above.

(c) Paragraph 6.4.101 of the JLDP refers to the Housing Need figures from the latest Local Housing Market Assessments (LHMA) i.e. the Anglesey (2016) and Gwynedd (2013) versions. This identified a need of approximately 889 houses per annum for 5 years to meet backlog and emerging needs. Note these figures cover the whole of the Gwynedd Planning Area and not the part within the KSA.

Paragraph 6.4.102 of the JLDP does however state it is not expected that the planning system alone will, or should, provide for this shortfall. The Plan is just one tool to ensure that the demand for affordable housing is met. Policy PS 18 within the JLDP states that the plan will seek to deliver a minimum target of 1,572 new affordable

homes. For the period 2011 to 2018 the total number of affordable houses delivered was 518 units. This means that at present there is no spare capacity from within the additional affordable housing provision anticipated to be delivered through the JLDP or from the existing affordable housing stock.

(d) In accordance with Policy TAI 15, planning permissions for intermediate affordable housing will be subject to either a planning condition or legal agreement to ensure that the person seeking to occupy such a dwelling complies with 'need' and 'occupancy' tests set in the Policy. Normally, the Local Planning Authorities do not apply a planning condition or a legal agreement on planning consents for social rented housing.

FWQ10.1.17: The accommodation strategy assumes that housing developers would anticipate and respond to the demand created by the Wylfa Newydd Project. Given the lead time for construction are any of the parties proactively engaging with developers on this matter to ensure that the housing stock needed is delivered on-time and at an affordable price? How would the proposed Housing Fund help with the delivery of this stock?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The need for pro-active measures to deliver additional new units is explained in detail in the following sections of LIR Housing Chapter: • Section 5.1 (page 14) Horizon's Demand for Accommodation; • Section 5.2 (page 19) Estimate Supply of Accommodation; and • Paragraphs 5.4.7 and 5.13.6. The IACC's evidence indicates that 520 new build units are required to create sufficient supply during the build-up of numbers in the incoming Wylfa Newydd workforce. The analysis of the timing of demand for private market accommodation suggests that this can only be met, without disrupting the normal functioning of the housing and tourism markets, by a planned increase in supply between Y3Q1 and Y4Q4, and particularly during the six months of Y4Q3 and Y4Q4. There is no information in the Housing Fund of how this is going to be delivered (i.e. by who, when, how many, where, what type etc.). This is unacceptable given the long lead in time for construction and the significant 'ramp up' of non-home based construction workers after Y3 Q3 (see Figure 1(page 19), Figure 2 (page 28) and Figure 10 (page 61) of the LIR Housing Chapter for further detail).	Horizon's response to FWQ10.1.17 sets out the data demonstrating that the market is already responding. Horizon's response to the LIR - Housing addresses some errors and unreliable assertions underpinning IACC's position that 520 units are required. This number is very sensitive to changes in IACC's (un-evidenced) assertion that only 10% of the market is available for workers and ignores the current level of over-provision that the market is already delivering. Leaving aside other issues with the methodology, simply doubling the capacity assumption to 20% would reduce the "need" to 300 units. If it is 50% (in line with the Arc4 assessment done for Gwynedd County Council) the need would be only 62 units. This level of delivery could be achieved through an expansion of the Empty Homes programme supported by the Housing Fund details of which will be secured through the DCO s.106 agreement (see the draft DCO s106 agreement submitted at Deadline 3). In addition to the above, and since the issue of the draft DCO s.106 agreement Horizon has reconsidered its position on direct delivery of residential units and is now willing to commit to early delivery of the Madyn Farm Site in Amlwch. This is a site allocated for housing with planning permission, which Horizon has control of. If IACC are supportive of such an option, this could be secured as part of the capacity enhancement proposals (i.e. direct delivery of Madyn Farm and a corresponding reduction in the capacity enhancement contribution proposed in Schedule 5 of the draft DCO s.106 agreement).

	It is on this basis the IACC currently object to Horizon’s Workforce Accommodation Strategy.	

FWQ10.1.22: Section 9.3 of the ES [APP-412] makes a number of statements as to what the Housing Fund 'could' do. Can the applicant confirm:

(a)What it 'would' do?

(b)How it would operate and who would make decisions about how the funds would be most effectively spent? (c) What funds it would have available and would these be available at the outset or would they be phased across the project as a whole? (d)What would happen in the event of a dispute? Can the IACC and GCC confirm if they consider that the Housing Fund would help boost the supply of housing in the area? If not, why not?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
GCC	The questions posed by the Examining Authority in Question 10.1.22 reflect similar questions which have been proposed by GCC over a period of time. GCC has not had sight of the proposed Housing Fund, the Draft DCO Obligation which would deliver it, nor has it received any formal submission from Horizon as to the total sum and the proportion of money potentially allocated to Gwynedd. Discussions have focussed upon the Workforce Accommodation Management Strategy [APP-412] and a number of potential opportunities which could be brought forward by the Fund. However, the Strategy does not provide firm commitments as it is not a certified document within the context of the Draft DCO (see answer to Qu.4.0.107 above). The Fund would only boost the supply of housing if sufficient monies were to be forthcoming and if they were to be provided sufficiently in advance of impacts occurring. Providing funds to boost supply at a point when impacts are recorded would be too late given the lead-in times associated with the delivery of accommodation.	(a) – (c) Allocation of the Housing Fund referred to in section 9.3 of Workforce Accommodation Strategy [APP-412] is proposed to be secured through the draft DCO s.106 [REP1-010] Agreement. Allocation of the funds is set out in Schedule 5 – Worker Accommodation of the draft DCO s.106 Agreement as follows: • A Worker Accommodation (Capacity Enhancement) Contribution payable by Horizon to IACC, GCC and Conwy Council, in proportions which reflect the anticipated percentage of non-home based workers living in those areas. This payment is anticipated as an upfront payment early in the development to enable the Councils' to use these funds to build capacity in advance of peak workforce years. The contribution is proposed to be directed towards the Councils achieving a minimum of 600 bed spaces by: ○ undertaking interventions to stimulate supply of latent accommodation; ○ providing new build permanent housing, including Affordable Housing; ○ supporting the social-rented sector through the provision of assistance to existing tenants (including rehousing support); and ○ bringing empty homes back into use in the period in the lead up to year three in the Construction Period; • A Worker Accommodation (Annual) Contribution payable by Horizon to IACC annually for 6 years (in the lead up to and covering peak construction). The Council would be required to allocate this money to: ○ monitoring homelessness and housing displacement, and working with GCC and Conwy Council on the same ○ establishing and operating community programmes that assist with managing housing and accommodation demands and prevention of homelessness including help with downsizing

		○ monitoring accommodation enforcement issues, and working with GCC and Conwy Council on the same • Accommodation Officers Contributions, payable by Horizon to IACC for the construction period to fund between 2 and 3 IACC officers (increasing and decreasing as construction worker numbers peak then fall) to monitor housing and engage with the development and WAMS • An Accommodation Contingency Fund which would be available throughout the construction period. The fund would be released either at the direction of the WNMPOP at the recommendation of the Accommodation, Tourism and Leisure Sub-Group, where a significant adverse effect on the accommodation sector within the Key Socio-economic Area (KSA) may be shown by evidence demonstrating: ○ An increase in homelessness within the KSA caused by the Wylfa Newydd DCO Project. ○ A lack of access to the private rented sector within the KSA caused by the Wylfa Newydd DCO Project. ○ A need for additional officer time to manage and/or monitor the impact of the Wylfa Newydd DCO Project on the accommodation sector within the KSA. (d) In general disputes under the draft DCO s.106 [REP-010] agreement are proposed to be covered under Clause 12 of the agreement which allows for reference out to a suitably experienced expert. Disputes as to the Sub- Group or WNMPOP direction are proposed to be managed pursuant to dispute clauses in the WNMPOPs terms of reference. Further work is being done on those terms of reference, which will be shared with IACC and the Welsh Government. The obligations within the draft DCO s.106 [REP-010] Agreement will continue to be discussed and agreed with IACC and key stakeholders. In respect of comments regarding the security of the commitments in the WAMS, specific commitments concerning the WAMS have been included within the draft DCO s.106 agreement submitted at Deadline 3. That document currently has a placeholder for the WAMS Terms of Reference to be appended. This will ensure that the GCC's concerns will be addressed.

FWQ10.1.24: The WAMS [APP-412] would not be a certified document albeit that some of the measures it contains would be secured through other mechanisms such as Section 106. Are the IACC and GCC satisfied that the WAMS should not be a certified document?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
GCC	Gwynedd would wish to see the WAMS as a certified document principally for the reasons set out in answer to Qu.4.0.107, QU.10.1.12 and Qu.10.1.22. Whilst it might be the case that some of the WAMS measures may be set out within the DCO Obligation (Section 106) Gwynedd Council has not seen that document and considers that the information presently contained within the proposed Heads of Terms (section 7.4 of the Planning Statement APP-406) to be lacking in sufficient detail.	In response to GCC's comments regarding FWQ10.1.24, it is Horizon's intention that specific commitments concerning the WAMS will be included within the DCO s106 agreement (see the draft DCO s. 106 agreement submitted at Deadline 3 (18 December 2018)). That document currently has a placeholder for the WAMS Terms of Reference to be appended. This will ensure that the commitments that have been made are secured.

FWQ10.1.24: The WAMS [APP-412] would not be a certified document albeit that some of the measures it contains would be secured through other mechanisms such as Section 106. Are the IACC and GCC satisfied that the WAMS should not be a certified document?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	No. The IACC consider that an outline WAMS should be certified with the detailed strategy submitted and approved in accordance with that outline under a requirement. This would enable it to be amended under requirement with the approval of IACC to allow flexibility to adapt should experience show a need to do so.	Horizon set out its commitments to deliver the WAMS in the draft DCO s.106 agreement submitted at Deadline 3 (18 December 2018). The service will operate in accordance with the terms of reference, which have been appended to the draft DCO s.106 agreement (and appended to the WAS [APP-412] at Appendix 10-1 <i>Appendix: Wylfa Newydd WAMS Draft Terms of Reference</i>). This will provide both sufficient detail and certainty for the Examining Authority and stakeholders.

FWQ10.1.24: The WAMS [APP-412] would not be a certified document albeit that some of the measures it contains would be secured through other mechanisms such as Section 106. Are the IACC and GCC satisfied that the WAMS should not be a certified document?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
WG	The WAMS is identified as providing a crucial part of both directing workers to appropriate accommodation and monitoring where those workers are residing as part of Horizon's "plan, monitor, and manage" approach. Consequently if there is not a requirement either through the S106, or a certified document, for Horizon to provide an appropriately managed and resourced WAMS for the duration of the construction period then the Welsh Government does not see how the WAMS role in the mitigation and monitoring can be guaranteed.	It is Horizon's intention that specific commitments concerning the WAMS will be included within the DCO s106 agreement (see the draft DCO section 106 agreement submitted at Deadline 3 (18 December 2018)). That document currently has a placeholder for the WAMS Terms of Reference to be appended. This will ensure that the commitments that have been made are secured.

FWQ10.1.28: The ES [APP-088] refers to the fact that the number of houses being built on Ynys Môn has decreased by 60% since 2008-2009. Can the IACC provide the following information: (a) Did the IACC have five years' worth of housing land supply during this period? If so what was it and was it met? (b) provide an update on the current 5 year housing land supply position? (c) advise whether it is a supply side issue (ie a lack of planning consents) or a delivery issue (ie developers are not implementing planning consents) for any shortfalls?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions																																																							
IACC	(a) Information relating to completion rates and land supply in Ynys Môn since 2008-09 is noted in the following table: <table><tr><th>Year</th><th>Completion rate (Ynys Môn)</th><th>Land supply (as noted by JHLAS)</th></tr><tr><td>2008-09</td><td>296</td><td>5.13*</td></tr><tr><td>2009-10</td><td>225</td><td>4.57*</td></tr><tr><td>2010-11</td><td>143</td><td>5.1*</td></tr><tr><td>2011-12</td><td>119</td><td>5.8*</td></tr><tr><td>2012-13</td><td>223</td><td>5.4*</td></tr><tr><td>2013-14</td><td>161</td><td>4.7*</td></tr><tr><td>2014-15</td><td>139</td><td>-</td></tr><tr><td>2015-16</td><td>140</td><td>-</td></tr><tr><td>2016-17</td><td>126</td><td>-</td></tr><tr><td>2017-18</td><td>254</td><td>6.3</td></tr></table> It is evident that there was a decrease of about 60% in the number of houses being completed in Ynys Môn between 2008-09 and 2016-17. However, the completion rate for 2017-18 is closer to that of 2008-09. (b) The land supply figures for the period are noted in the table above. All the land supply figures denoted with an asterisk are based upon the past build rate method, not the residual method. This was due to the fact that Ynys Môn during this period did not have an up to date adopted development plan and therefore it was permissible to use the past build rate methodology, as set out in Technical Advice Note (TAN 1) Joint Housing Land Availability Studies (2006). However the	Year	Completion rate (Ynys Môn)	Land supply (as noted by JHLAS)	2008-09	296	5.13*	2009-10	225	4.57*	2010-11	143	5.1*	2011-12	119	5.8*	2012-13	223	5.4*	2013-14	161	4.7*	2014-15	139	-	2015-16	140	-	2016-17	126	-	2017-18	254	6.3	In response to IACC's comments in relation to FWQ10.1.28 Completions data provided by IACC for 2008-09 to 2016-17 is as reported in IACC Housing Land Monitoring Statement (October 2017). The source of the figure for 2017-18 is not available. Stats Wales data shows the following total completions: <table><tr><th>Year</th><th>Completions</th></tr><tr><td>2008-09</td><td>159</td></tr><tr><td>2009-10</td><td>154</td></tr><tr><td>2010-11</td><td>112</td></tr><tr><td>2011-12</td><td>74</td></tr><tr><td>2012-13</td><td>131</td></tr><tr><td>2013-14</td><td>79</td></tr><tr><td>2014-15</td><td>80</td></tr><tr><td>2015-16</td><td>61</td></tr><tr><td>2016-17</td><td>103</td></tr><tr><td>2017-18</td><td>110</td></tr></table> Source: StatsWales (online, accessed December 2018: https://statswales.gov.wales/Catalogue/Housing/New-House-Building/newdwellingcompleted-by-period-tenure)	Year	Completions	2008-09	159	2009-10	154	2010-11	112	2011-12	74	2012-13	131	2013-14	79	2014-15	80	2015-16	61	2016-17	103	2017-18	110
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current version of TAN 1 (January 2015) states that only the residual method is acceptable in terms of calculating the land supply and this has to be based upon an up to date adopted development plan. Planning Authorities that do not have a current development plan cannot therefore calculate their land supply, and are considered to have a zero land supply. This is therefore the reason why no figures are shown for 2014-15 to 2016-17. However, in order to inform the housing requirement and supply in the then emerging Joint LDP, it was still necessary to monitor the number of annual completions.

(c) The Anglesey and Gwynedd Joint Local Development Plan was adopted in July 2017.

Consequently, a JHLAS was undertaken jointly for both authorities for the first time for the period 2017-18 i.e. the 2018 JHLAS study. Given that the Plan is relevant for both the Anglesey and Gwynedd planning authority areas, a single JHLAS study was required based upon the residual method i.e. based upon the housing requirement for the Plan area. The housing supply figure of 6.3 years included in the above table for 2017 – 2018 is therefore derived from the published 2018 JHLAS, which covers the JLDP area. An analysis of the data used to inform the 2018 JHLAS shows the completion rate for 2017-18 Ynys Môn only.

The 2018 JHLAS demonstrated a 6.3 years supply of land for housing. The newly (2017) adopted JLDP includes a number of housing allocations on the Island and provides for opportunities on windfall sites. Therefore, there is no current shortfall in the supply of land for housing.

There were 83 sites with planning permission for 5 or more units that were relevant to consider in the 2018 JHLAS study. 5 of these sites were completed during the previous year but 70 of these sites did not see a single unit completed during 2017/18. 28 sites have an element of the units permitted classified as being within categories 3 and 4 of the JHLAS i.e. not envisaged to be built within 5 years. As we have a newly adopted JLDP there are also numerous allocated housing

sites within the JLDP that are not yet subject to planning permission. However, the planning system is reliant on developers to deliver required houses on policy compliant land.

Similar to other areas country wide, delivery of houses fell during the period post financial crash.

The number of approvals were going up whilst the number of completions were going down, which suggest land owners/ developers have been 'banking' the land to be ready for an up-turn in the market or improved personal circumstances.

In answer to the question, the IACC believe that it is a delivery issue as there is no current shortfall in the supply of land and consents.

FWQ10.1.17: The accommodation strategy assumes that housing developers would anticipate and respond to the demand created by the Wylfa Newydd Project. Given the lead time for construction are any of the parties proactively engaging with developers on this matter to ensure that the housing stock needed is delivered on-time and at an affordable price? How would the proposed Housing Fund help with the delivery of this stock?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	No. The definition of Second Homes does not include holiday lets. Holiday lets are properties which are let out to holiday makers, who may stay in the property on a temporary basis for leisure purposes. The property is not a main or sole "home". Occupation by the same person(s) throughout the year is not permitted. Business rates apply to holiday lets. A second home is a generic term for a property owned by an individual in addition to their main or sole private residence for their own enjoyment. The owner and/ or family lives in the property only for short periods, for example, for personal/ family holiday or weekend use. They are therefore privately owned irregularly occupied properties. Second home owners pay an increased council tax rate. The Isle of Anglesey County Council resolved to introduce a 125% Council Tax premium, effective from 1st April 2017 on second homes on the island. See section 5.19 (page 55) of the LIR Housing Chapter for further detail on second homes and holiday lets.	In response to IACCs comments in relation to FWQ10.1.31, please refer to Horizon's response to Examining Authority FWQ10.1.31 submitted at Deadline 2 (4 December 2018).

FWQ10.2.2 The Jobs and Skill Strategy [APP-411] would not be secured by the dDCO. Given this sets out how Horizon would work with stakeholders to fund additional training to meet the skill needs of the project are the IACC, GCC and the Welsh Government satisfied with this approach?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
GCC	Gwynedd Council's preference would be to see all commitments to measures to maximise the opportunities generated by the development of Wylfa Newydd and minimise any potential risks of negative consequences, including in relation to the local labour market, secured by the DCO. As noted in the Statement of Local Impact Report by Gwynedd Council (section 6.2); the Council has, from the outset, welcomed the opportunities for economic development which may arise and expressed a desire to engage with Horizon Nuclear Power to maximise the positive impacts. However, the Council has also been mindful of, and highlighted, the potential for some negative consequences, including upon the local labour market, and has asked to work with Horizon Nuclear Power to minimise any negative impacts. The Council's view on the potential opportunities and risks is further outlined in the Statement of Local Impact Report. The Report also includes a request that the following are set out and committed to in the DCO: • That Gwynedd Council be fully involved in the Programme Board and all relevant Monitoring and Engagement Sub Groups • That monitoring is undertaken early and is ongoing throughout the construction period	Horizon agrees with GC's position on monitoring and that mitigation must follow impacts. Since DCO application submission, Horizon has worked to develop a draft Jobs and Skills Implementation Plan that sets out the specific areas for interventions to deliver the Jobs and Skills Strategy. The Jobs and Skills Implementation Plan will be appended to the draft DCO s.106 agreement and submitted at a later date into examination. There is therefore no need to also secure the Jobs and Skills Strategy, as it is delivered by the Jobs and Skills Implementation Plan, secured in the draft DCO s.106 agreement (Schedule 4). Schedule 4 also confirms that the Jobs and Skills Implementation Plan will be regularly updated to ensure it remains forward looking and sets out the trades where local residents are most likely to secure work on the project. The Jobs and Skills Implementation Plan has been developed collaboratively with stakeholders. The Skills Fund that will support delivery of the Jobs and Skills Implementation Plan (and delivery of the education elements) is also secured in Schedule 4 of the draft DCO s.106 agreement.

- That mitigation should be undertaken proactively where appropriate
- That mitigation should follow impact and consider direct, indirect and induced impacts.
- Ongoing monitoring of the cumulative effects of Wylfa Newydd in view of the large volume of major projects potentially being implemented in North Wales as a result of the North Wales Growth Bid.

FWQ10.2.2: The Jobs and Skill Strategy [APP-411] would not be secured by the dDCO. Given this sets out how Horizon would work with stakeholders to fund additional training to meet the skill needs of the project are the IACC, GCC and the Welsh Government satisfied with this approach?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	No. While the Jobs and Skills Strategy provides a general high-level set of commitments that address some of IACC's concerns, its lack of detail and provisional nature leaves considerable uncertainty about its actual support if the project is approved, including the levels of funding involved, the measures to be taken, the circumstances in which they would be applied, how they would relate to the supply chain, how they relate to the skills needs of employers affected by displacement of workers and how the controls and decision-making processes would work. Horizon's own description of the Jobs and Skills strategy is that it "will need to evolve over time", creating doubt that it can be relied upon into the future. Indeed, the most detailed topic in the Strategy (concerning the WNESS employment service) is described by Horizon as "emerging thoughts". IACC is still waiting for Horizon's education strategy which was absent from the DCO submissions despite being crossreferenced in other documents. Horizon acknowledges its responsibility to work with partners to ensure that local employment is maximised, but the Jobs and Skills Strategy is followed up with very few specific targets or clear commitments concerning its future role or actual funding	Since DCO submission, Horizon has worked with the Jobs & Skills Working Group (of which IACC is a member) to develop a Jobs and Skills Implementation Plan that sets out the specific areas for interventions to deliver the Jobs and Skills Strategy. The Jobs and Skills Implementation Plan will be appended to the DCO s.106 agreement (schedule 4). There is therefore no need to also secure the Jobs and Skills Strategy, as it is delivered by the Jobs and Skills Implementation Plan, secured in the draft DCO s.106 agreement (Schedule 4) and submitted at a later date into examination. Schedule 4 also confirms that the Jobs and Skills Implementation Plan will be regularly updated to ensure it remains is forward looking and sets out the trades where local residents are most likely to secure work on the Wylfa Newydd DCO Project. The Jobs and Skills Implementation Plan includes a commitment to update the education strategy that was summarised in the Jobs and Skills Strategy. The Skills Fund that will support delivery of the Jobs and Skills Implementation Plan (and delivery of the education elements) will also be secured through schedule 4 of the DCO s.106 agreement. Horizon's position on displacement is set out in its response to IACC's LIR, in short however Horizon notes that displacement will be comprehensively measured through the mitigation in schedule 4 of the draft DCO s.106 Agreement i.e. the WNESS, the Jobs and Skills Implementation Plan, and the Skills Fund. The other points raised in IACC's response to this question are addressed in Horizon's response to the LIR chapters on Local Employment and Education and Skills.

contributions. Many of the issues that IACC considers to be important or have been brought up during the consultation stages are not referred to or are not covered satisfactorily, for example earlier discussions concerning financial contributions to upgrading of school science labs are no longer referred to in the final documents. Horizon's estimated level of the labour participation of Anglesey residents during the construction phase appears low and lacks supporting information and no target is given; no target for local labour participation during the operational phase is given. In addition to these concerns, IACC believes Horizon's approach, in so far as it can be assessed, is overly reactive, placing an unduly high emphasis on a wait-and-see approach. This does not engender confidence and is not helpful for stakeholders in the complex education field where lead-times are often long and where failure to make plans and execute them in good time can lead to acute pressures. Further detail is provided in the Education Chapter of the IACC's LIR.

FWQ10.2.10: The Workforce Management Strategy [APP-413] sets out parameters for codes of conduct relating to workforce behaviour (paragraph 2.2.1) and employer behaviour (paragraph 2.3.1). Can the applicant:

(a) Confirm if home based workers would have to sign the codes of conduct?

(b) Explain what is meant by workers being off-site?

(c) Confirm that the codes would not breach workers (in particular home based workers) Human Rights or employment rights.

(d) Explain what the ramifications for breaching the codes would be.

(e) Explain how the codes would be enforced? Are the IACC, GCC, NWP, PHW and BCUHB satisfied with the measures proposed by the WMS given the concerns they have expressed with particular reference to safeguarding and anti-social behaviour? If not, why not?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
GCC	A: Gwynedd Council have reviewed the parameters relating to workforce and employer behaviour and are content with the measures proposed. The Council would seek assurances that the measures will relate to all workers resident throughout the KSA and would wish to understand how the codes would be enforced. The involvement of the public sector in this project will have provided the basis for identifying issues and anticipating the increased need and pressures, placed upon those organisations. This is clearly a vital part of such a development. However, in relation to the preparations being made for a "temporary" possibly isolated and mainly male dominated workforce within existing (and temporary housing) other sectors, particularly the third sector need to be included in future planning. There are certain types of criminal activity, such as domestic abuse, sexual offences and substance misuse, where individuals, both victims and misusers / offenders are	The Workforce Management Strategy [APP-413] 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 Code of Conduct is secured through PW8 in the Draft DCO. The principles are set out under workforce behaviour and employer behaviour, and relevant to individual employees, as well as Horizon and its supply chain partners and contractors. Application and enforcement of the Code of Conduct Horizon notes that Gwynedd Council has stated it is generally content with the measures proposed to control workforce and employer behaviour; however, it has sought assurances that the measures will apply to all workers resident throughout the KSA and how the codes would be enforced. Please refer to Horizon's response to FWQ10.2.10 which sets out how the Code of Conduct would be enforced. As noted above, the Code of Conduct will apply to all construction workers and contractors involved in the Wylfa Newydd DCO Project. Safeguarding and Crime The Workforce Management Strategy includes a number of principles designed to safeguard the community and to ensure that the workforce does not engage in criminal, antisocial or violent behaviours. Further explanation of the Workforce Management Strategy is provided in Horizon's response to IACC's Local Impact Report. Horizon has also committed to providing funding under the draft DCO section 106 agreement for local health and emergency services (see draft as submitted at Deadline 3 (18 December 2018)).

mainly supported by the third sector. Therefore, the capacity of our third sector providers may be affected by the anticipated increase in future need, and they therefore need to be addressed at the planning stages. In terms of the Workforce Management Strategy, with reference to any transport issues we have noted and raised previously, it appears at paragraph 2.2.1, some of our concerns are covered by the main bullet points 6, 7 and 20 (note the bullets are not numbered), as follows:

- All personnel must use the transportation services and facilities provided as part of the Project (i.e. the Park and Ride Facility, shuttle bus services, and car sharing initiatives) to travel to the Wylfa Newydd Development Area. Alternative travel arrangements (i.e. individual cars) must be preapproved by the Employer and will only be allowed in limited circumstances.
- All personnel will also comply with any vehicle registration procedures. All personnel using the Park and Ride Facility will be required to register their cars and contact details with Horizon. Any personnel found to be parking outside designated areas (or 'fly parking') will be disciplined.
- All personnel will comply with the Construction Traffic Management Strategy as set out in the Wylfa Newydd Code of Construction Practice (Application Reference Numbers 8.6 to 8.12), including speed limits, the highway-code, identified route restrictions and be respectful of other road users including agricultural vehicles, pedestrians, cyclists and

Traffic controls

As noted by Gwynedd Council, the Wylfa Newydd CoCP [REP2-031] includes controls on HGV movements during construction of the Wylfa Newydd DCO Project. As set out in response to the LIR, Horizon is also committing to further to pre-offline HGV movements (please refer to Horizon's response to the LIR).

In relation to worker vehicles, Horizon made amendments to the car sharing controls in the Wylfa Newydd CoCP (Revision 2.0) [REP2-031]. These changes require any workers who are driving to the Park and Ride Facility or the WNDA (if they have parking access) to car share. Horizon has committed to a target of an average car share ratio 2.0 people per car across all sites which will be monitored. Horizon will support the achievement of this target through the use of a car-sharing database and restricting entry to parking facilities where there is non-compliance.

In addition, the Workforce Management Strategy provides that the Code of Conduct must include disciplinary actions in respect of fly-parking and require construction workers to use the transportation services and facilities provided as part of the Wylfa Newydd DCO Project, with alternative travel arrangements (i.e. individual cars) to the WNDA needing to be pre-approved and allowed in limited circumstances (see principles in section 2.2).

livestock. However, whilst it is noted there is encouragement for the car share initiatives, and states workers will be disciplined for fly-parking. There still does seem to be a lack of mitigation measures should the aspirational, professional judgement set car share targets not be achieved, or if fly-parking occurs. In terms of the Workforce Management Strategy, with reference to any transport issues we have noted and raised previously, it appears at paragraph 2.3.1, similarly some of our concerns are covered by the main bullet point 22 (note the bullets are not numbered), as follows:

- Employers will implement the Construction Traffic Management Strategy, as set out in the Wylfa Newydd Code of Construction Practice (Application Reference Number 8.6 to 8.12), to manage workforce and construction movement to reduce effects on local road network. The only limit for vehicle flow set in the Code of Construction Practice (CofCP) is for the number of HGVs per day. Which is set out at para 5.4.13 – and copied below. GC would welcome, and have responded as such within the Statement of Common Ground, that vehicle limits are set for all construction traffic including workforce movements. GC have also requested that other parameters area set out in the CofCP, recognising there needs to be feasibility, but equally recognising there needs to be control of things such as traffic movements, traffic routes, shift times etc. All of which

	underpin the transport assessment and hence potential levels of impact. Para 5.4.13 Horizon commits to limiting the number of HGV movements by road so to not exceed a maximum of 40 HGV deliveries (80 movements) per hour and 160 HGV deliveries (320 movements) per day.	

FWQ10.2.11: Bullet point 8 (BP8) of paragraph 2.3.1 of the Workforce Management Strategy [APP-413] states that 'appropriate security checks will be carried out on construction personnel' and bullet point 17(BP17) deals with checks regarding vulnerable adults and children. Can the applicant: (a) Explain why BP8 is only considered necessary for construction personnel and not the whole workforce; and (b) Explain what would happen if the employee failed the security or screening checks? Can the IACC, GCC and NWP confirm: (a) That the list of proposed checks in BP8 is sufficient; and (b) Whether the proposed measures in BP8 and BP17 satisfactorily address their concerns regarding Safeguarding?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
GCC	BP8 to paragraph 2.3.1 list the following checks to be undertaken as: Basic Disclosure Certificate and Confirmation of Right to Work in the UK, National Security Vetting, Baseline Personnel Security Standard and Counter-Terrorist Check. BP17 references systems to identify any of the workforce which may pose a risk to vulnerable adults and children. Gwynedd Council would wish to receive confirmation that where relevant these checks will also apply to the any sub-contractors employed by the contractors as well as to those indirectly employed on the project. Examples of the latter would be people employed to drive shuttle buses or operate security at the park and ride and logistics site.	As highlighted by Horizon's response to FWQ10.2.10 and FWQ10.2.11, all personnel on the Wylfa Newydd DCO Project will have to abide by BP8 and BP17. Checks will apply to all people working on the Wylfa Newydd DCO Project (including shuttle bus drivers and security staff). Horizon's response to FWQ10.2.11 states that Horizon is applying the appropriate regulations which state all personnel who access Sensitive Nuclear Information (SNI), Nuclear Matter (NM), Other Radioactive Material (ORM) or require unescorted access to a Nuclear Licensed site require a minimum of BPSS; all other personnel would go through their own employment checks via their own company (which will be required to comply with the vetting processes set out in the Code of Conduct). For clarity, Horizon will amend BP8 to remove reference to 'construction' and make it more effective in an updated Workforce Management Strategy to be submitted at Deadline 4 (17 January 2019). Please also see Horizon's response to the Local Impact Report.

FWQ10.2.11: Bullet point 8 (BP8) of paragraph 2.3.1 of the Workforce Management Strategy [APP-413] states that 'appropriate security checks will be carried out on construction personnel' and bullet point 17(BP17) deals with Checks regarding vulnerable adults and children.

Can the applicant: (a) Explain why BP8 is only considered necessary for construction personnel and not the whole workforce; and (b) Explain what would happen if the employee failed the security or screening checks?

Can the IACC, GCC and NWP confirm: (a) That the list of proposed checks in BP8 is sufficient; and (b) Whether the proposed measures in BP8 and BP17 satisfactorily address their concerns regarding Safeguarding?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	Whilst the IACC accepts that the checks set out in BP8 appear satisfactory, the Council is of the opinion that measures proposed in the Worker Management Strategy and Code of Conduct would not, alone, be sufficient to prevent potential Safeguarding issues from occurring during the construction phase of the project. Chapter 6, 'Safeguarding', of the Local Impact Report, highlights a range of Safeguarding areas that are likely to be impacted upon as a result of a significant increase in population including:- i) Supporting Children and Young People ii) Safeguarding Children and Young People iii) Child Sexual Exploitation iv) Safeguarding Older People v) Safeguarding Adults at Risk vi) Illegal Drug Use vii) Trafficking and/or Modern Slavery viii) Violence against Women, Domestic Abuse and Sexual Violence ix) Prevent Chapter 6 of the LIR also proposes a range of mitigation measures to prevent issues arising and mitigate any which do	The migration that Horizon has proposed in respect of safeguarding is detailed in Horizon's response to the Local Impact Report. Please also refer to Horizon's response to FWQ10.2.11[REP2-002].

FWQ10.2.11: Bullet point 8 (BP8) of paragraph 2.3.1 of the Workforce Management Strategy [APP-413] states that 'appropriate security checks will be carried out on construction personnel' and bullet point 17(BP17) deals with checks regarding vulnerable adults and children. Can the applicant: (a) Explain why BP8 is only considered necessary for construction personnel and not the whole workforce; and (b) Explain what would happen if the employee failed the security or screening checks? Can the IACC, GCC and NWP confirm: (a) That the list of proposed checks in BP8 is sufficient; and (b) Whether the proposed measures in BP8 and BP17 satisfactorily address their concerns regarding Safeguarding?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NWP	Please see section 6 and 7 of written representations	Please refer to Horizon's response to NWP's Written Representation.

FWQ10.2.24: In your RR [RR-020] you refer to the need for better management and mitigation of displacement of existing workers in order to avoid significant adverse effects on existing and local businesses. What measures would you like to see proposed?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The IACC have addressed this point in detail in the LIR – please see the Employment, Skills, Supply Chain and Displacement Chapters. To maximise local take up of jobs whilst avoiding displacement, requires the implementation of measures that boost the supply side of the economy. Most of these must be around training and education (these are paramount to avoiding displacement). Others are concerned with getting people out of inactivity and unemployment (or indeed underemployed) into work, along with measures to attract ex-pats back and thereby boost the working age population. In addition to these we can monitor the labour market and ensure there is a flexible system to respond to skills pressures. The IACC have constantly raised concerns with regards to labour displacement (Pre-Application Consultation 1-3) and raise identical concerns within the LIR. Briefly, proposed mitigations would include: • Monitoring the capacity and hard to fill vacancies in the labour market • Knowledge exchange / careers advice • Additional places in education • Tracking school leavers and graduates • Reaching out to ex-Pats • Promoting return to work projects • A detailed supply chain action plan	Horizon's response to the LIR (submitted at Deadline 3 (18 December 2018)) sets out its position on displacement. Horizon recognises the risk of vacancies occurring and is proposing measures through the WNESS, Jobs and Skills Strategy Implementation Plan and Skills Fund, secured through the draft DCO s.106 agreement (including many of those listed in IACCs' response) to deal with this risk.

FWQ10.3.6: Applicant - Would any increase in demand for support services relating to alcohol, smoking, drugs or communicable diseases (in particular STDs) be provided by the on-site healthcare provision or through the use of existing off-site services? BCUHB and PHW - If off-site services were used do they have the capacity to deal with any increase in demand? All - Would these services be available in the Welsh language?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
WA	Applicant - Would any increase in demand for support services relating to alcohol, smoking, drugs or communicable diseases (in particular STDs) be provided by the on-site healthcare provision or through the use of existing off-site services? BCUHB and PHW - If off-site services were used do they have the capacity to deal with any increase in demand? All - Would these services be available in the Welsh language? WAST: WAST would be interested to see the HNP response to this and would expect clarification of the nature of the health services to be provided on site.	Please refer to Horizon's response to FWQ10.3.6 [REP2-002] submitted at Deadline 2 (4 December 2018). By way of update, the nature of the health services to be provided on site is being addressed with Betsi Cadwaladr University Health Board (BCUHB); Public Health Wales (PHW) and the Welsh Ambulance NHS Trust (WAST) through the Statement of Common Ground process. Welsh Government (WG) are also present at the meetings. On the 21 August 2018, in a meeting with BCUHB, WAST and WG Horizon shared the Discussion Document entitled Health Services for the Construction Workforce (dated 20 August 2018). This was discussed at this meeting and at meetings on the 1 October 2018, 9 November 2018 and 7 December 2018. WAST was present at the meetings in October and November and sent apologies for the meeting on 7 December 2018.

FWQ10.3.7: The applicant intends to establish a Health and Well-being Monitoring Group to monitor the implementation of the Health Impact Assessment mitigation. Do you have the relevant staff and resources available to participate in this group?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
WA	To: BCUHB, PHW and the Emergency service providers: The applicant intends to establish a Health and Wellbeing Monitoring Group to monitor the implementation of the Health Impact Assessment mitigation. Do you have the relevant staff and resources available to participate in this group? WAST: WAST does not currently have the resources to service groups generated by HNP and, in line with the further question below, would seek further information on the potential impacts on capacity. WAST would seek clarification of the timeframes and commitments required.	Horizon's position on the WNMPOP (being the working title for the re-named programme board) is set out in its response to paragraph 10 of IACC's WR, which is submitted at Deadline 3 (18 December 2018).

FWQ10.4.1 The Supply Chain Charter (and Action Plan) envisages business development opportunities for local (Ynys Môn) and regional (North Wales) businesses.

a) Has any work been undertaken to review whether the businesses needed to supply the applicant are available either locally or regionally? (b) If it has what were the findings? In particular what percentage of the applicants supply needs could currently be met either locally or regionally? (c) If suppliers are not available locally because companies are too small/ have limited resources/limited skills what support/help is proposed to enable existing companies to have the potential to supply/bid for work? (d) Is there sufficient office space, warehouse space, and small business units to meet the needs of the organisations/companies that would supply the project? (e) There are 11 construction companies on Ynys Môn – what measures are proposed to protect these businesses and to ensure that they can maintain their workforce during the construction period?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
GCC	GCC is yet to receive any information on the content of the Supply Chain Action Plan beyond the outline information contained in Horizon's submission to the Planning Inspectorate. As stated in our response to question 10.2.2 GCC has consistently welcomed the potential opportunities for the local economy from the development, recognised the potential for some negative consequences; and expressed a desire to work with Horizon, and other partners, in response. GCC has not been involved in any research to date to review whether the businesses needed to supply the applicant are available either locally or regionally and engagement on this matter has been intermittent. GCC was previously involved in a Supply Chain Group led by IACC on behalf of the North Wales Economic Ambition Board and has recently attended a Group on the matter convened by Horizon GCC is also aware that the Welsh Government has been leading on activity to meet the specific requirements of the nuclear under the 'Fit for Nuclear'	Please refer to Horizons response to FWQ10.4.1 at Deadline 2 (4 December 2018). Horizon are committed to working with a number of stakeholders including GCC to develop and finalise the supply chain action plan.

programme. As noted in the Statement of LIR by GCC (section 6.2), due to the lack of information currently available on the requirements, the potential impact cannot be quantified and we believe work in this field has been stymied as a result. Again, GCC would request that it is fully involved in the structures and actions outlined in the application to maximise the opportunities and monitor and mitigate any negative impacts and would ask that the requirement for such work be enshrined in the Draft DCO.

FWQ10.4.1 The Supply Chain Charter (and Action Plan) envisages business development opportunities for local (Ynys Môn) and regional (North Wales) businesses. (a)Has any work been undertaken to review whether the businesses needed to supply the applicant are available either locally or regionally? (b)If it has what were the findings? In particular what percentage of the applicants supply needs could currently be met either locally or regionally? (c) If suppliers are not available locally because companies are too small/ have limited resources/limited skills what support/help is proposed to enable existing companies to have the potential to supply/bid for work? (d)Is there sufficient office space, warehouse space, and small business units to meet the needs of the organisations/companies that would supply the project? (e)There are 11 construction companies on Ynys Môn – what measures are proposed to protect these businesses and to ensure that they can maintain their workforce during the construction period?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
WG	Please see our Written Representation Paragraph 7.3.10. 7.3.12 – 7.3.13; and In relation to specific questions a-c the Welsh Government's response is as follows: (a) Work was carried by Welsh Government in 2014 on the capability and the capacity of the Welsh supply chain to meet the requirements of Wylfa Newydd through the Welsh Government commissioned report by Miller Research into Nuclear Capability in Wales (published April 2015). (b) The Miller Report found that there are 11,000 plus companies in Wales that have the capability of participating in the new build project, 36% of which already have the basic accreditation to enter the nuclear supply chain (e.g. ISO9001). We do not yet have any detailed data regarding local or regional capability (as the Supply Chain packages setting out the opportunities have not yet been shared by Horizon) but steps are being taken to acquire this data via those registered with Business Wales and Sell2Wales services.	Please refer to Horizon's response to FWQ10.4.1 at Deadline 2 (4 December 2018).

(c) We are working to enhance the general competence, capability and capacity of the local, regional and Wales-wide supply chain via programmes such as 'Nuclear Business Readiness' which aims to raise awareness through a series of one-to-many seminars (Horizon are supporting this programme), as well as supporting the UK-wide 'Fit for Nuclear' supply chain development programme in Wales. We are also exploring how to shape our more generic business support programmes (e.g. those offered through the Business Wales programme) to assist those companies interested in non-nuclear specific contracts associated with Wylfa Newydd. The general expectation is that as the Wylfa Newydd DCO project ramps up and certainty of progression through FID increases, demand for all types of employment floorspace will increase in North West Wales. However, a recent report by Jones Lang Lasalle that focused on Anglesey (Study to assist the case for the development of new employment units Anglesey Enterprise Zone, North Wales, August 2018) concluded that although there is no specific demand currently for additional office floorspace on the island there is demand for new industrial space linked to servicing existing market demand.

(d) The importance of modern sites and premises to allow businesses to grow is recognised in the Welsh Government's Economic Action Plan. Welsh Government has already committed to a Joint Venture with the local authority to deliver new

starter units at Penrhos and is, together with stakeholders such as the North Wales Growth Bid team, also considering a future programme of advance build employment floor space in the area.

(e) We are supporting businesses, including those in the construction sector, to improve competence and capability – e.g. through the Construction Futures Wales and Fit for Nuclear programmes so that they are able to be as competitive as they can be in challenging for opportunities on the Wylfa DCO Newydd project.

FWQ 10.4.7: The proposed off-line Highways Improvements would result in the bypassing of a number of villages. What measures are proposed to mitigate any business that would be affected as a result of a drop in passing trade?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The IACC requires that measures are required to mitigate any business that would be affected as a result of a drop in passing trade. The IACC proposes that the measures should include; a) Permanent Highway signage to display the availability of shops / facilities in the by-passed village. b) Temporary access arrangements and Temporary Highway signage during the construction period to notify that 'businesses are open as usual' and are still operational during the duration of the works and customers have the necessary means to use facilities as normal. c) A modest marketing fund to publicise that the by-passed villages have facilities such as pub/ restaurant etc. The length of such a fund would be reviewed on an annual basis to ensure it remains fit for purpose. d) Community Involvement Officers notifying occupiers of business premises and properties in advance of works taking place and to provide information to the public about the proposed works (including timing and duration). The use of CIO's should ensure that any unforeseen impacts can be identified quickly and relevant mitigation put in place. e) Careful management and monitoring of the situation is also required to assess	Please see Horizon's response to FWQ10.4.7 submitted at Deadline 2 (4 December 2018). [REP2-002]

	impact levels on business revenues and mitigate accordingly.	

FWQ10.5.5: Reference is made in the documentation to Horizon providing a peripatetic teacher service (paragraph 6.2.28 of the Planning Statement [APP-406]) and indicates that initially two teachers would be funded (paragraph 7.4.27). (a) Does a peripatetic teacher service for Welsh language currently exist on Ynys Môn? (b) If it doesn't how would the service operate; who would manage it and how long would it run for eg during construction only? During construction and a time limited period of operation? During construction, operation and decommissioning? (c) Would two teachers be sufficient – given that it has been indicated that any service may potentially need to extend into Gwynedd?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	(a) There is no current peripatetic immersion teacher provision on Anglesey. Peripatetic provision is not considered appropriate in the context of Anglesey's education policy for the following reasons: 1. Primary aged pupils make the best progress in acquiring Welsh quickly to meet their educational needs via a 10 week long full immersion language course that has been specifically tailored to meet their second/additional language acquisition and curriculum subject needs. 2. Their mastery of Welsh on a 10 week full immersion course far exceeds the progress made in the less intensive provision provided by peripatetic teachers in other authorities in Wales such as Flint and Wrexham. 3. A high level of fluency in Welsh is required by all pupils in Anglesey primary schools to meet the Local Authority and Welsh Government targets. IACC Welsh language policy states that its aim is for all pupils to be fully bilingual by the time they leave KS2. A high level of fluency is also needed to assimilate within the Welsh-speaking community networks (not necessary to the same degree in more Anglicised parts of Wales such as	Horizon notes IACC's view that Peripatetic provision is not considered appropriate in the context of Anglesey's education policy. This view appears to be inconsistent with comments made by IACC during SoCG discussions with Horizon. The SoCG between Horizon and IACC refers to 'a specific contribution towards the appointment of peripatetic teachers' (SoCG IACC 0060) and also notes that the principle of the measure relating to immersion teachers has been agreed. Horizon would welcome further discussion on this in developing the SoCG between Horizon and IACC and the draft DCO s.106 agreement. The draft DCO s.106 agreement (submitted at Deadline 3 (18 December 2018)) includes provision for a Welsh Language Education Contribution. This contribution is towards funding Welsh language peripatetic teaching in the KSA, which includes Gwynedd. The first payment is to be paid prior to implementation of the Wylfa Newydd DCO Project, and subsequently paid annually for the duration of the construction period. The Draft DCO s.106 agreement provides for IACC to use the contribution to fund the employment of two or more peripatetic teacher to support Welsh language immersion education capacity, and if the monitoring indicates a need to do so, also in the Gwynedd Council local authority boundary; to facilitate this there is a commitment to include a remit for both Anglesey and Gwynedd in the employment contract of the peripatetic teachers. The WLIA anticipates an inflow of 220 workforce children during the construction phase and 31 during the operational phase. Horizon considers that the commitment to fund the employment of two language immersion teachers, to be in place prior to implementation, alongside ongoing monitoring of the number of Workforce Children, will enable the impacts on the language immersion service to be mitigated.

Flintshire and Wrexham). All but two primary schools on Anglesey are bilingual schools that conduct end of Foundation Phase and KS2 assessments through the medium of Welsh. In the two primary schools that are an exception, Welsh is a priority area for both schools. All primary school aged children who move to Anglesey will therefore need immersion support regardless of the school they choose to attend. Anglesey's immersion support for KS2 primary pupils is currently provided in two designated centres in Ysgol Moelfre and Ysgol Llanfawr. Both centres play an important role in enabling the children and young people of families who relocate to Anglesey become "bilingually proficient and possess the ability to use both languages equally at the end of their educational career.

FWQ10.5.23: The majority of the proposed mitigation and enhancement measures would be secured via a S106 – do you consider: (a) That this is the appropriate mechanism? And (b) Would it meet the test for planning obligations?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
GCC	A: Technical Advice Note 20 Planning and the Welsh language (2017) recognises that mitigation measures may be applied to permissions either through conditions attached to a planning permission or through section 106 obligations. All conditions and section 106 obligations in relation to mitigating the impacts on the Welsh language – which are considered necessary to make the development acceptable in planning terms and which are directly related to the development – are required to comply with all applicable law. The JLDP includes a number of Policies that embody mitigation and enhancement measures that will ensure that new development contributes positively to maintaining and enhancing the status of the Welsh language in communities. Policies include those that promote affordable housing; type, size and tenure of housing; provision for local businesses, SMEs and large-scale inward investment schemes. Additionally, Policy PS 2 in the JLDP “expects all new development to ensure sufficient provision of essential infrastructure (either on- site or to service the site) is already available or provided in a timely manner to make the proposal acceptable, by means of a planning condition or obligation.” Policy ISA 1 sets out that when “proposals	Horizon notes Technical Advice Note 20: Planning and the Welsh Language supports the use of s106 agreements for securing Welsh language mitigation and enhancement measures. Horizon's response to FWQ.4.0.111 provides a response to how the planning obligations meet the tests.

generate a directly related need for new or improved infrastructure and this is not provided by a service or infrastructure company, this must be funded by the proposal." Employment and training facilities, Welsh language measures, and cultural and community facilities are types of measures recognised by Policy ISA 1 that could be secured via a planning obligation, subject to meeting the statutory tests. Therefore, there is national and local policy basis to justify using planning conditions or planning obligations to secure suitable mitigation and enhancement measures. Horizon, in consultation with the Welsh language Working Group, has provided a schedule of mitigation and enhancement measures. Therefore, it has been demonstrated that there would be an impact that requires mitigation and enhancement. GC, as set out in its representations and Statement of Local Impact maintains that some of the measures need refinement/ strengthening. Setting that aside, implementation of some of the measures are solely within Horizon's control. The remaining require Horizon to fund activities delivered by local service providers. On this basis, it is considered that the use of a planning condition that requires Horizon to prepare and implement a Welsh Language Promotion Plan may be a more appropriate mechanism to secure the measures that are within Horizon's control. The emerging Supplementary Planning Guidance: Maintaining and Creating Distinctive and Sustainable Communities provides the following:

"Any development should not start until a scheme to mitigate the effects of the development on the Welsh language has been submitted and approved in writing by the local planning authority. The mitigation scheme includes a, b, c, etc., and includes a timetable for the implementation of the mitigation measures. Mitigation measures should be implemented as approved within the timeframe (-s) set out in the mitigation scheme." The mitigation scheme set out in the condition is expected to include provision of an annual report to record progress in achieving the measures. Measures set out in the Mitigation and Enhancement Strategy that would require Horizon to invest in facilities and services within the KSA in order to upgrade existing provision or provide new provision would need to be subject to a S106 Agreement.

FWQ10.5.24: The strategy with regards to the Welsh language is predicated on the employment of a certain percentage of Welsh speakers what mitigation is proposed/necessary if these targets cannot be met?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
GCC	The Chapters covering Community Impact/ Welsh language and Economic Development in the Council's Statement of Local Impact sets out its concerns about the robustness of the baseline information, its assessment, and the current monitoring and review framework. In terms of the risks and benefits to the Welsh language there is still a great element of the unknown. This is impacted by the fact that Horizon cannot ensure accurate and full data about all the workforce in a timely manner. The sharing of information, and the ability of Horizon (and service providers) to respond to data collected will be essential. It is likely that either additional or enhanced mitigation measures would need to be implemented where more/ less Welsh speaking workers than anticipated reside in any ward and the impact on Welsh language exceeds that assumed and assessed. The key at present is that so far, not enough information has been provided about when and how the data will be collected, recorded, assessed and shared/ reported, and who will assess and determine the negative impacts in order to govern where and when to target mitigation measures. This is essential to determine whether different measures to those that are	Gwynedd Council express that they would expect robust thresholds for reporting and monitoring the spatial distribution of workers in order to minimise the potential effects of a large temporary workforce on the use of the Welsh language within communities in Gwynedd. Schedule 1 of the draft DCO s.106 agreement submitted at Deadline 3 (18 December 2018) includes a commitment for Horizon to collect aggregate and anonymised data on the workforce dependents who move to the KSA through the Worker Accommodation Management Service (WAMS), including the Welsh language skills of partners and children, the number of children and their ages. There is also a commitment within Schedule 1 of the draft DCO s.106 agreement to complete an evaluation of the impact of the Wylfa Newydd DCO Project on the Welsh language in the KSA, with the parameters of such evaluation to be agreed with the Welsh Language and Culture Sub-Group. It is anticipated that the Welsh Language and Culture Sub-Group will include representatives of Gwynedd Council. As part of its commitment to monitoring the effectiveness of the measures set out in the WLCMES, Schedule 1 of the draft DCO s.106 agreement provides a commitment that Horizon will report to the Welsh Language and Culture Sub-Group: • Every six months on its implementation and performance of its obligations in relation to Developer led Welsh language management and policy, recruitment and careers, engagement with contractors and Welsh Language Officer Contribution; • Quarterly in respect of the collection on data on the workforce dependents via the Worker Accommodation Management Service; and • Following completions of the evaluations of the impact of the Wylfa Newydd Project on the Welsh language in the KSA. • In addition to the above the draft DCO s.106 agreement: • Secures at Schedule 1 a significant number of other proactive Welsh language mitigation

proposed are required, whether measures need to be activated sooner, or whether currently proposed measures need to be intensified. In terms of tackling a reduced percentage of Welsh speakers being employed, the strategy at present is a reactive one, rather than a proactive one, which is required in order to reduce the likelihood and degree of risks to domains that are important to the Welsh language and culture. The Council (and its partners) has therefore emphasised that it is essential that more suitable mitigation and compensation strategies are agreed with regard to the management of the impact of Worker Accommodation (spatially and the degree of interaction with communities). Capacity (spaces) and Linguistic character of schools Data would be required concerning the number, age, language backgrounds, place of residence and intended education setting of choice of the dependants that will be relocating to the area with Horizon employees in order to ensure that the education authority and the schools can proactively plan for the additional school intakes. Additionally, the data will help the Welsh language immersion service to be ready to respond to the potential impact, rather than be reactive. Education and skills A significantly improved Jobs and Skills scheme is required to encourage and facilitate the appropriate up-skilling of local residents to reduce outmigration of young people, especially in the short-to-medium term. This, alongside attracting local people and their families back to the

- Secures at Schedules 5 (Accommodation) and 8 (Education) a number of proactive measures in other linked areas. The committed financial contributions in these schedules are supported by contingency funds.
- Secures at Schedule 4 a comprehensive suite of education, skills and supply chain commitments which are delivered by detailed plans being agreed with key stakeholders.

Further information on mitigations secured above are set out in Horizon's response to IACC's Local Impact Report submitted at Deadline 3.

	area through offering good employment opportunities at Wylfa Newydd, should also be prioritised in order to protect the Welsh language and culture. Community facilities and services Monitoring and reporting of the spatial distribution of the workers. Management and control of the workforce is required to minimise the potential effects of a large temporary workforce on local communities. Triggers need to be agreed to enable proactive planning.	

FWQ10.5.26: In your RR [RR-020] (paragraph 5.14.1) you state that in your opinion the dDCO does not reflect the current commitment of the applicant in advocating the Welsh language as a 'golden thread' throughout all aspects of the project. What amendments to the dDCO would you wish to see to ensure that this commitment is realised?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The IACC recognises HNP's current engagement and commitment in advocating the Welsh language as a 'Golden Thread' throughout all aspects of its project and therefore HNP's position in general is in compliance with national and local policies. However, IACC does not consider HNP's documentation does not sufficiently reflect this commitment. The IACC's stance in general is that impacts should be avoided and where that is not possible mitigated through proactive and pre-emptive measures to protect and enhance the Welsh language and culture. This principle equally applies to all thematic issues. This includes agreeing a suite of preventative measures, including up-front investment, DCO requirements, DCO obligations and changes to phasing/timing to avoid or minimise impacts wherever possible. Where adverse impacts cannot be avoided, appropriate mitigation should be implemented to offset the identified adverse impacts. Compensation will be required in respect of residual impacts that cannot be mitigated. The Welsh Language and Culture Mitigation and Enhancement Strategy (WLCMES) proposed by HNP contains 24 measures for the enhancement and/or mitigation of the likely impact of Wylfa Newydd on the Welsh	Please refer to Horizon's response to the Examining Authority's First Written Questions (FWQ10.5.26), submitted at Deadline 2 (4 December 2018), and Horizon's response to the Welsh Language and Culture chapter of the LIR submitted at Deadline 3 (18 December 2018).

	language and culture. While IACC welcomes these commitments, in order to for HNP’s WLCMES to demonstrate that it advocates the Welsh language as a ‘golden thread’ throughout all aspects of the project, the revisions and further details to that strategy set out in the Welsh Language And Culture chapter of the LIR are required.	

FWQ10.5.27: The Applicant has been asked to prepare a Statement of Common Ground with organisations that representation the Welsh Language and have submitted a Relevant Representation. Which organisations do you consider the Applicant should include?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
WG	Of the groups that have submitted a Relevant Representation, we believe that the Applicant should include the following if they have not already done so: • Isle of Anglesey County Council • Gwynedd County Council • Conwy County Council • Menter Iaith Môn • Mudiad Meithrin • Urdd Gobaith Cymru • PAWB (Pobl Atal Wylfa B) • Fforwm Iaith Strategol Ynys Môn • Cymdeithas yr Iaith Gymraeg 'Dyfodol i'r Iaith' have not registered but could be an important consultee.	Horizon has engaged with IACC and Gwynedd Council to identify appropriate organisations that represent the Welsh language and that have submitted Relevant Representations. In their response to the Examining Authority's First Written Questions, IACC confirm Fforwm Iaith Mon as the most appropriate body to engage with. Fforwm Iaith Mon are the umbrella organisation which has the purpose of increasing the number of speakers and overall use of Welsh language on the island and includes all four parties previously identified by Horizon as appropriate for entering into an Statement of Common Ground with. Horizon has contacted Fforwm Iaith Mon, initially through their Chair, to seek their views on preparing a Statement of Common Ground with Horizon. As set out in the Statement of Commonality submitted at Deadline 2 (4 December 2018), the SoCG will be submitted at Deadline 6. Draft SoCGs, which cover the Welsh Language and Culture, are in progress with IACC, Gwynedd County Council and Conwy County Borough Council. Updated Draft SoCGs were submitted at Deadline 2 (4 December 2018). Apart from PAWB (Pobl Atal Wylfa B), the organisations listed by WG are members of Fforwm Iaith Mon. PAWB have not been identified by Gwynedd Council and IACC as an appropriate organisation to engage with on this matter. As stated by WG in their response, 'Dyfodol i'r Iaith' are not an Interested Party. Nonetheless, in undertaking the role, which includes development and implementation of the Welsh Language and Culture mitigation and enhancement measures, the Welsh Language and Culture Coordinator will liaise with external partners on matters relating to the Welsh language (as secured in the draft DCO s.106 agreement submitted at Deadline 3 (18 December 2018)).

FWQ10.6.3: Paragraph 3.2.15 of the Wylfa Newydd Code of Construction Practice (WNCocP) [APP-414] lists a number of socio-economic impacts that the Applicant considers will need monitoring. Do you agree with this list? Has anything been omitted or should anything be removed?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
GCC	With regard to the monitoring of impacts upon the local housing market Gwynedd Council would wish to add the following to the list provided in paragraph 3.2.15: Monitoring of average private rent levels and house prices, empty homes, homelessness and levels of displacement within defined communities across the KSA. The list outlined in Paragraph 3.2.15 of the Wylfa Newydd Code of Construction Practice (WNCocP) [APP-414] does not constitute a list of socioeconomic impacts; it lists a range of sources (combining performance data for some of the proposed mitigation measures and wider indicators) which could be utilised to monitor some of the impact which may occur. Gwynedd Council suggests that a far more structured and robust to measuring activity, outputs and outcomes is required and a formal monitoring and evaluation framework should be developed for each area where socio-economic impacts are anticipated. The Council also believes that monitoring must follow the spatial areas where impact is anticipated (i.e. the KSA and DCCZ) if a true picture is to be gained and action taken where appropriate. We note that 3.2.16 does not make reference to Gwynedd Council. Numbers and composition of people on the Housing Register number and composition on the	FWQ10.6.3 asked Gwynedd Council (GCC) if in paragraph 3.2.15 of the Wylfa Newydd Code of Construction Practice (CoCP) [APP-414] it agreed with the lists socio-economic impacts that the Applicant considers will need monitoring, if anything had been omitted or should be removed. Horizon believes that the list in 3.2.15 is comprehensive however Horizon has always acknowledged that the Wylfa Newydd CoCP [APP-414] and sub-CoCPs [APP415 to APP-420] would be further refined during Examination, in response to scrutiny and comments from the Examining Authority, other interested parties and stakeholders. Horizon has already submitted pro-active revisions of the Wylfa Newydd CoCP and relevant sub-CoCPs at Deadline 2 (4 December 2018) and will provide additional revisions at Deadline 4 (17 January 2019). It is Horizon's opinion that by the close of the DCO Examination period, the Wylfa Newydd CoCP and sub-CoCPs will contain the necessary level of detail sought by the relevant stakeholders to be precise and enforceable. The key issues raised by Gwynedd in relation to this question are related to accommodation. As stated in the draft WNMPOP terms of reference Gwynedd sit on the Accommodation and Tourism sub-group, therefore as part of the determination of the relevant monitoring points, it will be able to raise the recommendations and issues it has alluded to in this response in that group in an attempt to get the appropriate monitoring approved by the WMNPOP as stated in the Wylfa Newydd CoCP.

	Affordable Tai Teg register. Turn over and churn in private rented accommodation, numbers of workers residing in the community v type of property and occupancy numbers within those properties.	

FWQ10.6.3: Paragraph 3.2.15 of the Wylfa Newydd Code of Construction Practice (WNCocP) [APP-414] lists a number of socio-economic impacts that the Applicant considers will need monitoring. Do you agree with this list? Has anything been omitted or should anything be removed?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NWP	NWP notes that the list included at para 3.2.15 does not include transport movements which could potentially have an impact on health and wellbeing in terms of noise and air quality. NWP would also expect data to be made available on the distribution of the workforce and worker numbers.	Horizon believes that the list in paragraph 3.2.15 is comprehensive however Horizon has always acknowledged that the Wylfa Newydd CoCP [APP-414] and sub-CoCPs [APP415 to APP-420] would be further refined during Examination, in response to scrutiny and comments from the Examining Authority, other interested parties and stakeholders. Horizon has already submitted pro-active revisions of the Wylfa Newydd CoCP and relevant sub-CoCPs at Deadline 2 (4 December 2018) and will provide additional revisions at Deadline 4 (17 January 2019). It is Horizon's opinion that by the close of the DCO Examination period, the Wylfa Newydd CoCP and sub-CoCPs will contain the necessary level of detail sought by the relevant stakeholders to be precise and enforceable.

FWQ10.6.4: Can the Applicant confirm whether the Community Liaison Group meetings will have the facility to be bi-lingual? Paragraph 3.2.29 of the WNCOP [APP-414] advises that nearby residents will be provided with information packs. Can the Applicant advise: (a)What they mean by 'nearby'? (b)How often the information packs would be provided? (c) Whether the list should be expanded to include amongst other things hours/days of working and routes/times of delivery vehicles? (d)Whether the packs would be bi-lingual? Do the IACC/IP have any comments they may wish to make on the form and content of information packs?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The IACC considers that the Community Liaison Group (CLG) should be progression of the Wylfa Newydd Project Liaison Group (PLG) which has been meeting since 2015. The membership of the PLG is wide ranging and should be used as the basis to consider the membership of the Community Liaison Group. We are disappointed to note that the proposal is for the IACC to attend where appropriate, and would consider the IACCs attendance and contribution as being positive and adding value. We would suggest that this is reviewed, with the IACC becoming a full member. The Group should allow for a meaningful and transparent discussion platform where both positive and negative issues can be raised by both CLG members and Horizon for open and honest discussion. Where possible, and practical, action will always be taken by Horizon as a result of the issues raised. Any action taken by Horizon as a result of CLG discussions should be reported back to the group. This shows how the CLG has had a direct impact on the development process. The 'nearby' residents of the immediate local communities needs to be defined and	Please refer to Horizons response to FWQ10.6.4 [REP2-002] as submitted at Deadline 2 (4 December 2018).

should include all residents of communities affected by the construction phase of the project. As confirmed in the LIR, the IACC has requested that the CLG meets on a monthly basis rather than quarterly as proposed by HNP from commencement of site activities up to when First Nuclear concrete is poured, which is the period when effects from air quality and noise are most likely to be significant. The IACC considers that this is the forum to ensure that the local community is kept fully up to date of the site activities including having an understanding of planned works and to be informed of any activities that will potentially affect their daily life and routines. The IACC will require the CLG to have translation facilities. The IACC expects the Agenda's and Minutes of the Group meetings to be available on Horizon's website. The information packs should include details of the forthcoming construction activities so that local residents are fully aware of planned activities that have the potential to impact their daily routines.

FWQ10.6.5: Paragraph 3.3.4 of the WNCOP [APP-414] states that the complaints register will be made available to the IACC upon request. Are the IACC satisfied with this arrangement or would it be more appropriate for the information to be sent to them once a quarter and/or published on HNP's website?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The IACC requires access to the Complaints Register at all times as we need to have a clear understanding of the complaints received, the investigation being undertaken and the conclusion of the investigation. The IACC will receive direct communication from the public and will need to be in a position to respond directly to members of the public.	Paragraph 3.3.4 of the Wylfa Newydd Code of Construction Practice (CoCP) [APP-414] states a complaints register will be maintained by Horizon. All calls will be logged and mapped, together with a record of the responses and action taken. Mapping will be used to record where key concerns are raised by individuals, local communities or other stakeholders. The complaints register will be made available to the IACC upon request. Horizon confirm that there are no proposals to amend the text Paragraph 3.3.4 of the Wylfa Newydd CoCP [APP-414] however there would be no restriction to the frequency of requests from IACC for copies of the complaints register.

FWQ10.6.10 The ES Non-Technical Summary [APP-401] states that (paragraph 3.3.8) a Community Infrastructure Fund would be set up to provide additional resource to manage or offset effects during construction that cannot yet be predicted and therefore mitigated including impacts on community facilities and education.

(a) If they cannot yet be predicted how has the amount needed for the fund been calculated? (b) Are the IACC and GCC satisfied that there would be sufficient money in the fund to cover the necessary mitigation? (c) Who will be monitoring the need for this fund? and (d) How will payments be agreed and paid?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
GCC	GCC has not been consulted on the level of funding proposed by Horizon for the Community Impact Fund, nor has it had any indication as to the proportion of funding that may be applicable to Gwynedd. The Community Impact Report (APP-435) does not provide any additional information on the content of the Fund. The Planning Statement (APP-406) at paragraph 7.4.67 provides limited information and includes reference to the management of the fund by a committee consisting of representatives from Horizon, IACC, Welsh Government and the emergency services. GCC would wish to have a place on the committee and to agree the terms of reference. Clarity will also be required in terms of access arrangements to release funds to in advance of pressures.	Please refer to Horizon's response to FWQ10.6.10 submitted at Deadline 2 (4 December 2018) where The Community Fund is proposed to be secured through the DCO S.106 agreement; detailed in Schedule 12 – Community Fund (see the draft DCO s.106 agreement submitted at Deadline 3). The amount of the Community Fund is not yet determined. An appropriate sum will be agreed primarily between Horizon and IACC, having regard to the draft DCO s.106 agreement obligations and mitigation provision as a whole. The GCC response to the FWQ appears to conflate the Community Fund with the Contingency Funds. Horizon refers to its response to the IACC's WR (part 10) which explains the Community Fund, the Contingency Funds and the allocation of these.

FWQ Q10.6.12: The Codes of Construction Practice would rely on an overarching Programme Board and a series of engagement sub-groups (including for accommodation and tourism). (a) How would these boards/sub-groups work in particular who would they be accountable too? (b) Would they have a code of governance? (c) It is indicated that you would be asked to be represented on these boards do you have the resources and the relevant personnel available to attend these boards?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
GCC	Gwynedd Council has had little specific discussion on the proposed operation of the Programme Board and engagement sub-group. From the information contained within the Codes it is noted that Gwynedd is not identified as a member of the Programme Board (paragraph 3.2.5 APP-414). Other than in the context of the WAMS there is no reference to Gwynedd within the Code (APP-414) and there has been no discussion between the Council and Horizon as to how the sub-groups would work. In addition to the Programme Board, Gwynedd would wish to be included in the following sub-groups: Jobs and Skills, Accommodation and Tourism, Supply Chain Services, Health and Well-being, Welsh Language and Culture, Communications and Transport. Gwynedd Council would require additional support to adequately resource attendance and involvement with the sub-groups.	Horizon's position on the WNMPOP (being the working title for the re-named programme board) is set out in its response to IACC's Written Representation submitted at Deadline 3 (18 December 2018). Horizon will continue to engage with GCC through the Statement of Common Ground process.

FWQ 10.6.12: The Codes of Construction Practice would rely on an overarching Programme Board and a series of engagement sub-groups (including for accommodation and tourism). (a)How would these boards/sub-groups work in particular who would they be accountable too? (b)Would they have a code of governance? (c) It is indicated that you would be asked to be represented on these boards do you have the resources and the relevant personnel available to attend these boards?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NWFR	(a) NWFRS is concerned that the proposed board and sub-groups may be overly bureaucratic with the potential for the work of sub-groups to be duplicated given the cross cutting issues that they will be looking at. It is believed that the subgroups will report to the board which would ultimately have responsibility for taking action where required to address identified issues. (b) NWFRS is of the view that the board and sub-groups would need to have an accepted code of governance together with a mechanism to escalate issues for a resolution where this cannot be agreed. (c) NWFRS has identified that, given the scale of the development, it will require a dedicated resource to work on the project for the duration of the construction phase. NWFRS would need to secure funding from the developer to support this.	In response to (a) and (b) of NWFR's comments, Horizon's position on the WNMPOP (being the working title for the re-named programme board) is set out in its response to IACC's Written Representation, which is submitted for Deadline 3 (18 December 2018). In response to (c), Horizon recognises that the Wylfa Newydd DCO Project is likely to result in additional demands on the NWFRS and has committed to providing funding to mitigate additional costs resulting from the Wylfa Newydd DCO Project through the Public Services (Fire) Fund, secured through the draft DCO s.106 agreement that has been submitted for Deadline 3 (18 December 2018).

FWQ10.6.12: The Codes of Construction Practice would rely on an overarching Programme Board and a series of engagement sub-groups (including for accommodation and tourism). (a) How would these boards/sub-groups work in particular who would they be accountable too? (b) Would they have a code of governance? (c) It is indicated that you would be asked to be represented on these boards do you have the resources and the relevant personnel available to attend these boards?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
WA	WAST does not currently have the resources to service groups generated by HNP and, in line with the question above, would seek further information on the potential impacts on capacity. WAST would seek clarification of the timeframes and commitments required.	Horizon's position on the WNMPOP (being the working title for the re-named programme board) is set out in its response IACC's Written Representation, which is submitted for Deadline 3 (18 December 2018). This sets out how the WNMPOP would operate.

FWQ11.1.1: Paragraphs 4.3.34 and 4.3.37 of the Planning Statement [APP-406] indicate that it would take 18 months to construct the proposed Park and Ride facility and 15 months to construct the Logistics Centre.

Can the applicant:

(a) Advise why they will take this length of time to construct?

(b) What interim arrangements will be in place to manage construction vehicles whilst the logistics centre is under construction? and

(c) Whether the transport modelling took account for these additional vehicle movements before these facilities comes on-line?

Does the IACC/Highways Authority have any comments to make?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
WG	WG have raised significant concerns about traffic management prior to the operation of the Park and ride, MOLF and Logistic Centre. In particular, there are significant concerns regarding HGV movements over the single lane Britannia Bridge and potential for significant congestion, particularly at peak times (please see SoCG regarding avoiding construction traffic movements at peak hours). HNP's response is that HGV movements will not exceed the levels above those detailed in the CoCP. WG request that DCO requirements are imposed that both limit HGV movements to a specific number to those levels detailed in the ES Traffic and Transport document (APP-068); or Prevent the first pour of nuclear concrete until the MOLF is provided;	Please see Horizon's response to FWQ11.1.1 submitted at Deadline 2 [REP2-002]. HGVs are proposed to be capped to 160 per day and 40 per hour as per the Wylfa Newydd CoCP [REP2-031]. Since the submission of the DCO application Horizon has developed an early years strategy for Heavy Goods Vehicles (HGV) movements. This includes the following caps on Heavy Goods Vehicles (HGVs) on the A5025 at Valley: • Monthly Max movements — 2,500 HGV movements each way; • Hourly Max movements – 22 HGV movements each way; and • Daily Max movements – 160 HGV movements each way. These limits will be incorporated into the next version of the Wylfa Newydd CoCP to be submitted at Deadline 4 (17 January 2019). There is no rationale behind the request from Welsh Government for Horizon to provide a contribution towards a third crossing of the Menai Strait. The Transport Assessment [APP-101] presents a robust assessment of the operation of the Britannia and Menai Bridges in the peak AM and PM hours of the peak construction year and concludes that no mitigation is required above and beyond that already proposed as part of the application.

To ensure that Traffic movements are kept within the limits assessed in the ES, which is predicated on at least 60% of freight using the MOLF.

A s106 obligation requiring a contribution to support early delivery of Third Menai Crossing. (see WG's written representation (9.5.4).

WG still has concerns about the management of HGVs and has proposed to Horizon that they have a logistics hub located on the mainland. This arrangement would provide better control of HGVs at Britannia Bridge. Such proposal would also avoid the unnecessary traffic between Junction 3 and Junction 2 on the A55 as vehicles are required to travel past the Valley junction (J3) to go to Parc Cybi (J2), and then come back again to travel to site. Please see response to Q4.0.72 in respect to the need for a phasing strategy that would allow earlier use of Dalar Hir P&R site. It is critical that Horizon get provisions and infrastructure in place at the right time, and commit to delivering a travel plan from Day 1 of construction.

The rationale for the siting of the Logistics Centre at Parc Cybi is provided in the Site Selection Report [APP-441]. Given no consolidation of loads occurs at the Logistics Centre, sitting on the mainland would have no effect on reducing Wylfa Newydd DCO Project related flows across Britannia Bridge. HGVs are controlled via the commitments set out in the revised CoCP which was submitted at Deadline 2 [REP2-031] which includes enhanced measures for Horizon to control HGV's in the event of an incident.

FWQ11.1.4: (a) Would Abnormal Indivisible Loads (AILs) particularly those requiring an escort be scheduled to occur outside of the morning and evening peaks? (b) Can you confirm whether AILs would be required to go via the Logistics Centre or would they go direct to the WND? (c) If they are to go direct to the WND how would they be managed to ensure that they would not cause congestion on the A5025 for other construction traffic?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	(a) Arriva, Goodsir Coaches, Eifions Coaches, Gwynfor Coaches, O R Jones, Lewis y Llan. (b) Arriva – Contract 4E – awarded 2.10.00 – finishes 3.10.20 Arriva – Contract 4D – awarded 28.9.98 – finishes 3.10.20 Arriva – Contract 44S – awarded 1.10.00 – finishes 3.10.20 Arriva – Contract 53D – awarded 1.9.14 – finishes 31.08.19 Arriva – Contract 53S – awarded 4.10.15 – finishes 3.10.20 Arriva – Contract 62D – awarded 24.9.95 – finishes 3.10.20 Arriva – Contract 62E – awarded 2.10.00 – finishes 3.10.20 Arriva – Contract 62V – awarded 6.4.09 – finishes 3.10.20 Arriva – Contract 62S – awarded 4.10.15 – finishes 3.10.20 Arriva – Contract 63E – awarded 5.10.15 – finishes 3.10.20 Goodsir Coaches – Contract 21 – awarded 5.10.15 – finishes 4.10.22 Goodsir Coaches – Contract 21S – awarded 2.6.02 – finishes 3.10.20 Goodsir Coaches – Contract 25 – awarded 30.4.18 – finishes 4.10.22	Please see Horizon's response to FWQ11.1.4, submitted at Deadline 2 (4 December 2018) [REP2-002].

Eifions Coaches – Contract 32 – awarded 5.10.15 – finishes 4.10.22
Eifions Coaches – Contract 42S – awarded 9.12.18 finishes 31.03.19
Eifions Coaches – Contract 43 – awarded 5.10.15 – finishes 4.10.22
Eifions Coaches – Contract 45 – awarded 24.4.17 – finishes 4.10.22
Gwynfor Coaches – Contract 42 – awarded 5.10.15 – finishes 4.10.22
Gwynfor Coaches – Contract 42S – finishes 2.12.18
Gwynfor Coaches – Contract 50b – awarded 24.4.17 – finishes 4.10.22
Gwynfor Coaches – Contract 63a – awarded 24.4.17 – finishes 4.10.22
O R Jones – Contract 52D – awarded 24.9.95 – finishes 3.10.20
Lewis y Llan – Contract 60D – awarded 2.10.00 – finishes 3.10.20
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Lewis y Llan – Contract 61A – awarded 2.10.00 – finishes 3.10.20
Lewis y Llan – Contract 61B – awarded 2.10.00 – finishes 3.10.20
Lewis y Llan – Contract 61C – awarded 2.10.00 – finishes 3.10.20
(c) Horizon to confirm.
Use of existing bus services: The workforce would be required to use multiple services to travel between the Park & Ride and the WNDA. The infrequent services (approx. every 2 hours) would not be able to cater for all shift times. These services are also commercial and therefore the IACC has limited control over timings, etc.

Use of existing bus provider: The IACC would be concerned with capacity of the existing local bus providers to service the Wylfa Newydd workforce, primarily due to limited bus drivers in the area and the risk for displacement. There have been instances on Anglesey where certain bus services have been cancelled for a short duration due to the absence of a bus driver from his/her work. The IACC are unaware if Horizon have explored this further through discussions with local providers.

(d) Horizon to confirm. No discussion held with IACC.

(e) Horizon to confirm. No discussion held with IACC. It should be noted that the IACC are seeking for only approved bus routes and stops to be used by the Horizon shuttle bus service in the interest of road safety. For a number of bus stops, this will require providing physical improvements to make acceptable, which could be left in place post-construction to provide a legacy benefit. This matter has been raised within the Highways chapter of the LIR.

FWQ11.1.5 Concerns have been raised in a number of the RR regarding the fact that the Menai and Britannia bridges occasionally have to shut. Can the IACC/GCC provide details of: (a) How frequently the Menai and Britannia Bridges have shut over the last five years? (b) How often both bridges were shut at the same time? (c) What measures are currently in place when a bridge shuts eg how and where is traffic diverted or held and how does this effect travel times/congestion? (d) The structural state of both of the bridges and whether any maintenance/repair work is planned during the construction phase of the project which would result in either partial or full closure of either of the bridges? Can the applicant confirm: (a) Whether bridge closures were factored into their transport assessment/modelling? (b) What measure they propose during construction and operation to manage traffic if one or both of the bridges has to close?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
GCC	As far as the impact on the local (County) road network is concerned, the route from junction 11 (A55) to the Bryn Cegin Site is along the A5 (county road section), but we are not aware that this has caused any major congestion problems or any other network issues during high winds instances. However, the use of the Felinheli by-pass as a stacking area would and has in the past, been problematic. The alternative route through the village of Felinheli is unsuitable for heavy traffic use and therefore the Felinheli By-pass should not be used as a stacking area. Whilst the current procedures and stacking sites are deemed appropriate for current levels of use, the introduction of additional HGVs during the construction phase of the HNP works could have a significant impact on the operational aspect of the present procedures and also the capacity of the stacking areas (as currently identified).	Please see Horizon's response to FWQ11.1.5, submitted at Deadline 2 (4 December 2018) [REP2-002]. Horizon does not plan on using the Felinheli by-pass as a stacking area unless directed so by the Local Authority or North Wales Police.

FWQ11.1.5: Concerns have been raised in a number of the RR regarding the fact that the Menai and Britannia bridges occasionally have to shut. Can the IACC/GCC provide details of: (a) How frequently the Menai and Britannia Bridges have shut over the last five years? (b) How often both bridges were shut at the same time? (c) What measures are currently in place when a bridge shuts eg how and where is traffic diverted or held and how does this effect travel times/congestion? (d) The structural state of both of the bridges and whether any maintenance/repair work is planned during the construction phase of the project which would result in either partial or full closure of either of the bridges? Can the applicant confirm: (a) Whether bridge closures were factored into their transport assessment/modelling? (b) What measure they propose during construction and operation to manage traffic if one or both of the bridges has to close?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	(a) This data is not held by the IACC Highway Authority. Welsh Government to confirm. (b) This data is not held by the IACC Highway Authority. Welsh Government to confirm. (c) Welsh Government to confirm. Adverse weather conditions have a significant impact on both the Britannia Bridge and Menai Bridge (diversion route) where the bridge may be closed to high-sided vehicles, as well as closure during an incident i.e. road traffic collision. This was recently exemplified, whereby North Wales Police prohibited vehicular traffic on Britannia Bridge for over eight hours due to a road traffic collision. (d) The IACC is not in a position to comment as the Britannia Bridge (as a structure) is owned and maintained by Network Rail. Second part of the question: (a) Horizon to confirm. (b) Horizon to confirm. The IACC seeks further discussion with Horizon, along with other stakeholders i.e. Welsh Government and Gwynedd Council, to discuss and agree the management of Wylfa Newydd	Please see Horizon's response to FWQ11.1.5, submitted at Deadline 2 (4 December 2018) [REP2-002].

	construction traffic during the closure of the Britannia or Menai Bridge, and any other incident on the road network via a Traffic Incident Management Plan (TIMP).	

FWQ11.1.7 In your RR [RR-021] you highlighted a concern regarding an existing problem with 'illegal parking' on Ynys Môn. Can you provide further detail as to what you mean and why you consider that the Application may exacerbate this problem?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
GCC	In the Local Impact Report (LIR) at para 6.1.10, GC have provided additional details with respect to the fly parking experienced currently, as follows: 6.1.10 GC is also concerned that because of workers gaining access to the site and the proposals to encourage use of shuttle buses and car-share, there could be an increase in fly-parking adjacent to the main routes through the County and in the main towns of Bangor and Caernarfon. Fly-parking is already a concern on the county highway network in locations such as the A4244, Llys y Gwynt; the Class 3 Road off Junction 12 on the A55; Ty Mawr roundabout A4244/B4547/B4366; the A4086, Caernarfon Road, Bangor and the A4244, Felin Hen. Because of its concerns, GC has applied for, and has been successful in gaining, planning approval for Park and Share facilities in both the Bangor and Caernarfon areas. However, Ynys Mon is not an area that GC have specifically detailed as a problem area.	Horizon has committed through the Workforce Management Strategy (WMS) [APP-413] to discipline any worker caught fly-parking. Paragraph 2.2.1 of the WMS states that "<i>Any personnel found to be parking outside designated areas (or 'fly parking') will be disciplined</i>". A similar system is in place at Hinkley Point C and is considered to be successful by local stakeholders.

FWQ11.1.10: The traffic modelling/assessment is predicated on the basis that the MOLF will enable delivery of the majority of materials direct to the site. Is there any modelling/contingency that deals with the potential increase in vehicular movements should construction of the MOLF be delayed. In particular would the road network have the capacity to take any additional movements that may result and if there is an increase in movements how would this affect local residents?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The IACC seeks to secure Horizon's Phasing Strategy of developments and production and compliance of a Construction Traffic Early Years Strategy in the Draft DCO requirements and have clauses included which limit the construction of the Wylfa Newydd DCO project unless these elements have been completed:- • rThe MOLF must be constructed and operational prior to First Nuclear Concrete of Unit 1 (end of Q1 year); • eThe A5025 Off-line Highway Improvements and Park and Ride must be completed and operational by end of Q4 year 2; and • eThe Logistics Centre must be complete and operational by end Q3 year 2. Without critical mitigation such as the Marine Off-Loading Facility (MOLF), the impacts associated with an increase in HGV movements would not be within the envelope and would be unconsented. The IACC would seek to restrict/prohibit	Please refer to Horizon's response to FWQ1.1.10 submitted at Deadline 2 [REP2-002] (4 December 2018) and below: Construction of the key mitigation of the Wylfa Newydd DCO Project is committed to and secured by the Phasing Strategy [APP-447]. Requirement PW2 states that "The delivery of Key Mitigation must be in accordance with the sequencing set out in the Phasing Strategy, unless otherwise approved by IACC." Horizon will update the Phasing Strategy at Deadline 4 (17 January 2019) to provide the requisite level of detail and certainty (in terms of delivery and enforcement) that is required for a document of this nature. Any delay in the opening of the MOLF would not result in Horizon being able to increase HGV delivery numbers beyond that committed to and secured by the Wylfa Newydd CoCP [REP2-031]. Horizon are committed to delivering at least 60% of the construction materials required for the Wylfa Newydd DCO Project via the MOLF. This target is secured within the Wylfa Newydd CoCP [REP2-031]. Early years strategy For detail of Horizon's early years strategy see Section 1.4 of Horizon's response to the LIR - traffic & transport. HGV Movements The IACC refer to Hinkley Point C whereby the Draft DCO caps were recently increased temporarily. Note this was successfully approved by the local authorities in Somerset and appropriate mitigation put in place to address additional impacts arising.

construction until Horizon have assessed the impact and made amends to the Draft DCO, including the traffic mitigation.

The IACC has raised this concern within the Traffic and Transport LIR whereby further information is available in this regard. The assessment work in the Transport Assessment (TA) assumes that a minimum of 60% (with a target of 80%) of all construction materials will be delivered by sea via the MOLF. The traffic impact assessment and subsequent mitigation is therefore predicated on delivery and operation of this facility to enable transport to site of [60 to 80%] of all materials. If this is not delivered early enough the traffic impacts would be out with the assessed scope. The IACC fully supports water-borne transport over road transport at all stages of the project, as noted in EN-1. Notwithstanding this position, any delay to the delivery of the MOLF (as is evident at Hinkley Point C [HPC]) or if Horizon do not meet this target will inevitably have a significant and unacceptable impact on the local highway network. This impact will become further exacerbated by any delay to the delivery of the A5025 Highway Improvements. The IACC has consistently and repeatedly emphasised the need for an Early Years Strategy (the construction period for the Associated Developments, MOLF, A5025 improvements, Site Campus Phase 1, Site Grading, Earthworks and Excavations) which sets out the management and planning of construction traffic movements.

Horizon are not able to increase HGV delivery numbers beyond that committed to and secured by the Wylfa Newydd CoCP [REP2-031].

As part of the early years strategy the following caps on Heavy Goods Vehicles (HGVs) on the A5025 at Valley will apply:

- Monthly Max movements- 2,500 HGV movements each way;
- Hourly Max movements – 22 HGV movements each way;
- Daily Max movements – 160 HGV movements each way.

These limits will be incorporated into the next version of the Wylfa Newydd CoCP to be submitted at Deadline 4 (17 January 2019).

Consideration shall also be required for scenarios whereby there is a delay to the construction/completion of such components as, but not limited to:-

- The A5025 On-line Highway improvements;
- The A5025 Off-line Highway improvements;
- The Marine Off-Loading Facility (MOLF);
- Dalar Hir Park & Ride; and
- Parc Cybi Logistics Centre.

The IACC notes that the Phasing Strategy as drafted does not meet its key purpose as it does not provide certainty as to when mitigation in the form of these facilities must be delivered or provide that cessation of works will be required if that mitigation is not in place. As an example the MOLF is required to prevent serious and substantial traffic impacts being incurred during main construction but there is no explicit time or threshold given when traffic impact would reach the assessed maximum. The IACC has further concerns that Horizon might increase the number of HGV movements (daily or monthly) on the road network in an attempt to recover any programme delay. Such a scenario is currently evident at HPC, whereby the developer recently applied to uplift the quarterly maximum 500no HGV movements by 50% as a result of a delay to the delivery of the jetty, with the local community raising significant concerns. To avoid this potential impact, the IACC has repeatedly emphasised that

Horizon should undertake Sensitivity Analysis to identify traffic volumes and impacts during different stages of the Wylfa Newydd early years construction period (i.e. pre-MOLF). From this analysis, the IACC seeks to agree upon acceptable volumetric thresholds/caps for maximum traffic levels along the A5025 for the early stages of the project. Such thresholds/caps would ensure that Heavy Duty Vehicle (HGV and Shuttle Bus) traffic would not introduce unacceptable levels of congestion, delay and undue environmental impact on sensitive receptors.

The IACC has raised this concern within the LIR, and seeks a Draft DCO requirement for both the production and compliance of a Construction Traffic Early Years Strategy. This issue is also currently being discussed between both the IACC and Horizon.

FWQ11.1.10: The traffic modelling/assessment is predicated on the basis that the MOLF will enable delivery of the majority of materials direct to the site. Is there any modelling/contingency that deals with the potential increase in vehicular movements should construction of the MOLF be delayed. In particular would the road network have the capacity to take any additional movements that may result and if there is an increase in movements how would this affect local residents?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
WG	WG have raised concerns about traffic management prior to the operation of the Park and ride, MOLF and Logistic Centre. HNP's response is that HGV movements will not exceed the levels above those detailed in the CoCP, and ES, which is a maximum of 320 per day (currently Monday to Friday). Welsh Government would expect this to be secured through a Draft DCO requirement, which also requires monitoring and reporting of compliance. Welsh Government has suggested that Horizon could use Holyhead Port to reduce freight flows on the network and to complement the MOLF, particularly in adverse weather. It could also be used in the event of the MOLF being delayed or not constructed.	Please refer to Horizon's response to FWQ11.1.10 submitted at Deadline 2 (4 December 2018).

FWQ11.1.12: Construction traffic associated with the proposed North Wales Grid Connection Project has been excluded from the modelling on the basis that it would be relatively limited (20 vehicles per hour per direction) and there is a degree of uncertainty over movements. In your opinion given the relatively low levels of traffic on Ynys Môn should these movement be included in the modelling?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
WG	Welsh Government suggest the HGV movements associated with the North Wales Grid Connection should be included in the modelling. It is understood from National Grid's Transport Assessment that HGV/LGV movements for the tunnel and importation of aggregate for temporary haul roads would equate to 32 vehicles per hour per direction. National Grid traffic figures should be included as they will impact on the traffic flows across Britannia Bridge. Horizon have stated the SoCG between WG and HNP (Ref. WG63 – VISSIM Sensitivity) that there will not be a significant adverse impact on Britannia Bridge if construction traffic avoid peak times. WG have indicated further discussion is required on the measures that are required to secure this position. The cumulative impacts of both these interconnected projects must be robustly assessed. It appears that the number of movements assumed by Horizon and National Grid are inconsistent.	The cumulative impact of National Grid and Wylfa Newydd traffic on the operation of Britannia Bridge was assessed in the ES Volume C – Road traffic-related (project-wide) App C2-4 – DCO – Transport Assessment Appendix L [APP-113].

FWQ11.1.15: (a) Given the rural nature of the road network is the Highways Authority satisfied that the road network (following the proposed road improvements) is capable of taking the volume of traffic and loads proposed and would not be damaged as a result of the use by construction traffic? (b) If the road network is damaged by construction traffic who would be responsible for its repair? (c) Are there any requirements that the Highways Authority would suggest to minimise the effect of construction traffic on the road network and maintain existing road conditions over and above those already suggested by the applicant?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
WG	The Welsh Government hopes it will assist to answer this question insofar as the trunk road network is concerned. (a) The A55 has been designed as a strategic road capable of carrying HGV traffic. It is unlikely there would be structural damage to the trunk road as a result of the application, although there may be an increase in maintenance requirements. (b) The trunk network between Junctions 1 and 11 is maintained by UK Highways under the Design, Build, Maintain and Operate contract. The development will increase vehicle numbers on the A55 and may increase the shadow toll payable. Additional maintenance may also be required. Unfortunately, it has not been possible to calculate the financial and resource impact due to lack of information provided from HNP. Until such information is provided to WG, it will not be possible for UKH to confirm the impact. WG has no funding to compensate UKH in the event of additional payments having to be made to UKH. WG would be looking to HNP for reimbursement of any additional costs.	Please refer to Horizon's response to FWQ11.1.15 submitted at Deadline 2 (4th December 2018) and Horizon's response to section 5 of IACC's Written Representation submitted at Deadline 3 (18 December 2018). . The Transport Assessment [APP-101] assesses the impacts of all Wylfa Newydd DCO Project related traffic across Britannia Bridge based on a set of conservative assumptions. The Transport Assessment concludes that there is no need for additional mitigation above and beyond that already proposed as part of the Wylfa Newydd DCO Project. All traffic flow information is provided in ES Volume C - Road traffic-related effects (project-wide) App C2-3 - Traffic Flows [APP-100]. This includes data for the A55.

	WG requires a requirement in the DCO that will ensure that project traffic flows will be monitored on a real time basis throughout the construction phase in order to demonstrate that construction traffic is not crossing Britannia Bridge during peak hours. A s106 obligation needs to be secured which commits the Applicant to reimburse WG for any additional costs incurred which will occur directly as a result of the proposed development.	

FWQ11.1.16: Do the local authorities agree with the applicant's description of the baseline situation regarding traffic flows and can they confirm whether they were involved in scoping the transport surveys for establishing the baseline?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
WG	Welsh Government agree the extent of the VISSIM model, and the baseline. In respect of further sensitivity testing, discussions are ongoing regarding securing necessary mitigation that has been identified by Horizon. See reference to the SoCG between WG and Horizon (WG64). WG has concerns about the optimistic assumptions that have been inputted into the model in respect of such matters as onsite worker accommodation and home based workers in the context of the current lack of controls in place to ensure that those assumptions will be secured in practice – if any of those assumptions do not occur in practice those impacts could be greater than those assessed (Section 9.0 of WG relevant representation)	This question refers to baseline data collection only. The baseline situation regarding traffic flows is presented in detail in the ES Volume C – Road traffic-related (project-wide) App C2-4 – DCO – Transport Assessment [APP-101], Chapter 4. The scope of the Transport Assessment is detailed in Appendix B – Scope [APP-103] and this was discussed with the Isle of Anglesey County Council, the Welsh Government and Gwynedd County Council. The scope of the baseline traffic surveys used for establishing the baseline has been agreed with the Isle of Anglesey County Council in December 2017 as part of the Statement of Common Ground process. Following discussions with the Welsh Government as part of the Statement of Common Ground process, a series of sensitivity tests was undertaken using VISSIM to examine the operation of the Britannia Bridge with different assumptions concerning the home locations of workers. These sensitivity tests including assuming the number of workers who lived on the mainland doubled. The results of the analysis were shared with the Welsh Government in September 2018 and they showed that the increased traffic would not be expected to affect the results presented in the ES Volume C – Road traffic-related (project-wide) App C2-4 – DCO – Transport Assessment [APP-101] [APP-101]. This reflects the transport strategy which ensures that worker shifts are timed so that workers avoid travelling over the Britannia Bridge during periods of peak traffic flow.

FWQ11.1.19: Paragraph 5.2.3 of the WNCOP [APP-414] deals with the management of deliveries to the site can the applicant:
(a)Confirm what will happen once the A5025 off-line highway improvements become operational in terms of delivery times? (b)Explain why restrictions on deliveries during school start/end times are only proposed for the initial stages of construction (page 12 of the TA [APP-101]. (c) Advise whether to minimise congestion, restrictions should also be in place during the evening peak eg 17.00-18.30? (d)Explain what is meant by 'restrictions'. (e)Confirm what the delivery hours would be – the WNCOP [APP-414] infers 07:00-19:00 but the TA [APP-101] states that the period from 19:00 to 23:00 'could be used' (f) Explain why the logistics centre would need to operate on a 24 hour basis if deliveries would be restricted to 07:00-19:00 (or 23:00) Does the IACC/Highways Authority/Welsh Government have any comments on these arrangements?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
WG	WG position has been that the logistics centre should be located on the mainland. WG require the movement of construction traffic regulated in both directions across Britannia Bridge, in particular restricted to avoid crossing at peak times. Consequently, Welsh Government suggests that consideration needs to be given to where on the mainland HGVs can park up if they need to wait to avoid crossing at peak hours.	The rationale behind the selection of the location for the Logistics Centre is presented in the Site Selection Report - Volume 6 – Logistics Centre [APP-441] with paragraph 7.11.1 summarising the reasons why Parc Cybi provides the most suitable location for the facility. The operation of Britannia Bridge has been assessed as part of the DCO Transport Assessment [APP-101] in the AM and PM peak hours of the peak year of construction. The analysis presented in section 11.4 of the DCO Transport Assessment shows that the traffic impacts associated with Wylfa Newydd DCO Project related traffic, including construction vehicles crossing the bridge, are not significant and do not require further mitigation. The traffic volumes associated with the Wylfa Newydd DCO Project that have been assessed in the Transport Assessment are robust and conservative for the following reasons: • Construction vehicles have been estimated on the basis of 60% of all material required for the construction phase of the project coming to the WYDA via the MOLF. In reality this figure is likely to be more like 80%, • 20-25% of daily construction traffic movements are assumed to occur in the AM/PM peak hours. In reality this is more likely to be circa 8%. • The transport strategy proposes worker shift timings which avoid workers travelling during the peak hours. This is secured via the Wylfa Newydd CoCP [REP2-031] which is a certified document and under Requirement PW7 the construction of the Wylfa Newydd DCO Project must be carried out in accordance with it.

FWQ11.1.23: Due to its location the Park and Ride scheme has the potential to flood. Can the applicant outline what would happen if the facility flooded including what, if any, the alternative parking arrangements would be? Can the IACC/Highways Authority comment on what measures they consider would be appropriate in the event that the Park and Ride flooded?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The IACC would wish to understand: • Whether the proposed mitigations discussed in Q8.0.24 would ensure full availability of the parking area up to the design flood event; • If not, then confirmation of the area/number of spaces of parking lost under flood events of key probabilities, and details of the duration these would be unavailable together with an indication of flood warning times to prevent parking in these areas in advance/allow for evacuation of these areas. • What construction stage flexibility the applicant has to reduce construction worker movement if sufficient park and ride space is not available. If insufficient parking is likely to be available within the park and ride site, what	Please refer to Horizon's response to FWQ8.0.24 and FWQ11.1.23 submitted at Deadline 2 (4 December 2018). The design of the Park and Ride has been updated to mitigate the effect presented in the DCO application. As no car parking spaces will be flooded with the detailed design, no alternative car parking arrangements are required.

	temporary alternative parking would be utilised?	

FWQ11.1.25: The Wylfa Newydd Code of Operational Practice (WNCOP) [APP-421] sets out a series of measures which aim to minimise trips to the site by car. What measures are proposed to minimise trips to the site by car for the outage workforce? Are the IACC/Highways Authority/Welsh Government satisfied with the details contained within the proposed Operational Travel Strategy as set out in section 5 of the WNCOP?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
WG	Please see Welsh Government's Written Representation (Section 9.3 & 9.4) which sets out our concerns regarding the Travel Plan and car sharing.	Please see Horizon's response to FWQ11.1.25. submitted at Deadline 2 [REP2-002]. Please note that this question relates to the Wylfa Newydd Code of Operational Practice (CoOP) [APP-421], but the Welsh Government refer to Sections 9.3 and 9.4 of their Written Representation in this answer, which do not contain any comments regarding concerns relating to the Wylfa Newydd CoOP.

FWQ11.1.26: Does the TA include modelling for the impact on the road network of the additional 1,000 workers that would be required every nine months to deal with outages?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The TA states that the traffic impact has included the following scenario: 2033 Peak year for operational traffic including construction of radiological waste buildings and two scheduled outages Paragraph 1.9.1 and Section 7.7 state that during the operational phase, the number of trips to the WNDA will be based on the number of workers (850 typically rising to 1,850 during maintenance of each reactor) together with a small number of servicing/ delivery trips. However, there is no information on traffic generation and distribution assumptions for the peak operational year and whether it includes the full 1,850 workers.	Please refer to Horizon's response to Q11.1.26, submitted at Deadline 2 (4 December 2018).

FWQ11.1.32 At peak construction HGV flows along the A5025 would be increased by between 71-101% (twice current levels). Applicant: (a) The TA estimates that 'at peak' there would be 40 HGV movements per hour/per direction ie a movement every 45 seconds. Can you confirm what you mean by 'at peak' and how long ie a week/month/year it is envisaged that this would occur. (b) Confirm whether the transport modelling for the traffic along the A5025 included the movements generated by the park and ride shuttle buses? (c) Can you confirm that the proposed off-line highways improvements have been designed to accommodate these levels of traffic? IACC/Highways Authority can you: (a) confirm whether you consider that the design of the proposed off-line highways works is satisfactory? (b) In your RR you request that there should be a cap/threshold placed on the number of HGVs that would use the A5025. Can you explain why you think such a cap would be necessary and if it is necessary what it should be and how it should be imposed.

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	(a) Horizon to confirm. (b) Horizon to confirm. The IACC would note that according to doc 6.3.21 Strategic Traffic Model overview, the Main Construction activity includes all construction staff routing to/from the main site from various origins and locations as well as the HGV/LGV traffic associated with construction activities: • pre-Logistics Centre (HGVs); • Logistics Centre movements; • direct buses to WNDA development (from various locations and accommodation types, including Site Campus); • north and east buses (from various accommodation types); • direct private vehicles to the Wylfa Newydd Development Area;	Part for Horizon a) See Horizon's response to FWQ11.1.32 part a) [REP2-002] b) See Horizon's response to FWQ11.1.32 part b) [REP2-002] c) See Horizon's response to FWQ11.1.32 part c) [REP2-002] Part for IACC Highways In response to IACC Highways Authority (a) • The shared use footway/cycleway crosses the A5025 at either end of Section 5 and have been developed in conjunction with IACC Major Projects, further improvements to the crossing points can be considered during detail design. • Where access is required to maintain structures such as (including overbridges, underpasses and culverts), these are shown in the drawings Sections 2.7 to 2.10 A5025 Off-line Highway Improvements. IACC will be granted rights to access to maintain the structures along the identified routes. IACC as Highways Authority will have power or right to maintain structures or works under Provisions of Section 291 of the Highways Act 1990. • Section 2.2 Land Plans shows the permanent and temporary land requirements for each of the highways sections. Sections 2.7 to 2.10 A5025 Off-line Highway Improvements plans show the details of the highway to be constructed together with the land required for the relevant highway visibility splays. Horizon will continue to

	• Park and Ride bus shuttling; and Park and Ride cars. (c) IACC notes that the future design traffic, in the form of million standard axles (msa) over the design life, is acceptable. IACC Highways Authority: (a) The IACC are satisfied in principle with the design which has been developed through the Highways Collaboration Agreement between Horizon and IACC Major Projects Team. The design principles have been accepted and the A5025 Off-line Departures from Standard report has been approved by the Highways Department's Interim Head of Service. The IACC has however a number of concerns with and objections to the details submitted. The IACC notes at this time that it has objections to some of the detail of these proposals and these will be submitted to the Examining Authority in due course. In reviewing these plans, the IACC has also noted a number of points on which improvements could be made to the detailed proposals, including for example altering the layout of shared path provision to halve the number of carriageway crossing points required for pedestrians and moving crossing to points to locations where speed limits below the national seed limit would apply improving safety. Opportunities for improvements of this sort will be also be noted in the IACC's submissions on the detail.	work with IACC Highways to agree the extent of the land to be dedicated as highway maintainable as public expense. • Boundary features, such as hedgerows, fences, stone walls and Cloddiau will become the responsibility of the landowner and will be maintained by the landowner. • Horizon considers that a side agreement as suggested by IACC (i.e. S278 and/or S39) is inappropriate as the DCO should be the single instrument authorising the highways works and the protective provisions that will be provided for IACC are the most appropriate vehicle for protecting its rights and interests as Highway Authority. This approach is consistent with the position taken in the East Midlands Gateway Rail Freight Interchange and Highway Order. • Horizon will shortly be reverting with IACC with its comments on the proposed protective provisions for highways. • Horizon agrees that IACC Highways should undertake maintenance works of any affected streets, highways and in respect of the new A5025 Off-line Highways Improvement Works. • Horizon will liaise with IACC over the extent of maintenance works and costs and how these can be secured through the current draft protective provisions being negotiated with IACC Highways. Horizon will also consider what amendments are required to article 19 to reflect the agreed position in relation to maintenance. • In respect of the specific issues raised by IACC Highways in relation to the Valley section of the A5025 Off-line Highways improvements Horizon will continue to engage with IACC to consider these aspects via highway design proposals and through the expenditure of the transport contributions under the draft DCO s.106 agreement (b) Since the submission of the DCO application Horizon have developed an early years strategy. This includes the following caps on Heavy Goods Vehicles (HGVs) on the A5025 at Valley: • Monthly Max movements- 2,500 HGV movements each way; • Hourly Max movements – 22 HGV movements each way; • Daily Max movements – 160 HGV movements each way.

	Additionally, the Highways Authority would note there is still outstanding information required by it:- • Land transfer requirements to fully enable the Highway Authority to comprehend and establish the extent of land to be designated as a public highway which is to be maintained at public expense. • Further to this, the IACC assumes that boundary features will not be maintained by the Highway Authority. However, should this prove to be different, the IACC requests a schedule of boundary features that the Highway Authority will be required to maintain following the implementation of the improvements. The schedule should be developed and finalised in agreement with the IACC as part of the Highways Collaboration Agreement. • The access rights that will be granted to the Highway Authority to enable full access to all highway structures from all	These limits will be incorporated into the next version of the Wylfa Newydd CoCP to be submitted at Deadline 4 (17 January 2019).

directions (including overbridges, underpasses and culverts) and surface water attenuation ponds for maintenance purposes.

- IACC as Highway Authority are willing and able to enter into agreements to facilitate the necessary works to the public highway in a manner which respects the Highway Authority's need to maintain control of the public highway network and to manage occupation of the carriageway it in the interests of public safety and effective traffic management. Horizon has not sought agreement on alternative means of gaining the rights required for these works. A S278 agreement has been successfully concluded between Horizon and IACC for the A5025 online works and IACC would be willing to progress such agreements (i.e. S278 and/or S38) to facilitate these Off-line works.

IACC and Horizon to agree upon a Commuted Sum for the future maintenance of the new public highway.

Further IACC comments per Off-line improvement section:-
Valley

- The IACC are eager for this section to be completed first to minimise the impacts on the operation of the existing Valley crossroads junction.
- Further discussions are required on introducing suitable crossing provision for pedestrians across the frontage of the Petrol Filling Station (PFS) to the existing bus stop shelter along the A5. This includes the provision of a new kerbed footway in front of the PFS forecourt.
- Following the opening of the Valley bypass, an assessment of the signal configuration and timings will be required as part of the stopping up of the northern (A5025) highway arm.

Llanfachraeth

The IACC seeks assurances that construction traffic associated with constructing the Llanfachraeth bypass will be effectively managed, with disruption of local residents kept to a minimum. This may include providing temporary

measures to avoid construction traffic having to route through the village during construction of the bypass, e.g. provision of a 'Bailey Bridge' across the two rivers.

Llanfaethlu

The IACC seeks further clarification/detail on the area outside Ysgol Rhyd Y Llan once the road becomes a "dead-end". This will require full discussions with both the Highways and Education departments of the IACC.

(b) The IACC seeks to agree upon acceptable volumetric thresholds/caps for maximum traffic levels along the A5025 for the early stages of the project. Such thresholds/caps would ensure that Heavy Duty Vehicle (HGV and Shuttle Bus) traffic would not introduce unacceptable levels of congestion, delay and undue environmental impact on sensitive receptors. Further information can be found within the LIR.

FWQ11.1.34: Does the application comply with the relevant transport related policies of the JDLP in particular policies PS11, PS12, TRA1, TRA2 and TRA4? If not, why not?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	Policy PS 12: IACC is of the opinion that more information is required on the potential flood risk impacts, capability to deliver the expected car share ratio and traffic impact at the access and adjacent junctions before it can be satisfied benefits from the proposal outweighs the Council's preference for sites located in more sustainable locations on or close to the A55. This is a specific Policy for the Wylfa Newydd Park and Ride and park and share facilities. It has a preference under criterion 1(i) for sites located within or adjacent to development boundaries of Centres located along or close to the A5/A55. Criterion 1(ii) refers to sites at other locations along the A5/A55 where the site is part of a comprehensive approach to mitigating the transport effects of the project. Justification for such sites should take account of the Councils' preference to consider sites closer to Centres. In addition due regard should be given towards landscaping and environmental considerations, and where provision for travel to the site by sustainable means, including public transport and cycling, can be provided. Further criteria within the policy refers to the provision for new and enhancement of existing pedestrian and cycle paths and improvement to public transport services.	The Planning Statement [APP-406] assesses the Wylfa Newydd DCO Project against relevant Local Plan policies. The Horizon WR submitted at Deadline 2 (4 December 2018) provides further analysis of Policy PS9 at paragraphs 3.3.9 to 3.3.67, Policy PS10 at paragraphs 3.3.68 to 3.3.95, and Policy PS12 at paragraphs 3.3.109 to 3.3.118. This, in combination with the assessment contained in Appendix D of the Planning Statement [APP-406], is considered to address the policy aims appropriately. Additional assessment has been carried out and submitted at Deadline 2 (4 December 2018) (As shown described in the updated Design and Access Statement Volume 3 [REP2-030]) which included further details of the flood attenuation design to mitigate potential flooding effects. Horizon has responded to the IACC Local Impact Report at Deadline 3 (18 December 2018) which covers the issues raised in IACCs response to this written question. The relevant chapters of the LIR Response ("Local Impact Report Response - Dalar Hir" and "Local Impact Report Response - Traffic and Transport") provide the information in response to this question, and as such are not repeated here.

In addition the siting of buildings, activity, access and egress should have appropriate measures to mitigate any negative impacts of the proposed development on the amenity of local communities.

The proposed site clearly does not align with the preferred policy position set in criterion 1 of Policy PS 10. The IACC, as set out in Chapter X of its LIR, is not convinced that there are no alternative sites within or adjacent development boundaries of Centres located or close to the A55. It has concerns that the Dalar Hir site does not present a sustainable option for non – home based workers to access the main site at Wylfa Newydd.

The IACC also has concerns over potential flood risk impact on the Dalar Hir site and its effect on the deliverability of the site and lack of resilience and contingency planning within Horizon's strategy. In addition there are concerns regarding the traffic impacts at the Park and Ride access and adjacent junctions.

Parking provision levels are fully dependent upon the car share ratios which have been identified. If the % of single occupancy vehicles using the site increases there will be insufficient spaces available on the site and could lead to overspill parking.

IACC, the Welsh Government and GCC have been working collectively to identify appropriately located park and share sites. It is considered that these are required for contingency planning to make the car sharing issue acceptable to the IACC.

The Dalar Hir site has only given limited consideration for improvements to the pedestrian and cycle infrastructure to encourage journeys by foot or cycle. It's location in the open countryside away from any identified Centre limits the opportunity to access the site by foot or cycle.

Policy TRA 1: Whilst broadly speaking the project is in line with Policy TRA 1 IACC seek further detailed evidence (see the Transport Chapter for detail) and mitigation at certain locations.

TRA 1 deals with Transport Network Developments. It has 4 specific parts within the Policy being improvements to Existing infrastructure, Transfer Between Transport Modes, Transport Assessments and Transport Schemes.

For improvements to the existing infrastructure, 5 criteria need to be satisfied for proposals to be supported. The IACC have granted permission for A5025 on-line highway improvements to lessen the impact of Wyfa Newydd traffic from Valley to the proposed site. IACC have requested an improved cycle link between the proposed roundabout and A55 Junction 3 as a mitigation measure against increase in HGV traffic and a pedestrian crossing in Valley. In addition there needs to be agreement with IACC over where bus stops will be located on core routes serving the construction.

The reference to Park and Ride facilities within the Transfer between Transport modes in the Policy refers to permanent facilities required to tackle, for example, hot spots for existing fly parking issues or

to relieve congestion on key roads at peak travel time. This part of the Policy does support park and share sites within or adjacent to settlements. Strategically located facilities for overnight lorry parking and freight transfer should also be within or adjacent to Centres. As set out in Chapter X of its LIR, IACC believe the provision of additional park and share facilities at strategic locations would mitigate the likelihood of 'fly parking', enable more sustainable travel patterns as well as providing resilience, flexibility and a contingency provision to Horizon's strategy. However these proposals would be considered against the requirements of Policy PS 9 and Policy PS 12.

A large scale development should include measures as part of a Transport Assessment. The DCO application is supported by a Transport Assessment which include mitigation measures.

The Transport Schemes section of the Policy refers to the A5025 transport infrastructure improvements associated with the new nuclear development at Wylfa Newydd. On-line improvements to the A5025 are in line with the areas protected for such developments within the JLDP.

Policy TRA 2: This Policy deals with Parking Standards stating the provision should be in line with the Councils' Parking standards.

IACC seek a parking management phasing plan pre-commencement of development. Maximum parking spaces at the Wylfa newydd main site and the Associated Development sites are required with

minimum requirements for cycle and motorcycle. Details of the parking management system and details of car share parking are also required. The use of the car share parking will need to be monitored.

The above mentioned matters need to be addressed in order for the project to satisfy Policy TRA 2.

Policy TRA 4: Further evidence and mitigation is required to satisfy IACC that the project complies with Policy TRA 4.

This policy deals with Managing Transport Impacts. It states that proposals should be planned and designed in a manner that promotes the most sustainable modes of transport having regard to a hierarchy of users. The hierarchy gives priority to walking, disabled users, cycling and public transport down to the use of private cars. This seeks to reduce the reliance on the private car. The second part of the Policy seeks to ensure the safe and free flow of traffic along highways.

The intention to deliver a minimum of 60% of all construction materials by sea via the Marine Off-Loading Facility will help to lessen some of the transport impact with the proposal. The timely delivery of this facility and a prohibition on construction continuing without such delivery needs to be secured through the Draft DCO to prevent unacceptable traffic impacts.

The proposed location of the Park and Ride site limits the opportunities for reaching the site via walking or cycling. Also the lack of appropriate park and share facilities at strategic locations could impact

	upon the number of single occupancy vehicles using the site. IACC require further evidence to be satisfied that the access and adjacent junctions at the Park and Ride site can accommodate the anticipated transport peak flows.	

FWQ11.1.36: Until 2028, you have to pay a shadow toll to Carillion plc and John Laing group plc for the A55 based on vehicle numbers and lane availability until 2028. How will the application affect this toll and do you have the resources to cover any increase that may arise as a result of the Application?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
WG	The application will increase vehicle numbers on the A55 and may increase the shadow toll payable. Additional maintenance may also be required. Unfortunately, it has not been possible to calculate the financial and resource impact due to lack of information from Horizon. Until such information is provided to WG, it will not be possible for UKH to confirm the impact. WG has no funding to compensate UKH in the event of additional payments having to be made to UKH. The s106 agreement (or if necessary a separate side agreement) should secure a clear obligation on HNP to reimburse WG in relation to these costs which will occur as a direct result of this development.	Regarding the request for provision of information, all traffic flow information is provided in ES Volume C - Road traffic-related effects (project-wide) App C2-3 - Traffic Flows [APP-100]. This includes data for the A55 for all vehicles and separately for HGVs only. This assessment of traffic impacts of the Wylfa Newydd DCO Project is based on a set of conservative assumptions. The Transport Assessment concludes that there is no need for additional mitigation above and beyond that already proposed as part of the Wylfa Newydd Project. Horizon notes that monitoring of construction HGVs will be secured through the Wylfa Newydd CoCP (section 5.8) [REP2-031] which requires Horizon to monitor, manage and control deliveries via the logistic centre and then through an integrated Distribution Management Asset Tracking System (DMATS).

FWQ11.1.39: In your RR [RR-020] you have indicated that you would wish to see more park and share options in other suitable strategic locations. Can you please confirm: (a)What you mean by park and share? (b)How this would differ from the car sharing proposed by the applicant. (c) Where are the strategic locations you would wish to see such facilities located: and (d)What proportion of the workers traffic would you wish to see use such a facility?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	(a) and (b) Park & Share is defined by Planning Policy Wales TAN 18 (2007) as "sites where car users can meet and leave cars, continuing the journey in a shared vehicle ... where sustainability benefits are gained through reducing single occupancy journeys". The establishment of Park & Share facilities will be an important contribution to integrated transport. Such facilities seek to persuade car users to carshare for the final part of their journey, thereby reducing the level of congestion on the Ynys Môn highway network. This differs from the car sharing strategy proposed by the applicant as it is assumed that workers will be willing to walk or drive to another workers place of residence to car share, based on living close to each other or directly en-route. These Park & Share facilities, on a smaller scale than the proposed Dalar Hir site, should be located in the proximities of A55 junctions 6, 7 & 8 and also on the mainland. Benefits of these facilities identified by the IACC include:- • Enable the workforce to safely and conveniently meet to car share • Addressing parking concerns;	Please refer to Horizons response to FWQ11.1.39 submitted at Deadline 2 (4 December 2018).

- Provide parking legacy;
- Contribute to Horizon Operational Travel Plan;
- Reduce congestion on Pont Britannia and A55 junctions 3 & 4;
- Reduce traffic flow on the A55;
- Encourage car sharing and reduce single occupancy car travel; and
- Encourage travel on strategic highway network.

These would facilitate HNP home based and non-home based construction workers whom are accommodating in the Eastern and Southern region of Anglesey, as well as workers residing on the mainland. The combination of the forecasted density of workers in the Eastern region of Anglesey, the rural character of Anglesey and the emphasis on car sharing imposed by HNP will inevitably lead to 148 workers making informal arrangements (or formally via the database) to meet each other near the A55 corridor. It is currently envisaged workers will meet near junctions 6, 7 and 8 of the A55 to car share the onward journey either to Dalar Hir Park & Ride or directly to the WNDA.

The provision of these Park & Share facilities would supplement the Dalar Hir Park & Ride and WNDA car park, which in turn would enhance Horizon's sustainable transport strategy, as well as providing flexibility and resilience.

(c)The IACC assessed HNP's draft Gravity Model to ascertain suitable locations for proposed Park & Share facilities to

accommodate the workforce of the Wylfa Newydd Project. The Technical Note reviewed as part of this Strategic Case is titled 'Wylfa Newydd Project Technical Note: Home Based and Non-Home Based Worker Travel Gravity Models' (dated 28th April 2017). The purpose of the Technical Note was to set out the approach to, and results from, bespoke Gravity Models for estimating the geographical distribution of workers who either travel to work from their homes (Home Based Workers) or who are based in temporary accommodation (Non-Home Based Workers).

As the results from the Technical Note provided a basis for determining the estimated spatial distribution of the place of residence or accommodation of the workforce, it was used as an indicative tool to define the geographical source of workers commuting to the WNDA. This subsequently advised the most suitable strategic locations for Park & Share facilities. Following the review of HNP's Gravity Model, the facilities would be best suited at the following locations:-

- In the vicinity of Amlwch, which would also serve the communities of Penysarn and Llanerch-y-medd.
- In the vicinity of Benllech, which will also serve Brynteg and Pentraeth communities.
- In the vicinity of A55 Junction 8 Menai Bridge/Llanfairpwll, which will also serve the Llandegfan, Beaumaris and Llangoed

communities (and possibly the mainland).

- In the vicinity of A55 Junction 7 Gaerwen, which will also serve the southern communities of Anglesey, such as Dwyran, Niwbwrch, Brynsiencyn.
- In the vicinity of A55 Junction 6 Llangefni.

Any proposed Park & Share site should be located within or adjacent to development boundaries of Centres either close or along the A5/A55 and therefore align with the locational requirements of Policy PS 12 of the Joint Local Development Plan (JLDP), or within or adjacent to centres along the primary road network that will play a dual use, i.e. provide satellite hubs to facilitate sharing opportunities to the construction site or a central park and ride facility as well as alleviate known local fly- parking issues, thus aligning with Policy TRA 1 of the JLDP.

(d) The Park & Share facilities would facilitate the daily commuting workers whom will be required to leave/park their vehicles to car-share the onwards journey to either the Dalar Hir Park & Ride or WNDA with other workers.

The following provides clarification on the typical scenario at peak construction:-

At the WNDA: For every vehicle arriving at the WNDA, two vehicles will require parking elsewhere (car share ratio of 3no. workers per car).

At the Dalar Hir Park & Ride: For every two vehicles arriving at the Dalar Hir Park &

	Ride, a vehicle will require parking elsewhere (car share ratio of 1.5no. workers per car). The total number of daily commuting workers at peak construction period would consist of 2000 home based and 3000 non-home based workers whom will be accommodating on Anglesey and on the mainland.	

FWQ11.1.39: In your RR [RR-020] you have indicated that you would wish to see more park and share options in other suitable strategic locations. Can you please confirm: (a)What you mean by park and share? (b)How this would differ from the car sharing proposed by the applicant. (c) Where are the strategic locations you would wish to see such facilities located: and (d)What proportion of the workers traffic would you wish to see use such a facility?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
WG	Park and Share facility offer the options to reduce the numbers of vehicles, with co-workers either sharing a car or catching a bus to site and/or Dalar Hir Park and Ride site. WG is concerned about the use of a single Park and Ride site only at Dalar Hir, and the time it will take to bring it online - see also WG's response to question 11.1.11. Two sites on the mainland would reduce the number of vehicles using the Britannia Bridge and would offer a solution from day 1 of constriction when the Dalar Hir Park and Ride site is not available as well as when Dalar Hir will be decommissioned at the end of construction. The sites leave a legacy and should form part of the operational strategy for Wylfa. As the main conurbations, Caernarfon and Bangor Park and Ride and Park and Share sites would intercept all workers for outlying areas before they cross to the Isle of Anglesey. All workers living on the mainland should use these sites. Workers living in the south of Anglesey should use the sites at Fourcrosses and Gaerwen.	Please refer to Horizon's response to FWQ11.1.39 submitted at Deadline 2 [REP2-002] (4 December 2018).

FWQ11.1.40 Do you agree with the assumptions that the Applicant has made regarding car sharing in relation to demand for car parking (7.3.11- 7.4.12 of the TA [APP-101]). If not what figures do you consider should be used and how would this effect the number of spaces required?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The IACC welcomes the principle of car sharing (sustainable travel) and the provision of a Park & Ride facility on the island, however it is still significantly concerned and disappointed at the lack of acknowledgment by Horizon for the need of additional parking provision (on both the island and the mainland) to support the strategy. The IACC's concerns with the proposed Car Sharing Strategy are twofold:- 1. Car Sharing Ratio Targets Horizon have not submitted evidence to date which demonstrates that a car share factor of 2.0 project wide is achievable and realistic. From analysing the car sharing statistics for the HPC project, it is evident that car-sharing ratios have improved, however are still significantly below the targets as set out within the DCO. Such statistics are exemplified by the largest Park & Ride facility associated with the HPC project, which currently provides 920 spaces. As of July 2018, of the 428 workers arriving at site, 400 (84%) were car drivers and 58 (12%) were car passengers. This demonstrates the challenges of achieving a car share factor of 2.0 project wide. Horizon have failed to consider other constraints associated with a car sharing strategy, which include concerns by workers over safety of cars when meeting at a common	The Wylfa Newydd Code of Construction Practice [REP2-031] was updated at Deadline 2 with the following amended text in Section 5.7 to strengthen commitment to monitoring worker vehicle movements: • During the majority of the construction programme, most of the construction workers wishing to drive to the WNDA Site or Park and Ride Site will be required to car share. Horizon will target an average car share ratio of 2.0 people per car in the peak construction year • Horizon will therefore implement a car-sharing database which will likely utilise internet and mobile phone based applications to match workers who wish to drive to the WNDA or Park and Ride sites. The Construction Workers Accommodation Management Portal will be used as a basis to form the database • The level of car sharing required will vary depending on the number of construction workers, the availability of parking spaces, and the number of construction workers travelling to site by non-car modes such as shuttle buses, amongst other factors. Vehicle occupancy requirements, and changes to them, will be advertised clearly to all construction workers well in advance. • The existence of such a database and matching system will be communicated to all employees, including that non-adherence to the car-share policy could result in refusal of entry to the WNDA or Park and Ride car parks. and repeat offenders could face enforcement action. The comparison with Hinkley Point C is not appropriate. The HPC project is still very much in its early years stages and it is not at peak and will not be for some years. The transport strategy for worker travel adopted at HPC is very different from that proposed at Wylfa Newydd. The HPC strategy focuses mainly on park and ride sites and shuttle buses, with a very small on-site car park (300 spaces). Car sharing does not form a major part of the HPC transport strategy. There are no targets for car sharing to the main site car park for example.

location, as well as cultural factors i.e. independence and associated lack of convenience, flexibility and reliability. Reference has been made by Horizon to the construction of Sizewell B nuclear power station and its apparent successful level of car sharing. However, IACC is of the opinion that as Sizewell B was constructed in the early 1990s, car-ownership levels and worker travel patterns have changed significantly since then. Studies have shown that by the year 2021, it is expected that the number of cars per household will have increased by approximately 40% compared to the year 1991.

The information submitted within the DCO documents demonstrates that parking provision levels are fully dependent on the car share ratios which have been identified. The car share ratio at Dalar Hir at 1.5 persons per car implies that there will be potentially be 50% single occupancy vehicles. If this percentage increases and the car share ratio reduces, there will be insufficient spaces available. For example:

- 1.4 car share ratio will require 2,006 spaces;
- 1.3 car share ratio will require 2,161 spaces; and
- 1.2 car share ratio will require 2,341 spaces.
- These are in excess of the 1,900 available spaces at Dalar Hir.

2. Indiscriminate 'fly-parking'

To-date, Horizon have relied on the assumption that workers will be willing to

The Hinkley Point C transport strategy is tailored to respond to the local conditions in Somerset in terms of geographic location, available transport infrastructure, and existing congestion issues. These are very different to the local conditions that exist on Anglesey.

The car share strategy proposed at Wylfa Newydd is central to the transport strategy, and is more prescriptive as outlined in the CoCP [APP-414]). See also paragraphs 6.3.7 to 6.3.35 of the Transport Assessment [APP-101].

Horizon firmly believes that its car share strategy and target of an average of 2.0 workers per vehicle in the peak year is appropriate and achievable. Paragraph 6.3.13 of the Transport Assessment [APP-101] identifies potential challenges with delivering car sharing at an organisation (e.g. spread of home locations, need for flexibility). Paragraphs 6.3.14 and 6.3.15 then identify why these constraints are less relevant for the Wylfa Newydd Project and why car sharing is more feasible than for a typical development e.g. an office.

An increase in car ownership does not correlate to an increase in car-based commuting for work, as demonstrated by the Commuting Trends in England 1988 – 2015 document which shows that car mode share for commuting trips has reduced between 1993 and 2014.

Horizon's DCO application contains all of the necessary parking (onsite and at the Park and Ride) to meet the requirements of the Wylfa Newydd Project and minimise the traffic and transport impacts of the Wylfa Newydd Project.

Horizon has committed through the Workforce Management Strategy (WMS) to discipline any worker caught fly-parking. Paragraph 2.2.1 of the WMS states that "Any personnel found to be parking outside designated areas (or 'fly parking') will be disciplined". A similar system is in place at Hinkley Point C and is considered successful by the local authorities.

Issues of fly parking could be reported by local residents or stakeholders to the Transport Sub-Group which is proposed to manage and monitor traffic and transport issues for the Wylfa Newydd Project. IACC will be a member of this Transport Sub-Group which will have access to funds to undertake surveys and potentially implement management measures. The remit of this Transport Sub-Group is currently being negotiated with IACC.

walk or drive to another workers place of residence to car share, based on living close to each other or directly en-route. The IACC disagrees with this assumption due to it being unrealistic and overambitious; whereas the Authority believes the combination of the estimated geographic distribution of the workforce, the churn of workers over the construction period and the emphasis on car sharing imposed by Horizon will inevitably lead to workers making informal arrangements (or formally via the proposed database) to meet each other near the strategic road network. It is currently envisaged workers will meet near such locations as junctions 6, 7 and 8 of the A55, including other areas on the mainland, to car share the onward journey either to Dalar Hir Park & Ride or directly to the Wylfa Newydd Development Area (WNDA). This reflects current practice by workers car sharing on the island. 150 Within the DCO documentation, Horizon have stated that any worker failing to adhere to their agreed and chosen route to work (e.g. car share arrangement or bus route) will be refused entry through appropriate enforcement measures and potentially be given a formal warning. The IACC is particularly concerned with the lack of detail provided in relation to the proposed monitoring and enforcement for indiscriminate parking, which will result in local communities suffering undue inconvenience resulting from un-sociable and inconsiderate fly-parking by construction workers. This sensitive issue has been highlighted in previous press releases in relation to the HPC project.

Further to this, the IACC are concerned with the lack of contingency planning should the incentives prove insufficient to encourage car sharing, with the proposed disciplinary action for breach of car sharing being unrealistic as the construction programme will inevitably be argued by HNP to take priority over the carsharing strategy. This is particularly the case with workers who may indiscriminately park within walking distance of the site (i.e. Tregele), or in the vicinity of the nearest shuttle bus stop to the site.

The IACC believe that the provision of additional Park & Share (P&S) facilities (on a smaller scale to Dalar Hir) at strategic locations would mitigate this impact and enable more sustainable travel patterns to the Wylfa Newydd site and Park & Ride facility, as well as provide resilience, flexibility and a contingency provision to Horizon's Strategy.

Recognising the risk to local communities and the highway network, the IACC are currently working in collaboration with the Welsh Government and Gwynedd Council in developing suitable P&S sites to provide this resilience and contingency to the Wylfa Newydd workers during the construction phase. The IACC would welcome further discussion with Horizon on the implementation and delivery of these sites.

FWQ11.1.40 Do you agree with the assumptions that the Applicant has made regarding car sharing in relation to demand for car parking (7.3.11- 7.4.12 of the TA [APP-101]). If not what figures do you consider should be used and how would this effect the number of spaces required?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
WG	The ITTS contains two assumptions for average car occupancy during construction: para.6.1.10, p.44 refers to an average vehicle occupancy of 1.5 persons per vehicle is expected at the Dalar Hir Park & Ride; and para. 5.1.11, p.51 refers to average vehicle occupancy of 2.0 workers for daily commuting purposes across the Wylfa Newydd Project during peak construction. This compares with an average commuting car occupancy of 1.16 persons/vehicle in England in 2017 and an average worker occupancy of 1.2 persons / vehicle at Hinkley Point C's Park & Ride sites. No information is provided on the counting period and how average occupancy will be controlled. Accordingly, WG considers that the average car occupancy assumed by Horizon is too high and it considers the Hinkley car sharing ratio should be adopted for Wylfa Newydd. In addition Horizon's assumptions do not take account of shift patterns and turnover of staff (30-40,000 roles).	Control measures for the transport strategy have been enhanced since the submission of the DCO application and revised measures are provided in the updated Wylfa Newydd Code of Construction Practice (CoCP) submitted at Deadline 2 [REP2-031]. This proposes spot-check monitoring of car occupancy to be reported via the Transport sub-Group. Regarding car-sharing, as detailed in the updated Wylfa Newydd CoCP submitted at Deadline 2 [REP2-031], a car sharing database will be implemented and run by Horizon to ensure take-up of this mode of transport meets the targets for the peak year of construction. The average occupancy rate of 2.0 workers per vehicle in the peak year is now committed to via the updated Wylfa Newydd CoCP submitted at Deadline 2 [REP2-031]. Car sharing plays a much less significant role at Hinkley and therefore is a less important part of the Transport Strategy which is not promoted heavily. Hinkley do not have a dedicated car share database for their project for example. The Hinkley strategy relies mainly on park and ride and direct bus modes of transportation for construction workers. It should be noted that new facilities are required to be built at Sellafield as part of the decommissioning process and existing car parking spaces have had to be reduced significantly to allow space for the new facilities. The new access strategy to the site is now as follows: • Three workers per car minimum to access the main site car park • Two per car minimum to access the off-site car park • New direct buses from local towns. This scheme has been reported as a success by the UK government and details are provided at the following website (https://www.gov.uk/government/news/sellafield-travel-scheme-success). Sellafield therefore provides a good example of how the proposed car sharing strategy at Wylfa Newydd can be implemented and be successful. The Welsh Government suggest vehicles and workers should be counted for each hour of the day throughout the nine-year construction programme. This is considered overly onerous given that travel

		patterns are expected to change slowly in accordance with the build-up of workers. A survey of worker travel patterns every quarter is considered appropriate to provide sufficient information to determine the success of the transport strategy and make appropriate changes. This survey information will be in addition to the details recorded of each construction vehicle movement (via the DMATS system) and details of bus movements to be provided by the operator. See the updated Wylfa Newydd CoCP submitted at Deadline 2 [REP2-031]. The defined shift patterns (which are controlled by Horizon) will help Horizon achieve the car share target as significant groups of construction workers will all require travel to/from the WNDA at the same time, compared to a standard worksite or office where arrival/departure times are not fixed and more in the control of the worker. The turnover of staff will not impact the ability of Horizon to achieve the car share target.

FWQ11.4.7: Section 3 of the A5025 Off-line Highways Improvements sub CoCP [APP-420] sets out the pre-commencement consultation for properties and business within 100m of the proposed works. Given the size of Ynys Môn and the importance of the A5025 as a north/south route do you consider that this is sufficient? If you consider that this would be insufficient what other measures would you wish the Applicant to undertake?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The A5025 acts as the main north/south route across the island. It is an important transportation route for local communities and businesses as well as for tourists and visitors seeking to access the heritage Coast, AONB and the historic local attractions in the north and west of the island. It serves the existing Wylfa Power Station (where the spent fuel is currently being removed), and is of critical importance to the town of Amlwch. Businesses located in the communities of North Anglesey also rely upon the highway for the delivery of goods, arrival of customers and for the ability to deliver their products to markets within the rest of Anglesey and beyond. Many of the communities and businesses which are located away from the A5025, such as Llanfechell, Church Bay and Bodedern, also rely in upon it in part for access. Horizon's proposals to consult with occupiers of properties and the owners and occupiers of agricultural land within 100m of proposed works three months in advance of works taking place is welcomed but does not, in the opinion of IACC, go far enough. Horizon's community/stakeholder liaison capacity should be fully utilised to engage	Horizon agrees that the A5025 is an important road not only to the local communities and nearby towns and businesses, but it is clearly important to the running of the Wylfa Newydd DCO Project. The required level of consultation for each stage of the Project or key infrastructure work is something that will be discussed with IACC and other key stakeholders via the various Forum (Programme Board; Transport and Tourism Sub Groups and the Community Liaison Group) set out in the Wylfa Newydd CoCP [REP2-031], and will ensure the relevant level of consultation and information is made available in advance of any work.

with residents directly or indirectly impacted. This engagement and information should be informed by a communication protocol and action plan, ensuring sufficient prior warning to communities and businesses within a far wider area than that currently proposed. The precise geographical area and details of the measures proposed should be agreed in advance with IACC, and should include the provision of bilingual signage to show that existing businesses remain open, the diversionary routes to be taken (if required), the anticipated commencement and completion dates of the works and the contact numbers for those seeking further information. Given the importance of the A5025 as a tourist route IACC would expect that Horizon would provide digital material (in partnership with the IACC), fully embracing social media. The programme should also consider and try to avoid adverse impacts during peak holiday periods (including bank holiday weekends).

FWQ12.0.5 There are several references throughout the Code of Constriction Practice documents to work not occurring on Bank Holidays (eg paragraph 4.2.2 of the Park and Ride sub CPCP [APP-418]). Can the Applicant confirm that they mean Bank and Public holidays and amend the documents as necessary?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	NRW is awaiting additional information from the Applicant to address this matter.	As noted in Horizons response to the Examining Authority's First Written Question (FWQ12.0.5): "In response to the RR-088 issued by NRW, a technical memo was produced (see response to FWQ-Q5.0.5) to provide the additional information requested. This memo was then discussed at a meeting with NRW (27 September 2018) and subsequently updated. The final memo titled Supplementary Information on coastal processes to support Wylfa Newydd EIA (WN0902-HZDCO-PAC-REP-00025) has been submitted at Deadline 2 (4 December 2018) for reference." The response goes on to summarise the main themes and findings of the report.

FWQ13.0.1: Concerns have been raised that the names used for the application site are incorrect and that the correct names for the whole site are Cors Tyddyn Waen, Cors Tŷ Coch and Cors Bron Haul. Could the Applicant/IACC advise what are, in their opinion, the correct names and ensure that going forward any documentation/correspondence uses the correct place names.

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	Concerns have been raised that the names used for the application site are incorrect and that the correct names for the whole site are Cors Tyddyn Waen, Cors Tŷ Coch and Cors Bron Haul. Could the Applicant/IACC advise what are, in their opinion, the correct names and ensure that going forward any documentation / correspondence uses the correct place names.	Please see Horizon's response to FWQ 13.0.1 [REP2-002].

FWQ14.0.2: In respect of the Power Station site and the Design and Access Statement, Vol 2 [APP-408]:

(a) Are the design principles set out in Part 5 adequate to meet the 'Criteria for Good Design for energy infrastructure' in respect of 'aesthetics' set out in section 4.5 of EN-1 and would they be adequately secured in the dDCO [APP-029];

(b) Is the concept of a 'Grid Framework' (para. 4.1.9) to underpin the approach to design, layout and master planning appropriate and is it well realised in the design and layout proposals set out in the Design and Access Statement Vol. 2 [APP-408];

(c) Are the proposed indicative landscape palette (Section 6.2); overarching materials palette (Section 6.4) and the colour palette (para. 4.1.22 ff) satisfactory and would they be adequately secured in the dDCO [APP-029]?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	(a) No. The design principles set out in Part 5 of the DAS Volume 2 (text and table) refer to the design criteria in EN-1 and EN-6 with the exception of those listed below. The criteria for good design for energy infrastructure in Section 4.5 of EN-1 also include: • High quality • Inclusive design • Demonstrate how design process was conducted and proposed design evolved • Design options and reasons for favoured choice Further information needs to be submitted to the Examination that demonstrates how the design process was conducted in relation to the need to protect Cestyll Garden, the design options considered, the reasons for the favoured choice and the additional mitigation could be achieved to avoid the impacts. The dDCO does not adequately secure all the design principles in EN-1 and EN-6. It should include requirements to submit detailed designs for the layout, buildings,	<u>Part (a)</u> Paragraph 4.5.1 of NPS EN-1 states “the visual appearance of a building is sometimes considered to be the most important factor in good design. But <u>high quality</u> and <u>inclusive design</u> goes far beyond aesthetic considerations. The functionality of an object – be it a building or other type of infrastructure – including fitness for purpose and sustainability, is equally important.” High quality and inclusive design is therefore achieved when all aspects of good design are considered collectively. Part 5 of the DAS Volume 2 [APP-408] defines the relevant criteria that constitute good design, based on NPS EN-1 and EN-6, and sets out design principles that would adequately secure this. Paragraph 4.5.4 of NPS EN-1 states that “applicants should be able to demonstrate in their application documents <u>how the design process was conducted and how the proposed design evolved</u>. Where a number of different designs were considered, applicants should set out the <u>reasons why the favoured choice has been selected</u>.” Part 3 of the DAS Volume 2 is entitled “Consultation and Design Evolution” and satisfies the Requirements of this paragraph. In relation to Cestyll Gardens specifically, further details are contained within other DCO submission documents: • ES Volume D – WNDA Development D2 – Alternatives and design evolution [APP-121]; • Site Selection Report – Volume 2 – Wylfa Newydd Development Area [APP-437].

	lighting, landscape, etc to IACC for prior approval. (b) Yes, a grid framework approach to the layout of the main buildings is appropriate and it will be necessary to ensure that the flexibility sought by Horizon in the "parameter" approach does not disrupt this grid framework. (c) Yes, the indicative landscape palette, materials palette and colour palette are satisfactory. However, these need to be secured in the dDCO by requirements to submit detailed landscape and habitat schemes in compliance with them to IACC for approval.	In relation to IACC's request for prior approval of detailed designs, Requirement WN3 of the Draft DCO requires detailed designs of the Power Station to be submitted to IACC for approval, prior to commencement of construction. It is intended that the detailed design drawings that have been submitted for approval as part of the DCO will be approved through the DCO process and therefore not subject to further post-DCO approvals by IACC. Requirement WN9 of the Draft DCO requires detailed designs for the final landscape and habitat scheme (including lighting) to be submitted to IACC for approval by 12 months prior to the anticipated Unit 2 Commissioning Date. Further details of Horizon's position in relation to lighting is set out in its response to IACC's Local Impact Report submitted at Deadline 3. <u>Part (b)</u> Both the parameters and the design principles will form the basis of the design details that would be submitted to IACC for approval under Requirement WN3. Design Principle 26 states that the layout of the Power Station should provide a basis for a cohesive and legible development with a sense of identity, which may comprise a grid framework. <u>Part (c)</u> Horizon considers that Design Principles 31, 32, 35 and 62 deliver upon the preferences of consultees and adequately secure the approach to palettes in a satisfactory manner. Horizon notes that IACC will have an approval role under Requirement WN9 in respect of the final detailed designs for the Power Station, including external appearance.

FWQ14.0.3: In respect of the proposed buildings on the Power Station site outside of the Power Island (the 'office-type' and 'industrial' buildings): (a) Would the right mechanisms be in place to achieve architectural excellence; (b) Should arrangements be secured to ensure continuing design review of these elements as the project progresses; and (c) Would there be value in holding design or architectural competitions to achieve buildings of excellence that complement the significant investment in power generation and add value to the employee, visitor and resident experience?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	(a) No. DCO requirements to submit detailed designs of the buildings outside of the Power Island to IACC for approval are required. (b) Yes, these should be subject to review to enable continuing design review of these elements as the project progresses. (c) Yes. Design/architectural competitions could be held to achieve buildings of excellence subject to timescales and the need to ensure that these designs are still subject to IACC approval.	With regard to bullet (a) of IACC response. The draft DCO [APP-029] includes requirement WN3 (1) which states, <i>"No construction may commence in respect of a building or other structure identified in Requirement WN4 and WN5 until plans and written details of the design (including size, external appearance, siting and materials) have been submitted to and approved by IACC."</i> Requirement WN4 refers out to Table WN4A which lists all land based permanent buildings and other structures that are proposed to be built within the Wylfa Newydd Development Area, both buildings that comprise the Power Island and Power Station Site buildings outside of the Power Island. There is therefore a requirement to submit detail designs of the buildings outside of the Power Island to IACC for approval. With regard to bullet (b), please refer to Horizon's response to FWQ14.0.3. With regard to bullet (c), please refer to Horizon's response to FW Q14.0.3.

FWQ14.0.4: Does the approach to design and the proposals for the WNDA meet the project objectives set out in section 2.3 of the Design and Access Statement Vol.1 [APP-407] with respect to: (a) Integrating sustainability into all physical designs; (b) Developing a green and sustainable approach in the development management of the buildings and operational activities; and (c) Ensuring that all the elements are designed to connect with the varied beauty and character of Ynys Môn and conserve and enhance the natural environment as far as possible? If not, what more should be done and how could it be secured?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	a) No. There is insufficient information on the physical designs to be able to say whether sustainability has been fully integrated. For example, there is currently no embedded renewable energy generation and no details on building materials and their sources. (b) No. There is insufficient information on the management of the buildings and operational activities to conclude that these incorporate a green and sustainable approach. (c) No. See the IACC Landscape, Visual, Historic Environment and Ecology LIR chapters for the WNDA and AD sites for further mitigation and enhancements necessary to ensure that the elements limit their impacts on the natural and historic environment. Detailed designs for the WNDA should be submitted to IACC for approval, secured by DCO requirements.	It is important to note that as Horizon's DCO application has taken a parameters approach, there are no physical designs for key elements of the Wylfa Newydd DCO Project. Instead, Horizon has provided defined envelopes for the construction of these elements within the Requirements in Schedule 3 of the draft DCO which outline locations, number and maximum and where relevant minimum dimensions of the various elements of the Wylfa Newydd DCO Project. The parameter approach is detailed and justified in full within chapter 8 of the Design and Access Statement - Volume 1 - Project Wide [APP-407]. A parameters approach is common for DCO applications of the scale, and complexity proposed and to enable flexibility to accommodate changes between the DCO being granted and construction commencing. Although IACC is not specific about which parts of the Wylfa Newydd DCO Project they refer to, the majority of the matters raised by the IACC were addressed by Horizon's response to FWQ14.0.4 submitted at Deadline 2. Further responses are provided below: (a) The design principles contained in section 5 of the Design and Access Statement Volume 2 [APP-408] and section 3 of the Design and Access Statement Volume 3 [409] secure the integration of sustainability into the physical designs of the Wylfa Newydd DCO Project through Requirements WN3, WN19, WN25, OPSF2, PR3, LC3, OH3 contained in the draft Order. (b) Requirement WN10 in the draft DCO [REP2-020] states that the operation and maintenance of the Power Station Works must be carried out in accordance with the Wylfa Newydd Code of Operational Practice (CoOP) [APP-421], unless otherwise approved by IACC. The commitments contained in the Wylfa Newydd CoOP will secure the integration of green and sustainable management principles during the operational phase. (c) Horizon's responses to these matters are contained in the response to IACC's Local Impact Report.

FWQ14.0.4: Does the approach to design and the proposals for the WNDA meet the project objectives set out in section 2.3 of the Design and Access Statement Vol.1 [APP-407] with respect to: (a) Integrating sustainability into all physical designs; (b) Developing a green and sustainable approach in the development management of the buildings and operational activities; and (c) Ensuring that all the elements are designed to connect with the varied beauty and character of Ynys Môn and conserve and enhance the natural environment as far as possible? If not, what more should be done and how could it be secured?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	Our comments relate to the Ynys Môn Area of Outstanding Natural Beauty (AONB) and question (c). Issues concerning the sustainability of the physical design and development management lie beyond our remit. The approach to design is best represented by the contents of the Design and Access Statement Volume 2 and the Landscape and Habitat Management Strategy at 8.16. Of most importance to minimising significant effects on the AONB, and ensuring that the development integrates successfully within the landscape, are: the landscape design principles of the WNDA; the building design principles of the WNDA and Site Campus – particularly the colour palette; the use of lighting to minimise night-time effects; and the design of the MOLF and the Breakwater. The Design and Access Statement Volume 2 covers these appropriately. Aspects missing from the Design and Access Statement Volume 2 which need to be addressed are: (1) The Site Campus development has not been included. We note that its appearance, materials, colour and lighting	The development of the Site Campus is considered in Volume 3 of the Design and Access Statement Appendix 1-2 [REP2-029]. Given the temporary nature of the Site Campus it was considered more appropriate to include it within a separate part of the Design and Access Statement to the Power Station (which is dealt with in Volume 2 [APP-408]). Section 3 of the statement set out how the development of the Site Campus achieves the objectives of good design, including how landscape and visual impacts will be mitigated and minimised. In addition, a number of landscaping design principles provide a commitment to new planting to integrate the Site Campus into the surrounding landscape and with the Power Station. Requirements WN19 and WN21 in the Draft DCO require detailed building and landscaping designs of the Site Campus to be submitted to and approved by IACC in accordance with the design principles contained in Volume 3 of the Design and Access Statement [REP2-029]. The restoration of the site to agricultural use is secured by Requirement WN23 relating to the submission and approval of a Site Campus decommissioning strategy. (2) Please refer to Horizon's response to NRW's Written Representation submitted at Deadline 3 (18 December 2018).

will be seen in combination with the WNDA power station and significantly affect views from the AONB. There needs to be a co-ordinated approach to the detailed design of the visual elements of these two components of the project, to ensure they are complementary and take account of viewpoint analysis from the AONB. It would have been helpful to have had this link between the two elements of development expressly made within the Design and Access Statement Volume 2 and the relevant design principles identified. We advise that this matter needs attention in the dDCO.

(2) Landscape mitigation/ compensation proposals for areas of the AONB where significant visual effects would occur have not been factored into Design and Access Statement Volume 2. We advise that this needs to be considered further to meet fully the objectives of question (c) and needs to be addressed within the dDCO. We provide more comment on this in our Written Representation – see section 7.19.

FWQ14.0.5: Are the Power Station Design Principles set out in the Design and Access Statement Vol.2 [APP-408] Section 5 (page 700 ff), appropriate and sufficient to achieve the following objectives set out in para. 1.5.2 of this document [APP-408] and if not what can be done about it:
(a) Reflect the importance of its setting in Ynys Môn; (b) Uphold the unique culture and language of Ynys Môn; (c) Integrate sustainability into all physical designs; (d) Develop a green and sustainable approach in the development and management of the buildings and operational activities;
(e) Build on the legacy of the Existing Power Station, and help to create a positive for Ynys Môn; (f) Ensure that all the elements are designed to connect with the varied beauty and character of Ynys Môn and conserve and enhance the natural environment as far as possible?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	It has been assumed that this question relates to the design principles for the Power Station set out in Section 5 on p70. No. All of the design principles listed relate to the functionality of the Power Station only and do not achieve any of the objectives listed in (a) – (f).The following need to be done:(a) See IACC answers to Q14.0.2, Q14.0.3 and Q14.0.4 above and Q7.01 – Q7.0.13 and IACC WNDA LIR. (b) See IACC answers to Q10.5.1 – Q10.5.27.(c) See IACC answers to Q14.0.4 above. (d) See IACC answers to A14.0.4 above. (e) See IACC LIR chapter regarding the WNDA Historic landscape for IACC consideration of the extent to which the design responds to the Dame Sylvia Crowe landscape. (f) See IACC answers to Q7.01 – Q7.0.13 and IACC WNDA LIR.	Please refer to Horizon's comments on the responses made by IACC for each of the Written Questions listed. Please also see Horizon's response to the LIR in respect of sections of the LIR listed.

FWQ14.0.5: Are the Power Station Design Principles set out in the Design and Access Statement Vol.2 [APP-408] Section 5 (page 700 ff), appropriate and sufficient to achieve the following objectives set out in para. 1.5.2 of this document [APP-408] and if not what can be done about it:

- (a) Reflect the importance of its setting in Ynys Môn;**
- (b) Uphold the unique culture and language of Ynys Môn;**
- (c) Integrate sustainability into all physical designs;**
- (d) Develop a green and sustainable approach in the development and management of the buildings and operational activities;**
- (e) Build on the legacy of the Existing Power Station, and help to create a positive for Ynys Môn;**
- (f) Ensure that all the elements are designed to connect with the varied beauty and character of Ynys Môn and conserve and enhance the natural environment as far as possible?**

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	We reiterate our comments set out for Q14.0.4.	Please refer to Horizon's comments on NRW's response to FWQ14.0.4 above and Horizon's response to this question submitted at Deadline 2 [REP2-002].

FWQ14.0.7: Bearing in mind its location adjacent to the boundary of the Anglesey AONB, do the Design and Access Statement [REP2-029]; the parameter plans identified in Schedule 2, Part 4 and the Requirements in relation to Off-site Power Station Facilities Work Number 5, in Schedule 3 of the dDCO [APP-029] meet the planning policy objectives in respect of achieving high quality, sustainable development for the Off-site Power Station Facilities; with reference to: (a) Design principles; (b) Master planning strategy; (c) Environmental sustainability; (d) Hard and soft landscaping proposals – including planting proposals; (e) Building and structure footprint, height and massing; (f) Materials and colour palettes; (g) Surface treatments; (h) Lighting; (i) Boundary treatments; (j) Accessibility; (k) Community safety; (l) Maintenance regimes; and (m) Illustrative design proposals. And if not what should be done about it?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	(a) Yes. The design principles (ED01 – ED16) set out in Appendix A of the DAS Volume 3 (Appendix 1-1) do meet planning policy objectives for a high quality, sustainable development and all need to be met but there is currently insufficient detail in the DAS and plans to demonstrate that these will be achieved. Therefore, detailed schemes need to be submitted to IACC for approval to ensure that a high quality, sustainable development for the Off-site Power station Facilities is achieved in accordance with the design principles in the DAS, planning policy and objectives in the development plan and Wylfa Newydd SPG and which limits the impacts on the AONB and neighbouring properties. These need to be secured by DCO requirements and should include the following measures and all those identified in the IACC LIR for the Off-site Power Station facilities: (b) A master plan/layout that incorporates additional screening/planting along the northern and western boundaries of the site. (c) Measures to improve environmental sustainability, e.g. embedded renewable energy generation, electric car charging	Whilst Horizon responded to FWQ.14.0.7 at Deadline 2 (4 December 2018) [REP2-002], the following additional response is provided in order to address IACC's comments in relation to this question: (a) Schedule 3 of the draft DCO, Requirement OPSF2 in respect of any Off-Site Power Station Facilities, requires that no construction may commence until plans and written details of the design (including size, external appearance, and siting) have been submitted to and approved by IACC. Requirement OPSF2 also requires that submitted details must be prepared in accordance with the design and landscaping principles in the Design and Access Statement - Volume 3 – Associated Developments and Off-Site Power Station Facilities [REP2-029 and REP2-030]. (b) The master planning strategy is set out in the Design and Access Statement [REP2-029], in sections 3.3 and 3.4. The screening/planting as proposed in the DAS is informed by the detailed landscape and visual assessment in Chapter E10 – AECC ESL and MEEG E10 – Landscape and visual of the Environmental Statement [APP-248]. The landscape design principle 3.4.33 of the DAS [REP2-029], secured by Requirement OPSF2, states: <i>"Planting will achieve visual screening of the Off-Site Power Station Facilities during the operational phase, as far as reasonably practicable"</i>. (c) The measures to improve environmental sustainability, including the use of sustainably sourced materials, are set out in chapter 5 of the Design and Access Statement [REP2-029] and design principles 3.4.26 and 3.4.28. Regarding electric vehicle charging points (EVCPs) as set out in Horizon's response to FWQ.14.0.8(b) and FWQ.4.0.82 [REP2-002] submitted at Deadline 2 (4 December 2018), it is not considered these are necessary due to the size of the site and the nature of the vehicles that would be located there. It is also relevant that IACC does not currently have a policy requirement for EVCPs to be provided. Design principles for other sites, such as the Park and

	points, the use of local and sustainably sourced building materials for the buildings and other structures, the use of local provenance plants for the landscape scheme and measures to safeguard protected species. (d) Hard and soft detailed landscape schemes for the implementation and management of the landscape on the site.	Ride facility, do include the requirement to provide EVCPs due to the large scale of that facility and its proposed use. a) Hard and soft landscaping proposals are set out in section 4.2 of the DAS [REP2-029] and will be secured by design principles (3.4.31 to 3.4.43) and Requirement OPSF2. b) The building and structure footprint, height and massing are set out in chapter 4 of the DAS [REP2-029]. The final design will be within the parameters set in Requirement OPSF3 in the draft DCO and will be balanced against Horizon's functional, operational, safety and security needs as per the design principles (design principle 3.4.8, 3.4.9 to 3.4.11, 3.4.26). c) Details of materials and colour palettes are in chapter 4 of the DAS [REP2-029]. As stated in the design principles, the visual appearance of the development will blend into the existing landscape. d) These designs must be in accordance with the principles in the set out in section 3 of the DAS [REP2-029] which include principles relating to the use of permeable materials. e) The lighting scheme is set out in section 4.5 of the DAS [REP2-029] and controlled through design principles which seek to reduce light spill on sensitive receptors whilst meeting operational needs (design principle 3.4.47 to 3.4.49). f) Refer to b) above. g) Accessibility matters are set out in section 4.5 of the DAS [REP2-029] and secured through design principles relating to vehicular, pedestrian and cyclist access (design principles 3.4.16, 3.4.18 and 3.4.19). h) Requirement OPSF1 of the draft DCO requires the Off-Site Power Station Facilities to be constructed in accordance with the Off-Site Power Station Facilities sub-CoCP [REP2-034]. i) Maintenance matters are set out in section 7.3 and 8.4 of the DAS [REP2-029] and Horizon is required through a design principle to undertake maintained and replacement programmes (design principle 3.4.35). j) Illustrative design proposals are set out in Part B chapters 4 to 9 of the DAS [REP2-029].

FWQ14.0.9: Is the relationship between the proposed MEEG/AECC building on the Offsite Power Station Facilities site and the residential property to the east of the proposed building satisfactory – see Design and Access Statement Vol. 3 Part 1) [APP-409] Figures 20 (page 41) and 32 (page 55). If not, why not?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	No. The proposed MEEG/AECC building is too close to the residential properties to the north, northeast and east and should be moved southwards, away from the northern boundary so that screen planting can be established along that boundary.	As no detailed designs have been submitted for approval, the Off-Site Power Station Facilities will be subject to a parameters approach in the application. Requirement OPSF2 of the Draft DCO [REP2-020] requires detailed design proposals to be submitted and approved by IACC in accordance with the design and landscaping principles contained in Volume 3 of the Design and Access Statement [APP-409] and the parameters in Schedule 3 of the Draft DCO [REP2-020]. These design principles commit Horizon to the implementation of landscape planting and boundary treatment to integrate the development into the surrounding landscape. While the operational functionality of the Off-site Power Station Facilities is a key design consideration, there are a number of design principles which seek to control site and impacts on neighbouring residential properties including: • 3.4.9: Buildings will be positioned, designed, and orientated to reduce their effects on the surrounding areas as far as practicable within operational requirements; • 3.4.10: The site building design layout will seek to minimise noise at nearby noise sensitive receptors as far as reasonably practicable within operational requirements; • 3.4.21: The closest residential receptors (to the south of the boundary of the site) will be screened from the fixed plant area and substation by the MEEG/AECC building; • 3.4.26: The architectural design of the buildings, including scale, massing and materials, will complement the agricultural setting and location beyond the settlement boundary in the countryside, as far as practicable. The parameter zones that have been shown on the Parameter Plans [REP2-017 and REP2-018] have been based on these design principles and operational requirements. Whilst no detailed designs are submitted for approval in the application, as explained in Volume 3 of the Design and Access Statement [REP2-029 to REP2-036] illustrative designs and details of the design evolution set out in Volume 3 show how the design of the Off-Site Power Station Facilities has achieved a balance between the need for a functional design that satisfies nuclear safety and operational requirements.

		On the basis of the above, it is not considered that the parameters or design principles indicated for the siting and size of the proposed MEEG/AECC building as set out in the application should be amended.

FWQ14.0.10: Do the Design and Access Statement [APP-409]; the parameter plan identified in Schedule 2, Part 4 and the Requirements in relation to Site Campus Works Work Number 3, in Schedule 3 of the dDCO [APP-029], including the maximum dimensions shown in WN20, meet the planning policy objectives in respect of achieving high quality, sustainable development for the Site Campus; with reference to: (a) Design principles; (b) Master planning strategy; (c) Environmental sustainability; (d) Hard and soft landscaping proposals – including planting proposals; (e) Building and structure footprint, height and massing; (f) Materials and colour palettes; (g) Surface treatments; (h) Lighting; (i) Boundary treatments; (j) Accessibility; (k) Community safety; (l) Maintenance regimes; and (m) Illustrative design proposals. If not what should be done about it?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	(a) Yes. The design principles (ED01 – ED28) set out in Appendix A of the DAS Volume 3 (Appendix 1-2) do meet planning policy objectives for a high quality, sustainable development and all need to be met but there is currently insufficient detail in the DAS and plans to demonstrate that these will be achieved. Therefore, detailed schemes need to be submitted to IACC for approval to ensure that a high quality, sustainable development for the Site Campus is achieved in accordance with the design principles in the DAS, planning policy and objectives in the Wylfa Newydd SPG and which limits the impacts on the AONB and seascape. These need to be secured by DCO requirements and should include the following measures and all those identified in the IACC LIR for the Site Campus: (b) A master plan/layout that removes the blocks on Wylfa Head and relocates the MUGA further from the bat barn. (c) Measures to improve environmental sustainability, eg embedded renewable energy generation, electric car charging points, the use of local and sustainably sourced building materials for the buildings and other structures, the use of local	Please refer to Horizon's response to FWQ.14.0.10 submitted at Deadline 2 (4 December 2018) in respect of how the Site Campus will achieve high quality, sustainable design. As noted by IACC, Requirements WN19 and 21 provide that Horizon must submit detailed design drawings for the detailed design of the Site Campus (landscaping and building design) and management schemes to IACC for approval. These designs must be in accordance with the parameters in Schedule 3 of the draft DCO and the design, landscaping and management principles set out in the Design and Access Statement [APP-407 to APP-410] and the Landscape and Habitat Management Strategy [APP-424 and APP-425] Horizon notes that a number of the measures noted by IACC are secured through design principles or the Requirement including: (c) Design principle 3.4.32 and 3.4.45; (d) Requirement WN(4); (e) Through the parameters which set quite tight envelopes for the Site Campus buildings and design principle 3.4.12; (f) Design principles 3.4.31 and 3.4.16; (g) design principles have already been provided in respect of drainage at 3.4.49 – 3.4.51; (h) Design principle 3.4.43; (i) Design principle 3.4.28; (j) Horizon has removed the direct access gates from the Site Campus to Wylfa Head, which will be reflected on updated designs that will be submitted into Examination; (l) See (d) above; Horizon will also be incentivised to maintain the Site Campus in order to ensure it is attractive to the workforce; (m) Illustrative designs have been provided as part of the Design and Access Statement;

provenance plants for the landscape scheme.

(d) Hard and soft detailed landscape schemes for the implementation and management of the landscape on the site.

(e) Consideration should be given to minimising the footprint, height and massing of the buildings.

(f) Materials and colour palettes should be based on a "blend" rather than "bold" approach.

(g) The colour and materials of surface treatments including the use of permeable paving where appropriate (to allow ground water recharge but avoid pollution).

(h) Detailed lighting scheme that avoids night glow and light spill onto nearby receptors.

(i) Design of security fence to be sensitive to its location alongside the WCP.

(j) Accessibility – measures to limit accessibility between site campus and nearby sensitive landscape and ecological receptors, including Wylfa Head and Tre'r Goff SSSI.

(k) Measures to support community cohesion are set out within the appropriate chapter of the IACC LIR.

(l) Detailed maintenance schemes for the hard and soft landscaping and also for the buildings, surfacing, etc on the site.

(m) Illustrative design proposals need to be incorporated into the above detailed schemes.

In respect of (b), the proposed design has been assessed with the ES, furthermore the Design and Access Statement Volume 2 [APP-408] which sets out the design evolution of the site campus including how it delivers the objectives of good design as set out in NPS EN-1

(k) Is not considered relevant given the isolation for the Site Campus from the community.

FWQ14.0.10: Do the Design and Access Statement [APP-409]; the parameter plan identified in Schedule 2, Part 4 and the Requirements in relation to Site Campus Works Work Number 3, in Schedule 3 of the dDCO [APP-029], including the maximum dimensions shown in WN20, meet the planning policy objectives in respect of achieving high quality, sustainable development for the Site Campus; with reference to: (a) Design principles; (b) Master planning strategy; (c) Environmental sustainability; (d) Hard and soft landscaping proposals – including planting proposals; (e) Building and structure footprint, height and massing; (f) Materials and colour palettes; (g) Surface treatments; (h) Lighting; (i) Boundary treatments; (j) Accessibility; (k) Community safety; (l) Maintenance regimes; and (m) Illustrative design proposals. If not what should be done about it?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	Our comments relate to the appearance of the development from the AONB. We would defer to IACC for commentary on other visual impacts. We are satisfied that the AONB has been considered within the contextual analysis and the design principles. The form and scale of the development is driven by the needs of the development. Massing appears to have been planned to work within the angle of view presented within figures 28, 30 and 31 (Design and Access Statement Volume 3), however there is no comparable view from the AONB to be able to judge this aspect. We are therefore uncertain as to how this aspect of the design has addressed the AONB. The design principles for the colour palette appropriately draw from the colour of the existing landscape and the development's visual context. We consider the approach set out in Volume 3 makes a good start, but needs to be developed further in the following areas: The colour scheme needs to be reviewed from a number of angles of view including views from the AONB and Wales Coastal Path and design iteration applied	Horizon notes the comment from NRW that they are satisfied with the consideration given to the AONB within the contextual analysis and design principles for the development. Regarding appearance of the development from the AONB, it is assumed that NRW are referring to the design of the Site Campus. This is because the figures referred to in the NRW response (28, 30 and 31) in volume 3 of the Design and Access Statement (Associated Developments and Off-Site Power Station Facilities) (Part 1 of 2) [APP-409] illustrate the Site Campus. NRW request a similar illustration is provided from Llanbadrig Point within the AONB (equivalent to Photomontage view 11 of the Power Station in appendix D10-8 of the ES [APP-199]). Horizon confirm that the illustrative views of the Site Campus shown on the front cover and in figures 27a (colour options), 27c (colour palette design and assessment) and 28 (preferred building colour development model) of appendix 1-2 (The Site Campus) to Volume 3 of the Design and Access Statement [APP-409] are from Llanbadrig Point on the Wales Coast Path within the AONB. It is acknowledged that the location of these illustrative views is not specifically stated in the Design and Access Statement [APP-409]. Paragraph 4.3.44 of the Design and Access Statement [APP-409] notes that <i>"it [is] expected that the final colours will be subject to review with the planning authority as part of the approval process under the DCO Requirements."</i> Requirement WN19 of the Draft DCO [REP2-020] on detailed design approval for the Site Campus, requires that no construction of the Site Campus may commence in respect of a building or other structure identified in Requirement WN20 until plans and written details of the design have been submitted to IACC for approval. The details must be prepared in accordance with the design principles relating to the Site Campus in volume 3 of the Design and Access Statement [APP-409], which includes architectural building design principles at section 4.3. As NRW are a statutory consultee, it is anticipated that the IACC would consult NRW on this submission, in so far as it relates to AONB issues.

	based upon this contextual analysis. • The view is not static and at times the exposed coastal edge combines with woodland to give a strong sense of colour (exposed rock) and to create strong horizontal emphasis within the landscape/ seacape context of the development site. Colour, horizontal form and scale of use could therefore be better echoed in the site campus development. • To be satisfied that the AONB has been fully considered within the development's design at this stage, we recommend drawings similar to figures 30 and 31 (DAS Vol3) be submitted to confirm the development's massing and colour design within views from viewpoint 11 Llanbedrig point (Appendix D10-8 photomontage views). We advise that this information be made a requirement of the DCO and approved by the discharging authority in consultation with NRW.	Horizon do not therefore consider that any further DCO Requirement is needed.

FWQ14.0.10: Do the Design and Access Statement [APP-409]; the parameter plan identified in Schedule 2, Part 4 and the Requirements in relation to Site Campus Works Work Number 3, in Schedule 3 of the dDCO [APP-029], including the maximum dimensions shown in WN20, meet the planning policy objectives in respect of achieving high quality, sustainable development for the Site Campus; with reference to: (a) Design principles; (b) Master planning strategy; (c) Environmental sustainability; (d) Hard and soft landscaping proposals – including planting proposals; (e) Building and structure footprint, height and massing; (f) Materials and colour palettes; (g) Surface treatments; (h) Lighting; (i) Boundary treatments; (j) Accessibility; (k) Community safety; (l) Maintenance regimes; and (m) Illustrative design proposals. If not what should be done about it?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NWWT	This ExA question is asked of IACC, NWWT have supplied to IACC a brief note of issues that we felt were of relevance to this matter in relation to biodiversity (the environment being one of the 3 pillars of sustainable development). It is hoped that this may have been useful and to some extent reflected in the Council's response to this question. Additionally, we wish to draw the Examining Body's attention to the NWWT written representation on 'Biodiversity – Tre'r Gof SSSI and the Temporary Site Campus' which in Chapter 3 discusses the construction impacts and the design of the scheme.	Please refer to Horizon's response to FWQ14.0.10 [REP2-002] submitted at Deadline 2 (4 December 2018) and Horizon's response to the NWWT WR and eNGO Written Representation submitted at Deadline 3 (18 December 2018).

Q14.0.12: Do the Design and Access Statement [APP-410]; the Parameter Plans identified in Schedule 2, Part 4; the Detailed Design Plans identified in Schedule 2, Part 6 and the Requirements in relation to Park and Ride Facility Work Number 6 in Schedule 3 of the dDCO [APP-029] meet the planning policy objectives in respect of achieving high quality, sustainable development for the Park and Ride facility at Dalar Hir; with reference to: (a) Design principles; (b) Master planning strategy; (c) Environmental sustainability; (d) Hard and soft landscaping proposals – including planting proposals; (e) Building and structure footprint, height and massing; (f) Materials and colour palettes; (g) Surface treatments; (h) Lighting; (i) Boundary treatments; (j) Accessibility; (k) Community safety; (l) Maintenance regime; and (m) Post-operation strategy. If not, what should be done about it?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	(a) Yes. The design principles (ED01 – ED18) set out in Appendix A of the DAS Volume 3 (Appendix 1-3) do meet planning policy objectives for a high quality, sustainable development and all need to be met but there is currently insufficient detail in the DAS and plans to demonstrate that these will be achieved. Therefore, detailed schemes need to be submitted to IACC for approval to ensure that a high quality, sustainable development for the Park & Ride is achieved in accordance with the design principles in the DAS, planning policy and objectives in the Wylfa Newydd SPG and which limits the impacts on landscape fabric, character and neighbouring properties. These need to be secured by DCO requirements and should include the following measures and all those identified in the IACC LIR for the Park & Ride: (b) A master plan/layout that reduces the impacts on Important Hedgerows. (c) Measures to improve environmental sustainability, eg imbedded renewable energy generation, electric car charging points, the use of local and sustainably sourced building materials for the buildings	Please refer to Horizon's response to FWQ14.0.12 submitted at Deadline 2 (4 December 2018) [REP2-002] which sets out how Horizon considers that the design of the Park and Ride facility meets the objectives of achieving high quality, sustainable development. Please also refer to Horizon's response to the LIR Park and Ride Chapter. In particular, Horizon would like to note that: (a) The Park and Ride - Clearance and Demolition Plan [APP-023] illustrates that Horizon has limited the amount of Important Hedgerow that it proposes to remove as part of the site clearance. The remaining sections have been incorporated into the design. (b) A detailed decommissioning scheme has been secured through Requirement PR6 in the Draft DCO. (c) Design principles are provided in respect of lighting, the security fencing and gated access, flood mitigation, maintenance of planted landscaping, colour selection, provision of transport services (i.e. bus stop roundabout, and highway access), restoration of any removed hedgerow and low energy design as set out in Volume 3 of the Design and Access Statement (REP2-030).

and other structures, the use of local provenance plants for the landscape scheme.

(d) Hard and soft detailed landscape schemes for the implementation and management of the landscape on the site.

(e) Consideration should be given to minimising the footprint, height and massing of the buildings.

(f) Materials and colour palettes to be based on a "blend" rather than "bold" approach.

(g) The colour and materials of surface treatments including the use of permeable paving where appropriate (to allow ground water recharge but avoid pollution).

(h) Detailed lighting scheme that avoids night glow and light spill onto nearby receptors.

(i) Design of security fence to be sensitive to its location, to run around the boundary of the site and inside the boundary vegetation, with alternative security measures within the site.

(j) The provision of a public transport service with access into the site and amendments to the proposed park and ride roundabout.

(k) Detailed design to address the issue of flood risk to ensure the safety of the worker community. (l) Detailed maintenance schemes for the hard and soft landscaping and also for the buildings, surfacing, etc on the site.

(m) A detailed decommissioning scheme.

Q14.0.13: Bearing in mind its location within the Anglesey AONB, do the Design and Access Statement [APP-409, APP-410]; the parameter plans identified in Schedule 2, Part 4; the Detailed Design Plans identified in Schedule 2, Part 6 and the Requirements in relation to Logistics Centre Work Number 7 in Schedule 3 of the dCO [APP-029] meet the planning policy objectives in respect of achieving high quality, sustainable development for the Logistics Centre at Parc Cybi; with reference to:

(a) The appropriateness of the proposed use for the site; (b) Hours of operation; (c) Design principles; (d) Master planning strategy; (e) Environmental sustainability; (f) Hard and soft landscaping proposals – including planting proposals; (g) Building and structure footprint, height and massing; (h) Materials and colour palettes; (i) Surface treatments; (j) Lighting; (k) Boundary treatments; (l) Accessibility; (m) Community safety; (n) Maintenance regimes; and (o) Post-operation strategy. If not, what should be done about it?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	(a) Partly, as the site is within Holyhead and environs (see SPG GP33), in the A55 corridor (see SPG GP 35) and on an existing industrial estate. However, it is in the AONB. (b) As the site is an allocated employment site, in planning terms operating hours are acceptable however lighting schemes need to be further developed and should be subject to detailed approval (c) Yes, the design principles (ED01 – ED19) set out in Appendix A of the DAS Volume 3 (Appendix 1-4) do meet planning policy objectives for a high quality, sustainable development and all need to be met but there is currently insufficient detail in the DAS and plans to demonstrate that these will be achieved. Therefore, detailed schemes need to be submitted to IACC for approval to ensure that a high quality, sustainable development for the Logistics Centre is achieved in accordance with the design principles in the DAS, planning policy and objectives in the Wylfa Newydd SPG and which limits the impacts on the AONB.	In response to IACCs comments in relation to FWQ14.0.13, please refer to Horizon's response to Examining Authority FWQ14.0.13 [REP2-002] submitted at Deadline 2 (4 December 2018).

These need to be secured by DCO requirements and should include the following measures and all those identified in the IACC LIR for the Logistics Centre:

- (d) A master plan/layout that enables more of the mature woodland in the corner of the site to be retained.
- (e) Measures to improve environmental sustainability, eg imbedded renewable energy generation, electric car charging points, the use of local and sustainably sourced building materials for the buildings and other structures, the use of local provenance plants for the landscape scheme.
- (f) Hard and soft detailed landscape schemes for the implementation and management of the landscape on the site.
- (g) Consideration should be given to minimising the footprint, height and massing of the buildings.
- (h) Materials and colour palettes to be based on a "blend" rather than "bold" approach.
- (i) The colour and materials of surface treatments including the use of permeable paving where appropriate (to allow ground water recharge but avoid pollution).
- (j) Detailed lighting scheme that avoids night glow and light spill onto nearby receptors.
- (k) Design of security fence to be sensitive to its location in the AONB.
- (l) A commitment to secure public transport provision to the site
- (m) Effects upon community safety are considered adequate.

	(n) Detailed maintenance schemes for the hard and soft landscaping and also for the buildings, surfacing, etc on the site. (o) A detailed decommissioning scheme	

FWQ14.0.13: Bearing in mind its location within the Anglesey AONB, do the Design and Access Statement [APP-409, APP-410]; the parameter plans identified in Schedule 2, Part 4; the Detailed Design Plans identified in Schedule 2, Part 6 and the Requirements in relation to Logistics Centre Work Number 7 in Schedule 3 of the dDCO [APP-029] meet the planning policy objectives in respect of achieving high quality, sustainable development for the Logistics Centre at Parc Cybi; with reference to: (a) The appropriateness of the proposed use for the site; (b) Hours of operation; (c) Design principles; (d) Master planning strategy; (e) Environmental sustainability; (f) Hard and soft landscaping proposals – including planting proposals; (g) Building and structure footprint, height and massing; (h) Materials and colour palettes; (i) Surface treatments; (j) Lighting; (k) Boundary treatments; (l) Accessibility; (m) Community safety; (n) Maintenance regimes; and (o) Post-operation strategy. If not, what should be done about it?

Interested Party	IP response to FWQ	Horizon's Comments
NRW	The Parc Cybi site LDP allocation supports a major area of business development within the AONB. Attention to design, and to the existing character and appearance of the area, are important to placemaking. Whilst the development and use of the site for Wylfa Newydd is temporary, the infrastructure it puts in place is likely to remain and be reused. The physical components of the development will have a legacy and will inevitably influence the planning and design of development that will come forward in the future. We consider more could therefore be done to extend the planting strategy of native hedgerow with trees along the frontage of the site with Parc Cybi road, to provide a lasting high-quality landscape infrastructure to the site (subject to CCTV and highway sightlines). We recommend the landscape masterplan (Figure 19 DAS Vol 3 (part2/2)) be amended and a commitment made in the dDCO for these proposals to be included within the detailed design.	Please refer to Horizon's response to FWQ 14.0.13 submitted at Deadline 2 (4 December 2018) [REP2-002]. The updated Design and Access Statement – Volume 3 – Associated Developments and Off-Site Power Station Facilities [REP2-029 and REP2-030] contains design principles that requires Horizon to provide hedgerow planting to reinforce and enhance existing hedgerows along the northern boundary of the site and to define and reinforce the boundaries of the site (where practicable); however, the ability to provide hedgerow along the front of the site is limited due to the need to maintain sightlines for safety and security reasons.

FWQ17.0.4: Does the Application help deliver the following: (a)Climate Change Strategy for Wales (Welsh Government, 2010); (b)Low Carbon Revolution – Welsh Government Energy Policy Statement (2010); (c) Energy Wales : A Low Carbon Transition; (d)Economic Renewal: A New Direction (Welsh Government, 2010) (e)Cymraeg 2050: Welsh Language Strategy (2017)		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	Natural Resources Wales would defer to Welsh Government as the appropriate body to comment on policy matters in Wales.	Horizon has nothing further to add in addition to its original response to FWQ.17.0.4 submitted at Deadline 2 (4 December 2018) [REP2-002]. It is noted that the Welsh Government's response to this question aligns with Horizon's response in that the application does help to deliver the objectives and goals set out in the documents referred to in this question which, for ease of reference, are listed below: a) Climate Change Strategy for Wales (Welsh Government, 2010) b) Low Carbon Revolution – Welsh Government Energy Policy Statement (2010); c) Energy Wales: A Low Carbon Transition; d) Economic Renewal: A New Direction (Welsh Government, 2010); and e) Cymraeg 2050: Welsh Language Strategy (2017)

FWQ17.0.6: The applicant states in the Planning Statement [APP-406] that the Technical Advice Notes (TANs) that were in place prior to the adoption of EN-1 and EN-6 are considered to attract less weight than those that were adopted subsequently. This would include:- • TAN 11: Noise (1997) • TAN 15: Development and Flood Risk (2004) • TAN 18: Transport (1997) Can the parties comment on the weight they consider should be given to these documents? Of the relevant TANs that post-date the NPSs are there any aspects of the application that the parties consider fail to conform with or contradict these TANs?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The IACC disagrees. TANs provide detailed advice on topic specific matters in the Welsh planning context. The detailed points considered therein apply to all development in Wales. NSIPs in Wales should seek to comply with these or justify departure as they concern matters of detail which are not covered in or addressed by the NPSs.	Horizon's position on the role of Welsh national policy in decision making for NSIPs is set out in section 5 (from paragraph 5.4.42) of the Planning Statement [APP-406] (and briefly in Horizon's Written Representation at paragraph 3.2.1 [REP2-003]). It acknowledges that the TANs (alongside PPW and the Wales Spatial Plan) comprise the principal components of the strategic national planning policy framework that inform the preparation of local development plans. The statement made at paragraph 5.4.42 of the Planning Statement does not suggest that the TANs are not relevant. It relates specifically to the TANs adopted prior to NPS EN-1 and EN-6. It is not considered that these TANs have less weight per se, but that they were already taken into account when NPS EN-1 and EN-6 were prepared.

FWQ17.0.06: The applicant states in the Planning Statement [APP-406] that the Technical Advice Notes (TANs) that were in place prior to the adoption of EN-1 and EN-6 are considered to attract less weight than those that were adopted subsequently. This would include:- • TAN 11: Noise (1997) • TAN 15: Development and Flood Risk (2004) • TAN 18: Transport (1997) Can the parties comment on the weight they consider should be given to these documents? Of the relevant TANs that post-date the NPSs are there any aspects of the application that the parties consider fail to conform with or contradict these TANs?

Interested Party	IP Response to FWQ	Horizon's Response to First Written Questions
NRW	Natural Resources Wales would defer to Welsh Government as the appropriate body to comment on policy matters in Wales, particularly in relation to the weight that should be given to various policies. As advised in NRW's Written Representations on flood risk (sections 7.1, 9.1 and 10.1), NRW consider that aspects of the proposals are not compliant with TAN15.	Horizon's position on the role of Welsh national policy in decision making for NSIPs is set out in section 5 (from paragraph 5.4.42) of the Planning Statement [APP-406] (and briefly in Horizon's Written Representation at paragraph 3.2.1 [REP2-003]. Horizon, however, notes NRW's deferral to Welsh Government on policy matters. Please refer to Horizon's response to NRW's Written Representation. In respect of the Park and Ride facility, Horizon submitted updated detailed design drawings at Deadline 2 [REP2-019] which included additional flood mitigation. Horizon considers that these amended plans will resolve NRW's concerns in respect of the Park and Ride.

FWQ Q17.0.6: The applicant states in the Planning Statement [APP-406] that the Technical Advice Notes (TANs) that were in place prior to the adoption of EN-1 and EN-6 are considered to attract less weight than those that were adopted subsequently. This would include:-

- **TAN 11: Noise (1997)**
- **TAN 15: Development and Flood Risk (2004)**
- **TAN 18: Transport (1997) Can the parties comment on the weight they consider should be given to these documents? Of the relevant TANs that post-date the NPSs are there any aspects of the application that the parties consider fail to conform with or contradict these TANs?**

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
WG	Pursuant to S.105 Planning Act 2008, Welsh Government considers the planning policy documents listed in its written representation to be an "important and relevant consideration" and material consideration in the determination of the Wylfa Newydd DCO application TANs continue to be an "important and relevant considerations" pursuant to s105 PA 2008, which can be given due weight. The proposed development doesn't fall to be considered under s104 and therefore it does not automatically follow that they should be given less weight on the basis that they were adopted prior to EN1 and EN6 if they are matters relevant to consideration of the application.	Horizon's position on the role of Welsh national policy in decision making for NSIPs is set out in section 5 (from paragraph 5.4.42) of the Planning Statement [APP-406] (and briefly in Horizon's Written Representation [REP2-003] at paragraph 3.2.1). It acknowledges that the TANs (alongside PPW and the Wales Spatial Plan) comprise the principal components of the strategic national planning policy framework that inform the preparation of local development plans. The statement made at paragraph 5.4.42 of the Planning Statement does not suggest that the TANs are not relevant. It relates specifically to the TANs adopted prior to NPS EN-1 and EN-6. It is not considered that these TANs have less weight per se, but that they were already taken into account when NPS EN-1 and EN-6 were prepared.

FWQ17.0.9: Applicant - in paragraph 5.4.51 and 5.4.5-5.4.7 of the Planning Statement you state that parts of the revised SPG are, in your opinion, inconsistent with JLDP and advice from the Planning Inspectorate on SPG's for NSIPs. Can you: (a) Provide further explanation of where you consider the draft SPG is inconsistent with these documents? (b) Advise whether the SPG and relevance of SPG on pages 60 and 61 of the Planning Statement needs to be updated to reflect any progress made on the adoption/approval of the SPG? (c) In light of the above what weight do you consider should be given to the SPG? IACC – Please respond to the applicants comment with regards to the alleged inconsistencies between the SPG and the JLDP and advice provided in the PINS Advice Note 2?

IACC:

(a) Provide an update on the draft Wylfa Newydd Supplementary Planning Guidance 2018 (the SPG) that is referred to in paragraphs 5.4.48 to 5.4.1 of the Planning Statement [APP-406]? (b) Provide a copy of the most recent version of the SPG and indicate what weight you consider it should be given. (c) If the SPG has been adopted, outline what you consider are the implications for the Application?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	(a) The Wylfa Newydd SPG was formally adopted by the IACC on the 15th May 2018. (b) The IACC append a copy of the Wylfa Newydd SPG (the IACC have not included the Topic Papers or other supporting documents but can do on request). (c) The IACC has made submissions on the weight which should be given to the SPG in its Written Representation, please see section 2. (d) The SPG was originally adopted in July 2014 and reviewed and revised following the adoption of the JLDP. That review did not change the fundamental principles and objectives of the document. The IACC has consistently maintained that the SPG should be given significant weight and that Horizon should take it into account in developing the proposals. Given that this guidance has been available to Horizon throughout the iterative design and that the 2018 SPG is an up-to-date adopted document, the IACC considers that the project should be assessed against it and	Horizon address the role of the 2018 Wylfa SPG in its Written Representation [REP2-003]. Whilst it may be an 'important and relevant' consideration (in the context of s105 of the Planning Act 2008) in informing the Local Impact Report, the JLDP represents the primary local planning policy position, and this must be considered in the context of the primacy of the NPSs in determining NSIPs. Horizon therefore considers that weight should be given to the 2018 SPG in so far as it is consistent with NPS EN-1 and EN-6 and local planning policy in the JLDP. Horizon recognize that, in this regard, there is some helpful guidance in the SPG on considerations that would apply to the consideration of the siting of Associated Development, including in particular the Site Campus, in the LIR which generally reflect the consideration in the NPS with regard to environmental impact. Given that Horizon's site selection process was carried out prior to the publication and adoption of the 2018 SPG, Horizon is clear in the Site Selection Reports [APP-436 to APP-442] that the guidance in the 2018 SPG was therefore not informative in the selection of sites, but Horizon's view is that the Associated Development sites do accord with the 2018 SPG. Horizon's Written Representation provides an overview of the support that the 2018 SPG provides for the principle of delivery of embedded mitigation through each of the Associated Developments. As the Examining Authority will see from Horizon's representation to the SPG consultation, Horizon's principle concern was that the January 2018 draft SPG appeared to give a preference towards temporary worker accommodation being located on consented sites in Holyhead, whereas Policy PS10 in the JLDP guided the Applicant to a sequential approach, where existing accommodation and

	non-conformities justified, reduced or mitigated. The IACC does not accept that the SPG is inconsistent with the JLDP. Horizon, in their consultation response to the SPG prior to the 2018 adoption, raised points where they considered the SPG to be inconsistent – the IACC considered that consultation response carefully and determined that there is no inconsistency. A detailed report was produced following consultation noting and explaining each of these points, an extract of that concerning Horizon's submissions on inconsistency can be provided. Inconsistency with the JLDP would be a ground to legally challenge the adoption of the SPG and that this would be the appropriate remedy should Horizon genuinely believe that the SPG is inconsistent – Horizon raised no such challenge with the statutory period.	provision of permanent accommodation capable of re-use are considered first, before considering temporary worker accommodation (see analysis in the Planning Statement and Written Representation). The JLDP also gives equal preference to temporary worker accommodation being located on the Site Campus and on sites located adjacent or well related to settlements, which Horizon did not consider was clear in the draft SPG.

FWQ17.0.11: Do the parties consider that within the Welsh national context, there are any other present or forthcoming future policies, strategies or initiatives that are relevant to the examination and should therefore be considered by the ExA during the examination?		
Interested Party	IP Response to FWQ	Horizon's Response to First Written Questions
IACC	It is understood that the Welsh Government proposes to publish Edition 10 of Planning Policy Wales in December 2018, which will supersede Edition 9 PPW. Edition 9 of Planning Policy Wales (PPW) has been reworked into policy themes around the well-being goals, with policies updated to reflect new Welsh Government strategies. A55 Preferred route for the third Menai Crossing has been announced, with the TR111 protected route for planning purposes published. This shows progress being made to achieve the development of an additional crossing to alleviate current congestion.	The implications of the adoption of PPW 10 are addressed in brief at paragraphs 3.2.2 – 3.2.6 of Horizon's Written Representation [REP2-003] (with reference to the section on Welsh national planning policy at section 5 of the Planning Statement). Please also refer to Horizon's response to FWQ17.0.8 [REP2-002] in relation to any forthcoming policy from PPW10. Horizon note the preferred route for the Third Menai Crossing. As noted in the response to FWQ11.1.50 no further environmental information is available as to the scope or likely content of the ES, or any likely further environmental surveys that will be undertaken. It is therefore not possible to update the cumulative assessment in the DCO Transport Assessment [APP-101] to take a Third Menai Crossing into account.

FWQ17.0.11: Do the parties consider that within the Welsh national context, there are any other present or forthcoming future policies, strategies or initiatives that are relevant to the examination and should therefore be considered by the ExA during the examination?		
Interested Party	IP Response to FWQ	Horizon's Response to First Written Questions
NRW	The tenth edition of Planning Policy Wales is due in December 2018 and will be a material consideration for the ExA during the Examination. In relation to the Water Framework Directive, NRW has released an updated WFD classification for freshwaters (rivers and lakes) on Water Watch Wales. The marine classification (transitional and coastal water bodies) is expected during late 2018 or early 2019.	The implications of the adoption of PPW 10 are addressed in brief at paragraphs 3.2.2 – 3.2.6 of Horizon's Written Representation [REP2-003] (with reference to the section on Welsh national planning policy at Section 5 of the Planning Statement [APP-406]). In relation to the updated WFD classification, Horizon can confirm that this would have no impact on any of the waterbodies within or near to the WNDA.

FWQ17.0.14: Several references have been made regarding the need for the application to deliver a long term legacy for Ynys Môn. Can the IACC explain where this aspiration is set out in adopted policy such as the JLDP and whether in their opinion the proposal would comply with such a policy and if not, why not?

Interested Party	IP Response to FWQ	Horizon's Response to First Written Question
IACC	At the heart of the JLDP's strategy is anticipated transformational economic change arising from the major infrastructure projects on Anglesey, in particular the Island's Enterprise Zone status and the development of a nuclear power station at Wylfa Newydd [...] This objective is translated into policy. In the Council's opinion 'legacy' can take a number of forms, - on the ground changes or positive changes in the Island's socio-economic profile. Of particular relevance are criteria in Policy PS 9 Wylfa Newydd and related development, namely criteria 3, 5, 6, 9, 10, & 15 and criterion 1 of Policy PS 12. The proposals do not comply with the JLDP policies' need to consider, promote and secure a positive legacy from the development. The approach taken seeks to monitor and then address impacts rather than avoid or minimise them. Legacy has not been built into the proposals and only the immediate needs of the project itself have received meaningful consideration. The correct approach of pro-actively avoiding adverse impacts occurring would, in and of itself, help to deliver legacy. For	Horizon fundamentally disagree that the proposals do not "consider, promote and secure a positive legacy from the development". Horizon's Written Representation [REP2-003] provides a summary of the long-term legacy benefits of long term legacy benefits of the Wylfa Newydd DCO Project as set out in the DCO application and the draft DCO s.106 agreement (which has been submitted at Deadline 3 (18 December 2018)). The Wylfa Newydd DCO Project will, as well as playing a vital role in contributing to the urgent need for new low carbon, secure and reliable energy (which is a significant and long term benefit for the whole of the UK), deliver other long term and positive local legacy benefits. These are summarised at Section 4 of Horizon's Written Representation [REP2-003]. The IACC's response takes a very narrow view of 'legacy' and focuses only on the physical delivery of built form, through the Associated Developments, that could be utilised beyond the construction period. It does not recognise the significant and long lasting benefits that will be delivered by the Wylfa Newydd DCO Project through: • Economic investment and job creation • Infrastructure improvements • Support for the Welsh language • Leisure and recreation enhancements • Promotion of tourism • Skills and education • Capacity enhancements in housing through financial contribution • Support for community projects through the Community Fund • Environmental enhancements through site remediation and habitat creation

example, the Plan (at 6.3.21) requires the consideration of re-use or conversion of buildings or provision of permanent buildings before temporary buildings are considered. Providing worker housing in permanent buildings would comply with Policy PS10, would minimise the impact on the accommodation sector in accordance with Policy PS9 criterion 5 and create a permanent legacy of increased housing stock which could be used for social housing. Simply proposing temporary housing in modular units to be removed offers no legacy at all. Horizon have avoided the policy requirement to provide legacy on the accommodation campus site by siting on this main site which is not in or adjacent to a development boundary to which PS10(4) therefore does not apply. Any other site would be required to be informed by a legacy use under that policy. Only where a legacy use was unfeasible would temporary building to be removed be allowed and the site cleared (PS10(10)).

The section of the site at Dalar Hir, a greenfield site remote from any settlement, fails to properly allow for legacy as suitable re-uses of the site once developed have not been identified and are not proposed, with the intention being to remove all of the installed infrastructure completely. As well as being a poor proposal in sustainability terms, this offers no legacy for the Island. The development of the site at Parc Cybi offers some legacy in that that allocated employment site will have been improved however the proposals for that site could

With regard to the Site Campus, JLDP Policy PS10 is explicitly supportive of temporary campus style accommodation workers where there is a need for such which cannot be met through existing sources or the provision of new buildings. Horizon has also noted its consideration, and discount, of other consented sites in its response to FWQ10.1.5 [REP2-002].

Horizon has, through the Workforce Accommodation Strategy (WAS) (which will be secured through the DCO s.106 agreement), adopted a balanced approach which both utilises spare capacity in existing accommodation (up to 3,000 at peak) and includes home based workers already residing in the community (2,000 at peak). The drivers behind the accommodation of the remaining 4,000 bed spaces at the Site Campus next to the main site are ensuring that there is enough accommodation that is attractive to workers, that is affordable, has a good range of facilities and importantly, significantly reduces the need to travel. The Site Campus will meet this demand and ensure that adverse effects on the local community and on the tourism sector are mitigated as well as mitigating against adverse impacts on leisure facilities and health services

The need for purpose built temporary workers accommodation is addressed in detail at section 4.2 of Appendix C of the Planning Statement [APP-406] and in section 7 of the Workforce Accommodation Strategy (WAS) [APP-412].

With regard to permanent new build housing, as noted at paragraph 4.2.20 of Appendix C of the Planning Statement [APP-406], permanent new build housing is properly dealt with through the local plan process to plan for long term housing needs rather than temporary demand.

The draft DCO s.106 agreement secures financial contributions which would support the delivery of new housing, help IACC bring new properties back into use, encourage provision of latent accommodation and fund measures to improve the function of the housing market. These measures contribute to all of the measures in criterion 1 of JLDP Policy PS10 in a way that also meets Horizon's fully justified need for TWA as set out above.

In response to concerns raised about legacy, Horizon has decided to revisit the provision of legacy housing at Madyn Farm. Horizon is considering the options available to provide legacy housing on this site (as the current planning permission may be extant); although it notes that any proposal would need the support of IACC.

With regard to the Park and Ride facility, whilst the site is located outside of the development boundaries a site selection process has been undertaken and has found that the proposed location on the A55 is the most suitable site for the facility and therefore why its location in the countryside is essential. Following the sequential approach in JLDP Policy PS12, other locations along the A5/A55 are considered appropriate. This is also supported by Policy GP35 of the Wylfa SPG. With regard to

be improved, including through improving connectivity by sustainable transport methods.

On balance the Council considers that the principle of the development is supported by policy and that much of the proposal is compliant. Some of the non-compliant elements which cannot be avoided or fully mitigated, such as the loss of heritage assets on the main site, are capable of being outweighed by the general policy support for the project. The IACC does not however accept that the proposals as made are fully compliant, particularly on delivering measures to maximise opportunities for employment and upskilling of local people, minimising impacts on the housing market, protecting and enhancing the natural environment. The IACC wishes to see the mitigation measures identified in this LIR secured in order to ensure that the impacts of the development are addressed in a manner which complies with the JLDP and SPG. The IACC considers that proposals as made are non-compliant with the policies of the JLDP and do not follow the guidance set out in the SPG regarding the need to secure legacy.

future use following construction, it is entirely appropriate that the site should be reinstated to its current agricultural use. Horizon notes, however, that this reinstatement will involve some enhancements including the introduction of additional lengths of species rich hedgerows and retention of cycle and certain highways improvements.

With regard to the Logistics Centre, IACC's response notes that there will be some legacy benefit through the retention of some of the infrastructure on the site, for the benefit of a future employment use.

In summary, Horizon welcome the confirmation by IACC that the principle of development is supported by policy. Horizon does not however accept that the Wylfa Newydd DCO Project fails to secure a legacy benefit.

FWQ 20.0.8: Your RR [RR-088] states that there is insufficient detail in ES C6 to demonstrate how construction generated waste will be managed and that the assessment of available waste management capacity will need to be updated prior to and throughout the construction phase.

Can NRW explain where the deficiencies lie and why it considers that a Site Waste Management Plan is necessary as opposed to measures set out within the CoCP?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
NRW	At this stage, details on how construction generated waste will be managed is not available and it is not possible to set out mitigation measures in ES chapter C6 (e.g. until contractors are appointed). NRW consider that it would be appropriate for further detail on waste management methodologies to be set out in a Site Waste Management Plan, which will be governed by the CoCP and relevant Sub-CoCPs. These will need to be approved by the discharging authority in consultation with NRW.	Horizon's approach to the management of waste and associated waste management practices, including monitoring and reporting are set out in section 9 of the Wylfa Newydd Code of Construction Practice (CoCP) [APP-414], the various site-specific sub-CoCPs [APP-415 to APP-421] and the Wylfa Newydd Code of Operational Practice (CoOP). An updated waste and materials management strategy (WMMS) (as set out in the Wylfa Newydd CoCP) and a commitment by Horizon to include a Site Waste Management Plan (SWMP) will be set out in an updated Wylfa Newydd CoCP to be submitted at Deadline 4 (17 January 2019). The updated WMMS and the SWMP will provide a robust framework for implementing effective waste management. The updated WMMS will ensure that sufficient provision of essential waste infrastructure is available on-site, or to service the site. The updated WMMS will require consideration of local waste management opportunities where these are suitably prepared, compliant and auditable. Horizon will continue to work with NRW, IACC and other stakeholders of the Waste and Materials Oversight Group (WaMOG) in relation to the evolving WMMS. This will ensure that the forecast of waste in the SWMP can be compared with locally available capacity, including potential capacity from unimplemented permissions.

FWQ21.0.1: Can the applicant confirm: (a) if they were aware of the EU (WEFO) Bathing Water Quality in Cemaes Bay Study, as is referred to in [RR-017]? (b) Did the report include an assessment of the impact of the proposal on the bay? (c) Was the findings of the report included in the applicants assessment of water quality in the ES and or the Water Framework Directive Compliance assessment? (d) Can IACC expand on its concerns in its RR [RR-020] para5 .7.5 in relation to bathing water quality at Cemaes Bay?

Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	The area that could potentially be affected by the proposed development of the Wylfa Newydd Main Power Station Site includes all the water features that may be hydrologically linked to the site and the land areas that drain these features. The surface water study area encompasses five small surface water catchments while the groundwater study area has been defined to extend 3km in radius from the centre of the Wylfa Newydd Development Area. The study areas include locations that are at significant risk from flooding as well as sensitive receptors including water dependent SSSIs at Tre'r Gof, Cae Gwyn and Cemlyn Bay, designated Bathing Water areas and private water supplies. Following a multi-stakeholder effort between the Council, NRW and Dwr Cymru to implement measures to improve the water quality at Cemaes, after being classed as 'poor' during the 2016 and 2017 bathing seasons due to diffuse pollution from agricultural land within the catchment, the bathing water has now been confirmed as having a 'sufficient' rating in the latest 2018 report. The water quality problem at the beach has also formed part of a £5.8m Acclimatize Project, a study led by Aberystwyth and	Horizon considers that the modelling and assessment that it has carried out relating to discharges of elevated suspended solids and sewage discharges into the marine environment, as set out in chapter D13 of the Environmental Statement [APP-132], is appropriate for the DCO application. That modelling considers the potential impacts on Cemaes Bathing Water from a variety of perspectives including modelling of discharges of treated foul effluent, and modelling of sediment from construction discharges from the Wylfa Newydd DCO Project. Horizon has also undertaken a qualitative assessment of the effects on the Cemaes Bathing Water cumulatively with other discharges operated by Dŵr Cymru Welsh Water (DCWW) by comparing the modelled discharge against existing bacti levels in Cemaes bay. These assessments are summarised in sections 13.6.52 – 13.6.53 of chapter D13 of the Environmental Statement. The modelling shows that sewage discharged in the north of Porth-y-pistyll would be quickly dispersed and the concentrations of faecal coliforms reaching the bathing water are low: in a worst-case scenario, the modelled concentrations reaching the bathing water at Cemaes would result in an increase in 29.3CFU/100ml. Under the Bathing Water Directive, the concentration of intestinal enterococci must not exceed 200CFU/100ml in 80% of samples to achieve good status. The predicted concentrations reaching Cemaes are well below the maximum concentrations required to achieve good classification and therefore Horizon concludes that there would be no predicted effect on bathing water at Cemaes as a result of the Wylfa Newydd DCO Project. Furthermore, as presented in the Water Framework Directive Compliance Assessment [APP-444], the Wylfa Newydd DCO Project is not considered to risk further deterioration in bathing water quality in that the modelled concentrations are not sufficient enough to result in a change in quality based on the levels within the Bathing Water Directive. Horizon considers that its assessment is conservative due to the assumptions incorporated into the modelling and assessment work. Horizon acknowledges the sensitivity of the ecological receptors in the vicinity of the Wylfa Newydd DCO Project. To minimise any effects of the development on these receptors, Horizon has designed

Dublin Universities looking at the effects of climate change on 'at risk' beaches in Wales and Ireland. The Study included developing technology for modelling likely bacteriological water quality based on a number of monitored parameters such as river flow, tide, temperature, relative humidity and rainfall. This has helped to inform a more sophisticated public advice system at the beach to advise beach users about the suitability of the water for bathing (see Twitter page @traethcemaes).

The Council considers the water quality at Cemaes to remain 'at risk' and that any further deterioration in microbial quality due to the development could be deleterious to future EU compliance and impact on the coastal community which is heavily dependent on tourism. The beach lies within the Anglesey AONB and part of the beach is also within the North Anglesey Heritage Coast.

The ES confirms that Horizon will develop a passive engineered solution of the drainage system, with the system matching baseline conditions as closely as practicable possible and in agreement with the regulator as part of the final landform design. There is a need to acknowledge that sensitive ecological receptors (low flows) and flood risk receptors (high flows) will not be adversely affected. Specific concern relates to turbidity and sedimentation risk for Bathing Water quality at Cemaes Bay.

Further detail of the mitigation design detail should be provided by Horizon to demonstrate that mitigation can be

the drainage system within the development to replicate as closely as possible the baseline hydrological regime with respect to both low and high flows and in relation to water quality, including turbidity and suspended sediment content. [ES Volume D - WNDA Development App D8-8 - Summary of preliminary design for construction surface water drainage [APP-167]] presents Horizon's conceptual drainage design which as far as practicable recreates the processes that are present in the catchments around the WNDA, including restriction of runoff rates, attenuation of excess runoff, provision for seepage through soils to recreate natural groundwater seepages, facility for overland flow from drainage ditches, capture of suspended sediment in ditches and sedimentation lagoons and the facility to dose runoff where suspended sediment content is considered high relative to an agreed level defined through an appropriate Environmental Permit.

The nature of the landform changes within some catchments has resulted in unavoidable but generally small changes in catchment area which could have an effect on predicted flows. [Chapter 8.5 of ES Volume D - WNDA Development D8 - Surface water and groundwater [APP-127]] presents the scale of any changes, based on hydraulic modelling, and concludes that the magnitude of change is small, particularly on catchments draining to Tre'r Gof.

Horizon believes that the proposed drainage system will be successful in replicating the baseline hydrological conditions and that the sensitive ecological receptors will not be adversely affected. The detail of the drainage design is being further developed and this will be provided by Horizon to demonstrate that it can be successfully implemented within the order limits and agreed parameters. In addition, Horizon is committed to the implementation of additional monitoring of the water environment, which will continue to provide a detailed understanding of the existing hydrological regime as well as monitor the effectiveness of the implemented drainage system. The monitoring data collected will provide further opportunity to adapt the drainage system to improve any aspect that appears to be inconsistent with the aims of the drainage design or any aspect that is not working as effectively as intended.

Horizon has made an application to NRW for construction water discharge activity under the Environmental Permitting Regulations 2016. This application includes the discharge of sewage effluent through the construction of the Power Station. NRW has exercised its powers under Paragraph 4 of Part 1 of Schedule 5 to request further information which includes modelling and assessment. Horizon is working with NRW to agree a set of input parameters to model to further understand the risk of the project in combination with existing assets to result in failures of the Cemaes Bathing Water against the Bathing Water Directive.

In summary, Horizon do not consider the Wylfa Newydd DCO Project to significantly increase the risk of bathing water failure. Horizon acknowledges the sensitivity of the bathing water as a result of

implemented successfully, and to confirm that the drainage system will match existing baseline, as close as practically possible.

We are aware that further modelling and assessment is being progressed by HNP in consultation with Welsh Water and this is to be submitted into the examination process. The IACC would be seeking confirmation from NRW that they are satisfied with the conclusions of these assessments including proposed mitigation proposals.

unrelated conditions within the catchment and are undertaking additional modelling and assessment to further understand the risks in combination with existing assets in the waterbody. Furthermore, Horizon believes it can implement a drainage design that replicates baseline conditions and has committed to future monitoring to determine the effectiveness of the system and allow opportunity to modify should issues arise.

FWQ21.04: Section 10.4 of the Main Powers Station Site Sub CoCP [APP-415] sets out a variety of monitoring and survey work that will be undertaken. Who is responsible for assessing all this monitoring and survey work? If it is the IACC or NRW do they have the expertise and/or resources to undertake the work or would a developer contribution be required to fund this aspect of the proposal?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	IACC has the expertise to undertake the work required but considers that the fees proposed for discharge of requirements are entirely inadequate to resource the officer time needed. Please see detailed submission on this point in the Written Representation at section [8, especially 8.4].	Horizon can confirm that it will be responsible for carrying out the monitoring and surveys set out in section 10,4 of the Main Power Station Site sub-CoCP [APP-415]. It is noted that the purposes of this monitoring relate to water management during construction and Natural Resources Wales would be the relevant statutory body. It is considered that NRW would therefore have the relevant regulatory expertise in relation to these matters and will be responsible for assessing the monitoring and survey results. As identified in rows 5 to 7 of the Wylfa Newydd DCO Project Details of Other Consents, Licenses and Agreements [APP-053], Environmental Permits would be required for the related activities e.g.in respect of construction discharges. Abstractions would be subject to licensing from NRW. It is expected that regulatory input on the monitoring would arise through future permit applications. Horizon would pay the fees levied with respect to the Environmental Permits and Water Abstraction Licence which would be consistent with the normal arrangements for such permits/licences.

FWQ21.0.4: Section 10.4 of the Main Powers Station Site Sub CoCP [APP-415] sets out a variety of monitoring and survey work that will be undertaken. Who is responsible for assessing all this monitoring and survey work? If it is the IACC or NRW do they have the expertise and/or resources to undertake the work or would a developer contribution be required to fund this aspect of the proposal?		
Interested Party	IP response to FWQ	Horizon's Response to First Written Questions
IACC	[NRW advise that if the DCO is made, detailed Sub-CoCPs will need to be approved by the discharging authority, in consultation with NRW, ahead of the relevant activities taking place. We would expect this to be secured as a DCO Requirement which will require an addition to the Requirements as set out in the current version of the draft DCO (APP-029). NRW in its statutory consultee role will provide advice to the discharging authority on the relevant monitoring and survey work set out within the Sub-CoCPs. NRW aims to discuss the matter of developer contribution with the Applicant during the Examination and make further representations to the Examining Authority.	Horizon can confirm that it will be responsible for carrying out the monitoring and surveys set out in section 10.4 of the Main Power Station Site sub-CoCP [APP-415]. It is noted that the purposes of this monitoring relate to water management during construction and Natural Resources Wales would be the relevant statutory body. It is considered that NRW would therefore have the relevant regulatory expertise in relation to these matters and will be responsible for assessing the monitoring and survey results. As identified in rows 5 to 7 of the Wylfa Newydd DCO Project Details of Other Consents, Licenses and Agreements [APP-053], Environmental Permits would be required for the related activities e.g.in respect of construction discharges. Abstractions would be subject to licensing from NRW. It is expected that regulatory input on the monitoring would arise through future permit applications. Horizon would pay the fees levied with respect to the Environmental Permits and Water Abstraction Licence which would be consistent with the normal arrangements for such permits/licences.