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Date: 17 December 2018 18:02:14
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[05 Horizon's Response to Written Representation - Arthur Wyn Owen .pdf](#)
[06 Horizon's Response to Written Representation - Betsi Cadwaladr University Health Board .pdf](#)

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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15 Horizon's Response to Written Representation - Nuclear Free Local Authorities .pdf

Kind Regards

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Wylfa Newydd Project

Horizon's Response to Written Representation
– Gwynedd Council / Cyngor Gwynedd Council

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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1 Horizon's Response to Gwynedd Council's Written Representation

1.1 Introduction

- 1.1.1 This report provides Horizon's response to the Written Representation submitted by Gwynedd Council ("GC") at Deadline 2 (4 December 2018). For ease, cross-references are provided (where appropriate and feasible) and the response generally follows the structure and sequence of the written representation received. Horizon has endeavoured to respond to the key matters raised in this written representation. Where Horizon has not responded to a particular point or issue raised by an Interested Party, this should not necessarily be taken as agreement with that point
- 1.1.2 Horizon and GC are currently progressing a number of matters related to the Wylfa Newydd DCO Project through a SOCG. An update on this process was provided to the Examining Authority at Deadline 2 (4 December 2018) in the SOCG between Horizon Nuclear Power Wylfa Limited and GC [REP2-051].
- 1.1.3 Horizon will continue to engage with GC through this process and provide updates to the Examining Authority at appropriate deadlines throughout the Examination. Many of the issues identified in the Statement of Local Impact Report submitted by GC at Deadline 2 (4 December 2018) are subject to ongoing discussion between both parties. On this basis Horizon intends to provide a detailed response to the submitted GC Statement of Local Impact Report at Deadline 4 (17 January 2019).
- 1.1.4 Horizon notes that the core issues and concerns identified by GC in their report have also been raised by IACC in their submitted Local Impact Report ("LIR"). Horizon has formally responded to the IACC LIR at Deadline 3 (18 December 2018), and as such we would encourage GC to review this response, in addition to the responses provided by Horizon to the Examination Authority's First Written Questions, also submitted at Deadline 2 (4 December 2018) [REP2-002]. As stated above, Horizon will continue to engage with GC on location specific matters raised and formal responses will be provided at Deadline 4 (17 January 2019). Where matters raised in GC's report are not addressed below, a further response will be provided at Deadline 4 (17 January 2018).
- 1.1.5 For the purposes of providing a response to GC by Deadline 3 (18 December 2018), acknowledging that matters will be progressed through the SOCG Process, Horizon has categorised the issues raised in the GC report into the following principal themes:
- Highways and Transport;
 - Economic Development;
 - Tourism;
 - Community Impact/Welsh Language; and
 - Housing.

- 1.1.6 A response for each of these themes is provided below.

1.2 Highways and Transport

- 1.2.1 The transport impact of the Wylfa Newydd Project is presented in C2-4 DCO Transport Assessment [APP-101] and its associated 12 appendices [APP-102 to APP-113].
- 1.2.2 The Wylfa Newydd DCO Project includes a series of embedded mitigation measures to address potential traffic impacts. For example, the provision of the Logistics Centre would mitigate potential traffic-related effects of construction through the control of HGVs travelling to and from the WNDA; the site campus would reduce daily traffic commuting to and from the WNDA; and the provision of the MOLF will reduce the amount of material required to travel by road. Potential traffic impacts due to traffic travelling over the Britannia Bridge have been mitigated by ensuring the worker shift start and end times are defined so that workers do not travel over the Britannia Bridge during the AM and PM peak hours of traffic over Britannia Bridge. These shift timings are secured by the Main Power Station Site sub-CoCP [REP2-032]. All other areas of the highway network are not substantially impacted by Wylfa Newydd DCO Project traffic.
- 1.2.3 Following discussions with the Welsh Government and GC as part of the SOCG 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 included assuming the number of workers who lived on the mainland doubled. The results of the analysis were shared with GC in October 2018 and they showed that the increased traffic would not be expected to affect the results presented in the DCO Transport Assessment [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. Variations in the distribution of workers living in Gwynedd are not expected to have an impact on the operation of the road network. This is because the shuttle bus network is flexible and can respond to changes in demand so that, for example, if more people than expected live in Caernarfon then more frequent or larger buses can be used to serve this area.
- 1.2.4 In respect of paragraph 6.1.9, please refer to Horizon's response to the FWQ11.1.5 [REP2-002].
- 1.2.5 The Wylfa Newydd DCO Project includes a Park and Ride facility at Dalar Hir. This facility (together with the shuttle bus network, Site Campus and promotion of car sharing) is considered to be sufficient to serve the transport needs of the Project. Other park and ride sites have been considered but as described in paragraph 12.2.3 of App C2-4 DCO Transport Assessment [APP-101] they are not considered necessary to manage or mitigate traffic flows associated with the Wylfa Newydd DCO Project. However, Horizon will work with stakeholders to consider the use of proposed Park and Share facilities, on the basis that the scheme is delivered by others, as a complementary component of the transport strategy for the Wylfa Newydd DCO Project. If the scheme is delivered, Horizon recognise that it could

- potentially provide flexibility, for example as park and share facilities which could be available for workers car sharing.
- 1.2.6 Chapter 5 of the Wylfa Newydd CoCP (Revision 2.0) [REP2-031] contains details of the traffic and transport management strategy for the scheme.
- 1.2.7 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.
- 1.2.8 Problems associated with 'fly parking' can be reported by the public, with funds available through the Transport Sub-Group to implement additional mitigation measures e.g. new parking controls. Compliance with parking restrictions would be enforced through the Code of Conduct. This document will also require workers use transport facilities and services provided by Horizon and comply with Horizon controls around parking and occupancy requirements
- 1.2.9 A number of matters are ongoing in respect of highways and transport considerations as reported in the draft statement of common ground submitted at Deadline 2 (4 December 2018). Horizon are committed to working with GC to resolve these issues.

1.3 Economic Development

- 1.3.1 Horizon estimates that around 2,000 home-based workers would be employed during the peak period of construction. Those are workers who currently live within the Daily Construction Commuting Zone ("DCCZ"), being the area defined by a 90-minute travel time to the Wylfa Newydd Development Area (and which includes the majority of Gwynedd). The 2,000 home-based workers would deliver major beneficial changes to employment in the construction sector in the DCCZ.
- 1.3.2 There would also be significant beneficial effects on the economies of Anglesey and north Wales as a result of the investment to be made by the Wylfa Newydd DCO Project from the additional earnings of employees, from contracts with local businesses and investment in infrastructure, and from workers spending their income at local businesses. An expected investment of between £200 million and £400 million within north Wales over the construction period would lead to the provision or safeguarding of the equivalent of 120 to 350 Full Time Equivalent jobs over that period.
- 1.3.3 During operation of the Power Station it is estimated that a workforce of 850 will be required and Horizon estimates that around 85% of those employed would already be resident within the DCCZ. This represents a significant contribution to local employment opportunities and to the long-term population stability on Anglesey. Given the magnitude of change in local employment, the long-term nature of the positions, and the potential to reduce outward migration trends, alongside the importance of the local labour market, this would represent a major beneficial effect on the labour market on Anglesey.

- 1.3.4 Horizon is also developing a Supply Chain Action Plan jointly with IACC, the North Wales Economic Ambition Board ("NWEAB"), and the Welsh Government. One of the aims of the Action Plan is to maximise opportunities for businesses within the local area. Horizon has signed a SOCG with the NWEAB which sets out how they will work collectively with the organisations that form part of the NWEAB to maximise benefits for north Wales.
- 1.3.5 Horizon will continue to develop the Jobs and Skills Strategy [APP-411] through the SOCG process and through working with local partners. The next steps will be to continue meetings with partners to make further progress on the Wylfa Newydd Employment and Skills Service (WNESS) and to agree a programme of training that will help to maximise the opportunities available to local people.
- 1.3.6 Horizon acknowledges that some people may choose to move from other sectors to work on the Wylfa Newydd DCO Project and intends to support backfilling of any vacancies through the WNESS. The WNESS will assist in the recruitment of new employees to the labour market; train and upskill both new entrants and others; and provide a brokerage service by filling vacant posts to support businesses which encounter difficulty finding appropriate replacements when workers move on to the Wylfa Newydd DCO Project. Horizon intends to secure the WNESS through the draft DCO s.106 agreement, which is being negotiated with IACC.

1.4 Tourism

- 1.4.1 Horizon agrees with GC regarding the importance of the tourism sector to the local economy. Horizon proposes that, through the draft DCO s.106 agreement, a Tourism (Annual) Contribution will be applied by the IACC, liaising with GC and Conwy County Borough Council where appropriate for joint tourism promotion initiatives. Horizon also proposes that GC and Conwy County Borough Council may make application(s) to the Accommodation, Tourism and Leisure Sub-Group for release of the Tourism (Contingency) Fund where such application must provide adequate evidence of significant adverse effects or which forecasts trends that are likely to lead to significant effects on tourism in the local authority areas of Gwynedd and Conwy.

1.5 Community Impact and Welsh Language

- 1.5.1 The mitigation measures within the draft DCO s.106 agreement have been developed based on evidence and drawing on consultation with stakeholders and WLIA steering group members. Many of the measures have been strengthened following feedback received from stakeholders through the WLIA steering group (e.g. by adding more detail or stronger commitments).
- 1.5.2 Horizon is continuing to take account of stakeholder views and considers these to be important to the development and implementation of the measures. Further detail on the implementation of measures will be provided through ongoing discussions related to the development of SOCG.
- 1.5.3 Horizon also proposes in the draft DCO s.106 agreement that IACC will use the Welsh Language Education (Annual) Contribution to fund the

employment of two or more peripatetic teachers to support current Welsh immersion education capacity within the IACC's local authority boundary (and if the monitoring indicates a need to do so, in the Gwynedd Council local authority boundary) and it will be included in the employment contract of such teachers that their remit will be in both Anglesey and Gwynedd.

1.6 Housing

- 1.6.1 As outlined in the Workforce Accommodation Strategy [APP-412], Horizon will establish a Worker Accommodation Management Service (WAMS) to ensure that the impact on existing housing and tourist accommodation is acceptable. As part of the WAMS, Horizon will work with the Isle of Anglesey County Council to establish the Construction Worker Accommodation Management Portal which will manage the impact of temporary construction workers seeking accommodation during the construction of the Wylfa Newydd Project. This will include collecting data and reporting on it to stakeholders and using that data to help guide workers' choices and avoid adverse impacts on local communities, including facilities and services.
- 1.6.2 In relation to the cost of housing, the WAMS would provide a mechanism to monitor the effects of the Wylfa Newydd Project on the supply and demand for accommodation and housing as a result of the inflow of non-home-based construction workers and their families. In the draft DCO s.106 agreement, Horizon proposes that GC would be represented on the board established in accordance with the Workforce Accommodation Strategy to oversee the operation of the WAMS.
- 1.6.3 Horizon will provide housing funds through the DCO s.106 Agreement to mitigate impacts on housing that cannot be managed through the WAMS. The Worker Accommodation (Capacity Enhancement) Contribution will be flexible and would be used to incentivise provision of new housing, especially affordable housing, bring vacant properties back into use, encourage provision of more latent accommodation; fund measures to improve the function of the housing market and fund officer time to deal with any increase in homelessness. Horizon proposes that GC would receive 20% of the £10,000,000 fund.
- 1.6.4 Further, in the draft DCO s106 agreement provides that funding for up to three Accommodation Officers will be provided during the Construction Period who will, among other things, liaise with GC and Conwy County Borough Council to ensure a collaborative approach to monitoring accommodation matters relating to the Project.
- 1.6.5 In addition, Horizon proposes that a Worker Accommodation Annual Contribution will be applied by IACC towards the cost of, among other things, monitoring instances of homelessness and housing displacement within the DCCZ as a result of the Wylfa Newydd DCO Project and working with GC and Conwy County Borough Council to undertake such monitoring.

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