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Subject: Wylfa Newydd DCO Deadline 3 Submissions [NOT PROTECTIVELY MARKED]
Date: 17 December 2018 18:14:21
Attachments: [18 Horizon's Response to Written Representation - IACC .pdf](#)
[19 Horizon's Response to Written Representation - North Wales Police .pdf](#)
[20 Horizon's Response to Written Representation - North Wales Fire and Rescue Service .pdf](#)
[21 Horizon's Response to Written Representation - Welsh Ambulance Services Trust .pdf](#)
[22 Horizon's Response to Written Representation - People Against Wylfa B .pdf](#)
[23 Horizon's Response to Written Representation - J Chanay .pdf](#)
[24 Horizon's Response to Written Representation - National Grid .pdf](#)
[25 Horizon's Response to Written Representation - eNGO Biodiversity Cemlyn Nature Reserve .pdf](#)
[26 Horizon's Response to Written Representation - North Wales Wildlife Trust .pdf](#)
[27 Horizon's Response to Written Representation - National Trust .pdf](#)
[28 Horizon's Response to Written Representation - Public Health Wales .pdf](#)
[29 Horizon's Response to Written Representation - Holyhead Council .pdf](#)
[30 Horizon's Response to Written Representation - Network Rail Infrastructure Ltd .pdf](#)
[31 Horizon's Response to Written Representation - North Anglesey Councils Partnership .pdf](#)
[32 Horizon's Response to Written Representation - Nuclear Decommissioning Authority .pdf](#)
[33 Horizon's Response to Written Representation - Welsh Government .pdf](#)
[16 Horizon's Response to Written Representation - Welsh Anti-Nuclear Alliance .pdf](#)
[17 Horizon's Response to Written Representation - Zencity Limited .pdf](#)

Good Evening

This is the second 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).

16 Horizon's Response to Written Representation - Welsh Anti-Nuclear Alliance .pdf
17 Horizon's Response to Written Representation - Zencity Limited .pdf
18 Horizon's Response to Written Representation - IACC .pdf
19 Horizon's Response to Written Representation - North Wales Police .pdf
20 Horizon's Response to Written Representation - North Wales Fire and Rescue Service .pdf
21 Horizon's Response to Written Representation - Welsh Ambulance Services Trust .pdf
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31 Horizon's Response to Written Representation - North Anglesey Councils Partnership .pdf
32 Horizon's Response to Written Representation - Nuclear Decommissioning Authority .pdf
33 Horizon's Response to Written Representation - Welsh Government .pdf

Kind Regards

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Wylfa Newydd Project

Horizon's Response to Written Representation – Welsh Ambulance Services Trust

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 Welsh Ambulance Services Trust's Written Representation

1.1 Introduction

- 1.1.1 This report provides Horizon's response to the Written Representation submitted by Welsh Ambulance Service Trust 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.

1.2 Written Representation

- 1.2.1 Horizon notes the Written Representation provided by Welsh Ambulance Services Trust, and also refers the Examining Authority to the draft SOCG with Welsh Ambulance Services Trust submitted at Deadline 2 (4 December 2018) [REP2-055]. This SOCG was based on discussions with Welsh Ambulance Services Trust during the SOCG meetings, though Welsh Ambulance Services Trust have not provided any formal comments on the draft versions of the SOCG and therefore it does not represent an agreed draft.
- 1.2.2 Horizon recognises that the Wylfa Newydd DCO Project is likely to result in additional demands on Welsh Ambulance Services Trust and has committed to providing funding to mitigate additional costs resulting from the Wylfa Newydd DCO Project through the Public Services (Ambulance) Fund, secured through the draft DCO s.106 agreement.
- 1.2.3 The scale of contribution is not, however, agreed. Horizon has sought to understand the likely additional costs to Welsh Ambulance Services Trust as a result of the Wylfa Newydd DCO Project. To this end, it has developed an estimate of costs associated with call outs to incidents on site. Horizon has also requested estimates from Welsh Ambulance Services Trust of the annual increase in rate of injury and incidents arising off site (for instance, increased call outs as a result of road traffic accidents). Welsh Ambulance Services Trust have not provided these estimates to date.
- 1.2.4 Horizon note, however, that Welsh Ambulance Service's Written Representation provides some initial modelling to estimate the revenue and capital budgets that Welsh Ambulance Services estimate would be required to mitigate the impact of the project.
- 1.2.5 Welsh Ambulance Services Trust do note that this represents a 'worst case' scenario based on Horizon providing no medical provision on site. This is, however, an unrealistic starting point. Horizon has made strategic commitments to make appropriate healthcare provision on-site or contributions to healthcare off site. These commitments are secured through the Wylfa Newydd CoCP (Revision 2.0) [REP2-031], the Phasing Strategy

- [APP-447] (which Horizon notes is being updated in time for Deadline 4 (17 January 2018) to provide greater clarity as to the phasing of the Site Campus), the Workforce Management Strategy [APP-413] and the draft DCO s.106 Agreement [REP1-010]. Whilst the precise details of the on-site medical facilities (to be operated by a suitable healthcare service provider) are to be finalised, all minor injuries would be dealt with on site and therefore would not seek to call an ambulance on minor injuries.
- 1.2.6 Welsh Ambulance Services Trust set out conclusions from this initial modelling, suggesting that this is based on incidents per 1,000 population and multiplied by the construction workforce. This is then converted into a cost using a job cycle time and cost per hour and to provide estimates for incident responses, 999 calls and calls to NHSDW/11. The detailed calculations and assumed multipliers are not however provided.
- 1.2.7 Welsh Ambulance Services Trust have also applied this process to an additional population of 25% over and above the construction workforce. Horizon have not been made party to this assumption through the SOCG process and it is not clear what the basis for this figure is. It is significantly higher than the number of partners and dependents that Horizon anticipate at peak.
- 1.2.8 The majority of the estimated contribution (based on this draft methodology – and Horizon note that Welsh Ambulance Services Trust wish to use this as a basis for negotiation) is for the funding of an emergency ambulance resource requiring 12 full time equivalents to maintain this service.
- 1.2.9 Whilst Horizon wish to properly interrogate the response from Welsh Ambulance Services Trust (as these assumptions and costs have not been provided to Horizon prior to submission of the Written Representation at Deadline 2 (4 December 2018)), Horizon's initial view based on the information available is that the funding of a full ambulance resource at year three of the construction (with a population of around 1,000 predominantly home-based workers) is not proportionate.
- 1.2.10 Planning obligations must of course be necessary to make the development acceptable in planning terms; directly related to the development; fairly and reasonably related in scale and kind to the development; and reasonable in all other respects.
- 1.2.11 Horizon would like to reiterate that they are committed to providing funding to Welsh Ambulance Services Trust to mitigate any impacts that relate to impacts related to the Wylfa Newydd DCO Project and meet these tests for planning obligations and this funding will be secured through the draft DCO s.106 agreement.
- 1.2.12 Horizon remains committed to engaging with Welsh Ambulance Services Trust through the SOCG process to ensure its concerns are appropriately considered and addressed.
- 1.2.13 In addition to the matter of fund, Welsh Ambulance Services Trust in its Written Representation also reiterates its wish to be involved in the development of a Community Safety Management Strategy (CSMS). Horizon recognises that delivery of the CSMS is secured by Requirement

PW11 of the draft DCO [REP1-005]. The CSMS will set out how Horizon will work with existing public bodies, including IACC and the emergency services such as Welsh Ambulance Services Trust, to ensure the community's safety throughout the life of the Wylfa Newydd DCO Project, and will include a framework of communication routes and ways of working to mitigate any potential impact of the construction workforce within the community.

- 1.2.14 Horizon is committed to working with Welsh Ambulance Services Trust and other public bodies to prepare a CSMS, the general principles of which are secured through the Wylfa Newydd CoCP (Revision 2.0) [REP2-031]. It is proposed to amend the principles relating to Community Safety in the Wylfa Newydd CoCP (Revision 2.0) [REP2-031] in response to engagement with the emergency services and relevant partners. A revised Wylfa Newydd CoCP is therefore proposed to be submitted at Deadline 4 (17 January 2018).

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