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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](#)
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[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](#)
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[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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32 Horizon's Response to Written Representation - Nuclear Decommissioning Authority .pdf
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Kind Regards

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Wylfa Newydd Project

Horizon's Response to Written Representation – North Anglesey Councils Partnership

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 North Anglesey Councils Partnership Written Representation

1.1 Introduction

1.1.1 This report provides Horizon's response to the Written Representation submitted by North Anglesey Councils Partnership ("NACP") at Deadline 2 (4 December 2018). NACP provided six separate Written Representations addressing the following topics:

- Temporary Workers Accommodation ("TWA")
- Local Economic Opportunities
- Working Hours
- Transport
- Tourism and Recreation
- Residential Amenity

1.1.2 Each of these topics have been addressed in the following sections of this response.

1.1.3 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 the Written Representations. 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

2 TWA

- 2.1.1 Horizon has reviewed NACP's Written Representation regarding TWA [REP2-337]. Horizon notes NACP's general support for the provision of TWA as a way to mitigate impacts on tourist accommodation and housing stock.
- 2.1.2 The key issues identified in respect to TWA are:
- Impact of single campus
 - Legacy benefits
 - Rhosgoch

2.2 Single Campus

- 2.2.1 NACP notes that there needs to be a balance between the provision of services in the Site Campus and the need for local communities and businesses to benefit from temporary workers in the area. NACP states that this would be best achieved through multiple site campuses; although it does note the benefits of having a single campus in close proximity to the construction site.
- 2.2.2 Horizon acknowledges that the Site Campus is located in a relatively sparsely populated area and that the level of facilities on-site will be important in attracting workers to live there and in allowing workers to stay on-site to meet their day to day needs.
- 2.2.3 Horizon agrees that there needs to be a balance between the provision of services on-campus, and the opportunity for local communities to benefit from the temporary workers residing in the area. However, Horizon disagrees that utilising more than one campus site would help this. Workers will want to leave the campus and spend money locally; and Horizon has proposed a range of measures to manage the effects of that outcome, including public transport to access other areas and setting standards of behaviour within the community through the Workforce Management Strategy ("WMS") [APP-413].

2.3 Legacy Benefits

- 2.3.1 NACP notes that Horizon changed its proposed approach between Stages 2 and 3 of the Pre-application Consultation with other off-site campus options being removed and the Site Campus becoming the only proposed location for TWA. NACP's key concern is that the use of a single TWA will not bring any direct legacy benefits to the local area as the Site Campus will be removed at the end of the construction period.
- 2.3.2 Horizon considers that the Wylfa Newydd DCO Project will still deliver significant legacy benefit, including the operational jobs and associated economic activity. 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.

- 2.3.3 In addition, in response to concerns raised about legacy, Horizon has also 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.

2.4 Rhosgoch

- 2.4.1 NACP has expressed disappointment at the decision not to progress TWA at Rhosgoch given its potential for legacy benefits and the perceived benefit of dispersing workers across the local area.
- 2.4.2 Horizon does not believe that additional accommodation at Rhosgoch is necessary, nor is it an alternative to the Site Campus. Horizon's approach and justification in relation to the site selection process for TWA is set out in detail in the Site Selection Report Volume 4 – Temporary Workers' Accommodation [APP-439]. The Site Selection Report explains how other alternative sites, including sites in Amlwch (Rhosgoch), Holyhead and other locations were considered, and why these were rejected.

3 Local Economic Opportunities

3.1 Introduction

- 3.1.1 Horizon has reviewed NACP's Written Representation regarding local economic opportunities [REP2-341].
- 3.1.2 Horizon acknowledges NACP's support in principle for the Wylfa Newydd DCO Project due to the economic opportunities and the benefits that could accrue for local communities. However, NACP raises concerns about the level of detail in the Jobs and Skills Strategy ("JSS") [APP-411] and that the proposal focuses on young people, rather than adults. It also raises concerns about displacement and about the delivery of local benefits, including through the supply chain.
- 3.1.3 The key issues identified in respect of local economic opportunities are:
- Level of detail & delivery of benefits
 - Displacement

3.2 Level of detail & delivery of benefits

- 3.2.1 Please refer to Horizon's responses to **FWQ10.2.19** and **10.2.20** [REP2-002] which sets out the measures that are proposed to maximise the opportunities for the recruitment of local people, including young people, within the Wylfa Newydd DCO Project.
- 3.2.2 Horizon's JSS sets out the strategic approach for delivering local benefits. Since submission of the DCO application, Horizon has worked with partners to develop a JSS Implementation Plan that sets out proposed actions in the first three years of construction. This is appended to the draft DCO s.106 agreement that has been submitted at Deadline 3 and sets out the agreed priority measures to:
- Maximise the home-based workforce in the civils sector (focusing on labouring, general ops, carpentry, steelfixing and scaffolding).
 - Maximise the home-based workforce in site services (security, clerical and administration as well as non-construction roles in professional and back office roles, catering, cleaning, driving, and other site service roles).
 - Identify opportunities to upskill local construction workers for the Wylfa Newydd DCO Project.
 - Adopt and implement a target for apprentices.
 - Determine required mitigation for backfilling and training and identify the route through the Wylfa Newydd Employment and Skills Service ("WNESS") and mainstream DWP support (including for non-construction roles).
 - Determine programme of activities to support diverse recruitment and retention.

- 3.2.3 This will ensure that benefits are delivered to local residents.
- 3.2.4 Since the DCO application was submitted, Horizon has also produced an update to the draft Supply Chain Action Plan (SCAP) that provides further details on Horizon's proposed actions to help local businesses benefit from the Wylfa Newydd DCO Project. The draft SCAP has been shared with the Welsh Government and IACC and will be submitted into Examination at a later stage.

3.3 Labour Displacement

- 3.3.1 NACP response also raises concerns about the risk of labour displacement, considering that it is given relatively low importance and does not consider effects outside of the construction sector.
- 3.3.2 As set out at length in Horizon's response to both the Welsh Government and IACC Written Representations, Horizon acknowledges that displacement is a risk but is not likely to have a significant impact.
- 1.3.3 In recognition of this potential risk, Horizon has therefore proposed making the Skills Fund and the WNESS available to support the backfilling of any such roles.

4 Working Hours

4.1 Introduction

Horizon has reviewed NACP's Written Representation regarding working hours [REP2-342]. The key issues identified in relation to construction working hours:

- Concern that long worker hours and shift patterns may impact worker's health and lead to an increased risk of accidents on site.
- Shift patterns and travelling home/tired driving.
- Horizon going beyond legal requirements for working arrangements with safety being paramount.
- No reference to worker hours in the WMS [APP-413].

4.2 Working hours, workers' health & accident risk

- 4.2.1 Under the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999 all employers (including the self-employed) have a duty to protect the health, safety and welfare of all their employees at work, so far as reasonably practicable. This also includes a duty to ensure others are not exposed to health and safety risks through their undertaking. Horizon understands this and makes safety one of its core principles as an employer.
- 4.2.2 Working hours will vary on the Wylfa Newydd DCO Project as the works progress. As with any project there may be requirements to work either shift or extended hours to meet the overall objectives of the project. The working arrangements will generally comply with the requirements of the relevant National Agreements, in terms of the Working Time Directive. This allows for periods of work in excess of 48 hours/week provided the agreed average is not exceeded in a 52 week control period. It is intended to develop shift patterns that are compliant to the Working Time Regulations of 48 hours averaged over the control period.
- 4.2.3 The working rule agreements make provision for 'opt out'; however, this is not envisaged to be standard practice. We will monitor individuals who may wish to exercise their right to 'opt out' through the provisions incorporated with the National Agreements so far as it is within our control. Horizon will be ensuring everyone takes the required number of holidays annually.
- 4.2.4 Through the appointed contractor it is expected that appropriate risk assessments shall be undertaken, and measures introduced, that are reasonably practicable, to remove or control identified risks. This will include the number of hours worked and how these hours are scheduled to mitigate/remove risk. The contractor will have specific experience in implementing such arrangements on major construction projects including the UK Rail Industry and will introduce management arrangements that meet with UK HSE guidance on managing working hours and shift working arrangement.

- 4.2.5 Fatigue management procedures will be adopted to ensure any additional hours worked beyond the planned, assessed rota are authorised only after review of the fatigue risk and any additional controls are put in place (such as mandatory rest time in camp or transport home). There would be local management arrangements resulting from the worker risk analysis. (<http://www.hse.gov.uk/research/rrhtm/rr446.htm>).

4.3 Shift patterns and travelling home

- 4.3.1 One benefit of the provision of the onsite Site Campus is that it will significantly reduce the number of workers travelling from site at the end of the shift, hence mitigating the risk identified by NACP. Where workers may be required to work an extended shift to finish pre-planned work activities (e.g. large concrete pours) these can be selected so that they are accommodated in the onsite facility.
- 4.3.2 Furthermore, specific travel plans will be made to ensure that any home-based worker who may have worked an extended shift would be offered local accommodation, or have specific transport arrangements made, to avoid the need to drive home.
- 4.3.3 In paragraph 6.2.1 of the Workforce Accommodation Strategy it states that while the home-based workforce will be drawn from a catchment area of around 90 minutes from the site, non-home based ("NHB") workers seeking temporary accommodation are expected to cluster in a smaller area. As they are relocating temporarily to the area, they are expected to seek accommodation with relatively short commuting times. This is consistent with a number of studies showing NHB workers having a shorter average commute (19 miles versus a UK average of 24 miles) . As this is an average, some will inevitably travel more, but most journey times for NHB workers will be significantly less than 60 minutes, reducing the risk of fatigue arising from long journeys.
- 4.3.4 Monitoring of driving behaviour on the A55 is already under discussion with North Wales Police and Horizon will consider how it can influence or facilitate this (e.g. through requiring speed limiters/trackers in company vehicles or including driving restrictions within the Code of Conduct). We are also looking at ways of making alternative transport methods more attractive and accessible to workers.

4.4 Legal requirements for worker safety

- 4.4.1 As stated in section 2.3.1 of the WMS [APP-413], working hours and conditions will accord with relevant health, safety and environment standards and legislation which are considered suitable for all major infrastructure projects.

4.5 Worker hours in the WMS

- 4.5.1 Horizon takes its duty of care to its workforce very seriously. The proposed shift patterns have been determined having regard to extensive experience of delivering similar projects elsewhere. Horizon submitted a WMS [APP-

413] with its DCO application which includes measures to ensure protections for the workforce, such as the requirement that all workforce will be treated fairly through appropriate industrial relations agreements and processes and that working hours and conditions must be appropriate and accord with relevant health, safety and environment standards and legislation. All contractors for the Wylfa Newydd DCO Project will be required to adhere to a Code of Conduct which will comply with this principle as they enter into contractual arrangements with construction workers. For this reason, it is not considered necessary to define workforce hours within the WMS as that document is a principles document, rather than providing detailed controls.

4.5.2 Horizon is currently proposing to make changes to shift patterns from those submitted in the DCO application and has gone out to consultation (from 8 November – 6 December 2018). Since submission of the DCO application, further work has shown that the shift times applied for result in an overlap between the day and night shifts that makes a part of each shift unproductive, posing a significant challenge to the construction programme. Horizon wants to build greater efficiency and resilience into the construction programme by adjusting the shift patterns while continuing to avoid adverse effects on Britannia Bridge.

4.5.3 New shift patterns have been identified which achieve these aims, as follows:

- In the early years of construction, two staggered day shifts and one night shift.
- During peak construction years, three staggered day shifts and two staggered night shifts.
- Changes to shift start times and shift duration.

4.5.4 The changes are explained in more detail in the technical document provided as part of the consultation [REP1-014]. Horizon is currently considering responses received during the consultation period.

5 Transport

5.1 Introduction

5.1.1 Horizon has reviewed NACP's transport-related Written Representations [REP2-335, 338 and 339]. The key issues identified in relation to traffic and transport are:

- Traffic and Transport – A5025 in Treglele
- Traffic and Transport – Cross country Routes
- Traffic and Transport – Highway Maintenance and Parking Practices

5.2 Traffic and Transport – A5025 in Treglele

5.2.1 In its Written Representation [REP2-338], NACP indicates that Horizon has acknowledged that construction traffic will route using the A5025 from Cemaes and so will pass through Treglele village once the proposed access has been constructed.

5.2.2 Horizon has not stated that construction traffic will route along the A5025 north of the site. Horizon has stated that it would not rule out the use of the A5025 north of the site if suppliers are located in North Anglesey, as doing so would stop local businesses from being able to supply to the Wylfa Newydd DCO Project.

5.2.3 In paragraph 2.1.1 of its Written Representation, NACP identifies that traffic speeds through Treglele village are significantly higher than the 40mph speed limit. NACP notes that it has requested the raw ATC data from Horizon so it could consider the recorded speed of traffic on the A5025 through Treglele.

5.2.4 In regard to concerns about speeding on the A5025, these should be directed to IACC. Horizon has offered, on several occasions, to supply ATC survey data collected to NACP. As previously advised¹, if NACP can quote the specific location of ATC survey data it requires using the referencing system shown on Figures 1-1 and 1-2 of ES Volume C – Road traffic-related effects (project-wide) App C2-4 - DCO TA Appendix D - Traffic Data Report [APP-105], then data for these sites can be supplied.

5.2.5 In section 3.1.1 (Treglele) of its Written Representation, NACP has interpreted the information presented in Figure 7-6 of the Transport Assessment contained within ES Volume C – Road traffic-related effects (project-wide) App C2-4 – DCO Transport Assessment [APP-101]. NACP considers that prior to the construction of the main access roundabout the AADT flows on the A5025 in the vicinity of Treglele are expected to increase by 2,481 HGV deliveries per month (one-way) which is equivalent to 23 HGVs per hour (one-way) or 46 HGVs per hour, assuming an unladen

¹ In the draft SoCG submitted at Deadline 2 (4 December 2018), the memo dated 19 July 2018 by Steer, and as explained in the presentation given by Steer on 9 August 2018.

return, in addition to any light vehicles that would be attending the site. NACP considers that Appendix C2-03 suggests that the AADT flow would increase to 4,068 of which 6% would be HGV. However, this contradicts the data in Figure 7-6 which (assuming a 12 hour working day) would result in 13% of the AADT being HGVs.

- 5.2.6 The calculations provided in section 3.1.1 of the Written Representation are incorrect. The flows chosen from the ES Volume C - Road traffic-related effects (project-wide) App C2-3 - Traffic Flows document [APP-100] compare 2016 baseline scenario with the 2020 Wylfa Newydd Project (without bypasses) scenario. The correct comparison is 2020 Reference Case with the 2020 Wylfa Newydd Project (without bypasses) scenario as that is the only comparison which provides the traffic impacts owing to Wylfa Newydd DCO Project traffic.
- 5.2.7 Note that all flows quoted in ES Volume C - Road traffic-related effects (project-wide) App C2-3 – Traffic Flows [APP-100] are quoted and labelled throughout as two-way, therefore the flows need to be divided by two in order to get one-way movements. Also note that AADTs are averages over an entire year.
- 5.2.8 Comparing the 2020 Reference Case with the 2020 Wylfa Newydd DCO Project (without bypasses) scenario AADTs for Section 21 gives the following increases in traffic due to the Wylfa Newydd DCO Project:
- 690 (total) (two way, divide by two for per direction);
 - 40 of which are HGVs (two way, divide by two for per direction).

Mitigation

- 5.2.9 None of the assessments undertaken in the various documents that comprise the ES conclude that the speed limits in Tregele need to be reduced or pedestrian crossings need to be provided to mitigate the impacts of the Wylfa Newydd DCO Project.
- 5.2.10 Any unforeseen or additional impacts arising can be discussed at the Transport sub-group and consideration given to additional mitigation as set out in the draft DCO s.106 agreement.

5.3 Traffic and Transport – Cross Country Routes

- 5.3.1 NACP is concerned that the forecast traffic flows are unrealistically low and as a consequence the effects have been underestimated, resulting in mitigation measures that do not fully address the traffic and transport impacts across North Anglesey. To address this NACP would like:
- Road safety improvements on the A5025 between Amlwch and the site.
 - Reassurance that no construction traffic will pass through Cemaes roundabout or along Tan y Bryn Road during school peak hours throughout the whole construction period.
 - The installation of a CCTV/Automatic Number Plate Recognition system in Llanfechell and Tregele villages.

- 5.3.2 Appendix E of the Transport Assessment [APP-106] provides a detailed assessment of accidents on all roads considered in the study area. The roads examined as part of this process are shown in Figure B3-1 of ES Volume B - Introduction to the environmental assessments Figure Booklet - Volume B [APP-087]. This includes the A5025 through Amlwch. As no accident clusters exist in this area, and the impact of Wylfa Newydd DCO Project traffic is not expected to change this, no safety related mitigation is proposed in this area.
- 5.3.3 Horizon is not proposing to restrict traffic flows through Cemaes which are estimated to be low in number as shown in ES Volume C - Road traffic-related effects (project-wide) App C2-3 - Traffic Flows document [APP-100] – see link reference number 22.
- 5.3.4 NACP identifies in its Written Representation [REP2-339] that it is acknowledged by Horizon that some construction traffic will route using the A5025 from Amlwch and some will travel along rural routes passing through villages such as Tregele and Llanfechell throughout the construction period.
- 5.3.5 This is incorrect as Horizon has previously stated that it would not rule out the use of the A5025 north of the site if suppliers are located in North Anglesey as doing so would stop local businesses from being able to supply the project. At no point has Horizon stated that construction traffic will route via rural roads that pass through villages such as Llanfechell. Horizon is not therefore proposing to install ANPR cameras in Llanfechell and Tregele. Construction vehicles will be monitored as set out in the Wylfa Newydd CoCP [REP2-031].

Predicted Impacts – A5025 between Amlwch and the Site

- 5.3.6 NACP has interpreted the predicted traffic flows associated with the Wylfa Newydd DCO Project and are concerned the numbers presented show a minimal increase in traffic along the A5025 between Amlwch and the site.
- 5.3.7 In addition, NACP feels the number of serious accidents along this section of the A5025 is high and it is nervous that an increase in traffic flows, with drivers who are unfamiliar with the roads, may result in more accidents.
- 5.3.8 NACP was reassured that construction vehicles would not be on the highway network during school peak times; however, the proposed Request for Non-Material Change no. 5 HGV Movements (recently consulted upon and now in drafting for submission later in examination) [REP1-016] indicates this restriction may only be in place during the initial stages of construction which is a significant concern for NACP who wish to ensure that school children are not affected by the construction activities.
- 5.3.9 This analysis is incorrect. The figure of 6,524 AADT quoted is for 2033, and is all traffic on the road, not Wylfa Newydd DCO Project construction-related traffic. Furthermore, year 2033 represents the operational phase of the Power Station, therefore this is not related to construction.
- 5.3.10 The increase in traffic in 2033 owing to the Wylfa Newydd DCO Project is the difference between 2033 Reference Case and 2033 Wylfa Newydd Project

flows which is 239 AADT of which 0 would be HGVs (because construction is complete). Flows are two way (divide by two for per direction).

- 5.3.11 Appendix E of the Transport Assessment [APP-106] provides a detailed assessment of accidents on all roads considered in the study area. The roads examined as part of this process are shown in Figure B3-1 of ES Volume B - Introduction to the environmental assessments Figure Booklet - Volume B [APP-087]. This includes the A5025 through Amlwch. No accident clusters exist in this area, and the impact of Wylfa Newydd DCO Project traffic is not estimated to change this.
- 5.3.12 Construction workers will be required to sign up to a Code of Conduct (prepared in accordance with Requirement PW8) which requires the workforce to adhere to measures including ensuring adherence to the Highway Code, speed limits, and other measures to ensure drivers associated with the Wylfa Newydd DCO Project drive safely and considerately. See the WMS [APP-413] for further details regarding the Code of Conduct.
- 5.3.13 The restriction on the delivery hours around school opening and closing times has always been on the A5025 before the A5025 Off-line Highway Improvements are open. This is stated in the Wylfa Newydd CoCP [REP2-031] (refer to paragraph 5.2.3). At no point has Horizon committed to extending these restrictions beyond the opening of the A5025 Off-line Highway Improvements.
- 5.3.14 The Ysgol Syr Thomas Jones and Ysgol Gynradd Cemaes are not located on the A5025 and are located to the north of the site. No construction vehicles are envisaged to travel on the A5025 north of the site; however, Horizon has stated that it would not rule out the use of the A5025 north of the site if suppliers are located in North Anglesey as doing so would stop local businesses from being able to supply to the Wylfa Newydd DCO Project.

Predicted Impacts – through Llanfechell Village

- 5.3.15 NACP has also interpreted the traffic flows associated with the Wylfa Newydd DCO Project through Llanfechell village and is concerned the numbers presented show a reduction in the number of HGV trips and the likelihood that employee bus shuttles will pass through the village.
- 5.3.16 This analysis is incorrect. The figure of 2,605 AADT quoted is for 2033, and is all traffic on the road, not Wylfa Newydd DCO Project construction-related traffic. Furthermore, year 2033 represents the operational phase of the Power Station, therefore this not related to construction.
- 5.3.17 The increase in traffic in 2033 owing to the Wylfa Newydd DCO Project is the difference between 2033 Reference Case and 2033 Wylfa Newydd DCO Project flows which is 79 AADT of which 0 would be HGVs (because construction is complete). Flows are two way (divide by two for per direction). At no point does the Wylfa Newydd DCO Project impact Llanfechell village with HGVs in any year or any scenario.

- 5.3.18 Also, please note that if a bus route was provided through Llanfechell, it would be of an appropriate size to navigate the roads on which it would run and this is therefore unlikely to be HGV class vehicle.

Predicted Impacts – through Tregele Village

- 5.3.19 NACP has interpreted the predicted traffic flows associated with the Wylfa Newydd DCO Project and are concerned the numbers presented show a minimal increase in traffic through the village of Tregele and the likelihood that employee bus shuttles will pass through the village.
- 5.3.20 This analysis is incorrect. The figure of 1,008 AADT quoted is for 2033, and is all traffic on the road, not Wylfa Newydd DCO Project construction-related traffic. Furthermore, year 2033 represents the operational phase of the Power Station, therefore this not related to construction.
- 5.3.21 The increase in traffic in 2033 owing to the Wylfa Newydd DCO Project is the difference between 2033 Reference Case and 2033 Wylfa Newydd DCO Project flows which is 79 AADT of which 0 would be HGVs (because construction is complete). Flows are two way (divide by two for per direction). At no point does the Wylfa Newydd DCO Project impact Tregele village away from the A5025 with HGVs in any year or any scenario.
- 5.3.22 Please note that if a bus does route through Tregele Village (away from the A5025), it would be of an appropriate size to navigate the roads on which it would run and this is therefore unlikely to be HGV class vehicle.

Mitigation

- 5.3.23 NACP would like Horizon to implement road safety improvements on the A5025 between Amlwch and the site to reduce the number and severity of recorded accidents. This mitigation would also provide a legacy for communities beyond the construction period.
- 5.3.24 NACP would also like a commitment from Horizon that no construction traffic will pass through Cemaes roundabout or along Tan y Bryn Road during school peak hours throughout the whole construction period unless there are exceptional circumstances and there is prior agreement with the school in question.
- 5.3.25 NACP would also like Horizon install a CCTV/ANPR system in Llanfechell and Tregele to monitor construction traffic. It is hoped that such a system could identify dangerous, illegal or anti-social drivers and would provide evidence of employees that do not comply with the Wylfa Newydd CoCP [REP2-031] and allow Horizon to enforce their WMS [APP-413].
- 5.3.26 Appendix E of the Transport Assessment [APP-106] provides a detailed assessment of accidents on all roads considered in the study area. The roads examined as part of this process are shown in Figure B3-1 of ES Volume B - Introduction to the environmental assessments Figure Booklet - Volume B [APP-087]. This includes the A5025 through Amlwch. No accident clusters exist in this area, and the impact of Wylfa Newydd DCO Project traffic is not expected to change this.

- 5.3.27 Any unforeseen or additional impacts arising can be discussed at the Transport sub-group and consideration given to additional mitigation, as set out within the draft DCO s.106 agreement [REP1-010].
- 5.3.28 Horizon is not proposing to restrict traffic flows through Cemaes which are estimated to be low in number as shown in ES Volume C - Road traffic-related effects (project-wide) App C2-3 - Traffic Flows document [APP-100] – see link reference number 22.
- 5.3.29 Horizon is also not proposing to install ANPR cameras. Construction vehicles will be monitored as set out in the Wylfa Newydd CoCP [REP2-031].
- 5.3.30 Construction workers will be required to sign up to a Code of Conduct which requires the workforce to adhere to measures which include ensuring adherence to the Highway Code, speed limits, and other measures to ensure drivers associated with the Wylfa Newydd DCO Project drive safely and considerately. See the WMS [APP-413] for further details of the Code of Conduct. Local residents will be able to report any incidents of suspected breach of the Code of Conduct to the Transport sub-Group and it will be investigated; however, Horizon will also monitor car use within the workforce.
- 5.3.31 Regarding rat-running concerns, an amendment will be made to the Worker Management Strategy [APP-413] at Deadline 4 (17 January 2019) stating that the Code of Conduct will include a clause requiring construction workers to stick to 'A' class roads and avoid 'B' class roads (wherever practicable) to avoid causing unnecessary nuisance and disturbance to local communities. This requirement has been replicated within the construction traffic management strategy section in the updated Wylfa Newydd CoCP [REP2-031] submitted at Deadline 2 (4 December 2018).

5.4 Highway Maintenance and Parking Practices

- 5.4.1 In its third transport-related Written Representation [REP2-335], NACP states that Horizon has not been forthcoming in providing raw Automatic Traffic Count (ATC) data so it could consider the recorded speed of traffic on the A5025 through the SOCG process.
- 5.4.2 NACP considers that an increase in traffic flow and HGV composition can lead to road surface degradation and damage which heightens accident risk. NACP is concerned that where the existing A5025 is being used as the principal construction route the road surface may experience levels of usage exceeding those used in the design criteria and thus wear and tear would occur. NACP considers that, based on its consideration of the transport data, the highway surfaces will be detrimentally affected as a result of construction traffic, leading to an increased risk of accidents, delays and diversions while repairs are made.

Highway maintenance

- 5.4.3 Horizon has offered, on several occasions, to supply ATC survey data collected to NACP. As previously advised², if NACP can quote the specific location of ATC survey data it requires using the referencing system shown on Figures 1-1 and 1-2 of ES Volume C – Road traffic-related effects (project-wide) App C2-4 - DCO TA Appendix D - Traffic Data Report [App-105], then data for these sites can be supplied.
- 5.4.4 The calculations provided in this section are incorrect. The flows chosen from the ES Volume C - Road traffic-related effects (project-wide) App C2-3 - Traffic Flows document [APP-100] compare 2016 baseline scenario with the 2033 Wylfa Newydd DCO Project scenario. The correct comparison is the baseline vs. with project flows for each scenario/year which results in the impact of Wylfa Newydd DCO Project related traffic.
- 5.4.5 In 2033, the impact of Wylfa Newydd DCO Project traffic is +1,775 (two way, divide by two for per direction) of which 42 are HGVs (two way, divide by two for per direction).
- 5.4.6 Horizon and IACC Highways have agreed to carry out condition surveys of the A5025 between the proposed Power Station Access Road Junction and the existing Magnox junction through Tregele, together with Junction 3 of the A55, HGV routes from Parc Cybi and the bus route from Dalar Hir on the local network (i.e. when not on the A55 and slip roads).
- 5.4.7 Following the surveys, Horizon will prepare a schedule of monitoring and agree with IACC Highways, the extent of works to upgrade the road surfacing where required. Horizon will financially support the initial re-surfacing and carry out periodic joint inspections throughout the lifecycle of the construction works. This would then inform Horizon of the requirement for ongoing repair works.
- 5.4.8 The assumption is that the works would be undertaken by IACC Highways maintenance teams, financed by Horizon. Maintenance obligations will also be dealt with under the draft protective provisions that will be included within Schedule 15 of the draft DCO [REP2-020]. These are currently being negotiated with IACC.

Parking practices

- 5.4.9 At section 3 of the Written Representation, NACP considers there would be a significant chance of parking occurring in inappropriate or dangerous locations instead of within designated areas.
- 5.4.10 NACP seeks further clarification about the intended locations of the designated areas but would support additional park and ride facilities for workers living locally. It is hoped these facilities could be used by shuttle buses and car sharers alike and would minimise parking in inappropriate or

² In the draft SOCG, the memo dated 19 July 2018 by Steer, and as explained in the presentation given by Steer on 9 August 2018

dangerous locations. In addition, NACP would like to see technology (such as CCTV/Automatic Number Plate Recognition) used to monitor parking practices within Llafechell and Tregelle so that action can be taken by Horizon rather than relying on reports by local residents of non-compliances.

- 5.4.11 As set out in the Transport Assessment [APP-101], at Table 7-4, sufficient parking is proposed for the peak parking demand expected in the peak construction year.
- 5.4.12 Horizon has committed through the WMS [APP-413] to require the workforce to register its cars and to discipline any worker that is caught fly-parking outside of designated areas. Paragraph 2.2.1 of the WMS states that "Any personnel found to be parking outside designated areas (or 'fly parking') will be disciplined".
- 5.4.13 Horizon's DCO application contains all of the necessary parking (onsite and at Dalar Hir) to meet the requirements and minimise the traffic and transport impacts of the Wylfa Newydd DCO Project. Nevertheless, IACC's proposed Park and Share facility at Four Crosses, could provide extra flexibility, for example as park and share facilities which could be available for workers car sharing.
- 5.4.14 The Wylfa Newydd CoCP [REP2-031] commits Horizon to monitoring car use and sharing; however, any issues can 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 DCO Project. The Transport Sub-Group which will have access to funds to provide additional monitoring or mitigation if deemed necessary, as set out within the draft DCO s.106 agreement which will be submitted at Deadline 3 (18 December 2018).

6 Tourism and recreation

6.1 Introduction

6.1.1 Horizon has reviewed NACP's Written Representation regarding tourism and recreation [REP2-340]. The key issues identified in relation to tourism and recreation are:

- Wales Coast Path – Construction
- Wales Coast Path – Operation
- The Copper Trail

6.2 Wales Coast Path – Construction

6.2.1 NACP has raised concerns about the diversion that is proposed to the Wales Coastal Path during construction on the basis that the length of the proposed diversion may discourage recreational walkers. If an in-land route is required, then NACP considers a phased approach to the diversion of the Wales Coastal Path should be provided.

6.2.2 During construction of the Power Station, Horizon will be required to close and divert a section of the Wales Coast Path that crosses through the WNDA around the perimeter of the construction fenceline. This is unavoidable. The diversion that has been proposed is the shortest route available that involves a route on land within Horizon's control.

6.2.3 IACC has described part of this route as being 'sandwiched' between the A5025 and the site boundary fence during construction. This is an incorrect representation of the route, which can be seen on Figure 5-12a of the Landscape and Habitat Management Strategy ("LHMS") [REP2-039] which is shown below for ease of reference:

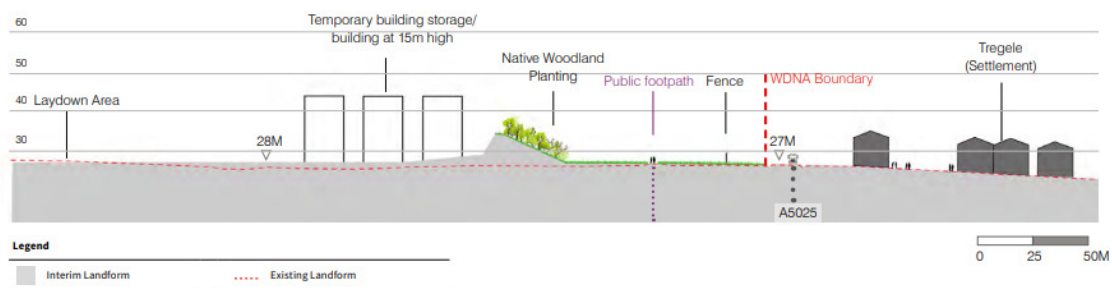


Figure 5-12 a - Illustrative section on advance planting screening along the A5025

6.2.4 The diversion around the boundary of the construction site would be designed to be sympathetic to walkers, as shown on Figure 5-12b of the LHMS.

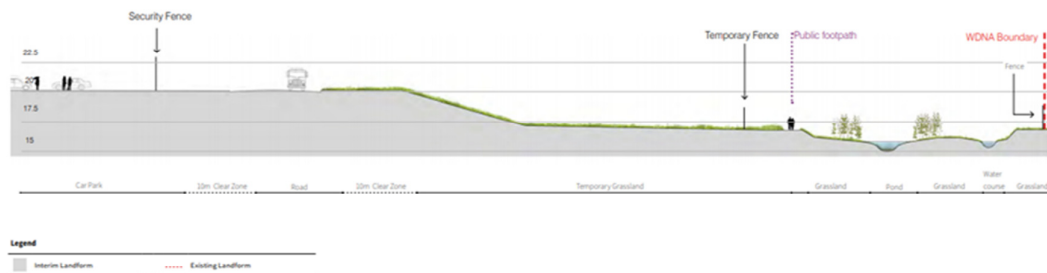


Figure 5-52 b - Illustrative sections of early planting during Main Construction

- 6.2.5 In addition to the provision of diversion routes for the Wales Coast Path, Horizon has also committed to providing a PRow fund under the draft DCO s.106 agreement, which can be used by IACC to maintain or enhance any public rights of way close to the WNDAs, or along the A5025 corridor between Valley and Treglele. It can also be used by IACC to improve sections of the Wales Coast Path along any section of the Anglesey coastline.

6.3 Wales Coast Path - Operation

- 6.3.1 NACP has expressed disappointment that the permanent Wales Coastal Path is not proposed to be a coastal route, and that Horizon has not placed sufficient importance on the Wales Coastal Path in the restoration and landscaping proposals.
- 6.3.2 During operation, a new PRow will be provided across the WNDAs, including a route for the Wales Coast Path that is sympathetic within the new landform, and a new car park to serve Wylfa Head.
- 6.3.3 Figures 6-11a and 6-11b of the LHMS shows a section of the Wales Coast Path along the Afon Cefnau during operation:

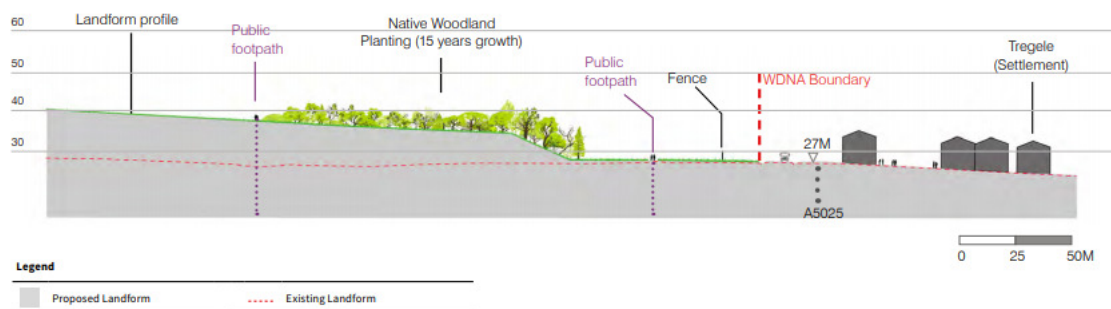


Figure 6-11 a - Illustrative section of proposed planting screening along the A5025 near Treglele



Figure 6-11 Illustrative sections through proposed planting screening

- 6.3.4 The routing on the Wales Coast Path for operation is considered to provide a good compromise for recreational walkers, and would provide links to two car parks, one serving Wylfa Head and the other at the proposed Visitor Centre. By routing the Wales Coast Path inland this resource, which will include toilets and a café (in the proposed visitor's centre), will be an enhancement to the existing route. There would also be a nature trail, which would utilise part of the Wales Coast Path.
- 6.3.5 The route provided is indicative and should the IACC consider other proposed PRoW within the WNDA to be preferable in terms of the formal diversion of the Wales Coast Path this would be acceptable to Horizon.
- 6.3.6 Options to route the Wales Coast Path seaward of the Power Station, in order to retain a coastal route, have been considered extensively by Horizon. However, a coastal route has been excluded due to a number of reasons including:
- Potential impacts on the security of the Power Station, principally the Cooling Water Intake.
 - Access to the coast between the Existing Power Station and the coast is beyond Horizon's control.
 - Attractiveness for walkers due to the close proximity to the Power Station and the need to be within an enclosed fenced tunnel at the Cooling Water Intake.
 - Lack of connectivity to a visitor centre with associated toilets, café and car parking.
- 6.3.7 In order to maintain the security of the Cooling Water Intake and guard against any malicious intent to deposit materials into this integral infrastructure (or accidental), walkers would have to be contained within a fenced tunnel. The fencing required would detract from recreational amenity and could be used for antisocial behaviour given its remote location.
- 6.3.8 The argument put forward for a seaward route is that walkers would be afforded sea views. As can be seen from the above figure, sea views across the Irish Sea from the Power Station would be obscured by the MOLF and breakwater.
- 6.3.9 It is noted that the value of the path as an attraction to the island is important to the tourism economy on Anglesey; however, it should be noted that none of the short or long walks advertised on www.walescoastpath.gov.uk or the Visit Anglesey website (www.visitanglesey.co.uk) or www.walkingbritain.co.uk are to Wylfa Head. In addition, Wylfa Head is not identified as part of the 'things to do' sections of those websites; however, Carmel Head and South Stack Lighthouse are.
- 6.3.10 It is acknowledged that the route of the 'Cemaes Bay Circular Walk' on the Weatherman Walking website does start at fisherman's car park. During operation this route would continue to be available to walkers.

- 6.3.11 On balance, Horizon is of the opinion that the proposed inland route is the most appropriate option for walkers, and provides many benefits to both local users of the Wales Coast Path and those who are undertaking a long-distance walk along the Anglesey, or indeed Welsh, coastline.

6.4 Copper Trail

- 6.4.1 NACP expresses support for Horizon's proposed diversion of the Copper Trail during construction; but considers that additional cycle paths could be provided through the WNDA during operation once final landscaping has been completed.
- 6.4.2 Horizon notes that the Copper Trail is an important asset for recreational cyclists and that there would be an impact on the Copper Trail as a result of its diversion from Cemlyn Road to Nanner Road. However, it is important to note that advanced mitigation has been undertaken on Nanner Road to enable vehicles on this road to pass more easily, thereby increasing the safety of cyclists. This route is considered suitable for cyclists and forms an attractive country road along which to cycle. However, it is acknowledged that there would be sections of the road which would have views of the Power Station, particularly in the short-term whilst vegetation is established. The landscape to the north of Nanner Road would also be changed as a result of the construction of the landscape mounding.
- 6.4.3 There would be a section of the Copper Trail which would be routed along the A5025; however, this would be mitigated through the construction of a segregated cycle path to the west of the road, which would enable cyclists to cycle this route without needing to use the A5025 road itself. While there would be a crossing over the A5025, this is already the case at two locations along its route.
- 6.4.4 The proposed diversion route avoids Treglele, this option was taken forward having undertaken consultation on the A5025 Off-line Highway Improvements, where there was no preference for one option (via Treglele) over the other option (avoiding Treglele). The preferred option reduces the length of the Copper Trail that is routed alongside the A5025 and is considered to be better for recreational cyclists. It has been calculated that by using this diversion route the distances cycled will be similar.
- 6.4.5 Consideration was given to an option for a dual use cycle / footpath through the WNDA during construction, following the route of the Wales Coast Path. In deciding to retain the Nanner Road diversion, the needs of recreational walkers on the Wales Coast Path was given priority taking into account the conflicts between walking along a pedestrian-only track or path and a route that would have to be surfaced and would be trafficked by cyclists. A cyclist-free route was considered preferable for recreational walkers. It was also considered preferable to maintain a single diversion for both construction and operation.

6.4.6 Funds will be provided in the draft DCO s.106 agreement to mitigate the effects of the diversion of the Copper Trail. This mitigation takes two forms:

- A payment to the IACC for improvements to signage along the Copper Trail, with priority to the signage between Cemlyn Bay and Llanfechell.
- A further fund is available to Sustrans (through the IACC) to provide for the Copper Trail leaflet to be updated. This leaflet would be available from the Sustrans website. In addition, funds would be available to re-print leaflets to replace the existing stock of these leaflets in tourist information venues across Anglesey.

7 Residential Amenity

7.1 Introduction

7.1.1 Horizon has reviewed the Residential Amenity chapter of NACP Written Representation [REP2-336]. The key issues identified in relation to residential amenity as follows:

- Noise
- Noise Mitigation
- Air Quality and Dust
- Visual Impact and Lighting

7.2 Noise

7.2.1 At section 2 of its Written Representation, NACP notes its difficulty in following the Environmental Assessment ("ES"), particularly in respect of noise, and notes some discrepancies in the information presented by Horizon.

7.2.2 In respect of the discrepancy mentioned between table D6-18 and paragraph 6.5.12 of Chapter D-6 of the ES [APP-125], Horizon notes that there are two errors in table D6-18:

- The small magnitude of change category for group B should read 375 properties.
- Eight properties should be indicated in the negligible magnitude of change category for group B.

7.2.3 When amended, this results in a worse impact being reported at one residential receptor in the table, and leads to 1,178 properties with significant effects being reported. The text at paragraph 6.5.12 reports the correct total of 1,177. Horizon will update this table as part of its errata document that will be submitted during Examination.

7.2.4 In responding to this Written Representation, Horizon considers that the meaning of 'significant effects' in the noise and vibration assessment requires further clarification as, in the context of noise effects, a finding of significant effect is applied to any effect that is more than minor and so can appear to result in much worse effects than other assessments (such as visual or ecology).

7.2.5 A *negligible* magnitude of change has been equated with *minor* effects at *high* sensitivity receptors, while *small* changes are linked to *moderate* effects, and *medium* or *large* changes are linked to *major* adverse effects. As a result, any construction noise levels exceeding those associated with a *negligible* magnitude of change at an individual property will be reported as either a *moderate* or *major* significant effect.

7.2.6 The lower thresholds of the *small* magnitude of change category is based on levels above which adverse effects on health and quality of life can be

detected, and are set out in table 1 below. This concept is frequently given the term *Lowest Observed Adverse Effect Level* ("LOAEL"). As a result of adopting the LOAEL as the lower boundary of the *small* magnitude of change category, **all** increases in noise above the threshold at which health effects can be detected are reported as being **significant** by the ES, even if they are only just detectable.

- 7.2.7 This approach is very conservative and, in part, came about because while there is robust evidence on the thresholds at which effects become detectable, there is far less evidence or agreement on when effects become significant. This approach will inevitably lead to large numbers of properties at which significant effects are reported, as it is inevitable that large scale construction activities will result in increased noise levels for some distance.

Table 1 – Lower Noise Thresholds of the Small Magnitude of Change Category

Magnitude of Change	Day of week/time period							
	Monday to Friday			Saturday			Sunday and Public Holidays	
	07.00 - 19.00	19.00 - 22.00	22.00 - 07.00	07.00 - 13.00	13.00 - 22.00	22.00 - 07.00	07.00 - 22.00	22.00 - 07.00
Lower boundary of Small band (LOAEL)	55	47	42	55	47	42	47	42

- 7.2.8 The derivation of the LOAEL weekday daytime value comes from the World Health Organization (WHO), who in their 'Guidelines for Community Noise'³ notes that '*during the daytime, few people are seriously annoyed by activities with L_{Aeq} levels below 55 dB*'. This is very similar to the level recommended in Defra research report NNR316 *Possible Options for Identification of SOAEL and LOAEL in Support of the NPSE*⁴, which concludes that for annoyance from daytime road traffic noise, a LOAEL of 56 dB $L_{Aeq,16}$ hours is supported. In its later Night Noise Guidelines for Europe, the WHO identifies 42 dB $L_{night,outside}$ (which can be expressed as a free-field noise level of 45 dB $L_{Aeq,8}$ hours) as being the threshold above which self-reported sleep disturbance and increased average motility when sleeping begin to increase.

- 7.2.9 To put these threshold levels into context, the most recent national noise incidence survey⁵ estimates that 32% of the population in England and Wales are normally exposed to free-field noise levels in excess of 55 dB $L_{Aeq,16}$ hours during the daytime, and 67% to free-field noise levels in excess of 42 dB $L_{Aeq,8}$ hours at night. Therefore, whilst it is desirable to

³ Birgitta Berglund, Thomas Lindvall, and Dietrich H Schwela, Eds., *Guidelines for Community Noise*. Geneva, Switzerland: World Health Organisation, 1999 [Online]. Available: <http://www.who.int/docstore/peh/noise/guidelines2.html>.

⁴ World Health Organization, *Night noise guidelines for Europe*. Geneva, Switzerland: World Health Organization, 2009 [Online]. Available: <http://www.euro.who.int/en/health-topics/environment-and-health/noise/publications/2009/night-noise-guidelines-for-europe>.

⁵ Chris Skinner, *The National Noise Incidence Study 2000/2001 (United Kingdom): Volume 1 – Noise Levels*, BRE, BRE Client report number 206344f, Feb. 2002 [Online]. Available: http://randd.defra.gov.uk/Document.aspx?Document=10280_NIS1206344f.pdf

achieve noise levels below these thresholds, it has to be recognised that much of the Welsh population is exposed to levels which are far higher on a daily basis, that the noise due to construction will be temporary, and that the reality of today's society is that:

- Some noise making activities are essential for society to function. At present, we cannot remove all adverse impacts of noise;
- Some significant adverse impacts may still be unavoidable;
- Some adverse impacts may still be unavoidable.⁶

7.3 Noise Mitigation

- 7.3.1 NACP states that, from its comparison of tables D6-18 and D6-35, only seven properties will benefit from additional mitigation measures and for this reason, the mitigation proposed is unacceptable and if nothing else can be offered, NACP questions the acceptability of the construction scheme as proposed.
- 7.3.2 NACP's conclusion that only seven properties will benefit from additional mitigation measures is not correct; 58 properties will benefit from the physical additional mitigation to the extent that the magnitude of change is reduced by one or more categories, and reductions in noise levels are predicted for many other receptors, even if these reductions do not cause the magnitude of change classification to alter. The physical noise mitigation measures such as Mound B1 will reduce noise levels reaching properties, and therefore offer a benefit both for indoor and outdoor spaces.
- 7.3.3 Horizon's DCO application also includes a commitment to apply to IACC for prior consent for the works under section 61 of the Control of Pollution Act 1974. This commitment is set out in section 8.2 of the Wylfa Newydd Code of Construction Practice (CoCP) [REP2-031]. The information that will be included in the application for prior consent is set out in Table 8-1 of the Wylfa Newydd CoCP and includes plant noise data, the Best Practicable Means (BPM) of noise and vibration control which will be implemented, and the resulting predicted noise levels at key receptors. This commitment ensures that IACC is aware of the noise control measures that will be implemented for specific construction activities, and IACC would not issue prior consent unless they are satisfied that the proposed measures represent the Best Practicable Means of noise control available.
- 7.3.4 Furthermore, it should be noted that Chapter D6 - Noise and vibration of the Environmental Statement [APP-125] does not reduce the residual significance of effect reported at dwellings as a result of the Local Noise Mitigation Strategy ("LNMS£). However, the principle has been established by other schemes (e.g. Thames Tideway, A14 Huntingdon to Cambridge) that if the minimum standard of avoiding significant adverse impacts cannot be achieved by mitigation incorporated into the scheme, the next option

⁶ Stephen Turner and Colin Grimwood, *The importance of clear policy objectives when managing noise. 10th International Congress on Noise as a Public Health Problem (ICBEN)*. London UK, 2011.

should be to offer mitigation at the receptor and compensation for loss of amenity, even if property values are unaffected.

- 7.3.5 In this respect, the voluntary LNMS and the Property Price Support ("PPS") scheme that Horizon has committed to both offer additional mitigation at the receptor which is not reflected in table D6-35 of the ES [APP-125].
- 7.3.6 In their decision regarding the Thames Tideway, the Secretaries of State are clear that off-site mitigation is part of the means available to an Applicant to manage the noise impacts, including cases where noise impacts are of such a magnitude that they necessitate *compulsory purchase in order to gain consent for what might otherwise be unacceptable development*.
- 7.3.7 In respect of the LNMS, Horizon has recently committed to reducing the eligibility criteria for noise insulation, and these thresholds are lower than imposed by comparable schemes. The scheme is also being extended to include provision of acoustic garden fences (to reduce noise levels in gardens) and improvements to conservatories if they meet certain qualifying criteria. The lower acoustic thresholds, and inclusion of acoustic fences and conservatories will be set out in an amendment to the LNMS section of the Wylfa Newydd CoCP at Deadline 4 (17 January 2019), and further information on how the scheme will be administered and the noise insulation measures available are set out in the LNMS Companion Guide which has been submitted at Deadline 3 (18 December 2018).
- 7.3.8 Given the lower acoustic thresholds for the LNMS (compared to Thames Tideway and other comparable schemes) that will be adopted in the Wylfa Newydd CoCP at Deadline 4 (17 January 2019), Horizon considers that major adverse construction noise impacts will be avoided.

7.4 Air Quality and Dust

- 7.4.1 At Deadline 2 (4 December 2018), Horizon submitted an updated Main Power Station Site sub-Code of Construction Practice (sub-CoCP) [REP2-032] which commits Horizon to using a higher proportion of newer construction plant and machinery at the WNDA which conform to more stringent emission standards. This will lead to reduced NO₂ concentrations compared to those reported in the ES. A supplementary report has been submitted at Deadline 3 (18 December 2018) which presents the analysis of additional modelling work undertaken with the use of the newer plant.
- 7.4.2 As well as the good working practices referred to in the Written Representation, Horizon proposes to use a comprehensive real-time air quality monitoring system with trigger alerts and appropriate response mechanisms to ensure that the dust mitigation measures are being implemented properly. In addition, Horizon has worked with IACC since submission of the DCO application to develop more detail in relation to air quality monitoring on site. As a result of these discussions, Horizon has updated Section 7 of the Wylfa Newydd CoCP [REP2-031], Main Power Station Site sub-CoCP [REP2-032] and other sub-CoCPs [REP2-033 - 036] to include more information on the following:

- Further detail of the real-time web-based environmental system including data management and access.
- The proposed location of monitoring equipment for PM10, PM2.5, NOx, NO2 and dust deposition.
- Confirmation of the thresholds and exceedance trigger levels for dust, NO2 and PM10, and frequency of reporting (including amber and red trigger levels).
- The process of investigating trigger exceedance and how this will be reported to the IACC.

7.5 Visual Impact and Lighting

- 7.5.1 In response to NACP's request at paragraph 4.1.1, Horizon has agreed to exploring the potential to prepare a series of 'illustrative construction visualisations' from a selection of representative viewpoints , to show the main construction elements, including tall cranes, the Site Campus, Marine Off-Loading Facility and breakwater construction and a range of construction plant and machinery. Please refer to Horizon's comments on IACC's response to **FWQ7.0.5** submitted at Deadline 3.

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