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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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[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](#)
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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
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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 Government

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 Government (WG) Written Representation

1.1 Introduction

1.1.1 This report provides Horizon's response to the Written Representation submitted by the Welsh Government 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 The key issues identified in this response are grouped by the following topic areas:

- Procedural matters;
- Planning obligations (including approach to monitoring);
- Cumulative effects;
- Welsh language and culture;
- Education, skills and labour supply;
- Economic development and supply chain;
- Tourism;
- Transport and infrastructure;
- Digital infrastructure;
- Health and wellbeing;
- Housing and accommodation;
- Historic environment; and
- Environment.

1.2 Summary of engagement

1.2.1 Horizon has engaged proactively with Welsh Government to understand and seek to address its concerns throughout the pre-application process and following the submission of the DCO application. This has included regular meetings and workshops on topics of interest to the Welsh Government, including housing, skills and supply chain. Full details of this engagement are set out in the draft Statement of Common Ground between Horizon and the Welsh Government [REP2-043] as submitted at Deadline 2 (4 December 2018).

1.2.2 Horizon welcomes the Welsh Government's support for a new nuclear facility at Wylfa (paragraph 1.1.2) and considers that significant process has been

made in relation to the areas of concern to the Welsh Government, many of which are addressed through the draft DCO s.106 agreement submitted at Deadline 3 (18 December 2018). Horizon believes that that these can be satisfactorily addressed throughout the examination.

1.3 Policy context

- 1.3.1 Since the Welsh Government's Written Representation was drafted, the Welsh Government has published PPW10 (on 5 December 2018) and this now supersedes PPW9.
- 1.3.2 PPW10, like PPW9, does not contain any specific policies relating to nuclear development, although it includes a number of broad principles that the Wylfa Newydd Project is considered to be consistent with including:
- Support for sustainable economic growth;
 - Recognising the importance of moving towards a low carbon, resilient society;
 - Making best use of resources;
 - The importance of good quality/well designed homes, jobs, services, infrastructure and facilities so that people feel content with their everyday lives; and
 - Acting in the long term to respect environmental limits.
- 1.3.3 In response to the Welsh Government's point at paragraph 2.1.5, whilst Horizon notes that NPS EN-6 does not contain any location specific policy in relation to Associated Development sites, it should be noted that the Welsh Government agree with the locations of the Associated Development sites in principle. Welsh Government do however consider that further resilience is required in relation to park and ride sites on the mainland (see WG04 in draft SOCG between Horizon and Welsh Government) [REP2-043] as submitted at Deadline 2 (4 December 2018).
- 1.3.4 Horizon notes that in considering the Associated Development sites, which are required in order to deliver the Wylfa Newydd DCO Project, the Examining Authority and Secretary of State should have regard to the identified urgent need for new nuclear power in NPS EN-1, as well as the benefits of the Wylfa Newydd DCO Project as a whole. This is set out further in Horizon's Written Representation [REP2-003] and the Planning Statement [APP-406].

1.4 Procedural matters

Crown Land

- 1.4.1 The Welsh Government's relevant representation dated 10 August 2018 notes that that "*Horizon have included parcels of land belonging to Welsh Ministers or the National Assembly for Wales upon which they wish to acquire rights. There has been an oversight as these have not been identified as being Crown Land and are not categorised under the Crown land section of the Book of Reference.*" It then referred to section 85(2) of the Government of Wales Act

2006 and under s135 of the Planning Act 2008 Horizon has not made a formal approach seeking Welsh Ministers consent for these rights.

- 1.4.2 Horizon has identified in the Book of Reference that three entities (National Assembly for Wales, Welsh Ministers and Secretary of State for Wales) own, occupy or have rights in plots located at Parc Cybi, Dalar Hir and the A5025 Off-line Highway Improvements Section 1 (Valley). Horizon is committed to ensuring that its DCO application documents reflect the nature of the Welsh Government's interests, and that it complies with the requirements set out in section 135 of the Planning Act 2008 including obtaining Welsh Government consent where necessary.
- 1.4.3 To this end, Horizon wrote to the Welsh Government on 2 November 2018 seeking confirmation of the nature and location of the affected interests, and the reasons why each plot is considered to be Crown land.
- 1.4.4 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.

1.5 Planning obligations and DCO requirements

DCO requirements

- 1.5.1 Horizon does not agree that the Draft DCO requirements are inadequate. The approach that Horizon has taken to the DCO requirements is to limit their number by securing the majority of the mitigation proposed within control documents via the provisions in Schedule 3 of the Draft DCO. Horizon considers that the management strategies in the Wylfa Newydd Code of Construction Practice ("CoCP") [REP2-031] and associated sub-CoCPs [REP2-032 to REP2-036], along with the mitigation secured elsewhere in other control documents such as in the Design and Access Statement [APP-407 to APP-410], contain sufficient detail to secure the mitigation required to appropriately mitigate the adverse effects of the Wylfa Newydd DCO Project. For this reason, a DCO requirement that control documents must be submitted for approval is not necessary or justified.
- 1.5.2 Horizon continues to engage with the Welsh Government and other stakeholders on these matters, and engagement to date has led to additional detail being added to control document submitted at Deadline 2 (4 December 2018). Horizon has also made further commitments, as noted in Horizon's responses to the Examining Authority's First Written Questions submitted at Deadline 2 (4 December 2018) [REP2-002] and in other Deadline 3 responses (18 December 2018), to add additional detail to the control documents to be submitted at Deadline 4 (17 January 2018). Horizon acknowledges that further refinement of the control documents will occur throughout the course of the Examination.
- 1.5.3 Horizon responds to the initial comments made by the Welsh Government on the Draft DCO (EV-013) on 4 December 2018; and a copy of this letter is attached as Appendix 2 to the cover letter that accompanied Horizon's Deadline 2 submission (4 December 2018).

- 1.5.4 Horizon responds to the specific requirements requested by Welsh Government in the topic specific chapter responses below.

Draft S106 Agreement

- 1.5.5 Horizon received detailed comments from the Welsh Government on the first draft DCO s.106 agreement and reverted to Welsh Government on 30 November 2018 responding to issues and updating the agreement [REP1-005].
- 1.5.6 Horizon continues to engage with IACC and the Welsh Government to ensure that a signed draft DCO s.106 agreement can be submitted to the Examining Authority by 25 March 2018 (in accordance with Horizon's proposed revision to the Examination timetable, as supported by the Welsh Government and IACC).

WNMPOP

- 1.5.7 Horizon notes the concerns raised by Welsh Government in relation to the WNMPOP. Horizon proposes the WNMPOP primarily to ensure fairness and transparency in relation to the release of a limited number of contingency funds, particularly for those topics that have the potential for regional effects. The approach is intended to ensure that Welsh Government has a role in determining the release of these contingency funds, alongside IACC. Horizon has proposed that it sits on the WNMPOP as it is a signatory to the draft DCO s.106 agreement and has a fundamental role to play in facilitating the mitigation being delivered by the contingency funds.
- 1.5.8 The WNMPOP builds on good practice from HS2, Crossrail and Thames Tideway Tunnel, each of which had strategic bodies which considered wider and cross-boundary planning issues. Hinkley Point C also had a strategic body which administered the Community Fund, which comprised a mix of district and County Councillors, independent members and the developer, EDF.
- 1.5.9 Horizon has shared draft terms of reference for the WNMPOP with the Welsh Government and IACC on 12 November 2018. It is proposed by Horizon that those terms of reference, once agreed, could be appended to the s.106 agreement. The draft DCO s.106 agreement itself also contains principles and processes by which the WNMPOP would need to allocate contingency funds. The draft terms of reference for the WNMPOP shared with the Welsh Government include membership and proposed approach to dispute resolution. The Welsh Government has yet to provide comment to Horizon on these draft terms of reference.
- 1.5.10 Horizon has noted the Welsh Government's response in relation to the responsibility of the Community Fund and will consider appropriate mechanism for this with IACC and other stakeholders.
- 1.5.11 It is noted that IACC, the Welsh Government and other key stakeholders appear to have differing views as to whether all payments should be routed through IACC or whether it is appropriate for some to be paid direct to the

organisation delivering the mitigation and/or monitoring. This needs urgent resolution including from Welsh Government and IACC.

- 1.5.12 Horizon considers that whatever approach is taken to the administration of contingency funds, provided that this is done so in accordance with the principles in the draft DCO s.106 agreement, this will ensure that the necessary mitigation is released for dealing with unforeseen effects. It should be noted that the contingency funds, which the WNMPOP would take decisions on, is only one element of the proposed mitigation to be secured through the DCO s.106 agreement and there is a significant level of contributions secured through the draft DCO s.106 agreement to address known effects.

Sub-Groups

- 1.5.13 The Welsh Government has raised issues throughout their Written Representation in relation to the terms of reference for the various sub-groups set out in the Wylfa Newydd CoCP [REP2-031] (see paragraphs 5.4.4, 6.5.4, 7.4.4, 8.5.4 and 11.4.5) of the Welsh Government's Written Representation. The draft terms of reference for the WNMPOP, shared with Welsh Government on 12 November 2018, states that detailed terms of reference would be agreed by the WNMPOP, but sets out key activities for each sub-group. These are replicated below for each sub-group. It is considered that these provide sufficient clarity on the proposed role and remit of each group. The agreed terms of reference for the WNMPOP, once agreed, are proposed to be annexed to the draft DCO s.106 agreement.
- 1.5.14 Horizon proposes an independent chair for the Welsh Language and Culture sub-group; however, it is not proposed that there are independent chairs for the other sub-groups. This follows the approach taken with regard to the existing structure, with an independent chair only for the Welsh Language Impact Assessment Steering Group.
- 1.5.15 It is not considered that the sub-groups need to be independently chaired for them to be properly accountable. Each group will be subject to scrutiny through the WNMPOP which would be a representative body comprised of IACC, Welsh Government, Horizon and a community representative, although final membership is still to be agreed.
- 1.5.16 The proposed key activities for each sub-group are:

Jobs and Skills – Day to day decision-making

- Consider performance data and reports from the Wylfa Newydd Employment and Skills Service;
- Agree and consider Key Performance Indicators in relation to jobs and skills, for instance the number of local people working on the project;
- Make decisions on any practical changes required to improve achievement of KPIs, where this does not relate to release of funds;
- Advice to the WNMPOP on allocation of the Education Contingency Fund and to IACC on the allocation of the Skills Fund; and
- Review of the Skills Implementation Plan.

Accommodation and Tourism Services - Day to day decision-making

- Consider recommendations from the Oversight Board for the Worker Accommodation Management Service (see terms of reference within the Worker Accommodation Strategy);
- Listen to and understand advice on accommodation issues from the local community; and
- Consider monitoring reports in relation to housing and tourism and make recommendations to the WNMPOP including on allocating the contingency element of the Housing Fund.

Supply Chain Services - Day to day decision-making

- Consider reports from the Supply Chain Service;
- Agree and consider KPIs in relation to supply chain, for instance the number of local firms working on the project and value of the commission;
- Make decisions on any practical changes required to improve achievement of KPIs;
- Consider monitoring reports in relation to the Supply Chain Action Plan;
- Advising on matters relating to the operation of the Supply Chain Portal; and
- Making recommendations to the WNMPOP in relation to Supply Chain matters.

Environment and Built Heritage – Advisory only

- Provide the strategic guidance if necessary of environmental monitoring (largely controlled by IACC through requirement, or Environmental Permits);
- Provide strategic advice in relation to environment and built heritage issues;
- Make recommendations to the WNMPOP in relation to any environment or built heritage issues as arising from monitoring; and
- Make recommendations to the WNMPOP in relation to the allocation of the Environmental Enhancement Fund and Cemlyn Lagoon Resilience Fund.

Emergency Services - Day to day decision-making

- Work with Horizon to inform the preparation of the Community Safety Management Strategy (CSMS);
- Monitor the implementation of the CSMS;
- To 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;

- To review and input into reports from the Community Involvement Officer in relation to emergency services matters;
- To review any actual or potential community tension arising from the project
- To feed back to the WNMPOP community comments and concerns not captured through the monitoring process;
- To feed back to the WNMPOP issues as seen from the stakeholder's area of expertise; and
- To feed back to the WNMPOP 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.

Health and Well Being – Advisory only

- Consider reports in relation to health and well-being matters;
- Make recommendations to the WNMPOP in relation to any health and well-being matters as arising from monitoring, including health implications of environmental monitoring;
- Make recommendations to the WNMPOP on release of the Health Contingency Fund;
- Monitor the implementation of the HIA mitigation strategy and provide advice on its delivery; and
- To feed back to the WNMPOP issues as seen from the stakeholder's area of expertise.

Welsh Language and Culture – Advisory only

- Ensure the delivery of the golden thread in relation to Welsh Language and Culture;
- Monitor the implementation of the Welsh Language and Culture mitigation and enhancement strategy, within the controls of the draft DCO S106 agreement;
- Make recommendations to the WNMPOP in relation to any Welsh Language and Cultural matters as arising from monitoring; and
- To feed back to the WNMPOP issues as seen from the stakeholder's area of expertise.

Transport – Advisory only

- Consider reports in relation to traffic and transport monitoring;
- Make recommendations to the WNMPOP on the allocation of the Transport Contingency Fund;
- Review the delivery of the Travel Plan and make recommendations on practical changes required; and

- To feed back to the WNMPOP issues as seen from the stakeholder's area of expertise.

WAMS

- 1.5.17 In relation to the points raised by the Welsh Government at paragraphs 3.2.13 to 3.2.14, Horizon is committed to establishing the oversight board for the WAMS – this is secured in Schedule 5 of the draft DCO s.106 agreement that has been shared with Welsh Government.
- 1.5.18 Welsh Government requests a place on the WAMS oversight board. The draft terms of reference for the WAMS which are included in the Workforce Accommodation Strategy [APP-412] include IACC and Gwynedd Council on the oversight board. The Welsh Government does not have a local housing remit and therefore it is not clear on what basis it would have a role on the WAMS oversight board. If it did have a role then a non-voting role would need to be considered.

WNESS

- 1.5.19 The WNESS is secured by the draft DCO s.106 agreement in Schedule 4. This sets out the aims of the WNESS which include supporting any employers who lose employees to the Wylfa Newydd DCO Project to backfill their roles. The Skills Fund is also available to mitigate this issue, and can be accessed for:
- Training capacity related to key skills requirements needed on the Wylfa Newydd DCO Project;
 - Development of training courses related to key skill requirements needed across the Wylfa Newydd DCO Project.
- 1.5.20 Schedule 4 of the draft DCO s.106 agreement also specifies that the Jobs and Skills Implementation Plan will apply to the construction and operational period of the Wylfa Newydd DCO Project and be updated on a three yearly basis and at agreed points during the operational period.

1.6 Cumulative Effects

- 1.6.1 With reference to Welsh Government's comments on the Reasonably Foreseeable Future Projects ("RFFP") list, Horizon would like to note the following:
- Third Menai Crossing (AN22) – Please refer to Horizon's response to **FWQ 11.1.50** of the Examining Authority's First Written Questions submitted at Deadline 2 (4 December 2018) [REP2-002];
 - Dwr Cymru Welsh Water Wastewater Treatment Works (AN26) – Horizon continue to liaise closely with DCWW over the required upgrade works. This includes ongoing sewage modelling. No further environmental information is available at this time. It is noted that the operation of the works would be subject to an Environmental Permit related for the required discharge.

1.7 Welsh Language and Culture

Principal issues

- 1.7.1 Welsh Government's Written Representation at paragraph 5.1.4 considers that there are three main areas that need to be addressed: relating to the delivery, timing and monitoring of the Welsh Language and Culture Mitigation and Enhancement Strategy (WLCMES) [APP-432]; sensitivity testing of construction workers and their distribution; the approach to monitoring impacts and mitigation under the Wylfa Newydd Code of Construction Practice (CoCP) [REP2-031]. Overall, the draft DCO s.106 agreement, submitted at Deadline 3 (18 December 2018) addresses the issues raised by Welsh Government in their Written Representation, and further demonstrates how the Wylfa Newydd DCO Project contributes to Welsh Government policy on Welsh Language including Planning Policy Wales.

Delivery, timing and monitoring of WLCMES measures

- 1.7.2 Schedule 1 - Welsh language and culture of the draft DCO s.106 agreement includes provision to secure the delivery, timing and monitoring of the measures.
- 1.7.3 As set out at Schedule 1 in the draft DCO s.106 agreement, the Welsh Language and Culture Coordinator will focus on the development and implementation of the measures; this would involve a refinement of the approach including in relation to the delivery of the measures, timing of activities relating to the measures, and on monitoring.

Delivery

- 1.7.4 Financial contributions to support delivery of the measures are set out (and secured) by the draft DCO s.106 agreement. These include:
- A Welsh Language Education (Annual) Contribution of £80,000 (Indexed) towards funding Welsh language peripatetic teaching capacity to operate in the KSA;
 - A Welsh Language Officer Contribution of £40,000 (Indexed) towards the provision of a Welsh Language Officer.
 - A sum of £250,000 towards provision of community translation services.
- 1.7.5 The draft DCO s.106 agreement also sets out the governance that will support delivery, including the Management Group and the Sub-Group and their roles and responsibilities.

Timing

- 1.7.6 WLCMES provides an explanation of the 'trigger' for the mitigation and enhancement measures, whether measures are for 'pre-construction', 'construction' and/or 'operation' stages of the Wylfa Newydd DCO Project. These 'trigger' timings are included in the measures secured by the draft DCO s.106 agreement.

Monitoring

- 1.7.7 The draft DCO s.106 agreement includes several provisions relating to the monitoring of impacts. The draft DCO s.106 agreement states that the Welsh Language and Culture Coordinator will monitor, measure and evaluate language and culture related community benefit activities and associated mitigation measures and will sit on and report to the Welsh Language and Culture Sub-Group. The draft DCO s.106 agreement sets out the approach to monitoring and evaluating the impact of the Wylfa Newydd DCO Project on the Welsh language in the KSA, with evaluation parameters to be agreed with the Welsh Language and Culture Sub-Group.
- 1.7.8 The draft DCO s.106 agreement also provides for reporting requirements to facilitate the monitoring, and a commitment to maintain dialogue with relevant bodies to understand and where relevant mitigate the inflow of pre-school age children on local Welsh-medium provision.
- 1.7.9 The Worker Accommodation Management Service (WAMS), secured at Schedule 5 of the draft DCO s.106 agreement, is a key tool for supporting monitoring. The monitoring data collected through WAMS will help inform and target mitigation measures.

Sensitivity testing of construction workers and their distribution

- 1.7.10 Further sensitivity testing regarding the overall distribution of construction workers has been a matter of discussion between Horizon and Welsh Government as part of on-going SOCG discussions (SOCG between Horizon and the Welsh Government [REP2-043]).
- 1.7.11 It is agreed between both parties that the WLIA [APP-432 and APP-433] is based on a worst-case scenario for Welsh language and that the assessment within the WLIA will not therefore consider a range of scenarios. Horizon has however agreed to do sensitivity testing based on scenarios including a greater number of non-home-based workers living on Anglesey. This will be high level sensitivity testing and will not include detailed scenarios specifically for Welsh language. The Worker Accommodation Management Service (WAMS) secured through the draft DCO s.106 agreement will consider a range of monitoring indicators when setting thresholds and managing the location of the workforce, including impact on Welsh language and culture.

The approach to monitoring impacts and mitigation under the Code of Construction Practice (CoCP)

- 1.7.12 Welsh Government requests further detail in relation to the use of WAMS (secured through the Wylfa Newydd CoCP and the draft DCO s.106 agreement) for gathering monitoring data. Schedule 4 of the draft DCO s.106 agreement, notes that during the construction period, Horizon will collect aggregate and anonymised data on the Workforce Dependents who move to the KSA through the WAMS and the Welsh Language skills of such partners and children, and the number of children and their ages (where such data is available and subject to compliance with data protection legislation).
- 1.7.13 Further to this, Schedule 6 (Education) of the draft DCO s.106 agreement, includes obligations relating to the monitoring of the Local Schools (as defined

in the draft DCO s106 agreement). Horizon undertakes that it will monitor the numbers of Workforce Children (as defined in the draft DCO s106 agreement) as part of the operation of the WAMS Workforce Management Portal and provide such data to the Jobs and Skills Sub-Group on a quarterly basis or such other period agreed by the Jobs and Skills Sub-Group. The draft DCO s.106 agreement also sets out provision for IACC to:

- Undertake monitoring of the number of Workforce Children enrolling in Local Schools on Anglesey by monitoring the available supply of primary and secondary school places within Anglesey and provide a capacity report to the Jobs and Skills Sub-Group;
- Use reasonable endeavours to work with Gwynedd Council and Conwy Council to enable those councils to monitor the number of Workforce Children enrolling in Local Schools by monitoring the available supply of primary and secondary school places within Gwynedd and Conwy respectively, and to provide a capacity report to the Jobs and Skills Sub-Group; and
- Within 10 Working Days of the end of each school term, provide a capacity report for Local Schools for the Jobs and Skills Sub-Group using the data collected which sets out the statistics on the numbers of filled and unfilled school places at the Local Schools as well as pupil number forecasts for the following school term.

1.7.14 Further to this, the Wylfa Newydd CoCP [REP2-031] and the draft DCO s.106 agreement includes provision relating to the role of the Wylfa Newydd Major Permissions Oversight Panel (WNMPOP) and Sub-Groups as it relates to monitoring and reporting. The Draft SOCG between Horizon and Welsh Government [APP-414] reflects the current position that Horizon consider this to be an important part of the next phase of implementing a DCO, that Welsh Government were provided draft Terms of reference for WMPOP and Sub-Groups and that this is an ongoing matter for discussion between Welsh Government and Horizon.

Further clarification on mitigation and enhancement measures

Role of the Welsh language in the recruitment process

- 1.7.15 Section 1.3.1 (h) of 'Schedule 1 - Welsh language and culture' of the draft DCO s.106 agreement [REP1-010] notes that Horizon's Welsh language policy will 'Ensure a Welsh-speaking member of staff is included on interview panels for jobs where candidates are required to have Welsh language skills'.
- 1.7.16 Section 2.5 of 'Schedule 1 - Welsh language and culture' of the draft DCO s.106 agreement further notes that 'Where practicable, the Developer will include a Welsh speaker on interview panels for job applicants for roles at the Developer whose preferred language is Welsh, provided that where the job role demands English language skills, those skills will also be considered in such interview process.'

Increased demand for accommodation affecting affordability of housing for local people

- 1.7.17 This is subject to on-going discussion relating through the Statements of Common Ground (see the draft SOCG between Horizon Nuclear Power Wylfa Limited and the Welsh Government [REP2-043]).
- 1.7.18 Schedule 5 of the draft DCO s.106 agreement provides a commitment to monitoring data in relation to accommodation to include monitoring the workforces' accommodation choices include the location of the accommodation and type of accommodation and will provide such monitoring data to the Accommodation, Tourism and Leisure Sub-Group on a quarterly basis or other such reasonable period agreed with the Accommodation, Tourism and Leisure Sub-Group.
- 1.7.19 The draft DCO s.106 agreement also provides a commitment to an Accommodation (Contingency) Fund. In the event that the Accommodation, Tourism and Leisure Sub-Group determines that the accommodation monitoring data 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 as a result of the Wylfa Newydd Project, then it will make a recommendation report to the Wylfa Newydd Major Permissions Oversight Panel (WMPOP) and the WNMPOP may make a mitigation direction as per Schedule 16 of the draft DCO s.106 agreement.
- 1.7.20 Horizon provides (12 November 2018) draft Terms of reference for WMPOP and Sub-Groups to the Welsh Government to confirm governance process, responsibilities, and members. Further discussions between Welsh Government and Horizon is required in relation to the matter and is on-going.

Peripatetic teachers

- 1.7.21 The draft DCO s.106 agreement addresses the Welsh Government comments on provision for a Welsh Language Education Contribution, an annual sum of £80,000 (Indexed). 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.
- 1.7.22 A complementary measure, secured at Schedule 1 of draft DCO s.106 agreement, is the circulation of welcome packs. During the construction period Horizon will circulate welcome packs to the Workforce Dependants who move to the KSA. These welcome packs will provide information on local services and the community and will include:

- 'Byw mewn gwlad ddwyieithog: Croeso i Gymru, Croeso i'r Gymraeg/Living in a bilingual nation: Welcome to Wales, Welcome to Welsh' Welsh language booklet (published by the Welsh Government, 2017);
- The 'Dechrau'r daith at ddwy iaith: Dy ganllaw i addysg Gymraeg/Begin the bilingual journey: Your guide to Welsh-medium education' documents (published by the Welsh Government, 2017); and
- Any other materials agreed by Horizon and IACC.

National Centre for Learning Welsh

1.7.23 Liaising with external partners is a key part of the WLCC's role as set out in the draft DCO s.106 agreement and would include the National Centre for Learning Welsh. Horizon will seek the advice of the National Centre for Learning Welsh in implementing the Welsh Language and Culture Mitigation and Enhancement Measures as set out in the draft DCO s.106 agreement, including:

- The establishment of a Welsh language skills competency framework and assessment tool;
- Engagement with contractors and the distribution of information on the Welsh language and culture as part of recruitment materials;
- The induction process of the workforce, including briefing materials to raise awareness and respect for the Welsh language and culture, and Welsh speaking among the contractors and the workforce;
- The provision of community translation service and community engagement by the Welsh language Officer.

DCO requirements

1.7.24 It is noted that Welsh Government has no comments in relation to the draft requirements with regard to Welsh language and culture.

Planning obligations

1.7.25 Welsh Government has raised a number of comments in relation to planning obligations in paragraph 5.4.4 of the response which are responded to below:

- Welsh language and culture coordinator (WLCC) – the WLCC is secured by Schedule 1 of the draft DCO s.106 agreement and has now been appointed and started work. Horizon is content to share the job description with Welsh Government, noting that this is a draft which will continue to evolve in discussion with Welsh Government and IACC;
- Welsh Language Education (Annual) Contribution – the annual contribution has been defined in the draft DCO s.106 agreement which was shared with Welsh Government on 30 November 2018;
- Community education obligation – Please see Horizon's response to Q10.5.3 of the Examining Authority's First Written Questions, submitted at

Deadline 2 (4 December 2018), which sets out Horizon's approach to education;

- Welsh language and culture sub-group – please refer to Horizon response on sub-groups above;
- Community language services - Horizon has included a commitment in the draft SPC s.106 agreement to purchase translation equipment. Horizon is not clear on precisely what Welsh Government is requesting in relation to further community language services and will discuss this with Welsh Government further;
- Community translation service contribution – this has been defined in the draft DCO s.106 agreement which was shared with Welsh Government on 30 November 2018;
- Interview procedures – Horizon has proposed a change to the DCO s.106 agreement to include the following wording “where practicable, the Developer will include a Welsh speaker on interview panels for job applicants for roles at the Developer whose preferred language is Welsh, provided that where the job role demands English language skills, those skills will also be considered in such interview process”.

1.8 Education, Skills and Labour Supply

Principal issues

Skills and Labour Supply

- 1.8.1 The Welsh Government's Written Representation raises three substantive issues with regard to skills (Chapter 6 of the Welsh Government's Written Representation [REP2-367]):
- i) The risk or likelihood of economic displacement;
 - ii) Requests for further information
 - iii) DCO Requirements and Planning Obligations.
- 1.8.2 For ease of reference the following two acronyms are used extensively in this response:
- Jobs and Skills Strategy (JSS) – the strategy for maximising local employment at Wylfa and managing impacts on the wider area;
 - Wylfa Newydd Employment and Skills Service (WNESS) – The Agency that will be established with partners to deliver the commitments in the Jobs and Skills Strategy, secured through the draft DCO s.106 agreement.

Displacement

- 1.8.3 It is the policy of both Welsh Government and IACC to create more jobs on Anglesey. Welsh Government has designated it as an Enterprise Zone. The first objective of the Enterprise Zones is to "Grow the local economy and provision of new jobs". The Anglesey Enterprise Zone is focused on the energy sector. IACC has adopted a Joint Local Development Plan at the heart of which is a desire to increase the number of jobs on the island in the energy sector.
- 1.8.4 A fundamental challenge for Anglesey's labour market is that it does not have enough jobs and in particular it does not have enough full-time, year-round jobs. Horizon therefore disagrees with Welsh Government that there is insufficient labour market capacity.
- 1.8.5 Table 4-11 (Comparative Job Densities by Area) in ES Volume C -C-1 – 1 - Socio-economic Baseline Report [APP-095] shows that Anglesey has far fewer jobs per working age residents (0.63) than either North Wales (0.79) or Wales as a whole (0.74). Anglesey would require an additional 3,500 jobs to achieve the average for Wales (and 5,000 to match North Wales).
- 1.8.6 Horizon is therefore helping to deliver a key government policy, the objective of which is to address the recognised lack of jobs in Anglesey.
- 1.8.7 IACC is already planning for this growth. Paragraph 5.4.5 of Chapter 8: Housing in IACC's Local Impact Report [REP2-061 to REP2-152] states that IACC's housing target would lead to an increase in out-commuting from Anglesey, as more housing is provided than is required to fill jobs on the island.
- 1.8.8 The Wylfa Newydd DCO Project is therefore an important part of the solution to the main labour market challenge facing Anglesey. Horizon believes its package of investment through the Jobs and Skills Strategy (JSS) and accompanying Skills Fund will enable the benefits of the Wylfa Newydd DCO Project to be enhanced and wider labour market risks to be managed.
- 1.8.9 The available evidence does not support the Welsh Government position that displacement is likely because there are not enough workers on Anglesey.
- 1.8.10 Further, Horizon does not agree with the Welsh Government's understanding of the definition of displacement. Paragraph 6.1.4 of the Welsh Government response (and appendix B paragraph 1.3.3) correctly defines displacement as 'a reduction in economic activity elsewhere as a result of the project'. This is consistent with official Government definition of displacement in the Green Book which is referenced in the Welsh Government's 'Guide to Developing the Project Business Case' (2018) which states that:

"Displacement is the degree to which an increase in economic activity promoted by an intervention is offset by reductions in economic activity elsewhere."

- 1.8.11 However, paragraph 6.1.4 then goes on to incorrectly re-define displacement. It states that:

"In this case the negative impacts of displacement are likely to be the loss of workers from existing local businesses to the Wylfa Newydd project, difficulties

back-filling any vacancies, which could lead to direct costs to businesses, wage inflation, and potentially business closures."

1.8.12 This is an incorrect definition of displacement in several ways.

- Firstly, many local contractors will win contracts on the Wylfa Newydd DCP Project. The local residents that work for those contractors, and therefore on the project will do so with their existing employer and therefore will not change job and will not leave a vacancy behind.
- Secondly, even where workers move jobs this is not displacement. Instead, as correctly identified at Appendix B, Paragraph v of the Welsh Government response, it simply labour market churn.
- Thirdly vacancies becoming harder to fill is not displacement.
- Fourthly wage inflation is not displacement and could in any case be a beneficial effect for the workforce and local economy.

1.8.13 Welsh Government does give an example that could potentially be displacement, which is business closure. However, a business closure does not always mean there is displacement. In a market economy there is a normal churn in businesses with both closures and start-ups which is essential to drive productivity growth in the economy.

1.8.14 Notwithstanding the above, the Welsh Government is correct to identify displacement, in its correct definition, as a potential risk. This is a standard feature of economic analysis. However, no evidence has been provided by Welsh Government or others that displacement is a likely significant negative impact of the Wylfa Newydd DCO Project.

1.8.15 In relation to specific assertions of risks in the document Horizon would make the following response.

1.8.16 Paragraph 6.1.5 correctly identifies that if residents move to the Wylfa Newydd DCO Project this could result in vacancies becoming harder to fill. Horizon recognises that this is a potential risk and has therefore proposed making the Skills Fund and the Wylfa Newydd Employment and Skills Service (WNESS) available to support the backfilling of any such roles.

1.8.17 At paragraph 6.3.12 the Welsh Government states that to avoid displacement, backfilled roles need to be filled by unemployed people. Horizon does not consider this is correct. In many cases employers will seek to recruit within their organisation often by promoting existing staff. This then creates lower level vacancies in the organisation which can be filled by someone outside of the current labour force – not only unemployed people, but also those who want to move from part time to full time work, work more hours, and those returning to work from caring responsibilities or illness.

1.8.18 This raises an important point about how the Welsh Government response considers the available workforce which very significantly under-estimates the available workforce to work on the Wylfa Newydd DCO Project and for other employers in the area.

1.8.19 This is because Paragraphs 6.4.6 to 6.4.7 and the Appendix of the Welsh Government's Written Representation incorrectly define the level of

unemployment as it does not use the Government's official measure (the internationally agreed and recommended International Labour Organisation definition) and also ignores the economically inactive – some of whom would like to work but aren't currently looking for jobs for various reasons.

- 1.8.20 Instead it uses the Jobseekers Allowance (JSA) measure (formerly the Claimant Count) which is simply those who are unemployed and in receipt of that benefit. The Claimant Count is an administrative statistic and the ONS states that:

"The Claimant Count does not attempt to measure unemployment, which is a concept defined by the International Labour Organisation (ILO) as all those who are out of work, actively seeking work and available to start work."

- 1.8.21 On the 23rd February 2017 the ONS released a statement "Publication arrangements for the Claimant Count" which stated:

"ONS has decided that, with effect from the Labour Market Statistics releases to be published on 15 March 2017, to remove the Claimant Count series from the UK and Regional Statistical Bulletins, as it may now be providing a misleading representation of the UK labour market. Claimant Count data will continue to be available as datasets on the ONS website and via NOMIS."

- 1.8.22 However, the Welsh Government response seeks to use the JSA measure to demonstrate that *"There is little spare capacity in the labour market."* (paragraph 6.4.2). This is not considered to be correct in Horizon's view and contradicts the ONS guidance on how the statistic should be used. This measure should not therefore be regarded as appropriate evidence for the consideration of labour market impacts.

- 1.8.23 Instead, the correct data to use to measure unemployment is the ILO measure: which is defined as:

"people without a job who have actively sought work in the last four weeks and are available to start work in the next two weeks, plus those who are out of work, have found a job and are waiting to start in the next two weeks."

- 1.8.24 This is important because the number of Job Seekers Allowance Claimants is significantly lower than the total number of people who are counted as unemployed using the correct ILO definition.

- 1.8.25 In Wales, over the last 12 months unemployed people claiming Job Seekers Allowance represented approximately one third of the ILO total as set out in the table below:

Table 1-1 Unemployed People claiming Job Seekers Allowance

Date	Total Unemployed (ILO)	Claimant Count	Claimant Count as a Proportion of All Unemployed (ILO)
October 2017	68,413	22,508	33%
November 2017	71,090	21,914	31%
December 2017	73,211	21,964	30%
January 2018	72,730	23,099	32%
February 2018	68,958	24,167	35%
March 2018	66,596	24,075	36%
April 2018	66,128	23,276	35%
May 2018	67,613	22,351	33%
June 2018	65,702	21,447	33%
July 2018	57,977	20,695	36%
August 2018	57,765	19,732	34%
September 2018	58,758	18,286	31%
12-month average October 2017 – September 2018	66,245	21,960	33%

- 1.8.26 Horizon's Environmental Statement uses data using the ILO definition and then uses the JSA Claimant Count measure to provide some localised context, as recommended by the ONS.
- 1.8.27 As noted above, labour market capacity – the number of people available to work on the Wylfa Newydd DCO Project – is not limited to the unemployed (on the correct ILO measure). There are many other people who could fill the new positions and backfill any vacancies created including:
- New entrants to the workforce – including those leaving full time education;
 - Economically inactive people (who do not meet ILO definition as economically active) but looking for work, which might include people with caring responsibilities or taking a break from work between contracts;
 - Employed people who are under-employed such as part-time and seasonal workers or have temporarily been away from work or working unpaid for a family business.
- 1.8.28 The Appendix to the Welsh Government Written Representation rules out all economically inactive people as it suggests they will not have the skills to work on the Wylfa Newydd DCO Project (paragraph 2.2.3), which Horizon

does not agree with. There is no evidence to support that statement, particularly given the commitment in the Jobs and Skills Strategy [APP-411] to support people who are not working to get the skills they need to work on the Wylfa Newydd DCO Project.

- 1.8.29 More broadly, it is not the case that the unemployed (or economically inactive) have to work on the Wylfa Newydd DCO Project specifically to be able to avoid displacement of employment (as set out in Appendix 2 Paragraph iv). As Horizon has noted above, if the unemployed can fill lower level jobs anywhere in the economy then they can expand the workforce. The normal operation of the labour market is that people are promoted into vacancies and then other people are promoted from lower levels into those vacancies and so on until there is an entry-level vacancy. Filling roles elsewhere in the labour market can free up employed people to move into other, potentially more suitable positions. This is a feature of a healthy and successful labour market which provides choices to both workers and businesses.
- 1.8.30 Horizon's analysis takes account of wider background growth in the sector. Although the Wylfa Newydd DCO Project and the North Wales Connection Project are relatively large individual schemes, they are less significant in the context of the overall construction workforce. The construction industry is made up of a large number of short-term projects and so aggregate demand fluctuates as projects start and stop. The demands from the Wylfa Newydd DCO Project need to be considered against the capacity of the construction industry as a whole. As set out in the JSS, the priorities for investment in training are highlighted as the trades within the construction industry where there is forecast to be significant growth and emerging skills shortages and where there is a reasonable prospect of local people being trained to fill any vacancies that arise. Horizon is therefore satisfied that it has carried out a proper assessment as envisaged by paragraph 5.12.3 of NPS EN-1.
- 1.8.31 As set out above, a fundamental challenge with Anglesey's labour market is that it does not have enough jobs and in particular it does not have enough full-time, year-round jobs.
- 1.8.32 Given that it is the policy of Welsh Government and IACC to bring more jobs to Anglesey, Horizon does not agree with the Welsh Government that there is not enough labour market capacity to cope when an employer offers to bring those jobs.

Requests for additional information

- 1.8.33 At paragraph 6.3.6 Welsh Government requests additional information.
- 1.8.34 The first two requests relate to the definition of workers and visitors and is addressed in the section on DCO Requirements and Planning Obligations below.
- 1.8.35 The other two requests are for more information on the number and roles of home-based workers and a detailed breakdown of activities, skills and roles of the construction workforce.
- 1.8.36 Horizon has provided as much information as it currently has (including a recent update to the Jobs and Skills Working Group of which Welsh Government is a member) and has committed to regular updates when more information is available. The next milestone for this is likely to be the end of Q2 2019, with at least quarterly updates available thereafter.
- 1.8.37 It should also be noted that the workforce information in the JSS and the draft Implementation Plan is similar to that provided at the point of applications for other Nationally Significant Infrastructure Projects such as Hinkley Point C (HPC) and Thames Tideway Tunnel ("TTT"). Horizon's proposals for the WNESS are also similar to those in place for HPC and TTT, with the developer and Jobcentre Plus/Department for Work & Pensions will both provide staff to support a joint job brokerage service.
- 1.8.38 The reality is that it is impossible to predict the number of available "new" jobs on any major project due to the fact that much of the supply chain will bring with it suitable qualified and experienced personnel (some of whom will be local residents). The opportunity is to maximise the potential for local candidates to access those vacancies likely to come to the wider market. Hence the assessments made for the potential for home-based (HB) workers in occupational groupings. With the appointment of Horizon's contractors, the knowledge of labour requirements is growing, and Horizon has committed to sharing forecasts as they develop over time.
- 1.8.39 Many of the roles will be created within the supply chain companies who themselves will already have a skilled pool of labour from which to draw in order to staff the project. These individual companies will inevitably strive to offer employment first to those with the requisite skills within their own workforce. Local employment opportunities are likely to be created locally by the presence of skills gaps (where a significant volume outstrips the available supply) or where part of the supply chain is unable to source someone with suitable skills from within, that results in a need to recruit externally.
- 1.8.40 It is for this reason that the JSS focuses on maximising opportunities for local people in occupations that meet the following criteria:
- They are in high demand at Wylfa;
 - There are existing skills shortages in the construction industry; and,
 - There is a reasonable prospect of workers being trained locally to achieve the necessary standards.

- 1.8.41 The JSS implementation plan focuses on training provision for such roles in a way that is consistent with the approach set out in the strategy and aims to provide the means by which local people are suitably skilled to compete for roles that are likely to be recruited externally. For example, in relation to general labouring roles, carpentry, scaffolding and steel-fixing the implementation plan sets out Horizon's intention to agree the content of and create training provision to meet the competency requirements for these roles. This is intended to provide local people with the best possible prospect of securing employment in the roles we anticipate will be in demand.
- 1.8.42 Welsh Government also raises a number of questions about the WNESS and the Skills Fund. Horizon can confirm that:
- The WNESS will cover non-construction roles;
 - It will discuss with Welsh Government the end point of the WNESS – it may not be the most appropriate tool for dealing with the issues raised in paragraph 6.3.21;
 - Funding for the WNESS is included within the Skills Fund and from Horizon's own resources which will be secured by the draft DCO s.106 agreement. This could provide matched funding for other potential funding streams.
- 1.8.43 The scope of the Skills Fund will be further refined but as proposed in the Schedule 4 of the draft DCO s.106 agreement submitted at Deadline 3 (18 December 2018) it includes funding for training and employment initiatives which relate to upskilling workers, developing training courses, educational activities (STEM and construction related), mitigation for labour displacement, and engaging and communication with the community including on employment opportunities. Spending on skills and training will be determined by the Jobs and Skills Implementation Plan. A draft of the first of these covering the first three years of the project has been produced for the Jobs & Skills Working Group and will be appended to the draft DCO s.106 agreement. This sets out the agreed priority measures to:
- Maximise the home-based workforce in the civils sector (focusing on labouring, general ops, carpentry, steel fixing 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 project;
 - Adopt and implement a target for apprentices;
 - Determine required mitigation for backfilling and training and identify the route through the WNESS and mainstream DWP support (including for non-construction roles);
 - Determine programme of activities to support diverse recruitment and retention.

- Maximise the opportunities for home-based workers in the operational phase
- 1.8.44 In terms of the operational workforce, Horizon aspires to build and operate a world class nuclear facility capable of operating in the top decile of nuclear power stations worldwide. To do this safely and efficiently, Horizon will aim to attract and retain the best talent to do so. In addition to qualifications, attitudes and behaviour are key indicators in selecting talent for Wylfa Newydd.
- 1.8.45 Horizon believes that to ensure local people feature heavily in the station compliment, it must do three things:
- Set the required standards and communicate them;
 - Enthuse children and young adults to consider a career at Wylfa Newydd;
 - Provide support and advice to children and young adults and those that might seek employment at Wylfa Newydd.
- 1.8.46 Horizon is currently in the pre-Final Investment Decision (FID) phase of development and any monies invested now are 'at risk'. Despite this phase, Horizon sees skills and education as a vital component to successful construction and operation of Wylfa Newydd. For many years, Horizon has communicated the required standards for the operational workforce through its careers route maps. These have been available to schools, Colleges and Universities and are prevalent at careers fairs, county shows and in outreach events attended by Horizon. These career route maps, supplemented with career profiles of individuals within the Horizon organisation, outline the key departments within the operational power station, a short outline of the posts available in those departments and the necessary routes and subjects of study required to obtain those roles.
- 1.8.47 Horizon needs a sustained pipeline of workers for the Wylfa Newydd DCO Project and has, for many years been active in schools' engagement. Starting with primary children, Horizon's schools' engagement, branded under the 'Dyfodol/Futures' banner has engaged with younger children to trigger an enthusiasm for the environment, energy and STEM subjects, morphing into targeted engagement on energy, nuclear and STEM subject for older school children. The engagement includes resources for teachers and students, materials for demonstrations and hundreds of hours of volunteer time in attendance at STEM events, careers fairs, the Big Bang, Careers options events and parents' evenings. Many of the Horizon team are qualified STEM Ambassadors and freely give of their time to enthuse children for STEM subjects. In addition to advising and coaching on Wylfa Newydd entry requirements and STEM subjects, Horizon conducts many sessions on softer skills such as CV writing, interview techniques and other such interventions to help equip young people with the skills they need to succeed on merit. In order to provide children with an insight into the world of work and potential careers at Wylfa Newydd, Horizon provides a Work Insight

Week for two age groups each year, teaching children interview and interpersonal skills, public speaking skills and about the nuclear industry.

- 1.8.48 There are a number of routes into the operational utility for Wylfa Newydd:
- From the open jobs market,
 - From the existing nuclear industry,
 - Transfer from the existing Horizon business,
 - Apprentices,
 - Graduates.
- 1.8.49 Horizon has held numerous discussions with Magnox and has participated in a number of talks with teams at Wylfa and Trawsfynydd in order to educate the staff as to the standards required, timelines as to when jobs will become available and the nature of the technology to be used at Wylfa Newydd. Provision of career route maps, job profiles and other such information is freely available and widely distributed through attendance at open surgeries, county shows, Eisteddfod and other public facing events to encourage and educate the wider population as to the opportunities available at Wylfa Newydd.
- 1.8.50 In order to ensure a sustained pipeline of talent for the future plant, Horizon has invested heavily in apprenticeships even in the pre-FID stage of the project. Prior to setting up Horizon's own Technical Apprenticeship Scheme, Horizon has provided £450,000 to Cwmni Prentis Menai to help secure apprenticeships for local young people. Horizon has a strong relationship with Grŵp Llandrillo Menai and works with the group to ensure that Horizon's future apprentice needs are communicated and any assistance that Horizon can provide is rendered.
- 1.8.51 Horizon is currently in the third year of its Technical Apprenticeship scheme and at the time of writing has 33 young people in employment with the business with the ultimate aim of working on the Wylfa Newydd site. Horizon's third year apprentices are currently working on nuclear power plants in Spain to gain the skills and practical experience needed to be able to operate at Wylfa. It is anticipated that Horizon will maintain a steady stream of local apprentices until FID when the programme will expand significantly in numbers and subjects. Once the first unit is in operation at Wylfa Newydd, it is anticipated that approximately 25% of the station complement will be apprentices who have passed through the Technical Apprenticeship Scheme locally. On completion of their apprenticeship, Horizon's apprentices will be able to undertake overseas secondments to bring back valuable nuclear skills to the plant at Wylfa. In order to facilitate provision of high quality education, Horizon has provided £1m to help relocate the Group's engineering provision from an outdated 1950s campus to a purpose-built suite at the Llangefni site. In leveraging the wider Hitachi Group, Horizon has been able to assist the Colleges of the group through provision of heavy machinery for use in the Heavy Plant Centre, substantial donations of power tools and media equipment. Horizon also provides technical advice and assistance to the College.

- 1.8.52 Horizon's graduate programme is run from the corporate centre and will provide high quality graduates to the operational business. In addition to universities across the UK, Horizon has a memorandum of understanding with Bangor University and works with the university to find opportunities for students and to help the University in nuclearizing their courses as well as participating in careers days and recruitment fairs.
- 1.8.53 Through the engagement of its Training Support Partner, Horizon intends to expand cooperation with Grŵp Llandrillo Menai and Bangor University to ensure that both institutions are equipped to continue to supply Wylfa Newydd with the talent it needs to operate as a top decile plant worldwide.
- 1.8.54 By continuing to engage at all points of the educational chain, providing support to educational and skills partners and communicating its entry standards, Horizon intends to ensure that local people are the qualified choice for employment at the station.

DCO requirements

- 1.8.55 The Welsh Government has requested that the Examining Authority consider three further areas in relation to DCO requirements for education, skills and labour supply (paragraph 6.5.3). Horizon's response to these are provided below:
- Definition of 'local', 'worker' and 'visitor' at paragraph 1.5.118 of Chapter C1 of the ES [APP-411] submitted with the DCO defines "local" as "already resident within the Daily Construction Commuting Zone". Horizon is considering Welsh Government's request for definitions to be included in the DCO.
 - Requirement for 90% local operational workforce – Chapter C1 of the Environment Statement [APP-411] states at paragraph 1.5.118 that it is expected that around 85% of the operational workforce would be resident within the DCCZ. This is based on benchmarks from other projects and employment at the Existing Power Station. Horizon does not consider that it is appropriate to specify a local employment figure within a DCO requirement, as the ability to achieve this figure would depend on the precise skills and availability of people over the lifetime of the power station (60 years). The Welsh Government draft Statement of Common Ground records that *"it is agreed between both parties that specific targets for local jobs and investment values should not be set but Key Performance Indicators' (KPI) and monitoring would be more appropriate. This would be monitored by the Supply Chain sub-group"*.
 - Training requirement - Welsh Government request a commitment from Horizon to provide training through the Wylfa Newydd Employment and Skills Service (WNESS) to enable residents within the North Wales region to gain higher quality employment, both to increase the supply of skills workers and to help fill displacement vacancies. The WNESS is secured through the DCO s.106 agreement (Schedule 4). The

WNESS works with the training to be delivered by the Jobs and Skills Implementation Plan and funded through the Skills Fund (also secured through Schedule 4) to help local people to access the training and opportunities provided by the Wylfa Newydd Project. The aims of the WNESS are set out in the s.106 agreement as follows:

- Ensure the best/most suitable people are able to work on the Wylfa Newydd Project and that it benefits local residents as a result;
 - Provide a point of access into the Wylfa Newydd Project for local people seeking work (including people who have moved away and want to return);
 - Support any employers who lose employees to the Wylfa Newydd Project to backfill their roles; and
 - Guide the provision of training to support these aims.
- On this basis, Horizon considers that the WNESS meets the requests of the Welsh Government of training to enable North Wales residents to successfully compete for the opportunities available.

Planning obligations

1.8.56 Welsh Government has raised a number of comments in relation to planning obligations in paragraph 6.5.4 of the response which are responded to below:

- Skills Fund – the Welsh Government sets out various detailed comments in relation to the Skills Fund, which Horizon is addressing as part of its ongoing discussion on the draft DCO s.106 agreement. The delivery and spending of the Skills Fund will be linked to the Jobs and Skills Implementation Plan.
- Jobs and Skills Implementation Plan – Welsh Government is a member of the Jobs and Skills Group which has in principle agreed the draft Terms of Reference (for both the Group itself and the WNESS) and the first draft Jobs and Skills Implementation Plan, subject to any final comments which the group have committed to provide by 14 December 2018. The Welsh Government therefore has copies of the Jobs and Skills Implementation Plan;
- The operational workforce skills plan is in the Jobs and Skills Implementation Plan. In addition, schedule 1 of the draft DCO s.106 agreement commits Horizon to maintaining its existing Wylfa Newydd Project Technical Apprenticeship Scheme. This is a three-year technical apprenticeship scheme which offers participants the opportunity to train in the core technical and practical engineering skills needed to build, operate and maintain the Wylfa Newydd Project while gaining relevant qualifications and accreditations in line with National Occupancy Standards. This will ensure the local population is enabled to access operational jobs. The Jobs and Skills Implementation Plan will be reviewed and revised periodically (expected to be every three

years) Horizon is happy to discuss further amendments to the Jobs and Skills Implementation Plan with IACC and Welsh Government via the existing discussions;

- The draft DCO s.106 agreement (Schedule 4, paragraph 2.2) includes a commitment for the Jobs and Skills Implementation Plan to cover the operational period as well as the construction period;
- WNESS – The issues raised by Welsh Government seem to reflect a misunderstanding of how the WNESS will work. Its central element is an online portal (funded by Horizon) that is effectively a joint venture between the Department for Work and Pensions (DWP) and Horizon. It will provide a link between mainstream DWP services and the Wylfa-specific interventions that Horizon will support. Through the agreed (in principle) draft Terms of Reference, the DWP has committed to provide access and links to its systems;
- In the unlikely event that the DWP steps away from the WNESS, Horizon would continue to run the portal;
- The spatial targeting of the WNESS will be achieved through two routes – a period of exclusivity for advertising vacancies in the local area (which is secured through the draft DCO s.106 agreement) and through the practical links with local organisations that are helping residents gain the skills necessary to work on the project. The WNESS will not fund those organisations, any funding would come from the Skills Fund;
- The draft DCO s.106 agreement secures Horizon's obligations in relation to the WNESS (Schedule 4), which include supporting it for the duration of the Construction Period, providing two members of staff to support its operation, notifying external job vacancies through it and providing space for it to operate from.

1.9 Economic development and Supply Chain

Principal issues

- 1.9.1 Horizon has been engaging proactively with Welsh Government in relation to supply chain opportunities and maximising the economic benefits of the Wylfa Newydd DCO Project for Anglesey and north Wales. In relation to the areas raised by Welsh Government, Horizon provides the following update:

Supply Chain Action Plan (SCAP)

- 1.9.2 A draft SCAP was shared with Welsh Government on 6 December 2018, in accordance with the agreed programme. Horizon has two workshops planned to discuss the development of the SCAP with Welsh Government and other stakeholders, including IACC. Following these, the SCAP will be finalised and annexed to the draft DCO s.106 agreement.
- Workshop number 1 on SCAP which took place on 11 December 2018
 - Workshop number 2 on SCAP scheduled for 29 January 2019

- 1.9.3 The issues raised by the Welsh Government in their vision for the SCAP can be effectively reviewed through the above process, to ensure that the SCAP, once adopted, takes into account these comments as far as possible.
- 1.9.4 Horizon would confirm that the points raised in paragraph 7.3.14 of the Welsh Government's Written Representation are addressed within the draft SCAP however will make the following additional clarification and commitments which are at present not specifically addressed within the draft SCAP:
- Supply Chain Portal - this is being hosted through Competefor which was introduced and explained to Welsh Government in a specific meeting on the 6 March 2018. Horizon can now confirm that this portal is now up and open for suppliers to register and will also be utilised for publishing appropriate information about future opportunities.
 - Horizon has committed to establishing a Supply Chain Service. Its purpose is explained in Chapter C1 of the ES [APP-088] as a service that will oversee the delivery and implementation of the Supply Chain Action Plan and will be jointly formed of stakeholders and key delivery partners from the Wylfa Newydd supply chain. Terms of Reference (ToR) for the Supply Chain Service were shared with Welsh Government following a discussion on the 5 March 2018 and Horizon note that no comments have yet been received. Comments were received on the ToR for the Supply Chain Service at the workshop of the 11 December 2018 (see below).
- 1.9.5 With respect to the concerns raised in paragraph 7.1.4 of the Welsh Government Written Representation, Horizon makes the following observations:
- The draft SCAP was specifically discussed with Welsh Government at a meeting of the 4 July 2017. Welsh Government shared initial comments and observations on the draft SCAP at this meeting. Welsh Government suggested that it was beneficial to implement a Supply Chain Service at this meeting and Horizon accepted this action;
 - 13 November 2017 – Horizon met with Welsh Government to discuss the draft ToR for Supply Chain Service and further development of the SCAP;
 - 05 March 2018 - Supply Chain Update - Horizon shared ToR for Supply Chain Service with Welsh Government for comment;
 - Competefor is a free to use procurement portal which Horizon will utilise for supplier registration and the sharing of opportunities at Wylfa Newydd. Horizon are looking at the interface between Sell2 Wales and Competefor and see no issue in information on Competefor being posted on Sell2wales;
 - Supply Chain Value - Horizon has discussed this issue previously with Welsh Government and Welsh Government answered this question at a Supply Chain event in Llandudno on the 24 October 2018 that

Horizon cannot make any commitments in terms of value for works to be placed on the Project. However, Horizon will via the Supply Chain Service implement a monitoring framework to map the supply chain to support maximisation of opportunities in the region. These monitoring reports will be available to the Supply Chain Sub-Group, of which the Welsh Government is part;

- Horizon is committed to supporting the WNESS, which is secured in the draft DCO s.106 agreement. This will, amongst other things, support concerns relating to displacement.

1.9.6 In relation to the issues raised at paragraph 7.3.15 of the Welsh Government's Written Representation, Horizon has agreed with Welsh Government through the draft SOCG that specific targets for local jobs and investment values should not be set but Key Performance Indicators' (KPI) and monitoring would be more appropriate. This would be monitored by the Supply Chain sub-group (of which the Welsh Government is part).

1.9.7 In relation to the points raised in paragraphs 7.3.5 and 7.3.6 of the Welsh Government's Written Representation, Horizon considers that it has engaged proactively with the Welsh Government on the draft SCAP, Supply Chain Portal and the Supply Chain Service as explained above. Horizon has noted in its response to FWQ10.2.22 that the draft SCAP could not be fully developed until the appointment of Horizon's contractor in August 2018, however, it engaged with Welsh Government on principals before this and has then subsequently shared draft documents for comment.

1.9.8 Horizon via the Supply Chain Service and SCAP will implement a monitoring framework to support intervention/ mitigation where necessary to support maximisation of opportunities. This monitoring will be considered through the Supply Chain Sub-Group (secured through the draft DCO s.106 agreement) of which the Welsh Government is part.

1.9.9 On the 11 December 2018 a workshop was held between IACC, the Welsh Government and Horizon to discuss the SCAP and the commercial approach. At the meeting it was agreed that all attendees would clarify comments on the Terms of Reference (ToR) for the Supply Chain Service by the 18 December 2018 and to share SCAP comments by mid-January 2019. At the workshop it was agreed that the following commitments would be included within the SCAP:

- Horizon will consult and inform the Supply Chain Service Working Group (SCSWG) early in the procurement commercial workflow to optimise the opportunity for all parties to influence Horizon's procurement methodology. The main mechanism for this will be the regular monthly SCSWG meetings
- Horizon to share the Commercial Procurement Workflow and use the Earthworks for the facilitation of construction as a result of the DCO contract as the first opportunity to test this approach to ensuring early direct engagement with Tier 2/3/4 via Welsh Government, IACC and

other channels – providing specific examples of contract qualifications and accreditations required

- A draft Engagement Programme will be produced by 29th January 2019
- Key Performance Indicators will be agreed that will be used to monitor delivery of the SCAP. These will be recorded in the Terms of Reference for the SCSWG by the end of February 2019.
- The SCSWG will together identify current best/accepted practise for optimising opportunities for the Welsh Supply Chain in existing capital and EU contracts with examples or guidance to be exchanged on, or prior to, the next meeting on 29th January 2019.
- There will be SCWSG standing agenda items on updates from other relevant DCO working groups/Major Projects Oversight Group and the Engagement Programme

DCO requirements

1.9.10 Paragraph 7.4.3 sets out the various requests Welsh Government has made in respect of DCO requirements to secure supply chain opportunities. These include:

- Support for local business supply chain: A commitment from Horizon that it will provide details on how the Wylfa Newydd DCO Project will ensure involvement of local businesses. This detail will be provided through the SCAP, which is secured by the draft DCO s.106 agreement;
- Monitoring: Commitment to monitor supply chain activity with a quarterly submission of an action plan monitoring report to identify factors such as number of contracts awarded, involvement and success of Welsh businesses in the tendering process and additional activities if supply chain target was not achieved. Schedule 4 of the draft DCO s.106 agreement states that The Developer will report on the operation and effectiveness of the Supply Chain Portal to the Supply Chain Sub-Group. This is proposed to be on a quarterly basis or other such reasonable period agreed with the Supply Chain Sub-Group for the duration of the Construction Period.

Planning obligations

1.9.11 The Welsh Government has raised a number of comments in relation to planning obligations in paragraph 7.4.4 of the Written Representation which are responded to below:

- SCAP – as stated above, Welsh Government has been provided with a draft SCAP for comment. Prior to this, principles for the draft SCAP were shared for comment;
- In relation to targets for supply chain and local economic impact, Horizon refers to the agreed position above. One of the roles of the Supply Chain Sub-Group (as referred to in the draft ToR for the

WNMPOP) would be to “agree and consider KPIs in relation to supply chain, for instance the number of local firms working on the project and value of the commission.”

- Economic Development Officers – part of the role of the Economic Development Officers, as set out in the draft DCO s.106 agreement, is to liaise with Welsh Government economic officers to promote supply chain capacity and access at regional level.

1.10 Tourism

Principal issues

- 1.10.1 In response to paragraph 8.1.2, Horizon has sought to work with the Welsh Government throughout the pre-application phase. As with other socio-economic topics, Horizon has been conscious of paragraph 5.12.7 of NPS EN-1 (i.e. that the decision-maker may conclude that limited weight is to be given to assertions of socio-economic impacts that are not supported by evidence) and sought to base its approach to workforce accommodation on the best available evidence.
- 1.10.2 Welsh Government has consistently raised concerns about Horizon's evidence base but provided limited alternative evidence itself. It commissioned work from Arc4 which was shared with Horizon before the submission of the DCO application, but this does not seem to have informed its Written Representation. Its Written Representation seems to be based on new work, carried out since Horizon submitted its DCO application and therefore unable to inform Horizon's approach.
- 1.10.3 Much of the Welsh Government's position on the lack of accommodation capacity continues to rest on assertions. Horizon recognises the risks raised by Welsh Government and seeks to avoid, manage and mitigate them through its overall approach.
- 1.10.4 With regards the use of tourism accommodation to house workers, Horizon has provided a response to this in section 1.14 of this response (housing and accommodation). Horizon notes the errors in the calculations presented by Welsh Government and the resultant underestimate of capacity in that stock.
- 1.10.5 As noted in the DCO tourism assessment in the Chapter C1 -Socio-economics of the Environmental Statement [APP-088] there is no evidence to assume that there will be any adverse effects on visitor numbers off island. Anglesey's tourism brand is recognised, as is that of north west Wales, however given there are predicted to be no material effects on traffic, or other disruption in off-island locations, there is no reason for visitor numbers off island to be affected by the Wylfa Newydd DCO Project. It is recognised that tourist accommodation off island may be utilised by workers. Horizon has responded to concerns raised by Gwynedd Council about this in the draft SOCG submitted at Deadline 2 (4 December 2018) [REP2-051].
- 1.10.6 Horizon notes the Welsh Government's concern with regard to labour churn within the local economy and the associated risk of labour displacement at section 1.8 of this response (education, skills and labour supply).

- 1.10.7 Horizon is committed to supporting the food and catering sector in north west Wales. As part of North Wales Growth Deal bid a proposal has been submitted for a hospitality training centre as part of Grwp Llandrillo Menai. As part of its support for the Growth Deal and the local economy, Horizon is committed to using site and campus catering facilities as catering training kitchens (or providing equivalent skills development support for the catering sector). This commitment will be outlined within the Jobs and Skills Draft Implementation Plan which is secured via the draft DCO s.106 agreement, Schedule 4.
- 1.10.8 The importance of the tourism sector on Anglesey is noted and recognised. Horizon has agreed to make funding available under draft DCO s.106 agreement Schedule 3 for the promotion of Anglesey as a holiday and tourism destination. This funding is to support additional marketing activities and not to cover staff time of a dedicated officer, which is provided as a separate item in the draft DCO s.106 agreement.
- 1.10.9 Direct tourism related s.106 agreement commitments have been made to cover a range of areas of Welsh Government and IACC concerns. Horizon has committed to include annual contributions for marketing and sector support, of £100, 000 per year during construction, and for 2 years post construction (totalling £1.1m); a tourism officer for the duration of the construction programme (totalling £360,000), annual contributions to increased tourism related monitoring during construction and for 4 years post construction, totalling £260,000, with a corresponding reduction in the level of funds held in contingency. This would still leave a significant Tourism (Contingency) Fund, totally £740,000, available up to 5 years post construction. It is noted that this is a change in position from the second draft s.106 agreement which is before the Examining Authority and these commitments will be secured in the draft DCO s.106 agreement to be provided at Deadline 4 (17 January 2019).
- 1.10.10 In addition to this, the Wylfa Newydd Code of Construction Practice outlines an array of 'Good Practice' mitigation measures that Horizon intend to establish throughout the construction phase of the Wylfa Newydd DCO Project, not least the Accommodation and Tourism Services sub-group, which will include representation from Welsh Government. This sub-group will examine key issues in regard to Accommodation and Tourism Services that arise during the construction period. They will then prepare a recommendation report of the key issues under consideration and present it to the Wylfa Newydd Major Permissions Oversight Panel (WNMPOP), the administrators of the Tourism Contingency Fund, that will determine if that such Fund can be used, subject to terms and conditions, to provide assistance to mitigate any actual or perceived impacts on the tourism sector during the construction of the Project. In addition, it is proposed that the Tourism Officer, funded via s106 agreement contributions, will in develop a tourism action plan in the first-year post Implementation outlining proposed activities to be supported by the Tourism (annual) Contribution.
- 1.10.11 In response to paragraph 8.1.4, As demonstrated at Sizewell B, accommodation for workers and visitors can work well together.

- 1.10.12 *"The impact on the rented and especially the bed and breakfast/guest house, accommodation sectors can also be positive, if it helps to spread high occupancy levels over time. This was the case at Sizewell B where incoming workers filled up the weekday capacity, but often went home at weekends when there was compensating tourism demand. Similarly, the workforce helped to achieve high occupancy levels across the seasons. Sizewell B workers constituted up to 50% of weekday bed and breakfast lettings, and 80% of winter lettings"* (Better monitoring for better impact management: the local socio-economic impacts of constructing Sizewell B nuclear power station, John Glasson Impact Assessment and Project Appraisal, volume 23, number 3, September 2005, pages 215–226).
- 1.10.13 In respect to concerns regarding effects of traffic and disruption to roads during the construction of the Wylfa Newydd DCO Project, Horizon acknowledges that there would be significant adverse effects, namely in the form of increased traffic flows, on sections of the A5025 between Valley and Tregale as reported within the Chapter C2 - Traffic and transport of the Environmental Statement [APP-089]. Such effects are anticipated during 'peak construction' which will only be a limited period of the overall construction programme, therefore such effects are not likely to have a lasting effect on the tourism sector in the long term.
- 1.10.14 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.
- 1.10.15 In any case, Horizon notes that traffic congestion in major tourist destinations is a persistent issue however there is little evidence that it deters or indeed influences visitation. International evidence (Chong, 2015) and national evidence (BBC, 2018a) suggests that gridlocked traffic will not dissuade or influence visitation. Cornwall is a valuable analogous example which enjoyed significant levels of excessive demand in summer 2018 but traffic queues and accessibility failed to dissuade visitation despite significant national and international media coverage (BBC, 2018a; 2018b). Similarly, the internationally popular Ring of Kerry route in Ireland regularly witnesses tailbacks of 2-2.5 hours and remains a major destination in spite of traffic congestion and one-way routes are being utilised to tackle congestion given the continued growth in demand (Lucey, 2018).
- 1.10.16 In other aspects of leisure and visitor behaviour, such as festivals; the overwhelming majority of festival attendees recognise these events cause congestion, the vast majority use private transport to attend. The ease of

traffic flows is not a determinant in visitation. Similar indications can be seen in Skye where traffic congestion was widely reported over the years 2016-2017 with no impact on demand (Henderson, 2017) which continued to escalate during 2018 according to Visit Scotland data. Whilst consumers are sensitive to traffic it clearly has no impact on destination choice or reasons to travel.

- 1.10.17 There is no evidence put forward by Welsh Government that traffic congestion puts people off visiting Anglesey at present and the traffic impact assessment shows no significant impact on the key routes onto the island.
- 1.10.18 The Wales Coast Path website recognises the Wylfa Head coastline for its industrial heritage.
- 1.10.19 *"People often ask us: 'what are the most scenic parts of the Wales Coast Path?' There is no easy answer! For a start, beauty, as they say, is in the eye of the beholder. Many people will find the wide open spaces of the Dee and Severn estuaries appealing, especially those with an interest in the bird life for which both are famous. Others will find urban areas attractive – the great cities of Swansea, Cardiff and Newport in the south or the north Wales resorts of Prestatyn, Rhyl, Colwyn Bay and Llandudno, for example. Not to mention the dramatic castles and other monuments liberally scattered around our coastline; or the drama and interest for some in the industrial landscapes such as Port Talbot steelworks or Wylfa nuclear power station on Anglesey."*
- 1.10.20 In response to paragraph 8.3.4, Horizon's scoping report [APP-060] identified the KSA as the study area for the tourism assessment. The KSA is applied to the assessment of tourism accommodation effects, while the visitor assessment considers effects on Anglesey only. This was agreed with IACC and Welsh Government in advance of the Visitor Behaviour Survey at a meeting on the 29 April 2015. As noted above, there is no evidence to suggest visitor behaviour off-island will be impacted in any way by the project and no causal routes have been identified by which should effects could arise, e.g. significant amenity disruption.
- 1.10.21 It is also noted above, that significant funds are being provided to IACC to support the tourism marketing activities and provision is made explicitly for them (through Schedule 3 of the draft DCO s.106 agreement) to liaise with Gwynedd and Conwy Councils where appropriate for joint tourism promotion initiatives.
- 1.10.22 Alongside provision of the second draft DCO s.106 agreement to the Welsh Government on 30 November 2018, Horizon also provided a response paper to the detailed issues raised by the Welsh Government which stated Horizon's position that there has been no evidence provided indicating the justification of a separate marketing fund for North West Wales given the effects on tourism will be primarily on Anglesey. To the extent that there are impacts wider than Anglesey, these are anticipated to be in the accommodation area, and separate direct mitigation is provided for this in Schedule 5 of the draft DCO s.106 agreement. However, the Welsh Government was asked to confirm costings of exactly what is being sought. That information has not been received at this time.

- 1.10.23 In response to paragraph 8.3.7, Horizon disagrees with the assertion that the survey results are outdated and do not reflect the current understanding of the scale and impacts of the Wylfa Newydd DCO Project. While informed parties may have developed their understanding of effects over this time, there is no evidence to suggest that there has been any change in visitor's perceptions of effects since the survey was completed.
- 1.10.24 The draft DCO s.106 agreement outlines Horizon's commitment to monitoring the impact of Wylfa Newydd on tourism via a contribution to Welsh Government for part-sponsoring the existing Wales Tourism Surveys to improve both the sample sizes and regularity of such surveys (Schedule 3).
- 1.10.25 The Anglesey 2015 Visitor Behaviour Survey queried respondents about their knowledge of the existing Magnox Nuclear Power Station as well as their awareness of the plans for the Wylfa Newydd Project in the area adjacent to the existing Power Station. The results of the Survey shows that only 52% of respondents were aware of the existing Power Station, of those, approximately 90% stated that it had no impact upon the enjoyment of their visit to Anglesey.
- 1.10.26 In response to paragraph 8.3.9, it is normal practice for accommodation providers to maintain properties even when occupancy levels are high. The most appropriate approach is to refurbish and upgrade during weekends (when it is likely that some construction residents absent) or by taking a single room off hire. This characterises operation of any branded hotel chain and is simply an operational issue.
- 1.10.27 The fact that providers will have the opportunity to have more consistent occupancy levels throughout the year should be recognised as advantages to the sectors and to the providers and will enable them to reinvest in their properties. Refurbishment costs can be set against corporation tax (thus reducing tax liability).
- 1.10.28 The WAMS will work with providers to support them in this as appropriate and provide gaps in bookings should that be required to allow maintenance to occur. It is also expected that most providers will only allocate a proportion of their accommodation to the Portal for use by workers and therefore there is no expectation that properties will be necessarily full all year around.
- 1.10.29 In response to paragraph 8.3.13, the survey does not show that 9% of visitors would be deterred from returning to Anglesey but that they would be less likely to do so and when asked why, the answers given suggest that up to a quarter would still visit but maybe different parts of the island.
- 1.10.30 In response to paragraph 8.3.24, there is a high likelihood that if visitors were put off visiting the north of the island due to the construction activities at Wylfa Newydd, they would just visit somewhere else on the island and any revenues would not be lost to the local economy. In addition, as noted above, funding is provided for both upfront investment in marketing, monitoring of effects and contingency should that be required.
- 1.10.31 In response to paragraph 8.3.30, in line with the Welsh Government comments, IACC note in their Local Impact Report - Chapter 5 - Tourism that it is essential that high quality temporary facilities are provided to cater for

construction and education tourism. Horizon is committed to providing appropriate visitor interpretation facilities during the construction phase of the project. Horizon has confirmed its commitment to the provision of on-site temporary viewing facilities within 6 months of the start of the construction stage (Wylfa Newydd CoCP [REP2-031]). In addition, Horizon is keen to agree with local communities, the provision of other temporary facilities to support visitor interpretation. These could include facilities in the north of Anglesey. Horizon is also committed to the provision of archaeological interpretation materials, linked to the site (proposed under the draft SPC s.106 agreement).

DCO requirements

- 1.10.32 It is noted that the Welsh Government has no comments in relation to the draft requirements with regard to tourism.

Planning obligations

- 1.10.33 The Welsh Government has raised a number of comments in relation to planning obligations in paragraph 8.5.4 of the response which are responded to below:
- Tourism (Annual) Contribution - Schedule 3 of the draft DCO s.106 agreement, which has been shared with Welsh Government, includes provisions with regard to tourism and confirms scale and duration of the Tourism Fund;
 - The figures provided in Schedule 3 of the draft DCO s.106 agreement will be safeguarded for tourism;
 - The draft DCO s.106 agreement includes provisions for Gwynedd and Conwy Councils to make applications to the Tourism (Contingency) Fund and for the Welsh Government for regional monitoring. It is not considered that a payment to Tourism Wales is appropriate in addition to the other contributions being made for tourism, particularly given the limited impact predicted on the wider north Wales region;
 - Availability of Tourism Fund – The Tourism (Annual) Contribution will be provided to IACC for 2 years post construction. In addition, monitoring funding will be provided for 4 years post construction and the Tourism (Contingency) Fund will be available for 5 years post construction (to be outlined in a revised draft DCO s106 agreement to be submitted at Deadline 4 (17 January 2019)).
 - Triggers – the draft DCO s.106 agreement includes circumstances against which the Tourism (Contingency) Fund would be released in Schedule 3;
 - Tourism (Contingency) Fund – the draft DCO s.106 agreement includes provisions for Gwynedd and Conwy Councils to access this fund where appropriate;

- Tourism Officer Contribution – the fund would be available where there is a significant reported impact as a result of the Wylfa Newydd Project. On this basis, it is not considered that a contribution for a tourism officer outside of IACC would be justified or meet the relevant planning tests;
- Tourism (Welsh Government Annual Monitoring) Contribution – It is anticipated that monitoring carried out by Welsh Government would be considered alongside other monitoring considered by the Accommodation and Tourism Sub-Group when making a recommendation on the release of the Tourism (Contingency) Fund; and
- Visitor Centre – As noted in the draft DCO s.106 agreement, Horizon will use reasonable endeavours to obtain a planning permission for the development of a Visitor and Media Reception Centre to be available from the commencement of Operation of Unit 2. Horizon continue to discuss the requirements for this centre with IACC and other stakeholders with a view to providing more detailed proposals for this facility by Deadline 4 (17 January 2019).

1.11 Transport and infrastructure

Principal issues

Background, Policy and Review of DCO Application

- 1.11.1 Paragraphs 9.1.1 to 9.3.27 of the Welsh Government Written Representation provide a general background to the transport issues associated with the Wylfa Newydd DCO Project. These are noted, and the following clarifications are provided:
- Paragraph 9.3.3 excludes the circa 800 car parking spaces proposed at the WNDA for residents of the Site Campus (this ensures that car parking total for each element of the scheme sums to 3,800 spaces).
 - Paragraph 9.3.8 – for reference a high-level assessment of the impact of the construction programme being delayed by two years was carried out in Appendix L of the DCO Transport Assessment [APP-113] – see Chapter 6.
 - Paragraph 9.3.18 refers to the ITTS and its input assumptions. 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 included 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 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 on Anglesey 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 Holyhead then more frequent or larger buses can be used to serve this area. In addition, traffic flows across Anglesey are low reflecting the predominantly rural nature of the network and construction worker shift timings have been defined to help avoid travel by construction workers on the road network during normal AM and PM peak hours.

- Paragraph 9.3.19 suggests that the opening of the Park and Ride facility is linked to the number of construction workers at the WNDA. This is not correct, and the timing of the delivery of the Park and Ride facility is defined in the Phasing Strategy [APP-447] which is a control document.
- Paragraph 9.3.19 misrepresents the split of car parking at the Park and Ride facility. The proposed split is 936 spaces for daily commuters, 936 spaces for residents of the Site Campus and 25 spaces for visitors (see Table 7-4 of DCO Transport Assessment [APP-101]).
- Paragraph 9.3.20, Please note that the Site Campus will not be in place during the Operational phase of the Project.
- Paragraph 9.3.30 suggests 400 workers would be working "offsite". This is not correct. These workers are facilities management workers who will be working at the WNDA and other Associated Development locations. These facilities management workers have different shift patterns to the construction workers and hence they are considered separately as part of the transport analysis.
- Paragraph 9.3.31 provides an analysis of bus passenger trips. The calculations assume that there would be an average occupancy of 30 passengers per bus. However, buses with a capacity of 50 passengers and typically 80% occupancy are assumed for the bus service to and from the Park and Ride site as stated in Table 1-1 of the Transport Assessment [APP-101].

1.11.2 Table 9-1 of the Welsh Government Written Representation incorrectly allocates workers travelling using "Park and Share" to buses. These workers are who park their car en-route to the WNDA at another workers residence and then car share with another worker to the WNDA (or other development site).

1.11.3 Taking into account the above, the estimated maximum number of shuttle buses and Park and Ride buses required in the peak year for the day shift would be approximately 50 buses. Horizon confirm that sufficient space will be provided at the WNDA to accommodate the required number of buses.

Impacts and Evidence

Introduction

- 1.11.4 Section 9.4 provides a summary of "Impacts and Evidence" and it is noted that in relation to traffic impacts of the Project, paragraph 9.4.2 states that the Welsh Government concludes that "*The [junction] analysis appears to be appropriate and conclusions reasonable.*" Horizon note that the shift patterns and timings are stated in the CoCP [APP-414] which is a control document.
- 1.11.5 Paragraph 9.4.3 incorrectly states that the impact of the North Wales Connection has not been considered. This analysis is provided in Section 2.2 of Appendix L of the DCO Transport Assessment [APP-113].
- 1.11.6 Paragraph 9.4.6 refers to Abnormal Indivisible Loads and the management of these vehicles. This is controlled through Section 5.4 of the Code of Construction Practice [APP-414]. Horizon will follow standard procedures in place for the permission to move AILs.
- 1.11.7 Paragraphs 9.4.7 and 9.4.8 refer to the control measures for the transport strategy including targets and monitoring. These control measures have been enhanced since the submission of the DCO application and revised measures are provided in Chapter 5 of the updated CoCPs submitted at Deadline 2 (4 December 2018) [REP2-031 to REP2-036].

Comparison with Hinkley

- 1.11.8 Paragraphs 9.4.10 – 9.4.26 provide a benchmarking exercise using Hinkley Point C as an example.
- 1.11.9 It is important to note that the transport strategy adopted at Hinkley is reflective of the local transport network, its geographic location, and the specific constraints and issues experienced on the transport networks surrounding the construction site in Somerset. The transport network and issues in Anglesey and North Wales are very different to that of Somerset.
- 1.11.10 The existing highway network in Somerset between the strategic highway network (M5) and the construction site is regularly congested, hence the strategy for Hinkley focuses on intercepting traffic close to the M5 and consolidating worker traffic at park and ride sites to help reduce impacts on the congested network in and around the town of Bridgwater. The same issues do not exist in Anglesey and North Wales.
- 1.11.11 Furthermore, Hinkley can be approached by workers and construction vehicles from three directions of travel (north, east and south) providing more points to intercept traffic. This means that several parks and ride facilities have been built to intercept traffic from these three directions. Indeed, HPC has sought planning permission for a further park and ride (Quantock Lakes) to the west of the site as to capture further workers travelling from the west. In contrast, the WNDA is located on the north-western point of Anglesey, with all construction deliveries and almost all worker traffic coming from one direction – south. This means that one park and ride facility has been proposed to intercept traffic on the A55 east of the WNDA.

- 1.11.12 Paragraph 9.4.12 describes the bus provision at Hinkley. Horizon confirms that it will implement direct buses and stopping buses to serve local towns and provide buses between the Park and Ride facility and the WNDA. These services are likely to be free of charge to construction workers (see Horizon's response to Q11.1.20 of the Examining Authority's First Written Questions submitted at Deadline 2 (4 December 2018) [REP2-002] which confirms this). Therefore, the bus strategy being proposed for the Wylfa Newydd Project is very similar to that in operation at Hinkley. Discussions with bus operators began in 2010 for Hinkley as their construction programme was set to start shortly after. The reasons for the long gap between the start of discussions and award of contract was the multiple delays to the start of the Hinkley project.
- 1.11.13 It is noted that parking at the main construction site for Hinkley is constrained and that the transport strategy adopted for Hinkley is tailored to suit the local conditions in Somerset and the various route choices available for transporting workers and freight by road to the Hinkley construction site as explained above.
- 1.11.14 The transport strategy proposed for the Wylfa Newydd DCO Project is considered sustainable because 4,000 of the 9,000 workers expected in the peak constructing year will live on site and thus will not require any form of transport to commute to/from the WNDA on a daily basis. Another 1,630 workers will travel by buses from local towns and the wider area. The rest of the construction workers will travel with varying degrees of car sharing to meet an average target of 2.0 workers per car across the Project in the peak construction year. For a construction site in a rural location this is considered to be a sustainable transport strategy. Note the changes made to the Wylfa Newydd CoCP submitted at Deadline 2 (4 December 2018) [REP2-031] include reference to this car share target.
- 1.11.15 Section 5.10 of the Wylfa Newydd CoCP (Revision 2.0) [REP2-031] provides information on the monitoring of travel arrangements. This section has been updated since the submission of the DCO application and the version 2 submitted at Deadline 2 (4 December 2018) now includes further details on how Horizon will manage, monitor and regulate car parking spaces and how vehicle occupancy will be monitored and reported. These arrangements include providing a quarterly report to the Transport sub-group which has access to funding for the implementation of additional mitigation measures if required. Horizon is considering the appropriateness and use of mode share targets and more detail will be provided at Deadline 4 (17 January 2018).

Sustainable Travel

- 1.11.16 Paragraph 9.4.27 refers to a car sharing website and further information on this issue is provided in Chapter 5 of Version 2 of the Wylfa Newydd CoCP (Revision 2.0) [REP2-031].
- 1.11.17 The potential need for additional coach services is discussed in paragraph 9.4.28. This issue has been considered in paragraph 11.7.3 to 11.7.8 of the DCO Transport Assessment [APP-101] which concluded that further services are not required. Further information is provided on the revised rail

franchise in operation along the North Wales Coast in Horizon's response to FWQ11.17 [REP2-002].

Management of daily commuting

- 1.11.18 In this section, the Welsh Government assume that workers who live at the Site Campus will be required to walk to their place of work. In practice, on-site buses are likely to be provided to facilitate these movements. The buses would also facilitate the transfer of people from the shuttle buses to different work areas. These buses would not travel on the public highway.
- 1.11.19 Paragraph 9.4.30 refers to car parking and queries the balance of car parking at the WNDA. This information is provided in Table 7-4 of DCO Transport Assessment [APP-101]. Again, it should be noted that the delivery of mitigation is specified in the Phasing Strategy [APP-447] and this does not provide a link between mitigation and number of workers.
- 1.11.20 Control measures for the transport strategy have been enhanced since the submission of the DCO Application and revised measures are provided in Chapter 5 of Version 2 of the Wylfa Newydd CoCP (Revision 2.0) [REP2-031] submitted at Deadline 2 (4 December 2018). It should be noted that at Sellafield new facilities are required to be built on the site as part of the decommissioning process and car parking spaces have had to be reduced in number 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.
- 1.11.21 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>).
- 1.11.22 Sellafield therefore provides a good example of how the proposed car sharing strategy at Wylfa Newydd can be implemented.

Parking Management

- 1.11.23 This section considers the allocation of car parking. This is specified in Table 7-4 of DCO Transport Assessment [APP-101] and provides a balance between convenience and the need to manage and mitigate travel by private car.
- 1.11.24 Paragraph 9.3.35 states that more spaces should be allocated at the Park and Ride Facility to daily commuters to reduce traffic impacts on the A5025. Given the overall sustainable approach adopted for the movement of construction workers by Horizon, it is not deemed necessary to further enhance this. The A5025 has been fully assessed in the DCO Transport Assessment [APP-101] and no capacity problems are expected. A comparison with Hinkley is not considered valid as the transport strategy developed for Hinkley is in response to the local conditions in Somerset, which are very different to those in Anglesey and North Wales.

Car Sharing

- 1.11.25 Control measures for the transport strategy (including car sharing) have been enhanced since the submission of the DCO Application and revised measures are provided in Chapter 5 of revised Wylfa Newydd CoCP (Revision 2.0) submitted at Deadline 2 (4 December 2018) [REP02-031]. As described above, Sellafield provides a good example of a location where a similar car sharing strategy to the one proposed at Wylfa Newydd has been introduced.

Bus Services

- 1.11.26 The shuttle bus service will be provided by Horizon and its supply chain. It is expected to be free for construction workers at the point of use. The bus shuttle bus strategy will be implemented, subject to worker demand, from the start of construction activities. As described in the DCO Transport Assessment (at paragraph 5.1.15) [APP-101] the services will be flexible and routes will be refined to meet the actual demand from construction workers. Deciding on bus routes before grant of DCO is not deemed appropriate as they will most likely change by the time the construction programme starts. The bus strategy is flexible to ensure that as many construction workers as possible are served by bus routes, and to avoid buses running around empty, potentially causing unnecessary delays on the local highway network.
- 1.11.27 Note that Horizon will control the bus strategy, including route choices, not the bus service operator.
- 1.11.28 Paragraph 9.4.47 of the Welsh Government's Written Representation refers to the type of engine to be used for the shuttle bus network. Paragraph 5.1.19 of the DCO Transport Assessment [APP-101] states that buses will meet the minimum standards for emissions in place at the time of construction. Local operators will be encouraged to tender for services and it is considered that the specification of bus engine type should be flexible to ensure a wide selection of operators can be bid to run the services.

Park and Share

- 1.11.29 The potential use of Park and Share sites has been further considered by Horizon since the submission of the DCO application.
- 1.11.30 Horizon's DCO application contains all of the necessary parking (onsite and at Dalar Hir) to meet the requirements of the Wylfa Newydd DCO Project and minimise the traffic and transport impacts of the Wylfa Newydd DCO Project. Nevertheless, Welsh Government's proposed Park and Share facility in Bangor and Caernarfon, could provide extra flexibility, for example as park and share facilities which could be available for workers car sharing.

Monitoring and Enforcement

- 1.11.31 Control measures for the transport strategy have been enhanced since the submission of the DCO application and revised measures are provided in Chapter 5 of the updated Wylfa Newydd CoCP (Revision 2.0) submitted at Deadline 2 (4 December 2018) [REP2-031].

- 1.11.32 The Phasing Strategy [APP-447] has been developed to enable the delivery of the Wylfa Newydd Project in a timeline which reflects the urgent need for new electricity capacity and this reflects the proposed timing of the delivery of the Logistics Centre, Park and Ride facility and A5025 Off-line Highway Improvements.
- 1.11.33 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.

DCO requirements

- 1.11.34 In respect of transport, the Welsh Government has requested DCO requirements for the following matters:
- Construction Transport Management Plan, which would include a Abnormal Indivisible Load Management Plan, to be agreed before construction commences.
 - A Code of Operational Practice to be agreed before construction commences.
 - Requirements for Horizon to demonstrate the site campus will be fully occupied by 2023 (or corrective action to be taken) and reporting on transport usage to support assessment assumptions.
 - Appointment of a Travel Plan officer.
 - Controls around the provision of shuttle bus services, including process for implementing, reporting and monitoring the service and funding provision in the event of passenger shortfall.
 - Requirement for the shuttle bus service between Dalar Hir and the WNDA to be in place and operational during the construction phase and for monitoring of vehicles in order to balance shuttle bus and parking provision.
 - Requirement for Dalar Hir, the A5025 Off-Line Highway Improvement Works, the MOLF and the Logistics Centre to be operational before construction commences, and controls or alternatives in the event that this mitigation is delayed (i.e. restrictions on HGV movements).
 - Protections against fly-parking along the local highway.
 - Monitoring and controls on HGVs crossing Britannia Bridge.
- 1.11.35 Horizon notes that the majority of these matters are already dealt with through the control documents, such as the transport strategy in the Wylfa Newydd CoCP (Revision 2.0) [REP2-031], the Workforce Management Strategy [APP-412] and the Phasing Strategy [APP-447].

1.11.36 Control measures for the traffic and transport management strategy are set out in Chapter 5 of the Wylfa Newydd CoCP (Revision 2.0) [REP2-031]. These include a range of commitments including:

- Freight movements are controlled within the CoCP (APP-414) to a maximum of 320 movements per day throughout the construction period. Management of HGVs will be undertaken through the Logistics Centre.
- A commitment to the MOLF receiving at least 60% of bulk materials required for the construction of the Wylfa Newydd DCO Project.
- Monitoring arrangements are proposed in Section 5 of the Wylfa Newydd CoCP in respect of vehicle occupancy and HGV movements at the Logistics Centre and WNDA. If targets are not achieved then Horizon will refine the transport strategy to change travel behaviour and meet the required targets.
- A commitment from Horizon to manage, monitor and regulate the availability of car parking spaces to reflect the number of workers on the Wylfa Newydd DCO Project, balancing an over-provision of car parking (which could encourage car travel) with an under-provision of car parking (which could encourage fly parking).
- Arrangements for the provision of shuttle bus services for the construction workforce. This is also supplemented by principles in the Workforce Management Strategy which require construction workforce to use the transport facilities and services provided by Horizon as well as through the restriction on car parking that is provided at the Park and Ride and at the WNDA.
- 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.
- All construction heavy goods vehicles will be tracked using the DMATS (see Logistics Centre sub-CoCP, [APP-419]) and directed to using specific transport routes.

1.11.37 In addition, the Phasing Strategy [APP-447] has been developed to provide triggers for the delivery of key transport-related mitigation including the delivery and operation of the Logistics Centre, Park and Ride facility and A5025 Off-line Highway Improvements.

1.11.38 Horizon made a number of amendments to the Wylfa Newydd CoCP and the sub-CoCPs (Revision 2.0) [REP2-031 to REP2-036] at Deadline 2 and will consider what further updates can be made to these controls as part of the updated documents to be submitted at Deadline 4 (17 January 2019).

Planning obligations

1.11.39 Paragraph 9.5.4 provides a summary of suggested changes to the draft s.106 agreement. Each point is considered in the table below.

Welsh Government Comment	Horizon Response
Mitigation and monitoring mechanisms to address impacts on the strategic highway network (for which the Welsh Government is the strategic highway authority) are not currently covered. Welsh Government is concerned about highway impacts on the strategic highway network both on Anglesey and beyond (A55 and Britannia Bridge). The A55 is of huge economic value to Wales and the bridge already experiences congestion, which will be further exacerbated by the cumulative effects of Wylfa Newydd and National Grid's North Wales Connection.	Proposed monitoring arrangements are described in Section 5 of the Wylfa Newydd Code of Construction Practice [APP-414] and secured through the draft DCO s.106 agreement (Schedule 7). Funds are available for further monitoring, if required, through the Transport (Contingency) Fund. The release of such funds would be in response to monitoring and a recommendation report from the Transport Sub-Group of which the Welsh Government is part.
A commitment to additional park & ride sites as previously requested by Welsh Government, and running bus services through these sites.	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 DCO Project and minimise the traffic and transport impacts of the Wylfa Newydd DCO Project. Nevertheless, proposed Park and Share facilities in Bangor and Caernarfon and at Four Crosses on Anglesey, could provide extra flexibility, for example as park and share facilities which could be available for workers car sharing.
Contribution to the Third Menai crossing to support early delivery and provide resilience in bad weather (having regard to cumulative impacts with the Grid DCO application and announcement of the preferred route for the third crossing). It is worth noting that Horizon has raised both issues as justification to support their consultation in respect of the Request for Non-Material Change no.5 HGV Movements (November 2018).	The analysis provided in the DCO Transport Assessment shows that a third crossing is not considered necessary nor justified as part of the Wylfa Newydd Project (see paragraph 12.2.2 of the DCO Transport Assessment [APP-101]. On this basis, a contribution in the DCO s.106 agreement would not meet the tests for planning obligations.
Clearly enforceable measures in the event that the assumptions contained in the transport assessment prove not to	The monitoring of the transport patterns of the workers associated with the Wylfa Newydd DCO Project

be accurate (for example, in respect of location of workers and take up of the on-site worker accommodation).	will identify areas where further mitigation or changes to the transport strategy are required e.g. changing shuttle bus routes or frequencies to match demand. In addition, local residents and other stakeholders will be able to submit issues to the Transport Sub-Group which can then make recommendations to direct funds to alleviate any potential problems.
Contingency funding for unforeseen impacts on the strategic road network.	Funds are secured in the draft DCO s.106 agreement and available via a recommendation from the Transport Sub-Group (of which the Welsh Government is proposed to be member).

1.12 Digital infrastructure

Principal issues

- 1.12.1 Horizon has committed to ensuring that the digital communication infrastructure network of north Anglesey will not be compromised and where possible will be enhanced as a result of the Wylfa Newydd DCO Project. It is also aware of its obligations in terms of community safety and emergency planning.
- 1.12.2 In accordance with the requirements set out in paragraph 10.3.5 of the Welsh Government Written Representation, Horizon has instructed experienced consultants to undertake a phased programme of works in order to consider the implications and opportunities that the Wylfa Newydd DCO Project presents in terms of the digital infrastructure of the area.
- 1.12.3 The specification includes the following tasks to be undertaken:
- to meet with Welsh Government representatives to establish effective communication and consider the role of the Welsh Government;
 - an audit of the current digital infrastructure, broadband, mobile capacity and Airwaves / Emergency Services Network at and in the vicinity of the proposed Power Station (with particular emphasis on the proposed Site Campus), all Off-Site facilities and Associated Developments;
 - an assessment of current capacity for neighbouring settlements;
 - Liaison with service providers and other stakeholders; and
 - an initial response to matters raised by the Welsh Government and other appropriate stakeholders.
- 1.12.4 Future work will be determined by the outcome of the above tasks, but is likely to focus on:

- a review of the construction activities' requirements and the potential impact these could have on the digital communication infrastructure network;
- a proposed strategy for establishing future requirements for the digital communication infrastructure network including the need for any additional mobile network mast/s;
- an agreed approach to how any solutions might be secured; and
- the proposed steps and timescales required to implement each solution proposed.

DCO requirements

- 1.12.5 The above work proposed aligns with the requests set out by Welsh Government in paragraph 10.4.2 of the Written Representation in respect of the DCO requirements.

Depending on the outcome of the technical assessment proposed above at paragraph 1.12.3, future work could involve securing a commitment to a technical solution as part of the DCO. However, at this stage, Horizon is unable to comment further and reserves its position in respect of the DCO requirements until this assessment has been undertaken.

Planning obligations

- 1.12.6 It is not proposed that the commitment to any improvements to the digital communication network will be secured through a s.106 agreement contribution (Paragraph 10.4.3 of the Welsh Government Written Representation) but would be an in-kind cost as it would be Horizon procuring any solution directly.

1.13 Health and Wellbeing

Introduction

- 1.13.1 *WG state at Paragraph 11.1.2: "It is essential the Wylfa Newydd does not have an adverse impact on health and well-being. There is a need to ensure that an increase in population during the construction phase does not lead to a reduction and/or deterioration in the access and quality of services for the local communities and population of North Wales."*
- 1.13.2 Horizon note the Health Impact Assessment Report [APP-429] paragraphs J.4.7 to J.4.9:
- Horizon is committed to providing appropriate Occupational Health and Hygiene services for the construction and operational workforce.
 - Horizon is committed to making appropriate healthcare provision or contributions to meet the medical and healthcare needs of the construction workforce.
 - Horizon is committed to providing appropriate provision of emergency services for the construction workforce.

- 1.13.3 The draft DCO s.106 agreement at Schedule 8 includes the following payment mechanisms to support local NHS services (these are supported by provisions for monitoring and a contingency fund):
- A Health (First NHS Workforce Use) Payment will be paid by the Developer to BCUHB towards the cost of non-homebased Workforce personnel registration with or use of off-Site GP services in years 1 to 3 of the Construction Period.
 - A Health (Second NHS Workforce Use) Payment will be paid by the Developer to BCUHB upon the Site Campus medical facility becoming operational towards the cost of non-homebased Workforce personnel registration with or use of off-Site GP services for the duration of the Construction Period following delivery of the Site Campus medical facility.
 - A Health (NHS Referral) Payment towards the cost of referrals to NHS services of non-home-based Workforce personnel during the Construction Period.
 - A Health (NHS Dependants Use) Payment will be paid by the Developer to BCUHB for the cost of partners and children of the non-homebased Workforce personnel registering with and/or using off-Site GP services during the Construction Period.

Site Campus Medical Centre

- 1.13.4 WG state at Paragraph 11.3.3: *Welsh Government has requested a detailed specification of the medical services to be delivered on the Wylfa Newydd site.*
- 1.13.5 The detailed design and specification of the site campus health facility will be submitted for approval by IACC as part of draft DCO Requirement WN18. It will be prepared in consultation with the local healthcare authorities / representatives and will be operated by a suitable healthcare service provider. Horizon is engaging with BCHUB and the Welsh Ambulance Service on the provision of healthcare and emergency response facilities and will enter into a Statement of Common Ground with BCUHB on healthcare provision for the construction workforce.
- 1.13.6 WG state at Paragraph 11.3.5: *Further detail will be required on how the use of NHS services by the construction workforce will be monitored by and formulae agreed, for use of NHS services.*
- 1.13.7 Horizon's approach is to provide a high standard of on-site healthcare commensurate with the reasonable expectation of a very low NHS referral rate. The actual referral rate to NHS services would be monitored with payments adjusted accordingly, and secured via the DCO s106 agreement through a Health (NHS Referral) Payment. Horizon proposes to provide resources, secured via the DCO s106 agreement, to BCUHB to provide primary care to meet the needs of non-home based construction workers prior to the opening of the Site Campus Medical Centre.

- 1.13.8 WG state at Paragraph 11.3.6: *Welsh Government will require assurance that 'all arrangements for healthcare services for the construction workforce will be robust; meet required professional, clinical and statutory requirements, and minimise unintended consequences for local NHS services through unanticipated demand'. Horizon would operate two on-site healthcare facilities: a Construction Site Clinic (a facility within the construction security fence on the Power Station Site and a Site Campus Medical Centre (a medical centre on the Site Campus. At the start of the Construction Period, the clinic will be staffed initially by a nurse, with resources progressively increases as worker activities increase (e.g. to include paramedics, OCC Health Nurses, OCC Health Physicians). The Construction Site Clinic will be operational for the full construction period and staffing will scale up and down in proportion to the number of workers on site and demand.*
- 1.13.9 Horizon can confirm that all arrangements for healthcare services for the construction workforce will be robust; meet required professional, clinical and statutory requirements, and minimise unintended consequences for local NHS services through unanticipated demand.
- 1.13.10 WG state at Paragraph 11.3.7: *Welsh Government has requested health insurance checks are included for European Union (EU) citizens and international construction workers. Consideration must be given to how this will be secured through the S106 agreement and Code of Construction Practice (CoCP).*
- 1.13.11 Horizon would provide primary medical care on site. Contractors shall ensure all workers from outside the UK are adequately covered by medical insurance and/or a European Health Insurance card which would pay for hospital in- or out- patient treatment or specialist treatment in the UK, repatriation to country of origin if required and ongoing treatment in their home country.

Non-home-based workers

- 1.13.12 WG state at paragraph 11.3.9: *Welsh Government has raised concerns to Horizon in relation to the delivery of community health services such as dentistry and pharmaceutical services. These services would be to support the off-site construction workforce living outside of the Site Campus. Further clarification and assessment work will be required to agree appropriate demand estimates/assumptions that inform mitigation and monitoring measures.*
- 1.13.13 Horizon is engaging with BCHUB on this topic and is entering into SOCG with the Health Board on healthcare provision for the construction workforce [REP2-059]. The draft DCO s.106 agreement shared with Welsh Government on 30 November 2018 has provisions in relation to dentistry and pharmaceutical services to support the off-site construction workforce and an interim payment to address healthcare needs of the workforce in advance of the Site Campus medical facility being provided.
- 1.13.14 Clauses 2 and 3 in Schedule 8 of the draft DCO s.106 agreement state:

- Prior to Implementation Horizon will provide the Council with the Dental Services Proposal for the Council's written approval. Horizon will thereafter implement the approved Dental Services Proposal (or updated or replacement proposal) for the duration of the Construction Period and shall adhere to and comply with its provisions.
- Prior to Implementation Horizon will submit to the Council the Pharmacy Services Proposal. Horizon will thereafter implement the approved Pharmacy Services Proposal (or updated or replacement proposal) for the duration of the Construction Period and shall adhere to and comply with its provisions.

- 1.13.15 WG state at paragraph 11.3.9: *Welsh Government have previously raised that paragraph C.6.15 of the Health Impact Assessment (HIA) (Application Ref. 8.19; PINS Ref. APP-429), which states that GP funding follows the population is incorrect in relation to Wales. It therefore follows the funding for dependents should be provided in full and not as indicated currently for a lag in funding. Therefore, Welsh Government expects that the funding for dependent will be provided in full and not as indicated currently, where there will be a lag in funding being provided.*
- 1.13.16 Horizon proposes a contribution to BCUHB to bridge any lag in NHS funding to meet the needs of non-home based construction workers partners and dependants. The cost estimate per capita is set out in the 'Health Services for the Construction Workforce: Discussion Document (20.8.18)'. The estimate of 285 partners has been doubled for the purposes of these calculations to allow for 285 non home based construction workers to register at the same practice as their partner.
- 1.13.17 The Health Impact Assessment Report at paragraph C.6.15 states: GP funding follows the population, so Horizon would discuss any voluntary contributions to BCUHB for any lag in funding for incoming partners (at peak 285) and dependants (at peak 220) of workers as well as any non-home-based workers who register with a Welsh GP off-site (see table A-1). It is noted that there is not an automatic population adjustor for additional funding to BCUHB or Welsh Government.
- 1.13.18 Horizon notes that it is the case the GP funding in Wales is based on the number of registered patients. That funding comes, via BCUHB, from a limited NHS 'pot' held by Welsh Government. Horizon agrees that when a person moves their residence from England (or other parts of the UK) to Wales, Welsh Government would not be able to recover the cost of NHS service usage by that person from the UK Government. Equally, movement of people from Wales to England does not change the funding formula for the NHS in England. There is an agreed funding arrangement in place between the UK Government and the Welsh Government. Horizon does not recognise this cost as one that should be borne by the Wylfa Newydd DCO Project. The existing inter-government arrangements include a consideration of relative population (between England and Wales) when budgetary adjustments are made (but does not adjust simply due to population change). Recognising the potential for a lag in Welsh Government allocating BCUHB additional funds, Horizon has offered a contribution to the NHS costs of

dependants moving to Wales. It is a matter between Welsh Government and Westminster if the funds held by Welsh Government are not sufficient.

- 1.13.19 The draft DCO s.106 agreement [REP1-010] Schedule 8 includes the following payment mechanism to support local NHS services (this is supported by provisions for monitoring and a contingency fund): A Health (NHS Dependants Use) Payment will be paid by Horizon to BCUHB for the cost of partners and children of the non-homebased Workforce personnel registering with and/or using off-Site GP services during the Construction Period.
- 1.13.20 WG state at paragraph 11.3.10: *Welsh Government require confirmation that the free prescriptions cost will be covered for the construction workforce.*
- 1.13.21 Horizon can confirm that the free prescriptions cost will be covered for the construction workforce. This would be covered by the pharmacy services proposal secured by the draft DCO s.106 agreement.
- 1.13.22 The following was stated in the draft Statement of Common Ground with Betsi Cadwaladr University Health Board submitted at Deadline 2 (4 December 2018). BCUHB states that prescriptions in Wales are free and this will drive an increase in demand for prescriptions from local NHS services unless there is an equal offer from the on-site services. People forgetting to bring their medication can obtain meds free from a local pharmacy if they have a repeat slip. It will be necessary to establish an estimated demand and a means of monitoring. Horizon states that its intention is to agree a contract with a local pharmacy to provide prescription services to the Site Campus Medical Centre. The prescriptions that will be written by the Site Campus Medical Centre clinicians will be private prescriptions. The intention is that Horizon will subsidise these private prescriptions. In this way all workers will receive prescriptions without paying a fee. This will remove the incentive of free prescriptions that might otherwise persuade some non-home-based workers to register with a Welsh GP.

Role of Community Involvement Officers

- 1.13.23 WG state at paragraph 11.3.11: *Welsh Government consider that further detail is required in relation to the CIOs, particularly how they will work with the local communities, emergency services and healthcare services.*
- 1.13.24 Community Involvement Officers appointed by Horizon will be a key interface between the local community, key stakeholders and Horizon management. The CIO will be involved with implementation of HIA measures as well as relevant ES, WLIA and EqlA mitigation. Responsibilities will include the facilitation and implementation of mitigation during construction and operation. The CIO will be responsible for facilitating and co-ordinating a series of ongoing regular communication meetings with key stakeholders and local communities, to keep all stakeholders informed of issues arising throughout the operation of the Wylfa Newydd DCO Project. This will include consultation with groups representing people with protected characteristics. The role of the CIOs is set out in the Wylfa Newydd CoCP [APP-414] and secured in the draft DCO s.106 agreement which has been shared with Welsh Government (Schedule 14).

Safeguarding vulnerable groups:

- 1.13.25 WG state at Paragraph 11.3.13: *It was agreed that Horizon will produce a Community Safety Management Strategy (CSMS).*
- 1.13.26 Horizon note that the Community Safety Management Strategy, secured by draft DCO Requirement PW11 requires that:
- (1) Except for SPC Works, no construction of the authorised development may commence until a Community Safety Management Strategy has been submitted to and approved by IACC.
 - (2) The details submitted under sub-paragraph (1) must be prepared in accordance with the principles set out in the Wylfa Newydd CoCP.
 - (3) Except for SPC Works, construction of the authorised development must be undertaken in accordance with the written scheme approved under sub-paragraph (1), unless otherwise approved.
- 1.13.27 The CSMS will set out Horizon's commitment with respect of management, resourcing and, communication of matters relating to community safety during the construction period, to ensure that members of the public are properly informed and prepared about what to do in the event of an incident that impacts community safety.
- 1.13.28 Horizon will work with Welsh Government and other relevant partners to ensure that safeguarding matters are appropriately addressed in the CSMS.
- 1.13.29 The principles of the CSMS are secured through the Wylfa Newydd CoCP. Item 0111 of the Mitigation Route Map [APP-422] has been updated so that it now reads as follows:
- 1.13.30 Horizon will take reasonable steps to safeguard the welfare of its employees, its supply chain and, in relation to the activities of its construction workforce, the general public. Prior to, and throughout the construction of the Wylfa Newydd Power Station appropriate dialogue will be maintained between Horizon, the contractor, the supply chain and local safeguarding agencies, including North Wales Police. Discussions will include any individual or coordinated measures appropriate to avoiding risks to vulnerable groups, for example in relation to human trafficking and direct or indirect sex work. Security protocols will be agreed by Horizon and North Wales Police, and other safeguarding agencies, and reviewed regularly. An appropriate number of Horizon and supply chain staff will be trained in safeguarding issues so that, for example, security staff who conduct site and/or vehicle inspections will be aware of signs of illegal activity such as human trafficking. This is secured by the Wylfa Newydd Code of Construction Practice [APP-414].
- 1.13.31 In addition to the CSMS, the Workforce Management Strategy (WMS) [APP-413] describes the key principles that Horizon and its partners will utilise to manage and control the construction workforce. The Draft DCO requires Horizon to develop the Wylfa Newydd Code of Conduct with its partners in accordance with the principles set out in the WMS. The Code of Conduct will apply to all personnel and employers whilst working on the Wylfa Newydd DCO Project, both on-site and off-site.

- 1.13.32 The principles in the WMS and the subsequent Code of Conduct will help deliver the project safely while minimising the potential effects of large numbers of temporary construction workers on the local community. Horizon will ensure enforcement of the standards and procedures detailed in the WMS and the Code of Conduct and will provide support to the community and stakeholders to avoid unforeseeable problems and when they arise respond quickly, effectively and seek to prevent recurrence.
- 1.13.33 The principles in the WMS also set out employer requirements in terms of safeguarding impact on vulnerable groups. Compliance with the Code of Conduct will be secured through labour arrangements with the supply chain, trade unions and between contractors and its employees.
- 1.13.34 As recognised in the WMS, the Code of Conduct is intended to supplement, not replace existing law and order provisions in place to protect members of the community and which all individuals are responsible for abiding by.

Displacement of Healthcare and Social Care Service Workforce

- 1.13.35 WG state at Paragraph 11.3.16: *Welsh Government has highlighted that supporting IACC and BCUHB to develop their own Workforce Strategies will require further evidence gathering and additional mitigation measures, for example relating to skills and training. In the support which Horizon has offer to IACC and BCUHB, there should be consideration of the investment which will be required in training and skills development.*
- 1.13.36 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 Employment and Skills Service. Horizon will provide mitigation in this respect in the form of information sharing and resources for Welsh Government, IACC and BCUHB to conduct workforce planning. This workforce planning is currently set out to delivered through the Jobs and Skills Implementation Plan secured through the draft s.106 which has been shared with Welsh Government. Labour churn in the health and social care sector is considered in section C.9 of the HIA Report. This includes consideration of the displacement of jobs within the care sector.
- 1.13.37 The Health Impact Assessment Report at paragraph J.4.4 states: Horizon would support IACC and BCUHB in the development of their own Workforce Strategies to mitigate labour churn within the health and social care sector. Horizon would support the development of these Workforce Strategies through sharing of workforce information, assisting in carrying out any required monitoring, and the provision of an appropriate financial contribution and/or support to the IACC and BCUHB for officer time within those organisations. This measure would be secured through s106 agreements.
- 1.13.38 Schedule 4 of the draft DCO s.106 agreement Schedule 4 includes the: Jobs and Skills Implementation Plan; a Skills Fund; the STEM Gogledd Project; the Wylfa Newydd Employment and Skills Service; support for an Economic Development Officer and a Supply Chain Action Plan. The Jobs and Skills engagement sub-group may identify training and employment initiatives

which support, inter alia, mitigation to offset any identified adverse effects of labour churn as a result of the Wylfa Newydd DCO Project.

- 1.13.39 The Jobs and Skills Implementation Plan would be a process to identify skills and training gaps, filling the identified skills and training gaps and monitoring the impacts of the Wylfa Newydd DCO Project on the local labour market (including in relation to displacement). In particular the Skills Fund and Wylfa Newydd Employment and Skills Service would be available to support employers who lose workers to the Project. These measures are discussed in greater detail in the Horizon response to the Welsh Government Written Representation on Skills.

On-Site and Off-Site Workforce Behaviour – Monitoring and Enforcement of Behavioural Code Of Conduct

- 1.13.40 WG state at Paragraph 11.3.20: *Welsh Government is aware that further work is being carried out on the WMS, with the specific aim to develop the behavioural code of conduct.*
- 1.13.41 Further work is being carried out on the Workforce Management Strategy [APP-413], however the Workforce Management Strategy will not itself include a code of conduct. The Workforce Management Strategy will inform the development of the Wylfa Newydd Code of Conduct which will guide workforce conduct and behaviours. Note that this is not a “behavioural” code of conduct and has a slightly broader remit. Horizon notes that the Workforce Management Strategy will enforce and implement Horizon’s measures that are indirectly and directly related to safeguarding the welfare of its employees and its supply chain and, in relation to the activities of its construction workforce, the general public. Indirect measures relate to work that Horizon will undertake with external stakeholders that will contribute to maintaining and/or promoting resilience including: employment and skills; governance and community confidence; and local neighbouring communities. Direct measures include: employment screening and management systems; liaison with external stakeholders; Horizon policies and adaptive monitoring. Ensure there is a range of social, leisure and sporting facilities on the Site Campus in order to occupy workers during their free time including a multi-use games area, gym, and a number of other facilities. Employers will liaise with the local community to discuss opportunities for these facilities to be used by the local community and vice versa.
- 1.13.42 Adaptive monitoring: item 0097 Mitigation Route Map [APP-422] secured through the draft DCO s.106 agreement states that Horizon will establish an external stakeholder group (hereafter Health and Well-being engagement sub-group). If appropriate the Group will discuss the need for additional mitigation or follow-up investigation. To facilitate this process, a set of key topics and indicators will be agreed. The topics will be expected to include safeguarding with regard to vulnerable adults and children.
- 1.13.43 WG state at Paragraph 11.3.21: *Welsh Government would also welcome a commitment from Horizon to provide support for the workforce relating to health promotion and occupational health activities, both for mental and*

physical well-being. It is anticipated that this would also include support for the workforce for sickness absence, health surveillance, promoting positive mental health, drugs and alcohol, prevention, musculoskeletal (physio), immunisation, navigation, smoking cessation, Well women clinic, Well man clinic and counselling.

- 1.13.44 Horizon note the Health Impact Assessment Report paragraph J.4.10: Horizon would promote health and well-being, including occupational health and hygiene and good worker conduct through the preparation and implementation of a Code of Conduct in accordance with the principles in the Workforce Management Strategy. Reporting of compliance with the Code of Conduct would be undertaken on an annual basis to the Health and Well-being Monitoring Group. This measure would be secured through the Workforce Management Strategy.
- 1.13.45 Health Impact Assessment Report paragraph J.4.11: Horizon would deliver a health and welfare programme, and ensure access is provided, to all of its workers. This programme would ensure that local community health and welfare services and resources used by local residents are not adversely affected by the Project.
- 1.13.46 Health promotion 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 are present at the meetings. As part of the SOCG process a discussion document was issued to BCUHB on 21/08/18 'Health Services for the Construction Workforce: Discussion Document (20.8.18)' (not a DCO submission document). This includes the draft specification for health services for the construction workforce and covers for sickness absence, health surveillance, promoting positive health (mental and physical), drugs and alcohol, prevention, musculoskeletal (physio), immunization. This specification will be refined in consultation with BCUHB.

Contingency Planning for Emergency Services

- 1.13.47 WG state at paragraph 11.3.24: *Welsh Government require further detail about contingency planning for the emergency services, and also further information on the proposed financial contribution associated with that contingency plan.*
- 1.13.48 An appropriate financial contribution will be provided for the emergency services, to address the impacts of the Wylfa Newydd DCO Project. This is set out in the HIA, specifically in section C.6. This will be secured by a s.106. The draft DCO s.106 agreement shared with the Welsh Government included provisions for the police, fire and rescue service and ambulance service. Horizon is continuing discussions with the emergency services relating to resource planning to inform the contribution in the s.106 obligation.
- 1.13.49 The draft Statement of Common Ground with Welsh Ambulance Service submitted at Deadline 2 (4 December 2018) [REP2-055] states that there will be a contribution to WAST (the Public Services (Ambulance) Contribution – secured via planning obligation) based on a call out charge and the number of call outs.

Monitoring Proposals for Timely and Effective Mitigation

- 1.13.50 WG state at paragraph 11.3.25: *Robust monitoring arrangements will be required that involve independent oversight and involvement of partners to ensure mitigation is timely and effective.*
- 1.13.51 Section 1.5 of this response discusses the WNMPOP sub-groups.
- 1.13.52 Horizon note that the following was stated in the draft SOCG with the Welsh Government submitted at Deadline 2 (4 December 2018) [D2-2]. A number of mitigation commitments have been developed through the HIA. Horizon would establish an external stakeholder group (the Health and Well-being subgroup) that would include members of the health and emergency services to monitor the implementation of the HIA mitigation strategy and provide advice on its delivery. The HIA confirms that when appropriate Horizon would facilitate bespoke analysis of routinely collected public health data (existing indicators), relevant to the Project. The information would inform discussion by the Health and Wellbeing Sub-Group. If appropriate the Group would discuss the need for additional mitigation or follow-up investigation. This will be secured by the s.106 agreement. Horizon has shared draft terms of reference for the Wylfa Newydd Major Permissions Oversight Panel and sub-groups which it looks forward to discussing with Welsh Government.

Planning Obligations and DCO Requirements

- 1.13.53 WG state at paragraph 11.4.4: *Site Campus Health Facility (Requirement WN18): Clarification: The requirement should also control occupancy until the Site Campus Health Facility has been provided, not just the details that must be submitted.*
- 1.13.54 Horizon does not consider that a requirement controlling occupancy of the Site Campus until the health facility is provided is required. This is because Horizon is currently discussing the provision of an initial payment to the National Health Service to deal with workforce health requirements in the initial years of construction (in addition to the mobile emergency services on the Power Station Site) until sufficient construction workers are residing on site for the on-site health facility to be provided. The health facility will be designed in phases and staffing will scale up or down in size in response to resident numbers on the Site Campus. To date, discussions with Betsi Cadwaladr University Health Board and local service providers have been positive to this approach. Horizon is continuing these discussions as part of the Statement of Common Ground process.
- 1.13.55 WG state at paragraph 11.4.4: *Dentistry provision: Horizon must commit to providing a dentistry provision through the Site Campus Health Facility. Alternatively, Horizon must commit to funding an off-site provision for construction workers.*
- 1.13.56 An arrangement will be reached with a local dental practice to run clinics for the construction workforce for emergency dental treatment. Routine dental treatment for non-home based construction workers would take place with the workers dentist at their place of residence. On this basis no NHS contribution is expected.

- 1.13.57 Horizon has committed to fund off-site dental service provision for construction workers. A dental services proposal is set out in the draft DCO s.106 agreement. There would be no dentistry provision through the Site Campus Health Centre.
- 1.13.58 The draft DCO s.106 agreement states that the Dental Services Proposal means the proposal demonstrating how Horizon will have adequate dentistry provision in place from time to time (including emergency dentistry care) for the non-homebased Workforce from Implementation for the duration of the Construction Period which may include: provision of private dentistry facilities; or funding or other operational agreements with local dentistry practices.
- 1.13.59 WG state at Paragraph 11.4.4: *Community Safety Management Strategy (Requirement PW11): Welsh Government cannot agree to the proposed mitigation for protecting safeguarding groups until Horizon have provided the CSMS.*
- 1.13.60 As noted above, draft DCO Requirement PW11 provides that, except for SPC Works, no construction of the authorised development may commence until a Community Safety Management Strategy has been submitted to and approved by IACC.
- 1.13.61 WG state at Paragraph 11.4.5: *Welsh Government requests that the s106 includes a provision to agree a protocol for referrals to NHS services and ensures delivery of mitigation through a firm commitment to deliver the on-site medical facility (at the appropriate time) and that all necessary financial contributions are also secured and will be available in a satisfactory manner.*
- 1.13.62 Horizon would operate two on-site healthcare facilities: a Construction Site Clinic (a facility within the construction security fence on the Power Station Site and a Site Campus Medical Centre (a medical centre on the Site Campus. At the start of the Construction Period, the clinic will be staffed initially by a nurse, with resources progressively increases as worker activities increase (e.g. to include paramedics, OCC Health Nurses, OCC Health Physicians). The Construction Site Clinic will be operational for the full construction period and staffing will scale up and down in proportion to the number of workers on site and demand.
- 1.13.63 Phase 1 of the Site Campus would be fully operational before the number of non-home based workers exceeds 3,000 in the community. Delivery of the Site Campus would in three phases. Phase 1 would deliver first 1,000 beds (including an appropriate Site Campus Medical Centre at the Site Campus) on or before Q8 post DCO grant (i.e. end of October 2021), ensuring that delivery remains within the parameters of the Environmental Statement.
- 1.13.64 Horizon notes that clause 1 in Schedule 8 of the draft DCO s.106 agreement states a Health (NHS Referral) Payment would be made towards the cost of referrals to NHS services of non-home-based Workforce personnel during the Construction Period.
- 1.13.65 WG state at paragraph 11.4.6: *There are no Terms of Reference included for the Health and Wellbeing Sub-Group. Welsh Government request that the S106 agreement includes the Terms of Reference.*

- 1.13.66 Horizon has provided draft Terms of reference for Wylfa Newydd Major Permissions Oversight Panel and Sub-Groups to confirm governance process, responsibilities, and members. This contained the broad roles of all sub-groups including the Health and Wellbeing Sub-Group. It is proposed that the operational role of the Wylfa Newydd Major Permissions Oversight Panel and its sub-groups are set out in signed terms of reference appended to the s.106 agreement. This is considered an appropriate approach which avoids the need for inflexible speculative contractual drafting to closely define the roles of groups whose roles are anticipated to evolve over time, and which reflects how IACC, WG, Horizon and many other stakeholders currently effectively work in managing working groups which have been meeting and operating well in some cases for years.

Planning obligations

- 1.13.67 Welsh Government has raised two principal points in relation to health and well being obligations (at paragraph 11.4.5) – contributions for health provision and operation of the health and well-being sub-group. Horizon has responded in relation to terms of reference for the sub-groups in section 1.5 of this response.
- 1.13.68 In relation to health provisions, Horizon are working with BCUHB to agree a protocol for referrals to NHS services. The delivery of the on-site medical facility is secured by Schedule 8 of the draft DCO s.106 agreement. The draft DCO s.106 agreement includes a number of health related payments, as follows:
- A Health (NHS) Referral payment – which is a payment towards referrals to NHS services of non-home-based workforce;
 - A Health (NHS dependants use) payment – which is a payment for the cost of partners and children of the non-home-based workforce personnel registering with and/or using off-site GP services;
 - A Health (First NHS workforce use) payment – which is a payment towards the shortfall of non-home-based workforce personal registering for off-site GP services, before the on-site medical centre is in place;
 - A Health (Second NHS workforce use) payment – to address payment towards the shortfall of non-home-based workforce personal registering for off-site GP services, in the event that the on-site medical centre is delayed;
 - A Health (monitoring) payment – a payment to assist BCUHB in the monitoring of the health impacts of the Wylfa Newydd DCO Project;
 - A Health (Contingency) Fund – which is a payment which will be linked to monitoring data showing a significant additional demand or forecast trends which indicate a significant demand on local health services as a result of the Wylfa Newydd Project.

1.14 Housing and Accommodation

Principal issues

Introduction

- 1.14.1 Horizon has sought to work with the Welsh Government throughout the pre-application phase. As with other socio-economic topics, Horizon has been conscious of paragraph 5.12.7 of EN-1 (i.e. that the decision-maker may conclude that limited weight is to be given to assertions of socio-economic impacts that are not supported by evidence) and sought to base its approach to workforce accommodation on the best available evidence.
- 1.14.2 Welsh Government has consistently raised concerns about Horizon's evidence base but to date has provided limited alternative evidence itself. It commissioned work from Arc4 which was shared with Horizon before the submission of its DCO, but this does not, on the face of it, appear to have informed its Written Representation. Its Written Representation seems to be based on new work, carried out since Horizon submitted its DCO application and therefore unable to inform Horizon's approach.
- 1.14.3 Much of the Welsh Government position on the lack of accommodation capacity continues to rest on assertions, rather than clear evidence and therefore it is difficult for Horizon to respond to these or consider them as alternative positions. Horizon recognises the risks raised by the Welsh Government and seeks to avoid, manage and mitigate them through its overall approach.

Home-Based Workers

- 1.14.4 At paragraph 12.4.4, Welsh Government raises the issue of additional demand if the number of home-based workers is lower than forecast. Horizon acknowledges that the precise number of home-based workers cannot be known in advance with certainty, but it is not true to say that "for every home-based worker that is not available, accommodation will need to be identified for that worker." Horizon's Environmental Statement takes a conservative position with a central case that is based on 9,000 workers which is 500 more than it thinks it will need. This provides some headroom should the assumptions prove incorrect.
- 1.14.5 If there is more significant deviation from Horizon's central case, Welsh Government has suggested some benchmarks for the release of contingency funding that Horizon will discuss further with them through the SOCG process and discussions on the draft DCO s.106 agreement.

Temporary Worker Accommodation

- 1.14.6 Horizon acknowledges the Welsh Government's concerns about the need for more detail and will submit an updated Phasing Strategy [APP-447] at Deadline 4 (17 January 2019) to provide more detailed triggers for the provision of key mitigation. Horizon considers that the key mitigation should be delivered before significant effects take place for which this mitigation is in place.

- 1.14.7 Therefore, it has been working to tighten up the triggers for delivery, focusing on when in the Environmental Statement or construction programme the key mitigation is required. This is explained with regard to the phasing of the Site Campus below.
- 1.14.8 In terms of the Site Campus, Horizon has proposed the following phasing:
- Phase 1 to deliver first 1,000 beds on or before Q8 post DCO grant (Yr4 Q4 in the ES);
 - Phase 2 to deliver 1,500 beds on or before Q15 (so that the total count of beds will be 2,500);
 - Phase 3 to deliver final 1,500 beds on or before Q18 (so that the total count of beds will be 4,000).
- 1.14.9 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 [APP-088]).

Tourist Accommodation

- 1.14.10 The Welsh Government assessment is based on the June 2018 Bedstock Survey from IACC, which was only made available to Horizon after it had submitted the DCO application. It is also the third such survey that IACC has made available to Horizon, each with very different results. It is therefore not clear how much it can be relied on as a data source. Notwithstanding this, Horizon considers that this latest survey supports its accommodation strategy, through demonstrating a clear desire of accommodation providers within the tourism industry to take workers related to Wylfa Newydd DCO Project.
- 1.14.11 Horizon considers that there are errors in the way that the Welsh Government Written Representation has interpreted the results of this survey. Table 12-2 of the Welsh Government Written Representation makes a series of discounts (referred to as “moderators”) to estimate capacity, including one for whether businesses are interested in letting to workers. This introduces an element of double counting. As the Bedstock survey report makes clear, the reason why businesses are not interested in housing workers are included in two of the other columns – whether places are available to let and their level of occupancy. It also applies a 50% discount for workers not sharing rooms, but there is no evidence to justify that discount. Horizon does therefore not agree with the analysis in Table 12-2.
- 1.14.12 Horizon's review of the Bedstock survey confirms that there is sufficient capacity to meet the demands from workers. The table below shows the difference between the supply of tourism bed spaces as presented in the analysis to support the DCO application and the IACC Bedstock survey. The IACC Bedstock survey data suggests that there could be an additional 1,625 tourism bed spaces available, but 46 fewer caravan and camping bed spaces, compared with the analysis presented to support the DCO application.

Table 1-2 Difference between IACC Bedstock survey data and DCO data for tourism accommodation on Anglesey

	Tourism	Caravans and Camping
Gravity model/DCO estimate	1,695	1,950
IACC Bedstock survey	3,320	1,904
Difference	1,625	-46

- 1.14.13 The IACC Bedstock survey data does not change the significance of effects for tourism or caravan and camping accommodation in the DCO assessment.
- 1.14.14 It should also be noted that by applying a peak occupancy discount, this is assessing the capacity only in July and August. In the rest of the year, there is significantly more capacity.
- 1.14.15 Welsh Government raises the issue of illegal parking of caravans. Horizon has acknowledged the risks and concerns around this and will work to prevent it through the WAMS and by funding increased enforcement by IACC through the Housing Fund (in the draft DCO s.106 agreement).

Owner Occupied

- 1.14.16 IACC is planning for significantly more housing than its demographic need requires in order to support economic and employment growth. As noted by Welsh Government, part of the proposed housing delivery in Anglesey would be affordable housing and therefore not available for Wylfa workers. However, anything that increases the supply of housing eases constraints in the market irrespective of whether Wylfa construction workers occupy it.
- 1.14.17 As set out in Horizon's response to Q 10.1.17 of the Examining Authority's first Written Questions, submitted at Deadline 2 (4 December 2018) [REP2-002], the market is already responding and delivering more than IACC's demographic need.

Private Rented Sector

- 1.14.18 In paragraph 12.4.23, Welsh Government states that the only spare capacity in the private rented sector (PRS) is long-term empty homes and there is no capacity at all in the active PRS market. It states:
- "There may be some capacity in the housing stock for additional private rented bed spaces but this will be limited to the availability of empty dwellings that can be brought back into use and will require investment to do so."*
- 1.14.19 This is an assertion without evidence.
- 1.14.20 It is also inconsistent with the evidence provided by Horizon, by Welsh Government's previous consultants (Arc4) and by both of IACC's consultants (AFW and Cambridge University).

- 1.14.21 Welsh Government has asserted this position throughout the pre-application process but provided no evidence to support it. The evidence from its previous consultants was that there is capacity in the active PRS market. It has employed new consultants since the DCO application was submitted and this is the first time that Horizon has seen their work.
- 1.14.22 As IACC's Local Impact Report Chapter 8 Housing sets out, there are significant void periods within the rented sector. With increased demand (and with the ability of the WAMS to match workers with vacant properties) these would be expected to be reduced significantly, effectively increasing the supply of housing.
- 1.14.23 The Welsh Government analysis suggests that 168 bed spaces could be available through long-term vacancies. This is based on a series of assumptions one of which (that only 14% of long-term empty homes are in the PRS, in line with the proportion of total stock) has no supporting evidence. The English Housing Survey reports that 11.1% of PRS homes are vacant and 3.3% of owner-occupied homes are vacant which means that 44.4% of vacant homes are in PRS. Using Welsh Government's approach this would increase the number of bed spaces threefold.
- 1.14.24 The Welsh Government assumption of 14% is also inconsistent with IACC's work. The January 2017 Mitigated Scenario by Amec Foster Wheeler estimated (based on consultation with IACC's Empty Homes Officer) that 90% of previously empty homes in North Anglesey and Holyhead would then be rented out rather than sold on, and 50% elsewhere on the island. Welsh Government's methodology is not completely clear, but using the AFW evidence and applying it to the Welsh Government approach would again make the supply many times higher than the 168 identified by Welsh Government in paragraph 12.4.28.
- 1.14.25 The evidence is therefore clear that there is significantly more capacity in the PRS than asserted by Welsh Government because:
- Welsh Government has underestimated likely long-term vacancies by applying un-evidenced adjustments; and
 - Welsh Government has taken no account of shorter-term vacancies (voids) in PRS.
- 1.14.26 Horizon acknowledges there is uncertainty about vacancy rates which is why it has proposed the plan, monitor and manage approach. It has collected the best available evidence, including drawing on work provided by IACC and Welsh Government prior to submitting its DCO. It agrees that empty homes can play a role in meeting PRS demand, but this is not the only source of capacity.
- 1.14.27 Horizon also acknowledges the risk that rents will increase and notes the summary of the Welsh Government data on rent rises in the TA6 postcode but has not seen this data before and only limited information is provided here. Horizon would caution about focusing on very local areas, or considering rental changes in isolation without any comparators to understand what wider trends may apply. At very local scales with small numbers of properties involved, rent data will be erratic and rises may simply

reflect a change in the mix of properties coming onto the market (smaller, cheaper ones to larger, more expensive ones).

- 1.14.28 Horizon has provided Welsh Government with Office for National Statistics data on rents at the district level in Somerset over four years (since the first earthworks started) and over the most recent year. These show very little difference in Sedgemoor or West Somerset when compared to the rest of Somerset.

DCO requirements

Campus Occupancy and Phasing

- 1.14.29 At paragraphs 12.5.7 to 12.5.9, the Welsh Government notes that its key concerns with the DCO requirements is that they do not specify any phased provision of the Site Campus against worker numbers, provide any occupancy level commitment once the Site Campus is delivered, or a mechanism by which occupancy levels would be achieved.
- 1.14.30 Horizon notes that it has committed to the phased delivery of the Site Campus which will be reflected in the updated Phasing Strategy [APP-447] to be submitted at Deadline 4 (17 January 2019). This commitment would secure the delivery of the Site Campus as follows:
- Phase 1 to deliver 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).
- 1.14.31 Horizon does not consider it necessary to impose an occupancy threshold because high occupancy will be delivered through other mechanisms in the DCO, as follows:
- Horizon will secure high levels of occupancy by ensuring that the Site Campus fully meets the needs and expectations of a modern construction workforce. These needs will be met through provision of purpose-built high-quality accommodation and a range of on-site facilities and amenities.
 - Alongside the proximity of the Site Campus to the rest of the WNDA, thereby reducing the need and time to travel, the Site Campus will be an attractive location for construction workers to live.
 - Monitoring and incentivisation of site campus occupancy will be undertaken through the Workforce Accommodation Management Service (secured through the draft DCO s.106 agreement).

Planning obligations

- 1.14.32 Welsh Government has raised a number of comments in relation to planning obligations in paragraphs 12.5.10 to 12.5.16 of the response which are responded to below.

Workforce Accommodation Management Service

- 1.14.33 Welsh Government discuss the WAMS in paragraphs 12.5.10 to 12.5.13 of their Written Representation. Further discussion with stakeholders is required on the precise details of monitoring and reporting but Horizon will require accommodation providers to demonstrate that they comply with relevant standards, including Rent Smart Wales. This will be agreed through the WAMS Oversight Board and the Housing and Accommodation Sub-Group, as appropriate, and secured through the DCO s.106 agreement (Schedule 5).

Housing Fund

- 1.14.34 Welsh Government discuss the WAMS in paragraphs 12.5.14 to 12.5.16 of their Written Representation. The draft DCO s.106 agreement sets out the proposals for funding for officers, boosting supply and contingency. Discussions with stakeholders are ongoing.

Monitoring

Horizon agrees with the Welsh Government that a range of monitoring will be required and that the impact of Wylfa Newydd will need to be separated from a range of other background influences including welfare reform. Horizon will continue to work with Welsh Government on these issues. Monitoring will be carried out through the WAMS, which is secured through the draft DCO s.106 agreement.

1.15 Historic Environment

Principal issues

- 1.15.1 The Welsh Government's Written Representation raises the following issues with regard to the Historic Environment:
- Adequacy of mitigation to offset the substantial harm on Cestyll Garden, a Grade II Registered Park and Garden.
 - Exclusion of temporary sewerage treatment plant located within Essential Setting of Cestyll Garden from the ES.
 - Provision of a Written Scheme of Investigation (WSI) for archaeological remains to be preserved in situ and requirement for Horizon to commit to assessment, reporting, analysis, publication and dissemination of the results of the excavations within the Wylfa Newydd Development Area.
 - Restoration of historic buildings in the event of damage resulting from construction.
 - The setting impacts on Trelignath Burial Chamber Scheduled Monument and Ty Mawr Standing Stone Scheduled Monuments.

Adequacy of mitigation for Cestyll Garden

- 1.15.2 In paragraph 13.3.9 of their Written Representation the Welsh Government has stated that they do not consider that the measures to mitigate the effects on Cestyll Garden identified in Chapter D11 – Cultural Heritage of the Environmental Statement [APP-130] are adequate and that there is a need for Conservation Management Plan (CMP) to capture the long-term management and enhancement of Cestyll Garden, funded by Horizon. In addition, in paragraph 13.3.22 of their Written Representation the Welsh Government has stated that are not satisfied that Horizon are committed to delivering the CMP.
- 1.15.3 In paragraph 13.3.19 of their Written Representation, the Welsh Government has also stated that CMP should also include measures to mitigate impacts associated with 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).
- 1.15.4 The measures to mitigate effects on Cestyll Garden are set out in Section 11.6 of chapter D11 (cultural heritage) of the Environmental Statement [APP-130]. 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.
- 1.15.5 As Welsh Government is aware, Horizon does not have control over Cestyll Garden, but are in are in discussions with the Nuclear Decommissioning Authority (the owners of the valley garden) with regard to the production and implementation of a CMP for the valley garden. This is considered further in relation to planning obligations below.
- 1.15.6 In addition, the draft DCO s.106 agreement (revised draft to be submitted at Deadline 3) includes for a payment to be made to deliver the CMP and a commitment to use reasonable endeavours to enter a deed of covenant to develop and deliver a CMP.
- 1.15.7 Horizon and the NDA are in the process of agreeing heads of terms for acquisition of a number of land interests which include Cestyll Garden, although it is currently subject to contract. Horizon note NDA's desire to safeguard the amenity of the garden and our proposals align with this objective.
- 1.15.8 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 Felin Gafnan, Cylch-y-Garn (Asset 144) are set out in section 11.6 of Chapter D11 - Cultural heritage of the Environmental Statement [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.

- 1.15.9 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) (APP-130), and above, can be effectively implemented and 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]. The CMP would therefore be for the valley garden only.
- 1.15.10 As identified above, there is provision in the draft DCO s.106 for a CMP for Cestyll Garden and the mitigation for 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) secured through inclusion in chapter 12 of the Wylfa Newydd CoCP and chapter 12 of the Main Power Station Site sub-CoCP, both being secured through DCO requirements. Horizon therefore do not consider that there is a requirement for Historic Environment Fund, as identified by the Welsh Government in paragraph 13.4.5 of their Written Representation.
- 1.15.11 In paragraph 13.3.24 of their Written Representation the Welsh Government has requested further justification to demonstrate why the kitchen garden cannot be reinstated to its former location or alternative locations (subject to the approval of Cadw). Due to the operational requirements of the Power Station it is unlikely that the kitchen garden can be reinstated at its former location. However, Horizon are reviewing what can be practicably achieved, and will provide a response at Deadline 6 (19 February 2019).

Assessment of temporary sewage plant

- 1.15.12 In paragraph 13.3.24 of their Written Representation the Welsh Government has stated that it is not clear if temporary waste water outfall and temporary sewerage treatment plant were included in the assessment of effect on Cestyll Garden presented in chapter D11 (cultural heritage).
- 1.15.13 The assessment of effects presented in Chapter D11 - Cultural heritage of the Environmental Statement [APP-130] was based on the information presented in the Parameter Plans, parameter tables and Chapter D1 – Proposed development of the Environmental Statement [APP-120]. Sewage discharge is described in paragraphs 1.9.57 and 1.9.58 of Chapter D1 – Proposed development of the Environmental Statement [APP-120] and was therefore considered in the assessment. However, as described in paragraph 1.9.58 of Chapter D1 – Proposed development of the Environmental Statement [APP-120], under normal circumstances, as the inlet works and settlement tanks would not generate high levels of odour that could lead to annoyance at sensitive off-site locations, this was not

considered to make a significant contribution to the major adverse effect during construction and therefore was not separately identified in Chapter D11 - Cultural heritage of the Environmental Statement [APP-130]. Please also see Horizon's response to Q1.0.1 of the Examining Authority's First Written Questions [REP2-002].

Written Scheme of Investigation

- 1.15.14 In paragraph 13.3.31 of their Written Representation, the Welsh Government have stated that they need a commitment from Horizon to provide WSIs for protecting all historic assets which remain in situ on-site. In the event Horizon do not comply with the strategy, Horizon will be required to complete any excavation works prior to commencement of construction of the authorised development.
- 1.15.15 In addition, in paragraph 13.4.5 of their Written Representation, the Welsh Government requested a DCO Requirement committing Horizon to carry out assessment and analysis of any artefacts discovered (including appropriate archiving/recording) or provide appropriate funding for a third party to manage these works.
- 1.15.16 As identified in paragraph 11.6.6 of Chapter D11 - Cultural heritage of the Environmental Statement [APP-130] 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 (GAPS). In addition, all archaeological recording would include a programme of assessment, reporting, analysis, publication and dissemination commensurate with the value of the terrestrial archaeological remains removed, submission of reports to the Historic Environment Record and National Monument Record of Wales, and the preparation of an ordered archive which would be submitted to an appropriate repository.
- 1.15.17 The archaeological recording (which as identified in Chapter D11 - Cultural heritage of the Environmental Statement [APP-130] includes a programme of assessment, reporting, analysis, publication and dissemination) and to agree a WSI are included in section 12 of the Main Power Station Site sub-CoCP [REP2-032].
- 1.15.18 Horizon are currently reviewing available information to identify the feasibility of preservation in situ and where it is determined that this is feasible will develop an appropriate method to implement this. This will be agreed with Cadw and would be secured through inclusion in section 12 of the Main Power Station Site sub-CoCP (Revision 2.0) [REP2-032].
- 1.15.19 The summary reports on the results of the archaeological investigations are due to be submitted at Deadline 6 (19 February 2018).

Impact of construction works on historic buildings

- 1.15.20 In paragraph 13.4.44 of their Written Representation the Welsh Government have requested Horizon to make a commitment to restore any historic buildings which are subject to damage during construction activities.

1.15.21 Where Horizon are 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.

1.15.22 In relation to the Grade II* Listed Church of St Padrig (Llanbadrig) (Asset 26) (please refer to paragraph 13.3.39 of the Welsh Government's Written Representation), in addition to the mitigation identified in Chapter D11 - Cultural heritage of the Environmental Statement [APP-130], the draft DCO s.106 agreement includes for a payment for appropriate noise insulation measures (to be agreed by the IACC and the owners) to reduce noise to address impacts of construction noise for this heritage asset.

Setting impacts on Scheduled Ancient Monuments

1.15.23 The landscape masterplan and landscape design principles and planting strategy for the Logistics Centre are illustrated on figures 19 and 20 in Volume 3, Appendix 1-4 Logistics Centre of the Design and Access Statement [APP-407 to APP-410] The design principles and planting strategy have been informed by a thorough analysis of the Logistics Centre site and its wider context in order to mitigate effects on the surrounding landscape. The 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 whilst maintaining the existing view intervisibility between Trefignath Burial Chamber and Ty Mawr Standing Stone.

DCO requirements

1.15.24 The Welsh Government has set out the following requests in respect of heritage controls (paragraph 13.4.4):

- Provision of a Conservation Management Plan and long-term management of historic assets (including Cestyll Garden) – Horizon has responded in relation to draft proposed planning obligations below.
- Written Scheme of Investigation for protection of in-situ assets: Horizon notes that Requirement SPC8 requires it to provide a Written Scheme of Investigation (WSI) for submission to IACC. Once approved, the site preparation and clearance works will need to be undertaken with the approved WSI. During site preparation and clearance and Main Construction, section 12 of the Wylfa Newydd CoCP (Revision 2.0) [REP2-031]] will apply which sets out Horizon's cultural heritage management strategy that must be complied with during construction of the Wylfa Newydd DCO Project.
- Recording/assessment/archiving of artefacts: As noted above, the Wylfa Newydd CoCP (Revision 2.0) [REP2-031] and the Main Power Station Site sub-CoCP (Revision 2.0) [REP2-032] include a range of controls on the discovery of heritage features and establishes a

programme of assessment, reporting, analysis, publication and dissemination commensurate with the value of the terrestrial archaeological remains removed, submission of reports to the Historic Environment Record and National Monument Record of Wales, and the preparation of an ordered archive which will be submitted to an appropriate repository. The Main Power Station Site sub-CoCP (Revision 2.0) [REP2-032] lists the known cultural heritage features on site and identifies specific mitigation in relation to their removal and recording (refer to table 12-1).

- 1.15.25 In respect of the measures set out in the Wylfa Newydd CoCP [REP2-031] and the Main Power Station Site sub-CoCP [REP2-032], Horizon is proposing to include additional controls to ensure that further protections are provided to heritage assets during construction of the Wylfa Newydd DCO Project. It is currently anticipated that these will be provided as part of the Deadline 4 (17 January 2019) Wylfa Newydd CoCP update.

Planning obligations

- 1.15.26 Welsh Government has raised a number of comments in relation to planning obligations in paragraph 13.4.5 of the response which are responded to below.
- 1.15.27 Horizon has also committed to providing a financial contribution under the draft DCO s.106 agreement for the delivery of enhancement, interpretation and maintenance of the valley garden at Cestyll Garden.
- 1.15.28 In order to provide greater certainty on delivery of the CMP, as described above, Horizon and the NDA are in the process of agreeing heads of terms for acquisition of a number of land interests which include Cestyll Garden, although it is currently subject to contract.
- 1.15.29 Horizon's response to Q6.0.8 and Q.6.0.9 of the Examining Authority's First Written Question, submitted at Deadline 2 (4 December 2018) [REP2-002] set out Horizon's approach to managing cultural heritage effects. This includes the approach to fieldwork and agreeing a Written Scheme of Investigation (WSI).
- 1.15.30 Horizon's approach to the provision of funding for the historic environment is provided in the draft SOCG between Horizon and Welsh Government [REP2-043].
- 1.15.31 Horizon is not proposing a separate Historic Environment Fund, other than a payment to deliver the CMP for Cestyll Garden.
- 1.15.32 The following mitigation measures are identified in table D11-7 of Chapter D11 – Cultural heritage of the Environmental Statement [APP-130]:
- Level 2 Historic Building recording.
 - Level 2 Historic Landscape survey.
 - Photographic survey.

- Translocation of Lady's Finger of Lancaster apple trees from Cestyll Garden kitchen garden.
 - Horizon would work with the landowner to implement appropriate monitoring of soil pH and a visual inspection of the condition of plants during the bulk earthworks of the construction period.
- 1.15.33 Horizon is proposing a contribution towards heritage and archaeology through the SPC s.106 agreement which includes payments for interpretation of the findings of the current excavation works.
- 1.15.34 In light of these measures, a Historic Environment Fund is not considered necessary or justified.

1.16 Environment

Principal issues

Flooding

- 1.16.1 At paragraph 14.4.5, the Welsh Government requests clarification on how the TAN15 tests have been considered as part of the DCO application, where the assessment has identified businesses and properties.
- 1.16.2 Residual flood risks have been identified to business and properties at 2 locations; Cemaes (in relation to the WNDA development) and Dalar Hir (in relation to the Park and Ride). The following summarise both sites and the identified residual risk of flooding.
- 1.16.3 Cemaes lies on the Nant Cemaes, which will receive runoff from Mound A within the WNDA. The FCA submitted as part of the DCO application currently indicates that there could be small increases in flood level affecting businesses in Cemaes on the upstream (south) side of the A5025 where it crosses the Nant Cemaes. The cause of this is an apparent increase in flow to Nant Cemaes downstream of the A5025 from the drainage serving Mound A, which subsequently influences water levels at these businesses.
- 1.16.4 Dalar Hir differs from Cemaes in that the information presented within the DCO indicates that there is a risk of flooding to the proposed Park and Ride car parking areas, rather than an impact on property or businesses elsewhere. The source of flooding at Dalar Hir is the Nant Dalar Hir and the cause is related to culvert capacity beneath the A5 and A55.
- 1.16.5 The TAN15 tests were considered in the assessment of both sites. The TAN15 tests are outlined in Sections 6 Justification of the location of development, and in Section 5 Nature of development and land use, Section 7 Assessing flood consequences and Appendix 1, also called Assessing flood consequences.
- 1.16.6 Section 6 of TAN15 seeks to apply a sequential approach to the location of development relative to flood risk, directing development away from Zone C towards Zone A and Zone B. Neither the WNDA within the catchment of Nant Cemaes nor the site at Dalar Hir lie in Flood Zone C, indicating that the location of development is acceptable.

- 1.16.7 Section 5 of TAN15 presents information on the vulnerability of the development type relative to flooding. Power stations, such as the development at the WNDA, are identified as High vulnerability development. Car parks, such as the development at Dalar Hir, are identified as Less vulnerable.
- 1.16.8 Reference to Figure 1 of TAN15 indicates that Zone A has little or no flood risk and areas where the justification tests identified in Section 6 do not apply and where flood risk need not be considered further. Zone B is recognised as an area that may have flooded in the past, as evidenced by sedimentary deposits. In these areas a precautionary approach is recommended where site levels should be higher than the 0.1% flood level. If higher than the 0.1% flood level then there is no need to consider flood risk further.
- 1.16.9 Horizon's interpretation of the tests thus far is that development within the WNDA, including Mound A, is justified on the basis that it lies in Flood Zone A, which is acceptable for High vulnerability development. Development of Dalar Hir for car parking is also deemed justified on the basis that Low vulnerability development is acceptable within Flood Zone A.
- 1.16.10 As Horizon's detailed hydraulic modelling identifies for Dalar Hir that site levels were below the simulated 0.1% flood level, and in the case of the WNDA that runoff from Mound A results in slight increases in flood level within Nant Cemaes, it is arguably appropriate to consider the requirements of Section 7 and Appendix 1 on the acceptability of flooding consequences.
- 1.16.11 Section 7.2 of TAN15 indicates that whether development should proceed or not will depend upon whether the consequences of that flooding can be managed down to a level which is acceptable for the nature/type of development being proposed, including its effect on existing development. In the case of the WNDA development, it is the latter element that is important in relation to properties at Cemaes, and in the case of Dalar Hir it is the former in relation to the development itself.
- 1.16.12 The WNDA Development FCA [APP-150] concluded that there was a high risk of flooding from both fluvial and pluvial sources to the properties (and land) upstream of Cemaes village.
- 1.16.13 The conclusion in the FCA was reached on the basis of hydrological analysis and hydraulic modelling of both sources of flooding, without presentation of how the flood risk could be avoided, mitigated or managed. The FCA stated that mitigation would include modifications to the drainage design and re-modelling to show that this increased risk was mitigated. These modifications would be undertaken at the detailed design stage, as it was not possible to complete the detailed design stage prior to the time the DCO Application was submitted to the Planning Inspectorate.
- 1.16.14 Subsequent analysis has been undertaken to define the cause of the increased flood risk at Cemaes, principally in order to understand what mitigation might be effective in reducing the impact on flood risk that is currently shown. This analysis shows that the cause of the increased flood risk in Cemaes is due to an increased rate of runoff from the catchment

containing Mound A, which results in a slightly increase in flow of between 0.1m³/s in the 50% to 1% events and 0.2m³/s in the 0.1% event.

- 1.16.15 It remains the case that a detailed drainage design is not currently available and is unlikely to be available until later in 2019, however, in the absence of a detailed drainage design, Horizon is committed to the goal that there would be no increase in flow from the catchments draining into the Nant Cemaes downstream of the A5025, which is the outcome necessary to avoid an increase in flood level in Cemaes.
- 1.16.16 In addition to this commitment, a high-level analysis of options available indicates that space is available within the Order Limits of the WND A to provide additional attenuation of surface water runoff that would provide a greater design standard than that currently simulated in hydraulic modelling. It is Horizon's position therefore that it can manage the risk in Cemaes down to acceptable levels through design development within the order limits of the WND A and that as such the acceptability criteria of TAN15 can be met.
- 1.16.17 Horizon is committed to revising the preliminary drainage design at the detailed design stage and therefore will propose a requirement as part of an updated draft DCO to be submitted at Deadline 4 (17 January 2019) which will require Horizon to submit, for approval, a surface water drainage design for construction works.
- 1.16.18 With respect to the Dalar Hir site, the Dalar Hir Park and Ride FCA [APP-281] concluded that there was a high risk of flooding from both fluvial and pluvial sources to the Park and Ride site. There was also an existing high risk of flooding to the A5 and A55 to the south of the site and to agricultural land to the north that was unchanged as a result of the proposals.
- 1.16.19 The conclusion in the FCA was reached on the basis of conservative hydrological analysis and hydraulic modelling of both sources of flooding, without presentation of how the flood risk could be avoided, mitigated or managed. As only the baseline risk was assessed, no indication of any increase or decrease in risk elsewhere was presented.
- 1.16.20 The risk from other sources of flooding was considered low. Whilst not explicitly stated in the FCA, because of the fluvial and pluvial risk to the Park and Ride site, the development was considered to be non-compliant with TAN15, though sufficient assessment had been undertaken on potential mitigation measures to suggest that further development of those measures could provide compliance with TAN15. Unfortunately, these were insufficiently developed to submit within the FCA at the time of DCO application.
- 1.16.21 Additional assessment has since been undertaken to review and update the conservative approach presented in the Dalar Hir Park and Ride FCA [APP-281].
- 1.16.22 This additional assessment, the results of which are presented in an FCA Addendum submitted at Deadline 3 (18 December 2018), revises the hydrological inputs to the hydraulic modelling and assesses potential solutions for the avoidance, mitigation and management of the flood risks identified.

- 1.16.23 Further details of the additional analysis can be found within the FCA Addendum, however, the outcome of that assessment is that a solution has been developed that has been shown to be effective at managing flood risk at the site. The updated mitigation includes two grassed flood storage areas in the north west of the site and raised car park and road levels in some areas to ensure that they remain dry. This solution has been shown to ensure the site is free from flooding in the 1% AEP event (except one car parking space) and to provide betterment both upstream and downstream of the site.
- 1.16.24 Hydraulic model runs also suggest that there is also betterment within the site provided in more frequent events, and no detrimental impact in more extreme events. Further, the updated mitigation provides a betterment to agricultural land to the north and to the baseline flood risk identified to the A5 and A55 to the south. Residual risks to the site from blockage of culverts beneath the A5 and A55 or within the site itself would be managed through a maintenance plan for the site.
- 1.16.25 The conclusion of the FCA Addendum (submitted at Deadline 3) is that development of the Park and Ride can be achieved such that it will not be at risk from flooding and as such it is shown that the acceptability criteria of TAN15 can be met.
- 1.16.26 In addition to Cemaes and Dalar Hir, the Welsh Government has noted that there is a small increase in flood level (0.02m) simulated at Cemlyn Road where it crosses the Nant Cemlyn. As with the response provided above with respect to Nant Cemaes, the development of a detailed drainage design for the proposed mounds within the WNDA will be developed in 2019 and will be the primary means of avoiding or minimising the impact on Cemlyn Road identified. Again, it is considered that there is sufficient space available within the WNDA to develop the drainage design sufficiently to minimise, if not avoid, the impact identified such that the acceptability criteria of TAN15 can be met.

Waste Management

- 1.16.27 Welsh Government suggests in paragraph 14.4.6 that it is not clear why the assumptions on waste tonnages changed during different stages of consultation. Chapter C6 of the ES [APP-063] clearly states at Table C6-3 the tonnages of waste arisings that have been assumed during construction. Tables C6-7 and C6-9 and C6-11 do the same for operation and decommissioning respectively. With respect, it is not quite clear what the Welsh Government is asking – the fact that the waste arisings changed as a result of Horizon having more knowledge as the Project design was developed appears logical. These worse case figures are then what is assumed for the purposes of the ES.

Water Supply and Water Stress

- 1.16.28 Horizon can confirm that its discussions with Dwr Cymru Welsh Water (DCWW) on the proposed water treatment solution are based on the Site Campus being at full capacity. The draft SoCG between Horizon and DCWW

[REP2-048] confirms that DCWW is progressing preliminary design. The SoCG will be updated as discussions between Horizon and DCWW continue.

DCO requirements

Site Waste Management Plans

- 1.16.29 The Welsh Government is seeking a DCO requirement for Horizon to produce relevant Site Waste Management Plans for the WNDA and Associated Development prior to the commencement of any works at those sites.
- 1.16.30 In light of the waste and materials management assessment set out in the Environmental Statement, Horizon has prepared waste management practices for determining how construction and operational waste will be managed. These waste management practices are set out in the waste management strategy at section 9.3 of the Wylfa Newydd CoCP [REP2-031], the various site-specific sub-CoCPs [APP-415] to [APP-421] and the Wylfa Newydd CoOP.
- 1.16.31 Horizon is confident that sufficient controls regarding the management of waste and materials relating to the Wylfa Newydd DCO Project are provided for in the Wylfa Newydd CoCP, site-specific sub-CoCPs and the Wylfa Newydd CoOPs at this stage of the Wylfa Newydd DCO Project. However, 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.

Planning obligations

- 1.16.32 The Welsh Government's Written Representation does not raise any points with regard to planning obligations for environment issues.

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