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Subject: Wylfa Newydd DCO Deadline 3 Submissions (Email 4 of 8) [NOT PROTECTIVELY MARKED]
Date: 17 December 2018 18:34:45
Attachments: [38 Horizon's Response to Written Representation - Menter Iaith Môn Welsh Translation .pdf](#)
[39 Horizon's Response to Written Representation - Clybiau Ffermwyr Ifanc Ynys Môn .pdf](#)
[40 Horizon's Response to Written Representation - Clybiau Ffermwyr Ifanc Ynys Môn Welsh Version .pdf](#)
[41 Applicants responses to Batch 1 NMC Comments.pdf](#)
[42 Draft DCO s.106 Agreement.pdf](#)
[43 Status Update Paper for Key Issues arising from the Draft DCO s.106 Agreement.pdf](#)
[44 Addendum to Seabird Baseline Report Disturbance Monitoring at Cemlyn Lagoon.pdf](#)
[45 Addendum to 2018 Chough Baseline Report.pdf](#)
[35 Horizon's Response to Written Representation - Pinsent Masons on behalf of Land and Lakes .pdf](#)
[36 Horizon's Response to Written Representation - Bryngwran Community Council .pdf](#)
[37 Horizon's Response to Written Representation - Menter Iaith Môn .pdf](#)

Good Evening

This is the fourth 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).

35 Horizon's Response to Written Representation - Pinsent Masons on behalf of Land and Lakes .pdf
36 Horizon's Response to Written Representation - Bryngwran Community Council .pdf
37 Horizon's Response to Written Representation - Menter Iaith Môn .pdf
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45 Addendum to 2018 Chough Baseline Report.pdf

Kind Regards

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Wylfa Newydd Project

Horizon's Response to Written Representation – Pinsent Masons on behalf of Land and Lakes

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 Pinsent Masons on behalf of Land and Lakes (Anglesey) Limited

1.1 Introduction

- 1.1.1 This report provides Horizon's response to the Written Representation submitted by Land and Lakes (Anglesey) Limited ("Land and Lakes") 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 Land and Lakes has challenged Horizon's selection of the Site Campus for temporary worker's accommodation rather than the Land and Lakes owned sites at Cae Glas and Kingsland.
- 1.1.3 Horizon's approach and justification in relation to the site selection process for Temporary Worker's Accommodation (TWA) is set out in detail in the Site Selection Report Volume 4 - Temporary Workers' Accommodation [APP-439]. The Site Selection Report explains how other alternative sites, including sites in Amlwch (Rhosgoch), Holyhead and other locations were considered, and why these were rejected.
- 1.1.4 As explained in the Site Selection Report, Horizon concludes that the environmental and social effects of the construction workforce on the existing community is best managed through locating a significant proportion of them in a single, temporary purpose-built campus as close as possible to the Power Station.
- 1.1.5 The sections below set out that:
- The Site Campus has significant benefits;
 - The Site Campus is appropriate in planning terms; and
 - There were a range of matters weighing against the selection of the Kingsland and Cae Glas sites.
- 1.1.6 Overall, the Site Campus is an integral aspect of the Wylfa Newydd DCO Project, and Horizon has clearly set out the need and justification for the proposals.
- 1.1.7 In the time available between Deadline 2 (4 December 2018) and Deadline 3 (18 December 2018), Horizon is unable to provide substantive comments on the various reports submitted by Land and Lakes. However, the effects of the Site Campus (including effects on Site Campus residents) are comprehensively assessed in Volume D of the ES [APP-120 to APP-238].

1.2 Benefits of the Site Campus

- 1.2.1 Following a comprehensive review of the Workforce Accommodation Strategy [APP-412], Horizon reached the conclusion that a single on-site campus should be preferred. The principle reasons are:
- Having workers situated on-site would lead to a reduction in bus movements to and from alternative accommodation site(s) of up to 260 buses per day on the highway network;
 - Locating the Site Campus on-site would reduce the cost of transporting materials (refer to Integrated Traffic and Transport Strategy (ITTS) [APP-107]);
 - Reduction in allowances required to be paid to construction workers (in accordance with National Agreement for the Engineering Construction Industry (NAECI);
 - The impact on communities (including on Welsh language and culture) would be reduced by locating workers on-site together with the necessary supporting facilities and management of the workforce.
- 1.2.2 Overall, it was found that locating the TWA on a single site as close as possible to the Power Station Site would reduce the costs of the Wylfa Newydd Project significantly. These commercial factors are wholly legitimate concerns with an overarching objective to ensure the Wylfa Newydd DCO Project is implemented in the most efficient manner, whilst minimising impacts upon the local highway network and the amenity/culture of local communities.
- 1.2.3 Further benefits of the Site Campus are explained in section 7 of the Workforce Accommodation Strategy. For example, in reducing travel times for workers, the Site Campus will increase wellbeing and on-site productivity while reducing health and safety risks. The Site Campus also allows key workers to have immediate and easy access to the Power Station Site, so they can respond to emergencies and out-of-hours site needs.
- 1.2.4 The Site Campus will also play a significant role in attracting and retaining the workforce and ensuring they are able to work safely and productively. A large number of workers will value both the type and location of the Site Campus. The Site Campus will be popular in part because of the range of services and facilities that will be provided which are otherwise only really provided in serviced tourist accommodation, most of which will be significantly more expensive.
- 1.2.5 Large-scale, campus style TWA is generally acknowledged in the construction industry to be best to meet these needs. It provides the type of accommodation workers require on a scale and format that enables the delivery of associated services (e.g. room cleaning and managing changeover between workers) in a way regular houses would not. The campus style is also considered to be an economically viable way of managing accommodation needs.

1.3 Policy compliance

- 1.3.1 The Planning Statement [APP-406] at Appendix C assesses the Site Campus in respect of NPS EN-1, NPS EN-6, and national and local policy. It concludes that the Site Campus proposal is appropriate in planning terms in its own right, and is supported by local planning policy including Strategic Policy PS 10 of the JLDP. The Planning Statement explains that the facility is also integral to the delivery of the Wylfa Newydd DCO Project and its associated benefits and should be considered in the context of the urgent need for nuclear power.
- 1.3.2 It should be noted that in providing significant efficiencies compared to transporting workers from multiple locations, the Site Campus is particularly important in order to be able to deliver an efficient construction project which is capable of delivering the Wylfa Newydd Power Station as early as possible, in accordance with NPS EN-1 and NPS EN-6.
- 1.3.3 Further consideration of the Site Campus against JLDP Policies PS9 and PS10 are summarised in Section 3.3 of Horizon's Written Representation [REP2-003] (submitted at Deadline 2 (4 December 2018)) and also set out in Horizon's response to FWQ10.1.2 of the Examining Authority's FWQ10.1.2 [REP2-002] (submitted at Deadline 2 (4 December 2018)).

1.4 Matters weighing against the selection of Kingsland and Cae Glas

- 1.4.1 All sites identified for review in the Site Selection process were considered objectively using a RAG Assessment of 19 set criteria. These criteria include key planning, environmental and commercial considerations. The Stage 4 detailed assessment is explained at paragraphs 3.2.48 - 3.2.53 and table 3.5 of the Site Selection Report - Volume 4 - Temporary Workers Accommodation [APP-439]. This assessment also included further information that became available after PAC2 including on commercial viability as a result of a review of the Wylfa Newydd DCO Project to develop more efficient and cost-effective proposals (also known as project optimisation).
- 1.4.2 In the Site Selection Report, Cae Glas was assigned five red ratings and Kingsland assigned four in the RAG review for all sites considered by Horizon. The sites both rated red on the basis of being located within the AONB, visual impact (open, greenfield and within the AONB), greenfield status and viability issues. Cae Glas also rated red based on the potential for direct impact on a heritage asset (an Ancient Monument is located within the site). Amber ratings included proximity to SSSIs, potential adverse impact on living conditions and proximity to heritage assets. In comparison, TWA within the WNDA only had two red ratings for its greenfield status (in common with all sites other than EZ10) and lack of identified legacy potential (in common with all sites other than Kingsland and Cae Glas).
- 1.4.3 A detailed review of the criteria for the Kingsland site is set out in in Appendix 6-12 to Volume 4 of the Site Selection Report: Stage 4 SP696/SP785 [APP-439].

- 1.4.4 A detailed review of the criteria for the Cae Glas site is set out in in Appendix 6-13 to Volume 4 of the Site Selection Report: Stage 4: SP784 Cae Glas [APP-439].
- 1.4.5 Further, Horizon was not consulted by the applicant of these sites during their development and consenting stages and did not have any involvement in the design of the proposals, or in discussions on the practicality and feasibility of the consent or accompanying draft DCO s.106 agreement. As a result, the consents that were obtained cannot be reasonably used by Horizon without significant amendments and this would still not overcome the overriding concern of distance from the WNDA.

1.5 Overall

- 1.5.1 Horizon's selection of the Site Campus to provide a solution for temporary worker's accommodation is entirely justified given the benefits set out above.
- 1.5.2 The Site Campus proposal is appropriate in planning terms and is integral to the delivery of the Wylfa Newydd DCO Project and its associated benefits.
- 1.5.3 While Land and Lake's, as the developer, puts forward a case in favour of the Kingsland and Cae Glas sites, these do not form part of the DCO application in front of the Examining Authority, and there were a range of matters weighing against the selection of these sites.
- 1.5.4 The DCO requirements that are sought by Land and Lakes would effectively force Horizon into making a commercial deal with a private developer without any negotiating power. This could have serious financial repercussions for the overall Wylfa Newydd DCO Project and is entirely unjustified.