

Wylfa Newydd Project

Post Oral Hearing Summaries -

Monday 7th January

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HORIZON NUCLEAR POWER WYLFA LIMITED – WYLFA NEWYDD PROJECT – DEVELOPMENT CONSENT ORDER APPLICATION

Written summary of Horizon's oral submissions at the Issue Specific Hearing held on 7th January 2019

Introduction

1. This note summarises submissions made on behalf of Horizon Nuclear Power Wylfa Limited (Horizon) at the Issue Specific Hearing on Socio-Economic Matters (including accommodation, education, health and wellbeing, language and culture, law and order and recreation and tourism) held on 7 January 2019.
2. Oral submissions by all parties attending the hearing were made pursuant to the agenda published by the Examining Authority (ExA) on 19 December 2018. In setting out Horizon's position on the issues raised in the agenda, as submitted orally at the hearing, the format of this note follows that of the agenda.
3. In addition to covering the agenda items as noted above, this note also relates to the ExA's list of action points arising from the hearing.
4. A CV for each of the witnesses who made oral submissions on behalf of Horizon is appended to this document.

ExA's Agenda Item	Summary of Horizon's Oral Submission made in the hearing	Relevant document references
Item 3 – Accommodation		
3(a) Has there been any change in the position of the IPs regarding the effects of the proposals on accommodation needs of the project and how they might be fulfilled since those stated in by IPs at D2 and D3	<p>Mr Andy Hunt made the following introductory points on behalf of Horizon:</p> <ul style="list-style-type: none">• Horizon has received some feedback from Welsh Government on the Draft DCO s.106 [REP3-042] but has not yet received anything detailed from Isle of Anglesey County Council (IACC) on the accommodation schedule.• Horizon considers the Welsh Government proposals on monitoring are fine in principle but notes that further discussions are required as to how these can be achieved in practice. That	<p>Horizon's response to IACC's LIR [REP3-004]</p> <p>Horizon's response to IACC's Written Representation [REP3-019]</p> <p>IACC's Written Representation [REP2-367]</p> <p>Horizon response to Welsh</p>

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	<p>would provide the basis for agreement on monitoring, management and contingency.</p> <ul style="list-style-type: none"> Welsh Government's response indicates ongoing difference on the extent of spare capacity and therefore the mitigation needed, although Horizon doesn't yet have the detailed justification for the scale of the Housing Fund sought by Welsh Government. <p>As set out in Horizon's responses to IACC's Local Impact Reports (LIR) and Written Representations received to date, Horizon has set out an evidence-based approach and sought to include evidence provided by IACC and Welsh Government where it is robust and meets the standards set out in paragraph 5.12.7 of Overarching National Policy Statement for Energy (NPS EN-1).</p>	<p>Government Written Representation [REP3-034] NPS EN-1, paragraph 5.12.7</p>
<p>3(b) In particular to understand the differences of opinion over the proposals for Temporary Worker Accommodation (TWA) including when this would need to be provided; where this should be provided, and the quantity and quality of the accommodation proposed including alternatives.</p>	<p>Mr Hunt made the following general points about the TWA on behalf of Horizon:</p> <ul style="list-style-type: none"> Horizon's TWA proposal is for 4000 bed spaces to be provided within the Wylfa Newydd Development Area (WNDA) ensuring easy access for workers to the main construction site. The proposal will deliver a number of benefits which are detailed in Horizon's DCO application documents and addressed in further detail below. The TWA has been sized according to the needs of the Wylfa Newydd DCO Project and Horizon's assessment of existing local housing capacity. It consists of the Site Campus i.e. the bed spaces but also a range of amenity services to meet the everyday needs of the workforce including recreational facilities, shopping and medical facilities (the latter of which will also be available to the wider Horizon workforce not accommodated in the TWA). Horizon proposes to deliver the TWA in a phased manner, aligned with the anticipated build-up of the workforce over time. In response to a question from the ExA regarding the proposed 	<p>Horizon's response to IACC's LIR [REP3-004]</p> <p>Submission by Land and Lakes Limited at Deadline 1 - Appendix P (Transport Assessment) [REP1-083]</p> <p>Site Selection Reports (Volumes 1 to 7) [APP-436-APP-442]</p> <p>Site Selection Report Volume 4, Table 3-5 [APP-439]</p> <p>Horizon's response to Written Representation by PinSENT Masons on behalf of Land and Lakes [REP3-036]</p> <p>Anglesey and Gwynedd Joint Local Development Plan</p>

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	<p>location of the Site Campus medical facility, Ms Sarah Price confirmed that the medical centre would be provided within the Site Campus. Mr Charlie Tasker further clarified that Horizon is also proposing a Construction Site Clinic, in addition to the Site Campus medical centre, which will be provided within the construction security fence on the Power Station site.</p> <ul style="list-style-type: none"> • In response to a question from the ExA regarding meal facilities at the construction site, Mr Tasker confirmed that onsite meal facilities will be provided for workers at the construction site. <p>In respect of when the TWA is proposed to be delivered, Mr Hunt made the following points on behalf of Horizon:</p> <ul style="list-style-type: none"> • Horizon has assessed the capacity of existing accommodation and the proposed delivery of the TWA is before that is reached. • It will be delivered on or before Yr4 Q4 (Q8 post-DCO grant). This is in line with the Environmental Statement and is the earliest that Horizon can practically deliver it. • The total workforce in the last quarter before the Site Campus becomes available is just under 3,200, of which just over 50% (1,620) are expected to be non-home based, i.e. well below the 3,000 assessed in the Environmental Statement. • Horizon is mindful of the need to deliver additional housing capacity early and to this end, is proposing to also deliver additional capacity into the general accommodation market through the S106 Worker Accommodation (Capacity Enhancement) Contribution. • As set out in its response to FWQ 10.1.4 [REP2-375], Horizon will submit an updated Phasing Strategy at Deadline 4 (17 January 2019). • The ExA sought clarification on the Capacity Enhancement Contribution. In response, Mr Hunt explained that this is the 	<p>2011 – 2026, see PS 9 at page 84 and PS 10 at page 87</p> <p>Horizon's response to the ExA's First Written Questions – FWQ 10.1.16 at pg. 274 – [REP2-375]</p> <p>Design and Access Statement – Volume 3 – Associated Developments and Off-Site Power Station Facilities (Part 1 of 2) [APP-409]</p> <p>Site Selection Report, Volume 2 (Wylfa Newydd Development Area) [APP-437]</p> <p>Chapter D2 (Alternatives and design evolution) of the Environmental Statement, paragraphs 2.3.111 to 2.3.114 [APP-121]</p>

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	<p>proposed Housing Fund in the Draft DCO s.106 [REP3-042] and this was modelled on the equivalent fund provided for in respect of Hinkley Point C. Horizon is open minded about how this contribution is spent and acknowledges that it can be used to deliver both short-term and long-term mitigation measures. For example, short term measures could include providing support for IACC's existing empty homes programme, or the provision of small grants or loans to incentivise home owners bringing their homes up to a standard that can be rented out to Horizon's workforce; long-term mitigation measures or those that require a longer lead-in time include could include the delivery of new build homes or bringing forward stalled housing sites.</p> <ul style="list-style-type: none"> • Mr Hunt confirmed that the proposed size of the Housing Fund is £10 million; what could be achieved by this £10 million would depend on the mix of interventions implemented. It was confirmed that the size of the housing fund for Hinkley Point C New Nuclear Power Station (Hinkley Point C) was £7.5 million. • In response to questions regarding an early delivery of the first phase of the TWA, Mr Tasker noted that design and manufacturing programme limitations means that the proposed Yr4 Q4 delivery of phase one is the earliest the Site Campus can be provided. Further, Horizon's environmental assessment identifies that there is ample capacity in the local housing market to accommodate the early workforce, in advance of the TWA being delivered, and that there are benefits in filling these including providing a boost for the local economy such that there is no purpose for bringing the TWA forward any earlier. • In response to further queries by the ExA about whether the later phases of the TWA could be delivered earlier, Horizon agreed to prepare a note considering this for submission at Deadline 4 (17 January 2019). As part of this note, Horizon agreed to consider whether the stepping down of the TWA could be slowed. Although it was noted that certain restrictions imposed the Office 	

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	<p>of Nuclear Regulation (ONR) prevent the TWA from being provided as legacy accommodation.</p> <p>With respect to where the TWA should be provided, the ExA noted Horizon's position as set out in the DCO application and had no further queries.</p> <p>With respect to the quantity and quality of the TWA, Mr Hunt made the following points on behalf of Horizon:</p> <ul style="list-style-type: none"> • It is in Horizon's interest to make the TWA attractive and the "accommodation of choice". To this end, the Site Campus has been designed to achieve a high level of occupancy and incorporates a number of attractive features to ensure this including its onsite location and the proposed amenity facilities. Mr Tasker for Horizon acknowledged the importance of ensuring that facilities are provided to enable the workforce to live their lives away from home. • In response to comments about the potential effects of construction workers living in the TWA, Mr Tasker noted that the risk of these effects were identified in the Environmental Statement but that appropriate mitigation has been identified to address these risks including the provision of sealed windows and ventilation systems and locating night-shift staff away the noisier construction activities taking place during the day. Horizon agreed to provide a post hearing note addressing the potential adverse effects of living at the TWA and will submit this at Deadline 4 (17 January 2019). Mr Tasker confirmed that the detailed design for the TWA is proposed to be finalised following grant of the DCO. • Concerning the phasing of the housing blocks within the Site Campus, Horizon confirmed that the build out would be phased from Wylfa Head in the north down the site with the tallest 	

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	<p>housing blocks being located closest to the construction activities to act as a screen for the later builds, as detailed in the Volume 3 of the Design and Access Statement (Associated Developments and Off-Site Power Station Facilities) [APP-409 and APP-410]. Horizon agreed to clarify this phasing in the note being prepared on the TWA.</p> <ul style="list-style-type: none"> • In response to queries from the ExA, Michael Humphries QC (Counsel) confirmed that there is no requirement that the workforce use the TWA, such a requirement would be an infringement of the workers' human rights. However, it is in Horizon's best interest, financially speaking, to make it attractive; an empty Site Campus would be very commercially unsatisfactory. • Mr Tasker confirmed that the TWA accommodation will be priced in a way that it will be affordable to the Horizon workforce, and in line with the allowances to be paid to the construction workers. • In response to the queries regarding mobile communications at the TWA, Ms Price confirmed that work is ongoing regarding the telecommunication services in the area and Horizon's future needs in respect of this. A proposal is being developed to upgrade these services and Horizon has agreed to submit to the Examination a post-hearing note detailing this. <p>In respect of the discussion by various interested parties about the Land and Lakes' (L&Ls) planning permission under the Town and Country Planning Act 1990 (L&L proposal), Counsel made the following points on Horizon's behalf:</p> <ul style="list-style-type: none"> • The L&L proposal does not form part of Horizon's DCO application before the ExA. • There is no commercial agreement between Horizon and L&L regarding the proposal, nor is one proposed, meaning Horizon does not and will not have control over the proposed 	

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	<p>development.</p> <ul style="list-style-type: none"> Horizon has no objection to L&L developing the scheme independently, but it is not right to consider it as an alternative proposal to the Site Campus. Counsel queried L&L's intention in promoting the scheme. Counsel noted that consideration of a DCO which did not provide for the TWA would almost certainly lead to refusal of the DCO application. Further, any grant by the Secretary of State of a DCO that did not include the TWA this would certainly be legally challengeable. The L&L proposal has not been consulted on or environmental assessed as part of this DCO application. In response to comments by the ExA regarding the case of R (Langley Park School for Girls) v Bromley LBC [2009] EWCA Civ 734 on the consideration of alternatives to overcome planning objections, Counsel noted that the case concerned the Town and Country Planning Act 1990, not the Planning Act 2008 and as such relevant to this application is NPS EN-1 which includes an entire section on the consideration of alternatives. From a policy perspective, NPS EN-1 does not require a consideration of alternatives (see section 4.4.3). A post hearing note considering this case further is being prepared and will be submitted at Deadline 5 (12 February 2019). In response to comments from L&L and the North Anglesey Councils Partnership (NACP) about alternative TWA sites, Ms Price noted both the L&L proposal and NACP's suggestion of Rhosgoch present the same issue to Horizon in that they are too far from the main construction site, would increase traffic impacts and would require additional road improvements. Ms Price refers to Horizon's response to the ExA's First Written Questions - FWQ 10.1.5 [REP2-375] which details the consideration that Horizon gave to these sites and why the decision was reached not to take these options forward. 	

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	<ul style="list-style-type: none"> In response to queries from the ExA and to contextualise the points made about travel times between the worker accommodation and the construction site, Mr Hunt clarified that the Hinkley Point C campus included a split onsite and offsite element and that the offsite element involves a travel time of approximately half an hour. 	
3(c) To establish what the effects of providing the TWA on-site would have on Welsh language and culture; health and well-being; recreation and tourism and law and order.	<p>The ExA deferred discussion on this agenda item until a later issue specific agenda item.</p>	
3(d) To establish what effects providing TWA at an alternative location(s) would have on the Welsh language and culture; health and well-being; recreation and tourism and law and order.	<p>The ExA deferred discussion on this agenda item until a later issue specific agenda item.</p>	
3(e) To establish whether the alternative accommodation for workers (other than that provided through the TWA) would be sufficient and the effect that the proposal may have on housing stock within the Key Socio-Economic Study Area (KSA) and	<p>Mr Hunt made the following points on behalf of Horizon:</p> <ul style="list-style-type: none"> There is a difference in opinion regarding the availability of housing stock on Anglesey including within the private rental sector. Horizon's assessment is that there is overall capacity within the KSA, albeit with some uncertainties and pinch points which Horizon will deal with through its plan, monitor and manage approach. Horizon does not accept the analysis put forward by IACC and Welsh Government and doesn't believe it meets the test in paragraph 5.12.7 of NPS EN-1 of being evidence-based rather 	<p>NPS EN-1, paragraph 5.12.7 Horizon's response to IACC's LIR, paragraphs 8.6.6 – 8.6.8 and 8.6.12 – 8.6.15 [REP3-004] Anglesey and Gwynedd Joint Local Development Plan (JLDP) 2011 – 2026</p>

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<p>Daily Constriction Commuting Zone (DCCZ) with particular reference to availability and affordability.</p>	<p>than assertion as set out in Horizon's response to IACC's LIR [REP3-004].</p> <ul style="list-style-type: none"> With respect to the comment by IACC about the need to ensure housing for people looking to move to Anglesey, that would include workers on the Wylfa Newydd DCO Project and the Anglesey and Gwynedd Joint Local Development Plan (JLDP) recognises the need to provide for construction workers associated with major infrastructure projects. A Worker Accommodation Management Service (WAMS) is proposed which will register where construction workers are living, and this will enable monitoring in real time. Horizon considers that the use of the WAMS together with the Housing Fund can overcome any risks to the existing housing market. With respect to the use of tourist accommodation, there is a very large existing tourism market and that the actual demand Horizon will have on this market is approximately 2% of total supply of tourist accommodation stock on Anglesey. Therefore, it is not considered there will be significant disruption to the tourist market. <p>Horizon believes that the proposed plan, monitor and manage approach, the phased delivery of the TWA, and the early release of the Housing Fund will create resilience in the housing market.</p>	
<p>3(f) To understand whether these differences could be resolved through additional work, mitigation or changes to requirements of the draft development consent order (Draft DCO).</p>	<p>It was noted that this agenda item has to some extent been addressed in the agenda items above. However, the ExA questioned what would happen if the TWA were delayed and what the impact of this would be.</p> <p>In response, Mr Hunt confirmed that this would be detailed in the revised Phasing Strategy to be submitted at Deadline 4 (17 January 2019). It was noted that Hinkley Point C DCO, which experienced delays in delivering worker accommodation, did not have an equivalent mechanism securing delivery.</p>	<p>IACC's LIR, Chapter 8 (Housing), paragraph 6.1 [REP2-068]</p> <p>Welsh Government's Written Representation, paragraphs 12.5.19-20 [REP2-367]</p> <p>Welsh Government's Written Representation, Appendix E</p>

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	<p>The ExA queried the impact of early learned behaviour on workforce accommodation choices and Horizon agreed to consider the matter further and report back to the ExA.</p> <p>In response to further comments from L&L, Counsel reiterated his earlier points about the inappropriateness of substituting the L&L proposal as an alternative to the TWA. Counsel noted that were this proposal Horizon-lead, it would almost certainly have been rejected by the Planning Inspectorate on the basis of it being a fundamental change to the DCO application.</p> <p>Mr Hunt clarified that of the 3000-workforce anticipated before the TWA is proposed to be delivered, it is assumed that about half would be home-based because of the skills required in those early years.</p>	<p>(at pg. 3) [REP2-367]</p> <p>IACC's LIR, chapter 8 (Housing), paragraph 6.1 [REP2-068]</p> <p>Horizon's response to IACC's LIR, section 8.4 [REP3-004]</p> <p>Horizon's response to IACC's LIR, section 7.7 [REP3-004]</p>

Item 4 – Welsh language and culture

<p>4(a) Has there been any change in the position of the IPs regarding the effects of the proposals on Welsh language and culture since those stated in by IPs at D2 and D3</p>	<p>In response to comments made by the interested parties, Ms Price made the following points on behalf of Horizon:</p> <p>IACC</p> <ul style="list-style-type: none"> • In response to comments made by IACC about the need for immersion teachers at language immersion centres, Horizon is proposing to amend the Welsh Language Education Contribution within the Draft DCO s.106 to fund the employment of three immersion teachers to support the current Welsh immersion education capacity. This is proposed to be in place at the start of construction. • These immersion teachers would be centre based, rather than peripatetic teachers, provided that one could have the ability to provide a service in Gwynedd (should monitoring indicate the need to do so). • Further changes are proposed to the Draft DCO s.106 [REP3- 	<p>Draft DCO s.106, schedule 1 (Welsh language and culture) [REP3-042]</p>
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	<p>042] to address comments made about the timing of evaluation, the scope of the Community Translation Service, and the welcome packs will be provided in a variety of languages.</p> <p>Welsh Government</p> <ul style="list-style-type: none"> Horizon is considering amendments to refine the language of obligations in the Draft DCO s.106 [REP3-042] following comments from Welsh Government received on 21 December 2018. Some comments require further discussion with IACC such as defining the role of the Welsh language officer. <p>Gwynedd County Council (GCC)</p> <ul style="list-style-type: none"> The Draft DCO s.106 [REP3-042] provides additional detail regarding the securing mechanisms for ensuring that the potential effects arising from the spatial distribution of non-home-based workers will have on the communities of Gwynedd, including possible displacement within accommodation and the effects on schools. Statement of Common Ground (SOCG) discussions with GCC are on-going. A meeting is arranged for later in January 2019 to continue discussions in relation to Welsh language and culture. <p>Fforwm Iaith Môn (Anglesey Language Forum)</p> <ul style="list-style-type: none"> Following a request by the ExA during the ISH on DCO (October 2018), and following subsequent discussions with IACC and GCC, Horizon is developing a SOCG with Fforwm Iaith Môn, which includes community groups which provide Welsh language services. Horizon met with Fforwm Iaith Môn in December 2018 and on-going dialogue is scheduled during January 2019 together with a meeting, prior to the submission of the SOCG at Deadline 6 (19 February 2019). 	

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	<p>Welsh Language Impact Assessment (WLIA) Steering Group</p> <ul style="list-style-type: none"> Horizon has continued to engage with the Wylfa Newydd WLIA Steering Group and met during December 2018 to introduce the recently appointed Welsh Language and Culture Co-ordinator and provide an update on the Wylfa Newydd DCO Project, SOCG discussions, the Examination and hearings and the proposed DCO governance and sub-groups, particularly the Welsh Language and Culture Sub-Group. <p>Horizon continues to value the on-going involvement of the WLIA Steering Group and it expects the membership of the Welsh Language and Culture Sub-Group under the DCO to reflect that of the current WLIA Steering Group.</p>	
<p>4(b) To understand further how targets for home-based workforce and Welsh speakers would be achieved/secured and the effects that could arise if they were not met.</p>	<p>The ExA queries what was meant to be Welsh speaker. In response, Mr Hefin Thomas made the following points on behalf of Horizon:</p> <ul style="list-style-type: none"> To define what a Welsh speaker is, is difficult. Horizon relied on the definition used in the Census as being someone who had some medium-level Welsh skills in undertaking its assessment on Welsh language as outlined in the Welsh Language Impact Assessment [APP-432]. Horizon is not proposing targets be set for Welsh language speakers. Instead it is developing tools to encourage the use and development of Welsh language. For example, the Welsh Language and Cultural Mitigation and Enhancement Strategy (WLCMES) commits to developing a framework to develop Welsh language competency. This framework will be used as a tool for recruitment within Horizon to consider the level of skills required for the jobs at Horizon and is committed to within the Draft DCO s.106 [REP3-042]. <p>Mr Hunt clarified that the number of Welsh speaking home-based</p>	<p>Jobs and Skills Strategy (JSS) [APP-411]</p> <p>Draft DCO s.106 agreement, schedule 1 (Welsh language and culture) and schedule 5 (Worker Accommodation) [REP3-042]</p> <p>Horizon's response to ExA's First Written Questions: [REP2-375]</p> <ul style="list-style-type: none"> Q10.2.13 (at pg.295) Q10.2.14 (at pg.297) Q10.5.24 (at pg. 336) <p>Chapter C1 (Socio-economics) of the</p>

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	<p>construction workers is an assumption based on the existing population's Welsh language competency. A pilot programme currently run by Horizon shows that approximately 55% of the sector of the population who have registered an interest in working on the Project with the Department for Work & Pensions (DWP) identify as Welsh speakers.</p> <p>The parties agreed to prepare a short note detailing what a Welsh language competency framework is and how this might be applied to construction and operational workforces and what results this may have in the future.</p>	<p>Environmental Statement [APP-088] WLIA [APP-432]</p>
<p>4(c) To explore further the potential effect on education provision with particular reference to the effects on schools and services that would provide support for workers and their dependents including whether an educational strategy may be required.</p>	<p>Ms Stef O'Gorman made the following points on behalf of Horizon:</p> <ul style="list-style-type: none"> Horizon's assessment assumes that approximately 285 dependent partners and 220 dependent children will join the workforce at peak construction, as outlined in DCO application and in response to IACC's LIR [REP3-004]. The Draft DCO s.106 includes an education contribution of £1 million to improve the capacity in local schools. Horizon recognises that there is a potential time lag between education provision being provided for workforce children by the local authorities and funding being accessed from Welsh Government. Horizon has proposed a £3 million education contingency fund in the Draft DCO s.106 to mitigate the effect of this time lag. <p>In response to a query from the ExA about the number of non-English dependents, Counsel noted that this information was not available. However, the mitigation proposed will mitigate against the effect of this.</p>	<p>WLIA [APP-432] Horizon's response to IACC's LIR, Section 1.8 and paragraph 1.10.18 at (pg. 12) [REP3-004] Draft DCO s.106, schedule 1 (Welsh language and culture) [REP3-042] WLIA [APP-432], WLCMES measure 20 JSS, section 7 [APP-411] Draft DCO s.106, schedule 1 (Welsh language and culture) and schedule 6 (Education) [REP3-042]</p>
<p>4(d) To understand whether these differences could be</p>	<p>The ExA noted that discussions on the Draft DCO s.106 were</p>	

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resolved through additional work	ongoing.	
Item 5 – Health and Wellbeing		
5(a) Has there been any change in the position of the IPs regarding the effects of the proposals on health and wellbeing since those stated in by IPs at D2 and D3	<p>Mr Ben Cave noted that the relationship with the health partners has been constructive and productive. While there are some last-minute issues to address and information to exchange, all parties are confident that agreement will be reached.</p> <p>With respect to each of the interested parties, Mr Cave made the following points on behalf of Horizon:</p> <ul style="list-style-type: none"> • Betsi Cadwaladr University Health Board (BCUHB) • There has been ongoing dialogue and progress on all matters cited in BCUHB's Written Representation [REP2-277]. • Horizon and BCUHB have exchanged cost estimates. BCUHB has modelled a worst-case scenario based on a low standard of on-site healthcare and a high National Health Service (NHS) referral rate i.e. a non-mitigated effect, so further dialogue required to address this. <p>Welsh Government</p> <ul style="list-style-type: none"> • Welsh Government has participated in all meetings held with BCUHB. • Welsh Government is seeking provision in the Draft DCO s.106 to reflect an agreed principle that Horizon will bear costs of referrals. It considers that both protocol and clear funding/indemnity will be required. However, Horizon's view is that this is neither appropriate nor is it proportionate. The NHS is funded by taxation and Horizon and its workers would pay taxes. Horizon is offering appropriate financial contributions. 	<p>SOCG between Horizon and PHW submitted at Deadline 2 (4 December 2018) [REP2-052]</p> <p>Horizon's response to BCUHB's Written Representation [REP3-007]</p> <p>Horizon's response to PHW's Written Representation [REP3-029]</p> <p>Horizon's response to WAST's Written Representation [REP3-022]</p>

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	<p>Public Health Wales (PHW)</p> <ul style="list-style-type: none"> Horizon is close to a full agreement with PHW. In relation to microbiology services PHW notes that the workforce will be responsible for a relatively small population increase, and that it is likely to be younger and fitter than the general population. <p>Welsh Ambulance Service Trust (WAST)</p> <ul style="list-style-type: none"> A Draft DCO s.106 was sent to WAST. 	
<p>5(b) To better understand the potential effect on existing health and wellbeing services that may arise from construction and operational workers residing in the KSA or DCCZ and whether these would be adequately mitigated.</p>	<p>In response to queries regarding the provision of onsite health services, Mr Cave made the following points on behalf of Horizon:</p> <ul style="list-style-type: none"> Horizon is proposing a Construction Site Clinic within the security fence of the Power Station site for occupational health provision including drug and alcohol testing, minor injuries and for anything more serious, it would organise a transfer to A&E. The Construction Site Clinic will be available from day one of construction. The Site Campus includes an onsite medical facility, and this will be operational from the day the Site Campus is operational. The Site Campus medical facility will provide a range of services based on a walk-in model. It is intended to provide primary care services for construction workers to ensure that they do not overburden the NHS. Horizon has had discussions with BCUHB and local GP services about what could be offered in advance of the Site Campus medical facility being delivered and these discussions are ongoing. Home-based workers would continue to access healthcare in their ordinary way. Some medical services would be outsourced. For example, 	<p>Phasing Strategy (Revision 1.0) [APP-447] Draft DCO s.106, schedule 8 (Health and Wellbeing) [REP3-042]</p>

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	<p>dentistry would be provided offsite; pharmacy services would be onsite but delivered from offsite; and lab work would be outsourced offsite.</p> <ul style="list-style-type: none"> With respect to the free prescriptions offered in Wales, Horizon will pay for the cost of all prescriptions for non-home-based construction workers using the onsite pharmacy facilities. Mental health services including counselling services would be offered onsite through the Site Campus. <p>The parties agreed to prepare a post-hearing note summarising the discussions to date on the provision of health services including the areas of agreement and disagreement.</p>	
<p>5(c) To consider the effect on staffing of existing services within the KSA and DCCZ with particular reference to the ability to retain staff</p>	<p>Horizon acknowledged the comments made by the interested parties regarding the issue of displacement of specialist health care staff and the need to ensure that this could be managed.</p> <p>It was agreed that this agenda item would be discussed during the Jobs, Skills and Supply Chain Issue Specific Hearing on 8 January 2018.</p>	
<p>5(d) To understand whether these differences could be resolved through additional work</p>	<p>The ExA noted that discussions on the Draft DCO s.106 were ongoing.</p>	<p>Horizon's SOCG with BCUHB, item BCUHB 032 (MOU timetable) [REP2-059]</p> <p>Horizon's SOCG with BCUHB, item BCUHB 014 (further work on care pathways) [REP2-059]</p> <p>Draft DCO s.106, schedule 8 (Health and Wellbeing) [REP3-042]</p>

ExA's Agenda Item	Summary of Horizon's Oral Submission made in the hearing	Relevant document references
Item 6 – Recreation and tourism		
<p>6(a) Has there been any change in the position of the IPs regarding the effects of the proposals on tourism and recreation since those stated by IPs at D2 and D3 on importance of tourism to the economy of Ynys Mon and North Wales</p>	<p>Mr John Lennon made the following points on behalf of Horizon:</p> <ul style="list-style-type: none"> Horizon intends to develop a permanent Visitors Centre earlier than previously stated. Facilities are anticipated to include: <ul style="list-style-type: none"> - visitor / community space; - café; - educational facilities (STEM / low carbon etc); - showcasing local produce; - training kitchen facilities; - cultural heritage/ local archaeology; - Local ecology and wildlife / nature trail. Possible viewing facilities may now be integrated into the permanent Visitor Centre facility as part of the new facility's scope. <p>Counsel noted that this decision was made recently and so the detail as to when and how provision of the Visitor Centre is to be secured is still being finalised. It will, however, form a separate TCPA application as it is not included in the DCO. Horizon agreed to provide this information to the ExA by way of a post-hearing note.</p> <p>Mr Lennon outlined Horizon's position on IACC Tourism Report 2018 and the Visitors Surveys, 2017 and 2018 which in short demonstrated that 95% of respondents said that the Wylfa Newydd DCO Project will make no difference to their visitation rates. Given the survey results were only received on Friday 4 January 2019, Horizon proposed to prepare a full response to these surveys for submission to the ExA.</p>	<p>Tourism Impact Report (Swansea 2018) [REP2-110]</p> <p>Visitors Survey, 2018 (Not submitted to PINS)</p>

ExA's Agenda Item	Summary of Horizon's Oral Submission made in the hearing	Relevant document references
<p>6(b) potential effects on the tourist industry within the KSA and DCCZ with reference to availability of holiday accommodation; the ability of businesses to retain staff given the potential work at Wylfa Newydd and the possible long-term effects to the tourist industry</p>	<p>In response to various comments made by interested parties regarding the impact of the Wylfa Newydd DCO Project on local tourism and the respective tourism brands of the area, Mr Lennon made the following points on Horizon's behalf:</p> <ul style="list-style-type: none"> • The Wylfa Newydd DCO Project presents a transformational development that will bring a year-round demand on the accommodation sector and bring revenue to the island's economy not seen before. • The existing tourism brand is highly seasonal and offers extremely low rates. Anglesey is currently operating at approximately 60% occupancy rates meaning that 40% of tourism accommodation is empty. There is a need to ensure there is quality product moving forward to ensure a sustainable, year-round tourism sector. The Wylfa Newydd DCO Project provides an opportunity to invest in the quality of the tourist sector and build a legacy including, for example, the proposed permanent Visitors Centre. • Tourism is also a vulnerable sector. The insecurity of jobs and careers that this brings means it is difficult to attract young people to work in the sector. However, the demand and expenditure that this development will bring will help to strengthen this sector. The development also brings an opportunity for a greater dispersion of visitors to the island, particularly the north where visitation is typically low. • Care must be taken not to stereotype the construction workforce. The workforce will include a lot of management roles that will bring opportunities for higher levels of expenditure. Further, the traditional night-time economy is changing, there is less demand for night clubs or pubs as people are looking for other things to do in the evenings. • Hinkley Point C provides the most recent bench mark on the impact on tourism of large developments of this nature. 	<p>Horizon's response to Welsh Government's Written Representation [REP3-034]</p> <p>Horizon's response to IACC's LIR [REP3-004]</p>

ExA's Agenda Item	Summary of Horizon's Oral Submission made in the hearing	Relevant document references
	<p>Monitoring in 2017 and 2018 demonstrates continued growth and development and show no detrimental impact on visitors to the area as a result of the Hinkley Point C development.</p> <ul style="list-style-type: none"> The comments about conflict between construction workers and families visiting the area are unfounded. Further, IACC's Tourism Bedrock Survey Report in Annex 5D of IACC's LIR [REP2-111] confirmed that tourism accommodation providers were interested in accommodating workers indicating that those providers do not anticipate conflict arising from accommodating the workforce alongside their existing operations. <p>With respect to comments from the North Wales Wildlife Trust and National Trust regarding the impact on wildlife tourism, particularly at Cemlyn Nature Reserve, Ms O'Gorman noted that Horizon's proposals for a temporary and permanent Visitors Centre have fundamentally changed (as described above). These matters including impacts on the Cemlyn Nature Reserve will be picked up at later ISHs including the ISH on Public Rights of Way to be held on 8 January 2019.</p>	
6(c) To understand whether these differences could be resolved through additional work	<p>The ExA noted that discussions on the Draft DCO s.106 were ongoing.</p>	<p>Horizon response to NWP's Written Representation [REP3-020]</p> <p>Draft DCO s.106, schedules 5 (Worker Accommodation) and 14 (Community Involvement Officers) [REP3-042]</p>
7(a) Has there been any change in the position of the IPs regarding the effects of the proposals on	<p>Mr Kieran Somers made the following general points on behalf of Horizon:</p> <ul style="list-style-type: none"> North Wales Police (NWP) made a lengthy Written 	

ExA's Agenda Item	Summary of Horizon's Oral Submission made in the hearing	Relevant document references
law and order since those stated in by IPs at D2 and D3	<p>Representation at Deadline 2 (4 December 2018) as well as a further updated response at Deadline 3 (18 December 2018) which included a significantly increased financial request.</p> <ul style="list-style-type: none"> Horizon provided a response to NWP's Written Representation at Deadline 3 (18 December 2018) however this was not a full response given the time available and the quantum of information submitted. Horizon has engaged experts to consider the NWP reports and intended to provide a full response at Deadline 5 (12 February 2019). In summary, however, Horizon's view is that the basis of the Resource Allocation Formula used by the NWP in its 'Assessment of Impact' report incorrectly models demand that the development may have on NWP. Horizon's Traffic and Transport Team have had positive meetings with North Wales Police and its traffic consultants. <p>In response to a question from the ExA regarding the different assessment methodology used by Horizon and NWP, Counsel noted that Horizon's consultants are still considering NWP's report; however, their initial view is that the methodology is flawed and has overestimated the sums leading to the suggested £30 million contribution, which Horizon considers to be wholly disproportionate for a force that is largely funded by the tax payer.</p> <p>In response to a discussion about the potential impact of the Wylfa Newydd DCO Project on crime rates, Ms O'Gorman confirmed that Horizon's figure of an anticipated increase in crime rates applies to the whole of North Wales. If applied to only Anglesey and North Gwynedd, these rates would amount to a 6% increase and when applied to the whole of North Wales amount to only 0.2% increase.</p>	

ExA's Agenda Item	Summary of Horizon's Oral Submission made in the hearing	Relevant document references
7(b) Examine the potential effects on the provision of existing services within the KSA and the DCCZ with particular reference to safeguarding the existing community	<p>Mr Cave made the following general points about safeguarding on behalf of Horizon:</p> <ul style="list-style-type: none"> Horizon takes safeguarding extremely seriously. It is a cross-sector matter and Horizon has been in dialogue with all health and wellbeing partners and has SOCGs with a number of them. Horizon is proposing a considerable architecture of safeguarding checks and balances to minimise risks and to pick up on any untoward occurrences. The first comprehensive statement on safeguarding received by Horizon was the IACC's LIR at Deadline 2 (4 December 2018). Horizon provided a detailed response at Deadline 3 (18 December 2018) [REP3-004] which confirms that Horizon does not agree with the characterisation of many of the issues IACC raised. Horizon intends to resume active dialogue with IACC and other safeguarding related bodies to resolve the issues highlighted in the LIR and Written Representation. In late December 2018, BCUHB has stated that it considers that there may be an implication for community services provided by the Health Board and there may be implications for the wider public and third sector services. Horizon will pursue these with BCUHB and other safeguarding leads. PHW note that Welsh Government have stated that further meetings to consider safeguarding will be held as Team Wales meetings. Horizon is keen to continue dialogue with Team Wales. It was acknowledged that the interested parties generally agree that the construction personnel will be well-behaved and law-abiding. While there is potential for an impact to arise a considerable influx in population, care must be taken not to stereotype the workforce. Horizon in its Health Impact 	<p>Horizon's response to IACC's LIR [REP3-004]</p> <p>HIA Report, paragraphs C.7.5 to C.7.9 [APP-429]</p> <p>Draft DCO. s.106, schedule 5 (Worker Accommodation) and schedule 14 (Community Involvement Officers) [REP3-042]</p> <p>Chapter C-1 (Socio-economics), paragraphs 1.5.63- 1.5.68 (pg. C1-35) [APP-088]</p> <p>Workforce Management Strategy [APP-413]</p>

ExA's Agenda Item	Summary of Horizon's Oral Submission made in the hearing	Relevant document references
	<p>Assessment considered the nature of the workforce and appropriate mitigation proposed.</p> <ul style="list-style-type: none"> Horizon's response is and can only be as a private sector employer, not a public body. <p>Counsel further noted that Horizon is proposing a whole range of things that take this matter into account including, for example, the Workforce Management Strategy and the Code of Conduct. Horizon is very aware of these matters and looking at things very closely.</p>	
7(c) To understand whether these differences could be resolved through additional work	The ExA noted that discussions on the Draft DCO s.106 were ongoing.	
Item 8 – Action points arising from the hearing		
Action items	The ExA acknowledged that it would circulate an actions list but that publication date of this was unknown.	

**PROFESSOR JOHN LENNON****TOURISM EXPERT WITNESS**

Director of Moffat Centre for Travel and Tourism
Business Development

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Dean Glasgow School for Business and Society
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Kingdom

W: [My research profile](#)

AREA OF SPECIALISM

John has worked in tourism for over 30 years and leads the UK's largest University tourism research centre. John has expertise in : Tourism Destination development and Marketing, Tourism Impact Analysis and Economic and Financial aspects of Tourism

QUALIFICATIONS

- BSc (Hons) Oxford Brookes University
- MPhil Strathclyde University
- PhD Glasgow Caledonian University

RELEVANT WORK EXPERIENCE

John has worked on over 600 commercial tourism projects in over 50 countries. Specifically in relation to working with Jacobs he has worked on route development and economic impact strategies on the following projects: A9 Dualling, A96 Dualling, Manchester North West Quadrant, the Oxford and Cambridge Expressway, UK National Grid and Areas of Outstanding Natural Beauty

KIERAN SOMERS BSc (Hons)

EXPERT WITNESS FOR HORIZON NUCLEAR POWER

AREA OF SPECIALISM

Over twenty five years' experience in the water and energy and construction sectors, in particular new power station development including wind, gas, coal and new nuclear...

QUALIFICATIONS

- BSc(Hons) Environmental Science
- Post Graduate Diploma in Air Pollution Control

RELEVANT WORK EXPERIENCE

Over 25 years' professional and managerial experience in planning and environmental work related to energy and infrastructure development, including the following projects:

- Wylfa Newydd New Nuclear Power Station
- Oldbury New Nuclear Power Station
- North Hoyle off-shore wind farm
- Gwynt-y-Mor off-shore wind farm
- Little Cheyne Court on-shore wind farm
- Bradwell on-shore wind farm
- Staythorpe Combined Cycle Gas Turbine Power Station
- Pembroke Combined Cycle Gas Turbine Power Station
- Willington Combined Cycle Gas Turbine Power Station
- Tilbury – Clean Coal with Carbon Capture
- Aberthaw Power Station – Flue Gas Desulphurisation
- Also, numerous smaller on-shore wind and hydro schemes and sewage treatment works

All of the above projects have involved significant associated infrastructure including roads and grid/pipeline connections.

**SARAH PRICE****EXPERT WITNESS FOR PLANNING POLICY AND SITE
SELECTION****AREA OF SPECIALISM**

Sarah has 17 years of professional experience working in the private sector. She was previously at Town Planning Consultancy and RPS and then a Director of Quod for 7 years before moving to DWD in 2017 where she is a Partner. Sarah has been working in major infrastructure projects since 2008 when she started advising Heathrow Airport Limited on the third runway proposals and has since specialised in DCOs through her work on other significant infrastructure schemes. Sarah has also advised on a range of other commercial and mixed use projects and has provided expert witness evidence at Inquiry and participated in DCO examinations and Examinations in Public.

**PROFESSIONAL
ORGANISATIONS**

- Royal Town Planning Institute
- National Infrastructure Planning Association

QUALIFICATIONS

- BA Hons Urban Planning and Management
- Diploma in Town Planning

**RELEVANT WORK
EXPERIENCE**

Sarah was the planning lead for DONG Energy (now Orsted) for the Walney Extension Offshore Windfarm DCO, including coordinating the Statement of Common Ground with the local authorities and expert planning policy support through submission. Sarah was a key member of the planning team for EDF for Hinkley Point C, answering questions and appearing at the examination in relation to Associated Development sites and the highway schemes. Sarah spent nearly 10 years advising Heathrow Airport Limited in relation to the third runway, including expert DCO advice. Sarah has been advising Horizon on Wylfa Newydd for around 3 years and provides expert planning advice and appeared at the Gwynedd and Anglesey Local Plan examination on behalf of Horizon.



Stefanie O'Gorman

DIRECTOR – ECONOMICS

Stefanie is the Director of Sustainable Economics and has 17 years' experience in the planning, technical delivery, management of economic and socio-economic assessments for policy and infrastructure projects. With academic training in environmental management, natural sciences and economics, Stefanie has broad ranging expertise in both infrastructure and non-infrastructure projects. She also has extensive experience in economic analysis, such as cost-benefit analysis, benefits transfer; environmental and social impact assessments; and incorporating sustainable development criteria in all aspects of her work. Stefanie commonly used spatial economics techniques to consider the distributional effects of projects under review.

Stefanie has successfully delivered several socio-economic assessments for large infrastructure projects, most recently focussing on the nuclear sector. As part of her role as Director of Sustainable Economics, she has undertaken the planning, technical delivery and management of economic and socio-economic assessments in support of statutory planning requirements. She has appeared as an expert witness for the socio-economic assessments of a renewable energy development and a major port infrastructure development in Scotland, along with a number of road schemes in Ireland.

Relevant Project Experience

Selected Project experience;

Preparatory work for the GDF siting process -environmental and sustainability tasks: Defining the socio-economic baseline in candidate communities

Wylfa Newydd New Nuclear, Horizon Nuclear Power (2014- on-going)

Valuing Non Market Impacts in Economic Assessments,

-Victoria Department of Economic Development, Jobs, Transport and Resources (DEDJRT), Australia (March – July 2016)

Stormwater Infrastructure Economic Model, -christchurch City Council (2016)

Low Carbon Infrastructure - Projects for Scotland,WWF and the Low Carbon Infrastructure Task Force (June – October 2015)

Low Carbon Resilient Cities, Scottish Cities Alliance (2014)

North Wales Connections Impact Appraisal, National Grid 2012-2014

Geological Disposal Facility - Sustainability Appraisal, RWMD 2013

Dunkettle Interchange Upgrade socioeconomic impact assessment, National Roads Authority (2012)

Rosyth International Container Terminal, Babcock (2010 - 2011). Socio economic expert witness.

Forth Replacement Crossing, Transport Scotland (2009),Business Viability Assessment

NPower Renewable Energy (July 2007-January 2009) – sRenewables socio economic assessment- Expert Witness



Andrew Stephen Hunt

EXPERT WITNESS FOR ACCOMMODATION IMPACTS

AREA OF SPECIALISM

I am a Director of the Socio-economics team at Quod that specialises in assessing the full range of socio-economic impact of major infrastructure projects. I have over 20 years experience in the field, including spells working in policy development and academia.

I have advised Horizon on its Accommodation Strategy since May 2016 having carried out a similar role for EDF on Hinkley Point C (and currently on Sizewell C and Bradwell B).

QUALIFICATIONS

- BSc (Hons) Economics and Politics
- MA European Economics
- Fellow of the Royal Society of Arts

RELEVANT WORK EXPERIENCE

Wylfa is one of nine major DCO applications I have been involved with (the others are three nuclear power stations (Hinkley Point C; Sizewell C and Bradwell B); Navitus Bay windfarm; Silvertown Tunnel; West Midland Strategic Railfreight Interchange; York Potash mineral processing and transfer; and, Heathrow Airport). I have also advised on a range of major infrastructure schemes that have been consented using other routes (including road, rail, underground, waste and energy).

In 2002 I established Hunt Dobson Ltd, a consultancy specialising in assessing the socio-economic impacts of proposed developments of all kinds, including infrastructure, housing, and mixed-use schemes and have worked on most of the largest urban regeneration schemes in the UK. In 2011 the company was acquired by Quod Ltd where I became a Director.



Charlie Tasker [Senior Construction Adviser]

DCO Client Expert Witness Construction [Various Construction Topics]

AREA OF SPECIALISM

Charlie has over 30 years' experience in the electricity industry, the majority of which have been in power plant development and construction which included five years in an operations and maintenance management position.

Charlie is responsible for establishing Construction Management arrangements for Horizon's lead project, Wylfa Newydd Power Station. Prior to this Charlie oversaw the development activities associated with the Nuclear new build programme including establishment of Early Works Contracts, Front End Engineering Contracts, Associated developments and owners scope activities.

Electricity industry experience includes a wide range of Power plant construction activities including Nuclear, Coal, Flue Gas Desulphurisation retrofit projects, Coal Importation Facilities and Combined Heat and Power projects.

Many of these projects have been delivered using innovative construction management approaches combined with latest technology to maximise commercial benefits.

PROFESSIONAL ORGANISATIONS

- Member of the Institution of Civil Engineers
- Chartered Engineer

QUALIFICATIONS

- BSc Engineering
- CEng

RELEVANT WORK EXPERIENCE

Experienced construction project director/senior project manager that encompasses a wide range of Power plant construction activities including Nuclear, Coal, Flue Gas Desulphurisation retrofit projects, Coal Importation Facilities and Combined Heat and Power projects.

Experienced in managing large multi-disciplined project engineering teams associated specialist technical support organisations.

7 years design and construction experience in the water industry prior to entering Electricity Industry.

**HEFIN RHYS THOMAS**

EXPERT WITNESS FOR WELSH LANGUAGE AND CULTURE
MITIGATION AND ENHANCEMENT STRATEGY

AREA OF SPECIALISM

Welsh language and culture

**PROFESSIONAL
ORGANISATIONS**

- Member of Social Research Association

QUALIFICATIONS

- BSc Geography with Economics, London School of Economics

**RELEVANT WORK
EXPERIENCE**

Hefin is a Director and one of the founders of Arad Research. Over the last fifteen years, Hefin has designed and managed research and evaluations for clients including government departments, local authorities, private and third sector organisations. His main areas of expertise include Welsh language and culture, education, skills and training, economic and labour market analysis.

Hefin has recently been managing an evaluation of the Cymraeg for Kids programme for the Welsh Government and was previously a key contributor to the evaluation of the national Welsh-medium education strategy.

His previous experience includes managing research for clients including Welsh Government, Grŵp Llandrillo-Menai, S4C, Urdd Gobaith Cymru and Menter Caerdydd. He has also undertaken research on behalf of the Welsh Language Commissioner to review how local authorities and health boards are implementing changes related to the Welsh language standards. He is a fluent Welsh speaker.



Ben Cave

Expert Witness for Health Impact Assessment

AREA OF SPECIALISM

Ben has specialised in health and social impact assessment for the last 20 years. He has worked across the UK, in mainland Europe and further afield.

PROFESSIONAL ORGANISATIONS

- **Fellow** of the *Institute of Environmental Management and Assessment*.
- **Honorary Member** of the *Faculty of Public Health*.
- *International Association for Impact Assessment* (IAIA) “**Individual Award**” for major achievement and advancement in the theory and/or practice over a period of time at an international level (2011).
- MSc: Health Promotion Sciences, London School of Hygiene & Tropical Medicine
- BA hons, Social Anthropology, London School of Economics

QUALIFICATIONS

I have lead HIAs in a wide range of sectors: for example, infrastructure for energy, mining, road and rail.

RELEVANT WORK EXPERIENCE

I integrate health into environmental assessment (EIA & ESIA) at project level. I lead Health Impact Assessments (HIAs) in conjunction with environmental assessments and focus on providing high quality assessments that are robust and defensible.

I led the production of a briefing note for Public Health England on health in EIA and of an IEMA/Faculty of Public Health document on the same topic.

I conduct Strategic Environmental Assessments and I advise the World Health Organization on requirements and methodologies for SEA.