

Wylfa Newydd Project

Horizon Deadline 4 responses to actions set in
Issue Specific Hearing on 7 January 2019

PINS Reference Number: EN010007

17 January 2019

Revision 1.0

Examination Deadline 4

Planning Act 2008

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

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1 Horizon Deadline 4 responses to actions set in Issue Specific Hearing on 7th January 2019

1.1 Introduction

- 1.1.1 This document contains Horizon Nuclear Power Wylfa Limited's ("Horizon") responses to actions set in the Issue Specific Hearing on 7th January 2019 that were set for Deadline 4.
- 1.1.2 This document also contains details of other actions set at the Issue Specific Hearing on 7th January 2019 set for subsequent Examination Deadlines.

1.2 Summary of Deadline 4 action responses

Temporary Workers Accommodation Position Paper

- 1.2.2 Contained in Appendix 1-1 is Horizon's response to various points raised by the Examining Authority and Interested Parties about the Temporary Workers Accommodation (TWA) including matters on phasing, contingency planning, legacy benefits, and potential adverse effects on workers living at the TWA including a noise and vibration assessment.

Post-hearing note – Health Services

- 1.2.3 Contained in Appendix 1-2 is Horizon's response to the request by the Examining Authority for a post-hearing note summarising the areas of agreement and disagreement between key Interested Parties on the provision of health services.

Post Hearing Response Note - Tourism

- 1.2.4 Contained in Appendix 1-3 is Horizon's response to the Autumn 2017 and Spring 2018 Visitor Surveys prepared by Strategic Research & Insight Ltd for Isle of Anglesey County Council (IACC).

1.3 Action responses planned for subsequent Examination Deadlines

- 1.3.1 Table 1-1 summarises the responses to actions set at the Issue Specific Hearing on 7th January 2019 that Horizon is planning to submit at subsequent deadlines.

Table 1-1 Summary of planned action responses

Action / Deliverable	Planned deadline
A detailed response to North Wales Police's submissions at Deadlines 2 and 3	Deadline 5
A report setting out Horizon's proposal to upgrade broadband.	Deadline 6
A post-hearing note considering the case of <i>R (Langley Park School for Girls) v Bromley LBC</i> [2009] EWCA Civ 734 as requested by the Examining Authority.	Deadline 5
A post-hearing note on behalf of Horizon, Welsh Government, IACC and Gwynedd Council detailing the parties' shared understanding of the Welsh Language 1-5 Framework and how this framework might be applied during the construction and operation of the Wylfa Newydd DCO Project.	Deadline 5
A post-hearing note detailing Horizon's proposal for a permanent Visitors Centre including the timeframe for delivery of this Visitors Centre and the proposed mechanism for securing its delivery.	Deadline 5
A post-hearing update regarding the ongoing discussions with stakeholders on the matter of safeguarding.	Deadline 5

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Temporary Workers Accommodation Position paper including noise and vibration

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1 Introduction

1.1 Purpose of this Report

- 1.1.1 This report provides Horizon's responses to issues raised at the Issue Specific Hearing (ISH) on socio-economic matters held on 7 January 2019 in respect of the proposed Temporary Workers Accommodation (TWA). The Examining Authority requested that Horizon should respond formally in writing to the matters raised by Deadline 4 (17 January 2019).
- 1.1.2 Table 2-1 below provides a summary of the matters raised in respect of the TWA and a response from Horizon to each of the points made.
- 1.1.3 Table 3-1 provides Horizon's responses to the issues of odour, noise and vibration.

2 Matters Raised at the Socio-economic ISH: TWA

2.1 Comments on Matters Raised on TWA Matters

Table 2-1 Matters raised at the Socio-economic ISH in respect of the TWA with Horizon's response

Issue Raised	Horizon's Response
Why delivery of the TWA cannot be accelerated? In particular phases 2 and 3.	<p>The phasing of the TWA is predicated on the lead-in time for the procurement, construction, installation and connection of the living units that can only be instigated following the Financial Investment Decision (FID). The current programme for procurement, design, manufacturing and installation for Phase 1 is estimated to be around 22 months.</p> <p>Early delivery of Phase 1 is not possible due to significant cost of delivery prior to final investment decision spending. This is the most complex phase as it needs to provide all infrastructure required for the full 4,000 beds: including site access road, utilities provision, and the whole of the amenity building.</p> <p>To instruct work earlier would commit Horizon to a substantial cost pre-FID which would be unacceptable and result in additional funding requirements.</p> <p>Delivery of second and third phases of the Site Campus is constrained by the standard construction sequence and standard project durations for each of the procurement, design, manufacture and installation phases. It is not good practice to change the construction sequence, squeeze construction durations or opening accommodation blocks with partial beds as it adds to the complication of making the construction area separate from the living area.</p> <p>Additionally, the environmental impact assessment in the Environmental Statement has assessed the timeline for delivery of the Site Campus provided in the indicative timeline in the Construction Method Statement [APP-136]. Changes to the phasing of the Site Campus would result in changes in the activities occurring simultaneously in the early years. Horizon would need to consider whether this will give rise to any new or different environmental effects to those set out in the Environmental Statement.</p>

<p>Why decommissioning of the Site Campus is required and whether this decommissioning can be phased?</p>	<p>In their written representation the Office for Nuclear Regulation have clearly advocated for the closure and subsequent decommissioning of the Site Campus before the commencement of operation of the Power Station [REP2-355].</p> <p>The Site Campus is inherently a temporary form of development, as it is only required to house construction workers. This is the basis on which all of the design and assessment work undertaken by Horizon relating to the Site Campus has been undertaken. The temporary nature of the Site Campus development was also subject to statutory consultation prior to submission of the Draft DCO application during Stage Three Pre-Application Consultation.</p> <p>Due to this temporary nature, the Site Campus will be removed following construction and therefore a decommissioning strategy is required for its decommissioning and removal.</p> <p>As set out in Section 9 of the Design and Access Statement Volume 3 [REP2-029] the proposals for the Site Campus focus on restoration and providing enhancements to create a positive legacy for Anglesey. Measures could include the restoration of coastal grassland and stone walling, alongside a new viewpoint along the Wales Coast Path. The precise restoration measures, alongside any details of how the decommissioning may be phased will be submitted to and approved by IACC in accordance with Requirement WN23.</p>
<p>Could the construction of the TWA be phased?</p>	<p>The implementation and delivery of the Site Campus will be phased as set out in the updated Phasing Strategy which will be submitted at Deadline 4 (17 January 2019).</p> <p>Horizon would seek to deliver the Site Campus in the following three phases:</p> <ul style="list-style-type: none"> • Deliver the first 1,000 beds of Site Campus prior to exceedance of 2,200 Non-Home Based workers. • Deliver further 1,000 beds prior to exceedance of 4,200 Non-Home Based workers and • Deliver the final 2,000 beds prior to exceedance of 6,700 Non-Home Based workers. <p>Section 4 of the Design and Access Statement volume 3 [REP2-029 and 030] set out the illustrative proposals of how the Site Campus could be constructed. Detailed design of the Site Campus would be submitted to and approved by IACC in</p>

	<p>accordance with Requirement WN19 in the draft Development Consent Order [REP2-020].</p>
When will further design work on the TWA take place?	<p>Requirement WN19 in the draft Development Consent Order [REP2-020] states in-part:</p> <p class="list-item-l1">(1) No construction of the Site Campus may commence in respect of a building or other structure.... until plans and written details of the design have been submitted to IACC for approval.'</p> <p class="list-item-l1">(2) The details submitted under sub-paragraph (1) must be prepared in accordance with the parameters and parameter plans identified in Requirement WN20 and the design principles relating to the Site Campus in volume 3 of DAS.</p> <p>In accordance with this Requirement detailed design information in the way of plans and written details will be submitted to IACC for consideration and formal approval prior to any construction of the Site Campus commencing post DCO grant. This 'parameters approach' has been adopted by Horizon to ensure that there is sufficient flexibility to accommodate any design changes that may be required between the DCO being granted and construction commencing. The parameters for the Site Campus constrain maximum dimensions and locations of individual buildings within the Site Campus. Further details on the approach and why it is needed are contained in section 8 of volume 1 of the Design and Access Statement [APP-407].</p>
What is the contingency plan should delivery of the TWA be delayed?	<p>Horizon will provide a Worker Accommodation Portal that will provide a database of suitable vacant properties offered by landlords and other providers including the Site Campus when it becomes operational. The Portal will be provided as part of the Workforce Management Service (WAMS) which forms part of the Workforce Accommodation Strategy secured under the Draft DCO s.106 agreement [REP3-042].</p> <p>These measures will allow Horizon to monitor the construction workforce accommodation choices including the accommodation location and type. It is proposed that monitoring data will be reported to the Accommodation, Tourism and Leisure sub-group. It is proposed to develop triggers to identify if there are significant adverse effects emerging on the accommodation sector within any particular area.</p>

	<p>The Housing Fund secured by the Draft DCO s.106 agreement provides for:</p> <ul style="list-style-type: none"> • Worker Accommodation (Capacity Enhancement) Contribution to support interventions to stimulate latent capacity and measures to make the market work more effectively; • Contingency funding (allocated at triggers to be included in the Draft DCO s.106 agreement) <p>Based on the measures secured by the Draft DCO s.106 agreement in respect of monitoring and through the Housing Fund it is considered that Horizon has provided sufficient contingency safeguards into the Draft DCO on matters related to accommodation provision and impacts arising.</p>
<p>What is Horizon's position on a benchmark for a standard of accommodation at the TWA?</p>	<p>The accommodation provision within the TWA will be equivalent to what has been agreed at Hinkley Point C with union representatives.</p> <p>In summary the typical specification for each occupant is equivalent to 3-star hotel-type accommodation and is likely to include the following features:</p> <ul style="list-style-type: none"> • Serviced accommodation • Circa 15 square metres of lockable living space per occupant • 3.5 metre head space • All en-suite with power shower • Bed sized at 1.5 single bed size • Television point • Broadband connection • Catered meals available in amenity building • Laundry points
<p>Legacy benefits of the TWA.</p>	<p>Horizons Written Representation [REP2-002] in section 4 which was submitted at Deadline 2 (4 December 2018) summarizes the legacy benefits arising from the Wylfa Newydd DCO Project.</p> <p>Specifically, the representation refers to the various financial contributions set out in the Draft DCO s.106 agreement [REP3-041] which will deliver a number of longer term benefits including:</p>

	<ul style="list-style-type: none"> - The delivery of new housing, especially affordable housing; - Augment to IACC's existing empty homes programme to bring vacant properties back into use; - Encouragement for latent accommodation provision; - Funding of measures to improve the function of the housing market; and - Funding of IACC accommodation officer time to manage impacts on housing matters.
<p>Are the TWA proposals compliant with the JLDP in policy terms?</p>	<p>Section 3 of Horizon's Written Representation submitted at Deadline 2 (4 December 2018) in section 3 sets out the compliance of the Wylfa Newydd DCO Project with the Joint Local Development Plan (JLDP) (2017) including matters related to housing and the Site Campus. Specifically in respect of Policy <i>PS10:- Wylfa Newydd- Campus Style Temporary Accommodation for Construction Workers</i> of JLDP paragraphs 3.3.68 – 3.3.95 set out in detail how Horizon's approach to accommodating construction workers and mitigation including the provision of the Site Campus are compliant with policy PS10.</p> <p>Overall the conclusion of Horizon's Written Representation is that the relevant components of the Wylfa Newydd DCO Project are fully compliant with the relevant policies contained in the JLDP.</p>
<p>What is Horizon's position in terms of learned behaviour with respect to the choices workers make whether to reside at the Site Campus?</p>	<p>The extent of learned behaviour from the choices workers make in respect of whether to reside at the Site Campus is likely to be varied.</p> <p>A significant factor in the extent of actual learned behaviour possible will be the length of time workers are employed on the project. As well as the increase in the headline workforce numbers, there will also be significant churn within it, as different elements complete and workers complete their contracts and leave the project.</p> <p>Workers employed in the early years of construction, for example on earthworks, will be replaced by new workers as the construction progresses, for example on civils construction, and as such there will be no learned behaviour. New arrivals on the project once the Site Campus is open will have the opportunity to go into the Site Campus without taking other accommodation first.</p>

The persistence of learned behaviour will also depend on the mix of short-term and long-term workers that are employed at the same time that the Site Campus becomes available in the phased manner as secured by the updated Phasing Strategy [APP-447] which will be submitted at Deadline 4 (17 January 2019). The delivery of the Site Campus corresponds with proposed increases in non-home-based workers who will be new to the project. The extent of new workers at this time will be higher than the number of retained workers, thereby limiting the extent of learned behaviour that will be possible.

For retained workers who are not committed to long-term accommodation choices (owner-occupier or long-term lease) who choose to switch to living within the Site Campus are likely to provide the greatest potential for learned behaviour.

In all instances monitoring of workers accommodation choices including the location of the accommodation and type of accommodation choices will be undertaken via the Workforce Accommodation Management Service and Worker Accommodation Portal secured by the Draft DCO s.106 agreement [REP3-041]. Monitoring data will be provided to the Accommodation, Tourism and Leisure sub group on a quarterly basis, or other such reasonable period as agreed.

3 Matters Raised by Land and Lakes: Temporary Workers Accommodation

3.1 Comments on Matters Raised on Temporary Workers Accommodation Matters

Table 3-1 Matters raised by Land and Lakes at the ISH in respect of the TWA with Horizon's response

Issue Raised	Horizon's Response
<p>Land and Lakes (L&L) consider that the Site Campus at the WNDA was not a suitable location for TWA due to the potential for odour nuisance from the DCWW Wastewater Treatment Plant which will make the campus un-attractive to workers. As part of their representation, there was specific focus about windows needing to be closed to prevent these effects.</p>	<p>Chapter D5 (Air Quality) [APP-124] of the Environmental Statement includes embedded mitigation to prevent effects from Odour at the Site Campus. These measures include:</p> <ol style="list-style-type: none"> 1. Raising the requirement for the extension of the DCWW Cemaes WWTW to be designed in a manner to minimise potential odour impacts to residents of the Site Campus. Progress has been made with DCWW since submission of the application through the Statement of Common Ground process. It is agreed that Horizon will be consulted upon during the detailed design of the extension to the Cemaes WWTW to ensure it is designed to minimise the releases of odour which could affect workers residing in the Site Campus. 2. The package sewage treatment plant for Main Construction would be a modularised system that would be predominately enclosed. The processes with the highest potential to emit odours, such as the preliminary treatment (screens), balance tanks, primary treatment, sludge storage and sludge treatment, would be covered with active extraction to maintain a slight negative-pressure within the process units. The extracted air would be treated to reduce the odour concentrations. These measures are secured in Main Power Station Site sub-CoCP [REP2-032]. 3. The Site Campus would be designed to reduce the exposure of residents to odour emissions. Site Campus buildings within 70m of the Cemaes WWTW will have central heating, ventilation, and air conditioning (HVAC) system on the building with a roof mounted intake (or similar) to minimise odour effects. These measures are secured in the Design Access Statement Vol 3, Appendix 1-2 Site Campus [REP2-029] through design principle 3.4.39.

	<p>Horizon consider that with the proposed mitigation measures in place, there will be no significant effects from odour at the Site campus and therefore odour will not be a reason to make the Site Campus un-attractive to workers.</p>
Concerns were raised by L&L that the Site Campus was not a suitable location for Temporary Workers Accommodation due to effects that would be received by workers from noise.	<p><u>Concerns about Electrical Transformer Noise</u></p> <p>Concern has been expressed by L&L that previous issues raised by existing local residents in respect of noise generated by the electrical transformer would be detrimental to the living arrangements and attractiveness of the Site Campus.</p> <p>A full assessment of noise and vibration has been included in chapter D6 of the Environmental Statement [APP-125] and the transformer noise has been included as part of the baseline within the noise modelling which is portrayed in the noise propagation plans in figures D6-3 to D6-10 of the WNDA Development Figure Booklet - Volume D [APP-237].</p> <p>According to the results of historical measurements into the noise associated with the operation of the National Grid transformers the absolute level of National Grid transformer noise at Noise Sensitive Receptors is low (i.e. <25 dB(A)), a level which would not normally be expected to give rise to adverse community response. The historical adverse community response has therefore related primarily to the character of transformer noise in the context of the baseline noise environment, rather than its absolute noise level.</p> <p>The absolute level of noise from the National Grid transformers at the majority of the Site Campus buildings is estimated to be 35 dB(A) or less. Some of the closest buildings to the transformers may be exposed to slightly higher levels of transformer noise, but the character of the noise environment during the construction period when the Site Campus will be occupied will be influenced by various sources, including the operation of multiple diesel engines. Furthermore, as noted above the ventilation strategy for the Site Campus will be Mechanical Ventilation with Heat Recovery [REP2-029], which does not rely upon open windows or trickle vents to provide adequate ventilation and temperature control in rooms. In this context, the character of the National Grid transformers is not considered likely to be readily perceptible, or to result in annoyance at the Site Campus buildings.</p>

Concerns around assessment methodology

The site suitability of the proposed location for the Site Campus is considered in chapter D6 of the Environmental Statement [APP-125]. In addition a Royal Institute of British Architects Stage 2 concept design assessment has been undertaken, which outlines the required acoustic performance criteria for the development. The output of this is presented in the Design and Access Statement for the Site Campus [APP-409].

The noise assessment methodology used in chapter D6 of the ES [APP-125] was agreed with IACC. This methodology is summarised in ES Volume B - Introduction to the environmental assessments Appendix B6-2 - Noise and Vibration Modelling and Assessment Methodology Report [APP-086]. This methodology:

- predicts external construction noise levels in accordance with BS 5228-1:2009+A1:2014; and
- estimates internal noise levels from the external noise levels and the proposed building construction using the calculation methods from BS 8233:2014 and BS EN ISO 12354-3:2017

The predicted construction noise levels at the most exposed facades of the Site Campus are expected to be in the range of between 54 and 70 dB LAeq,16-hours during the daytime and between 43 and 54 dB LAeq,8-hours at night [ES chapter D6, APP-125].

Acoustic standards for Site Campus are secured through the principles in the Design and Access Statement. The Site Campus design principle at paragraph 3.4.40 requires that "Acoustic mitigation measures will be provided as part of the building design of the Site Campus to achieve the requirements and guidance provided in BS 8233:2014 'Sound insulation and noise reduction for buildings – Code of practice', World Health Organisation Guidelines (1999) (for L_{Amax} levels), Approved Document E of the Building Regulations and CIBSE Guide B4 Noise and vibration control for building services systems" (Design and Access Statement - Volume 3 – Associated Developments and Off-Site Power Station Facilities, page 31 [REP2-029]).

This is secured through Requirement WN19 of Schedule 3 to the Draft Development Consent Order [REP2-020] which provides that, among other things, the detailed design for the Site

	<p>Campus must be prepared in accordance with design principles in volume 3 of the Design and Access Statement.</p>
	<p>To achieve a high level of sound insulation in the Site Campus the accommodation building ventilation strategy is anticipated to be System 4 (as defined within Approved Document F of the Building Regulations), i.e. Mechanical Ventilation with Heat Recovery (Design and Access Statement - Volume 3) [REP2-029]. This generally provides the best resistance to external noise, since no trickle vents or open windows are required to provide adequate ventilation and temperature control in rooms. The use of this system would meet the Site Campus design principle referred to above.</p>

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Wylfa Newydd Project

Note on the Provision of Health Services Reflecting Areas of Agreement and Disagreement between Key Parties

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1 Provision of health services

1.1 Introduction

- 1.1.1 This post-hearing note covers the provision of health services. It reflects areas of agreement and disagreement between key parties.
- 1.1.2 The relationship with the health partners has been constructive and productive.
- 1.1.3 There are some final issues to address and information to exchange but all parties are confident that an agreement will be reached. This response summarises dialogue with:
 - Betsi Cadwaladr University Health Board (BCUHB);
 - Welsh Government (WG);
 - Public Health Wales (PHW); and
 - Welsh Ambulance Service NHS Trust (WAST).

1.2 The offer

Healthcare

- 1.2.2 The offer made by Horizon is to provide health services for construction personnel so as to mitigate any likely significant adverse effects on local NHS services through anticipated and unanticipated demand.
- 1.2.3 Horizon has provided a level of detail in its commitments that it considers appropriate to the DCO stage. This covers occupational health, primary care, secondary care and ambulance services.
- 1.2.4 At the request of health stakeholders Horizon has gone further, to develop successively greater levels of detail on service planning to illustrate its intentions, for example, mapping illustrative care pathways for particular health conditions.
- 1.2.5 The Construction Site Clinic (CSC) and Site Campus Medical Centre (SCMC) represent substantial commitments to alleviating pressure on the NHS. This in-kind provision is supplemented by additional funding through the DCO s106 agreement.
- 1.2.6 Collectively this mitigation package of private on-site healthcare, off-site financial contributions and adaptive monitoring (with a contingency fund) appropriately mitigates the likely significant healthcare related effects of the Wylfa Newydd DCO Project.
- 1.2.7 Horizon is committed to developing full operational detail of the CSC and SCMC to an appropriate timeline post-DCO.
- 1.2.8 It is noted that there is ongoing Statement of Common Ground (SoCG) discussion with parties. For example, on formulae around which financial contributions and adaptive monitoring can be agreed.

1.2.9 Horizon shared a discussion document with BCUHB, WG & WAST in which it set out the proposals ('*Health Services for the Construction Workforce: Discussion Document (20.8.18)*'). This specification has been discussed at regular meetings (21 August 2018, 1 October 2018, 9 November 2018, 7 December 2018 and 4 January 2019) and the approach has been refined accordingly. Horizon is committed to developing full operational detail of the CSC and SCMC to an appropriate timeline post-DCO. From DCO commencement (excluding SPC works) until the opening of the Site Campus Medical Centre Horizon will deliver the majority of occupational health services on-site, and the majority of primary care services off-site in community premises (REP2-059, BCUHB 032). The ways in which workers will access health services during this time is currently being discussed with BCUHB and with the local GP Practice, Canolfan Iechyd Amlwch. Increased financial payment secured in the DCO s.106 agreement are available during this period.

1.2.10 When the first Site Campus accommodation block opens, the Site Campus Medical Centre will be provided for the whole construction workforce. This will provide GP services to the construction workforce on a walk-in centre model (REP2-059, BCUHB 032).

1.2.11 At the request of BCUHB there will be a 'step change' in services between these two stages (pre and post the SCMC).

2 Areas of agreement and disagreement

2.1 Summary

Mitigation

2.1.2 Horizon has reached an understanding with BCUHB that the full operational detail of the CSC and SCMC will be developed post DCO grant with input from the main contractor. Horizon has committed to adaptive monitoring and contingency funds through the draft DCO s.106 agreement (REP1-010).

2.1.3 The parties take different approaches to mitigation.

- Horizon takes into account the role that the CSC and the SCMC will play in reducing demands on the NHS (commitments made through the DCO application, SoCGs and responses to Written Representations).
- BCUHB (see REP2-277) and WAST (see REP2-362) do not allow for the effects of the CSC and the SCMC.

Cost recovery

2.1.4 BCUHB states that all additional costs associated with the development should be funded by Horizon and BCUHB aims to secure a commitment to this as part of the DCO process (5.b (page 5) (REP2-277)).

2.1.5 WG seeks provisions to be agreed and included in the DCO s.106 agreement to reflect agreed principle that Horizon will bear costs of referrals to the NHS (WG deadline 2 Written Representation (REP2-367), para 11.4.5 first bullet).

2.1.6 Horizon's position is that health service funding commitments have been made through the draft DCO s.106 agreement (REP3-042). The DCO s.106 agreement financial offer itself was shared with BCUHB via email correspondence on 12th December 2018 (email from Ben Cave representing Horizon to Sally Baxter Acting Director of Strategy for BCUHB). The total amount offered, including contingency payments, was £9,582,885. Horizon considers this offer would appropriately mitigate against any likely significant effect on the NHS.

2.1.7 The devolved administration funding arrangements were made in the knowledge of potential population fluctuations. Horizon therefore considers that the responsibility remains with WG to provide BCUHB with appropriate funds where there is a change in its catchment population who are entitled to NHS services. Local NHS demand already includes a considerable transitory population, including those related to tourism and Holyhead port. Whilst Horizon acknowledges the additional demand from a transitory construction workforce (and is mitigating that demand), a transitory population is not a new feature of the local health economy. Horizon also notes that as a company, both it and its workforce pay taxes, from which the NHS is funded. Horizon therefore remains of the view that it should not meet the full costs of any gap in NHS budgets.

Safeguarding

2.1.8 Horizon is in the process of agreeing considerable financial settlements with public sector bodies, as well as funding multiple IACC officers in topic areas which are related to safeguarding. Safeguarding is part of that whole and should not require additional separate funding.

2.2 Betsi Cadwaladr University Health Board

2.2.1 There has been ongoing dialogue, and progress, on the matters cited in BCUHB Written Representation (REP2-277). For example, Horizon met with Canolfan Iechyd Amlwch and BCUHB (4th January 2019) about plans for the provision of primary health care services to construction personnel before the opening of the SCMC.

2.2.2 BCUHB states that all additional costs associated with the development should be funded by Horizon and BCUHB aims to secure a commitment to this as part of the DCO process (5.b (page 5) (REP2-277)).

2.2.3 Horizon and BCUHB have exchanged cost estimates.

2.2.4 Within the discussion of primary care, BCUHB and Horizon are agreeing how dentistry, pharmacy, laboratory services and sexual health services would be delivered for construction personnel. Horizon propose in-kind provision for these services supported by adaptive monitoring.

Horizon position

2.2.5 Horizon issued a discussion document with formulae for payments in August 2018 ('*Health Services for the Construction Workforce: Discussion Document (20.8.18)*').

2.2.6 The draft DCO s.106 agreement (REP3-042) payment amounts were shared on 12th December 2018 (email from Ben Cave representing Horizon to Sally Baxter Acting Director of Strategy for BCUHB). The total amount offered, including contingency payments, was £9,582,885.

2.2.7 This offer reflects Horizon's reasonable expectation that the CSC and SCMC would be effective mitigation (minimising demand for BCUHB services). The offer provides for timely payments (based on expected NHS demand), as well as adaptive monitoring and timely release of contingency funds if expected demand is exceeded.

BCUHB position

2.2.8 In its Written Representation BCUHB (REP2-277) models a worst-case scenario based on a low standard of on-site healthcare and a high NHS referral rate.

2.2.9 In an email on 21st December 2018 Sally Baxter, Acting Director of Strategy for BCUHB, indicated that the amount BCUHB will request from Horizon will be £12 million to £14 million and that the sum may increase.

- 2.2.10 The BCUHB Written Representation (REP2-277) does not include amounts of, or calculations for, funding.
- 2.2.11 It is understood that the main point of difference between Horizon and BCUHB is the extent to which the CSC and SCMC constitute effective mitigation for construction personnel use of, or referral to, BCUHB services.
- 2.2.12 Horizon is confident that it would provide a high standard of on-site healthcare commensurate with the reasonable expectation of a low NHS referral rate. BCUHB has indicated that it is assessing an unmitigated (or reduced mitigation) scenario.
- 2.2.13 On the 14th January 2019 BCUHB shared its costing methodology with Horizon (email from Wyn Thomas, Assistant Area Director Primary Care (West) BCUHB, to Ben Cave, representing Horizon). Following a meeting between Horizon and BCUHB on 15th January 2019 both parties are confident that agreement can be reached on the DCO s. 106 agreement payments.

2.3 Welsh Ambulance Service NHS Trust

- 2.3.1 HIA Report paragraphs C.6.20 and C.6.11 (APP-429) note that paramedic services would be provided in the Wylfa Newydd Development Area, including appropriately qualified staff and vehicles. These services will be part of the CSC. A determination will be made regarding the number of emergency vehicles required on site. The current proposal is for 2-3 ambulances including at least one 4x4 off road for the outer earthworks areas and at least one road ambulance for transferring non critical cases to hospital in Bangor. A second may be required to address potential for multiple incidents, subject to agreements that may be reached with WAST with regard to transfer from site to hospital (REP2-055, WAST 006).
- 2.3.2 The way in which patients are transferred from site to hospital remains to be agreed with WAST.
- 2.3.3 For the purposes of planning the current estimate is one major incident and seven moderate incidents on the main site per year that could require ambulance services. Other incidents (around 100 per year) are expected to be managed by on-site healthcare and would not require WAST attendance (REP2-055, WAST 007). This is consistent with annual injury rates during peak construction on other UK major projects e.g. Channel Tunnel Rail Link, Olympics, Crossrail etc.
- 2.3.4 The draft DCO s.106 agreement (REP3-042) was sent to WAST on 18th December 2018.
- 2.3.5 The calculations in the WAST Written Representation (D2) assume no medical provision by Horizon i.e. a non-mitigated effect (REP2-362, para 1.10).
- 2.3.6 In its D3 response to WAST Written Representation (REP3-022, para 1.2.5) Horizon states that the scale of contribution requested by WAST is not agreed. Horizon has sought to understand the likely additional costs to

WAST as a result of the Wylfa Newydd DCO Project. To this end, it has developed an estimate of costs associated with call outs to incidents on site.

2.3.7 Horizon has also requested estimates from WAST of the annual increase in rate of injury and incidents arising off site (for instance, increased call outs as a result of road traffic accidents). WAST has not provided these estimates to date.

Horizon position

2.3.8 As set out in the draft DCO s.106 agreement (REP3-042), Horizon intends to commit to a financial contribution towards the cost of WAST ambulance service use by workforce personnel.

2.3.9 A “Public Services (Ambulance) Contribution” is proposed towards building resilience and mitigating impacts of the Wylfa Newydd DCO Project on ambulance services on Anglesey.

2.3.10 Horizon is confident that, in addition to preventative measures to avoid accidents, it would provide appropriate on-site emergency response capability.

2.3.11 Detailed emergency planning matters will be considered and agreed through the Emergency Services Engagement Sub-Group (ESESG), on which WAST would be represented (REP2-055, WAST 015).

WAST position

2.3.12 In its Written Representation WAST (REP2-055, para 1.10) estimates a total potential impact of around £8 million over 11 years. WAST notes these figures are considered a worst-case scenario, based on no medical provision by Horizon.

2.3.13 The WAST calculation is based upon the service needs with no mitigation in place (e.g. WAST request funding for a further staffed ambulance, but do not account for such an ambulance being provided on-site).

2.3.14 The main point of difference between Horizon and WAST is the extent to which on-site healthcare and emergency capability provided by Horizon would reduce demand on WAST.

2.3.15 A meeting has been arranged between Horizon and WAST (24th January 2019).

2.4 Welsh Government

2.4.1 WG funds health provision in Wales which is a devolved function.

2.4.2 WG has participated in all meetings held with BCUHB.

WG position

2.4.3 The WG’s position is broadly aligned with that of BCUHB and other partners.

- 2.4.4 WG seek provisions to be agreed and included in the DCO s.106 agreement to reflect agreed principle that Horizon will bear costs of referrals (WG deadline 2 Written Representation (REP2-367), para 11.4.5 first bullet).
- 2.4.5 WG do not commit to providing additional health funding to BCUHB where people entitled to use the NHS move to the BCUHB area from other parts of the UK due to the Wylfa Newydd Project.
- 2.4.6 WG indicated a potential change to this position at the issue specific hearing on 7th January 2019 (a new population adjustor could increase BCUHB funding, subject to population changes in other parts of Wales).

Horizon position

- 2.4.7 Horizon commits to provide a CSC and SCMC. This will be inserted into an updated Wylfa Newydd Code of Construction Practice to be submitted at Deadline 5. Such on-site healthcare would be of a high standard and therefore there would be a low NHS referral rate.
- 2.4.8 The draft DCO s.106 agreement (REP3-042), Schedule 8 includes a "Health (NHS Referral) Payment" (with a formula allowing for adaptive monitoring and release of contingency funds, see draft DCO s.106 agreement (REP3-042), Schedule 8 paragraph 5.2.1) (in addition to other payments).
- 2.4.9 Horizon considers these measures appropriately mitigate against a likely significant effect on the NHS. Horizon remain of the view that it should not meet the full costs of any gap in NHS budgets (see paragraph 2.1.7).

2.5 Public Health Wales

- 2.5.1 Constructive meetings were held on the 7th and the 14th December 2018. These covered screening; microbiology services; outbreak of communicable diseases.
- 2.5.2 Horizon and PHW are close to full agreement (separate Horizon and PHW positions are therefore not presented). Horizon and BCUHB meet on the 22nd January 2019 to consider the SoCG.

Screening

- 2.5.3 As noted above, the SCMC will be delivered on a walk-in centre model. This will ensure that all workers will remain registered with their GP at their place of residence. Workers will return home regularly and will be able to attend screening at their place of residence.
- 2.5.4 The non-home-based workforce (i.e. workers moving to Anglesey) would be predominantly male and would be between 35 and 49 years old. PHW notes that there would be negligible demand on screening programmes as the male construction workforce would be outside the age range for population screening and workers would be able to return home for routine appointments e.g. for diabetic screening (minutes of meeting between Horizon and PHW, 14th December 2018).

- 2.5.5 Partners and dependants would not have access to on-site services but would be expected to register with the NHS and would be eligible for screening.
- 2.5.6 Access to screening for foreign nationals and non-home-based female members of construction workforce will be considered as operational details of the service are agreed with BCUHB/PHW (post-DCO). There will be a contractual requirement on overseas workers to have health insurance.
- 2.5.7 PHW maintains a watching brief on several issues: Home based workforce; Community need for health services; Potential migration of skilled medical staff.

Microbiology services

- 2.5.8 In relation to microbiology services PHW notes that the workforce will be responsible for a relatively small population increase, and that the workforce is likely to be younger and fitter (than the general population) (REP2-291, s6.2).
- 2.5.9 Horizon's working assumption is that laboratory services for microbiology and for pathology will be outsourced to a private provider. It is agreed that any outsourcing of laboratory services would meet appropriate accreditation expectations. PHW has indicated that PHW laboratories have UKAS accreditation (Medical Laboratory accreditation (ISO 15189)) and that the laboratories in Rhyd have spare capacity. Horizon proposes to include these laboratories in any commercial tendering process for laboratory services (minutes of meeting between Horizon and PHW, 14th December 2018). PHW has sent costs for microbiology services to Horizon.

Communicable diseases

- 2.5.10 PHW has indicated that the provision of the Site Campus introduces potential challenges with regards to communicable disease. The surveillance systems that will be set up as part of occupational health will lower the probability of communicable disease outbreaks. Horizon would put arrangements in place to ensure there is timely reporting of notifiable infections in line with legislation. Horizon will follow processes required by current law regarding the transfer of surveillance information into PHW's surveillance and case management systems.
- 2.5.11 Post-DCO Horizon will agree contingency plans with PHW should there be an outbreak of infectious disease on site. PHW to provide details of the steps and processes required in the event of an outbreak of communicable diseases among the construction workforce (minutes of meeting between Horizon and PHW, 14th December 2018).

Wylfa Newydd Project

Note responding to IACC's Tourism Topic Report
by Swansea University

PINS Reference Number: EN010007

17 January 2019

Revision 1.0

Examination Deadline 4

Planning Act 2008

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

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1 Response to 2017 and 2018 Visitor Surveys

1.1 Introduction

- 1.1.1 Horizon Nuclear Power Wylfa Limited ("Horizon") has reviewed the Autumn 2017 and Spring 2018 Visitor Surveys prepared by Strategic Research & Insight Ltd for Isle of Anglesey County Council (IACC). It is anticipated that this report will be submitted by IACC to the Examiners at Deadline 4 (17 January 2018).
- 1.1.2 This document sets out Horizon's response, to the extent we can provide it without the full survey data set, to the content and conclusions presented in the survey's reports that the IACC have utilised as evidence.
- 1.1.3 The focus will be on the Spring 2018 survey as the results of the two surveys are similar, but differences will be highlighted as appropriate.

1.2 Report Completeness

- 1.2.1 As the report does not provide all the questions asked in the survey or the results to the full survey to allow us to fully respond, Horizon request the raw data for the survey is provided by IACC.
- 1.2.2 As a result of the gaps in the reporting and the apparently selective nature of what is presented, Horizon are unclear on what other questions or information was provided to respondents. For instance, in the autumn survey after Q20, which asks about the response to increased traffic, one respondent provided the following comment: "The roads are too small for lorries of that size". This indicates that additional information was provided to the respondent, or the surveyor had a discussion with the respondent, about the traffic effects which is not reported as part of the survey and could have misrepresented the reality of the position with regards traffic effects, thus influencing the respondent's answers.

1.3 Survey locations reflect tourism visitation trends

- 1.3.1 The areas in which interviews took place (see table 1-1 below) reflect the most popular tourist destinations on Anglesey and therefore those with the greatest footfall. The highest responses were from visitors in Beaumaris, Llangefni and Llanfairpwll. None of those locations selected by the surveyors were in the north of the Isle of Anglesey and therefore underlines that, relative to the rest of the island, tourist visits to the north of Anglesey are low.

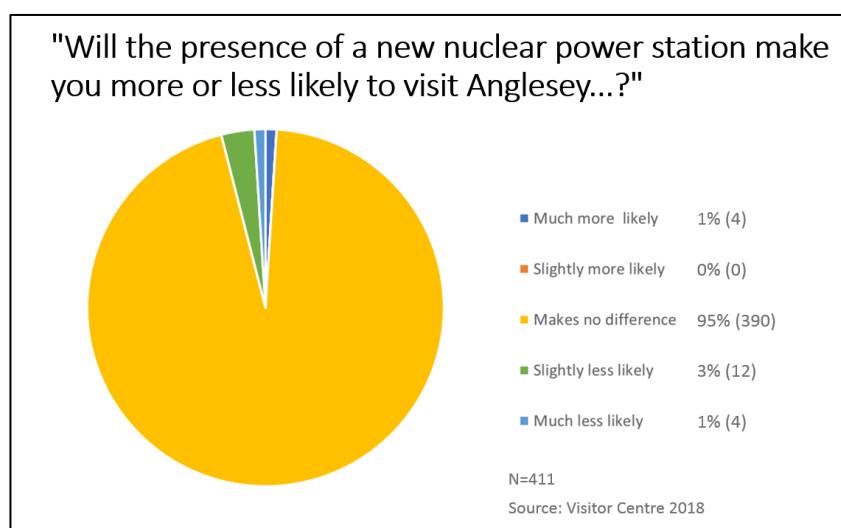
Table 1-1 Survey sample locations

Location	Autumn 2017 no. of interviews	Spring 2018 no. of interviews
Anglesey Sea Zoo	70	36
Beaumaris Town Centre	117	100
Benllech	16	25

Holland Arms Garden Centre, Pentre Berw	58	33
Holyhead Town Centre / Millennium Bridge	16	14
Oriel Ynys Mon, Llangefni	81	71
Plas Newydd, Llanfairpwll	47	77
South Stack Cliffs RSPB reserve	-	30
Traeth Cymyran Beach (Rhosneigr)	41	25
Total	446	411

1.4 Overall visitation concerns

1.4.1 Shown below are the results of the Q14. In brackets, are the number of respondents providing each response.



1.4.2 This response is set in the context of between 34% and 47% of respondents being aware of the project, when prompted. The question which directly proceeds Q14, talks about plans to “construct the Wylfa Newydd nuclear power plant”. We therefore do not accept IACC assertion during the Issue Specific Hearing (07/01/19) that this question is only eliciting a response which relates to the operation of the power station.

1.5 Visitation concerns relating to traffic effects

1.5.1 The survey utilises prompted questions (Q19 and Q20, shown below) which we believe to be easily misleading to respondents. The questions provide no indication of the effects of any increased traffic levels with which responded could base their responses upon.

Q19 Before now, were you aware that the construction of the new nuclear power plant and power line will increase the volume of traffic?

*Q20 Will **the increased** volume of traffic make you more or less likely to visit
... Anglesey during the construction period...?*

- 1.5.2 Paragraph 4.4 in the survey report highlights that the results from prompted questions tend to elicit different responses from unprompted questions, with higher positive responses shown in the case of Q11 and 13. This highlights the sensitive nature of the results from these prompted questions.
- 1.5.3 The survey report suggests that this will make 'no difference' to the likelihood of 95% of them visiting, 1% would be 'slightly more likely' to visit and 13% of respondents may be less likely to visit (10% slightly, and 3% much less likely). This 13% equates to 53 respondents.
- 1.5.4 The report also states that 16% of those staying in hotels/self-catering stated that increased traffic will make them 'less likely to visit' (paragraph 4.17). They provide no indication of the split in this sample between those stating they were 'slightly less likely' and 'much less likely' to visit. We would point out that the 16% equates to just 22 people [see Q9 which has a sample size of 252 of which 54% are staying in hotels/self-catering].
- 1.5.5 Because of the way the results are cross tabulated, it is unclear if the respondents in these two groups (the 13% and the 16%) are the same people, or different. This is important because of how these data are used within the Tourism Topic Paper [REP2-110]. This is discussed further in our response under section 2 below.

1.6 Clarity of results presented

- 1.6.1 The "Final Thoughts" sections of both the Autumn and Spring surveys discussed negative, neutral, and positive comments from respondents. The results differ slightly between the Autumn and Spring surveys as in the autumn 2017 survey, 33% of comments were negative, while just 9% were negative in the spring 2018 survey.
- 1.6.2 We would point out that these comments related to 'the visitor experience or the projects' and therefore there is no certainty that these relate to Wylfa Newydd, as the report suggests in para 4.18. That paragraph states "...open comments show that the construction projects could adversely affect future visits to Anglesey for some". We have found no evidence in the survey report which would suggest that if such comments are related to Wylfa Newydd, that they are not the same respondents that have already stated that they may be less likely to visit (Q14). On this basis we would question how representative these concluding remarks are of the quantitative results of the survey.
- 1.6.3 The report states "Heavier traffic remains the most likely impact on experience". This statement is made despite 86% of respondents to question 20 stating they would not be deterred from returning. Vague statements like "heavier traffic and a new power line sound ominous to some visitors" are not robust given the open-ended nature of "ominous" and "some". Statements like this are made throughout the report and undermine the robustness of the report's conclusions.

2 Response to IACC Tourism Topic Report

2.1 Key points

- 2.1.1 Horizon has reviewed the IACC's 'Tourism Topic Report' prepared by Swansea University (November 2018) [REP2-110] and has the following additional points to raise regarding the report. Comments are provided in Horizons response to the IACC LIR [REP3-004].
- 2.1.2 Paragraphs 1.1 and 1.2 do not fully consider the mitigation or potential positive effects arising from the proposed Wylfa Newydd DCO Project. The statements made do not appear to represent an independent analysis based on evidence, instead they read as a reportage based on conjecture.
- 2.1.3 The effects of Hinkley Point C (HPC) are considered to be misrepresented. Section 7.3.1 which discusses the impact of HPC on tourism are simply repeats the claims set out in the Local Impact Report. It is clear from publicly available data that such effects have not materialised. The negative effects on tourism from HPC reported by IACC have been selectively identified and fails to highlight evidence to the contrary on the monitoring of the tourism sector recorded in 5 of 7 reports. The HPC Survey monitoring results [RD1], as raised in the Issue Specific Hearing (07/01/19), conclude that "... All metrics suggest continued growth and development and the tourism business survey shows no detrimental impact on visitor perception as a result of Hinkley".
- 2.1.4 In paragraph 2.4 there is an extrapolation of the 'less likely' to visit response in a survey into a £30m loss based on the 2015 Visitor Survey which clearly assumes non-visitation (rather than simply a lower likelihood) and takes no cognisance of mitigation.
- 2.1.5 Paragraph 2.7 presents growth of the tourism sector but this should also be measured alongside employment trends in the sector that show its seasonality. This is because the reality of tourism growth is that tourism jobs created will be largely seasonal which reflects the patterns of occupancy on the island. Such temporary employment positions fail to provide careers or stable employment and contribute to rural depopulation and poverty [RD2].
- 2.1.6 The concern with traffic congestion and its impact of visitation is contradicted in 2.7 since it is suggested that "...the island's two bridges are already traffic choke points..." during a period of tourism growth [REP2-110]. The concern is also unfounded given that studies have shown that traffic congestion is not a deterrent for visitation or reason for destination choice. This is addressed further in section 2.2 below.
- 2.1.7 A decline in the tourism sector over the construction phase is presented in paragraph 2.8 despite recognition of positive effects of the project on tourism elsewhere in section 6.3 wherein the growth of accommodation demand is clearly identified over this period.
- 2.1.8 While the importance of the sector to the local economy is recognised, however Horizon contest the assertions around the value and awareness of the brand as suggested in paragraph 2.12. This should be viewed in the

context of low overall levels of visitation¹, no evidence of chain hotel investment (the exception being the 2-star Travel Lodge in Holyhead), seasonality, number of micro-businesses in operation, lack of growth in total employment in the sector, low average spend levels and attraction visitation numbers in many of the islands attraction. Section 5.4 of the report presents results that are indicative of relatively low accommodation occupancy rates, high levels of seasonality and lower than average revenues² that challenge the concept of high performing brand.

- 2.1.9 Paragraph 4.2.4 presents hypothesis based on cliché rather than evidence. The assertion of "...a rise in anti-social behaviour, prostitution and drug and alcohol-related incidents" require evidence from analogous contemporary benchmarks otherwise they simply constitute unsubstantiated assertions [REP2-110].
- 2.1.10 Discussion of displacement of workers (paragraph 4.2.6) in the tourism industry does not mention long term and well documented issues with the tourism and hospitality sector in relation to rates of pay, conditions of employment, seasonality in consideration of labour market issues and labour supply chains. Industries that traditionally have failed to provide quality, meaningful employment cannot be artificially protected from the need to improve rewards and employment conditions. Horizon cannot be expected to mitigate for industry wide failings in this regard. The potential growth in year-round demand for hospitality and tourism brings stability, year-round employment, and the potential for significant growth in visitation levels.
- 2.1.11 Paragraph 4.2.7 supposes that there will be a negative effect from displacement in local supply chain. While the risk of adverse levels of labour churn is identified by Horizon, measures will be in place to support the sector to avoid such effects and the Wylfa Newydd development will bring a step change to demand for the island and regional products with the potential to generate stable long-term demand at a time of enormous economic uncertainty. This is not a disadvantage.

2.2 The use of the Visitors Survey, 2018

- 2.2.1 The Tourism Topic Paper [REP2-110] appears to selectively identify the result of Q20 in the 2018 Visitor Survey, as discussed above, and completely ignore the survey results which state that the project will make no difference to 95% of respondents (and suggest 1% would be more likely to visit), with only 1% stating they would be 'much less likely' to visit as a result of the presence of the power station.
- 2.2.2 Despite the following points, the Tourism Topic Paper [REP2-110] relies on the results of Q20 heavily to conclude that between £39m and £49m will be

¹ Anglesey has no attractions achieving more than 100,000 visitors per year and the majority achieve less than 25,000 [RD3]

² As well as being presented in 5.4, VisitWales's survey also verifies this statement [RD4].

lost from the Anglesey Tourism economy annual. This conclusion is rejected and considered not evidential for the following reasons:

- There are clear problems with how Q19 and Q20 are phrased, as set out in section 1 above, and the resulting potential for these to mislead respondents on the true nature of the effects of the projects,
- The fact that the survey questions cover the construction of both a “new nuclear power station and power line” and that therefore it is not possible to disaggregate the effect solely of the proposed Power Station,
- Critically the fact that the 13% and 16% figures upon which these calculations are based could in fact be double counting the same respondents. There is nothing in the Visitors Survey reports which enable us to draw the conclusion that the author has reached that 13% of those staying with friend and relative and days visitor will not return, plus 16% of those staying in self-catering and serviced accommodation will not return. In fact, it appears entirely plausible that the 16% (or 22 people) are in fact the same people captured within the 13% (or 53 people), thus rendering the upper bound estimate of potential losses an over estimate notwithstanding Horizons rejection of these figures. The results of how many respondents, and therefore what proportion of the total they represent, for other accommodation types is not provided within the survey report.
- The conclusion is reached irrespective of the fact that it does not reflect the outcomes from any planned mitigation. As noted in table 11-9 from DCO Transport Assessment [APP-101], the maximum potential increase in journey times at peak is 23 seconds per journey. Such effects are clearly imperceptible to drivers and it cannot be concluded would result in any adverse response from visitors. We would also note that this assessment was in the public domain and therefore available to IACC in June 2018, prior to the design of this survey.
- It appears also to negate to recognise or take regard of the fact that stating you are less likely to visit does not mean you will not visit, or to adjust any potential losses to reflect the gains in tourism spending which will result from construction workers accommodation demands.

2.2.3 We would refer again to the HPC survey monitoring results [RD1], as raised in the Issue Specific Hearing (07/01/19), which conclude no detrimental impact on visitor perception as a result of Hinkley. This is despite the fact that a visitor survey conducted in advance of the DCO application for that project identified a proportion of respondents stating they were ‘less likely’ to visit.

2.2.4 Notwithstanding Horizons response to the IACC LIR [REP3-004, section 5], with regards the lack of a relationship between traffic congestion and tourism visitation levels, it is Horizon's position that the analysis presented in Tables 18 and 19 of the Tourism Topic report present conjecture, not evidence, on the part of the author and which should be given limited weight in accordance

with EN-1, para 5.12.7 which states: 'The IPC may conclude that limited weight is to be given to assertions of socio-economic impacts that are not supported by evidence (particularly in view of the need for energy infrastructure as set out in this NPS)'.

3 References

3.1.1 References from the body of the text are presented here.

Table 3-1 Schedule of references

ID	Reference
RD1	https://www.sedgemoor.gov.uk/1873
RD2	R. M. Ball (2006); <i>Seasonality: A Problem for Workers in the Tourism Labour Market?</i> ; Pages 501-513, Published online: 28 Jul 2006
RD3	VisitWales (2018; <i>Visits to Tourist attractions</i> ; Online at: https://gov.wales/docs/caecd/research/2018/181129-visitor-attractions-survey-2017-en.pdf
RD4	VisitWales (2018); <i>Wales tourism accommodation occupancy survey, 2017</i> ; Online at: https://gov.wales/docs/statistics/2018/180607-wales-accommodation-occupancy-survey-2017-en.pdf